

# 2023 INDEPENDENT ENVIRONMENTAL AUDIT

Stratford Coal Mine



Stratford Coal Mine  
6 August 2024

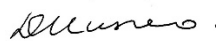
## REPORT

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### Approval for issue

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6 August 2024

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## Contents

<b>1</b>	<b>INTRODUCTION</b>	<b>2</b>
1.1	BACKGROUND	2
1.2	FINDINGS OVERVIEW	3
1.3	ENVIRONMENTAL PERFORMANCE	4
1.3.1	Noise and Blasting	4
1.3.2	Air Quality	4
1.3.3	Surface Water	4
1.3.4	Groundwater	5
1.3.5	Rehabilitation	5
1.4	ACTIVITIES	6
1.5	REPORT STRUCTURE	6
<b>2</b>	<b>SITE DESCRIPTION</b>	<b>7</b>
2.1	DEVELOPMENT CONSENT	7
2.2	MANAGEMENT PLANS, PROGRAMS AND STRATEGIES	8
2.2.1	Environmental Management Strategy	8
2.2.2	Air Quality Management Plan	8
2.2.3	Blast Management Plan	8
2.2.4	Heritage Management Plan	8
2.2.5	Noise Management Plan	8
2.2.6	Pollution Incident Response Management Plan	9
2.2.7	Rehabilitation Management Plan	9
2.2.8	Water Management Plan	9
2.2.9	Biodiversity and Squirrel Glider Management Plans	9
<b>3</b>	<b>IEA REQUIREMENTS</b>	<b>12</b>
3.1	DEVELOPMENT CONSENT	12
3.2	AUDIT GUIDELINES	12
3.3	AGENCY CONSULTATION	12
<b>4</b>	<b>NON-COMPLIANCES AND RECOMMENDATIONS</b>	<b>14</b>
<b>5</b>	<b>CONTINUOUS IMPROVEMENT RECOMMENDATIONS</b>	<b>16</b>
5.1	This IEA	16
5.2	Previous IEA Recommendations	17

## Tables

Table 1	Document review	10
Table 2	SSD-4966 Independent Environmental Audit Requirements	12
Table 3	Agency Requirements	13
Table 4	Stratford IEA Identified Non-Compliances	14
Table 5	IEA Recommendations	16
Table 6	2020 Previous Audit Recommendations and 2023 Status	17
Table 7	DA Table SSD-4966	24
Table 8	EPL Licence Table 5161	79
Table 9	Mining Regulation 2016 – Schedule 8A	108
Table 10	Mining Lease 1787	118

## Figures

Figure 1 – Stratford Extension Project Layout	11
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## Appendices

Appendix A Audit Itinerary .....	21
Appendix B Independent Audit Certification Form .....	22
Appendix C Compliance Tables .....	23
Appendix D Site Inspection Plates .....	123
Appendix E Regulatory Correspondence .....	124
Appendix F Audit Guidelines .....	125



## LIMITATIONS OF REPORT

In preparing this IEA report, RPS has assessed all activities appropriate and necessary to evaluate the environmental status of the site and operations undertaken within the audit period. RPS has addressed all technical matters which might reasonably be considered to be relevant to such an assessment conducted to standards which apply in NSW. Based on observations of the site, interviews with appropriate staff and a review of available documentation, it is RPS's opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, RPS can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues. The conclusions presented in this report are professional opinions based solely upon RPS's visual observations of the site and the immediate site vicinity, and review of available documentation, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

Opinions presented in this report apply to the site's conditions and features as they existed at the time of RPS' site inspections on 12 – 13 December 2023, and those areas accessible. They necessarily cannot apply to conditions and features which RPS is unaware of and has not had the opportunity to evaluate.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any circumstances constitute a breach of relevant legislation.

# 1 INTRODUCTION

## 1.1 BACKGROUND

RPS AAP Consulting (RPS) was commissioned by Yancoal Australia Pty Ltd (Yancoal) to conduct an Independent Environmental Audit (IEA) of the Stratford Extension Project (Stratford). This IEA includes an assessment of compliance against Development Consent SSD-4966 and is the third IEA required.

State Significant Development (SSD) 4966 approves mining operations (the removal, transportation and emplacement of overburden and extraction, processing, handling and storage and transportation of coal carried out on the site).

Stratford has been in operation throughout the entirety of the audit period.

This IEA consisted of a desktop review of documentation, interviews with key Yancoal staff and a site inspection of the workshop, the pit top area, key waste storage areas, rehabilitation areas and the railway.

The general IEA Itinerary is presented in **Appendix A**.

The auditing period for this IEA is from 2 December 2020 (day after the previous site inspection) to 13 December 2023 (last day of site inspection (the IEA period)).

The IEA was conducted by Dianne Munro (Lead Auditor – Exemplar Global Certified Auditor 107622) (see **Appendix B** for the Independent Audit Certification Form) and Jessica Robinson (Audit Assistant) from RPS.

The audit team also consisted of the following specialists in accordance with SSD-4966 and as per DPE request and approval (see **Appendix E**):

- Ian Richardson (RPS) – Air Quality Specialist;
- Tara Boreham (RPS) – Ecology Specialist; and
- Dale Redwood (Muller Acoustics) – Noise and Blasting Specialist.

Specialists audited their respective areas as indicated in **Appendix C**. As each did not attend the site inspection and as such they also did not attend opening and closing meetings.

The IEA was conducted generally consistent with *'ISO 19011 - Guidelines for Auditing Management Systems'* and the *'Independent Audit Post Approval Requirements May 2020'* (Audit Guidelines) (DPE, 2020). Risk rankings from the *'Independent Audit Guideline'* (DPE, 2015) (IEA Guideline 2015) have been included for identified non-compliances at the request of Yancoal.

Key documents reviewed during the IEA included:

- SSD-4966 (as modified);
- Environment Impact Statement (EIS), as relevant;
- Environmental Management Plans (EMP), as listed in **Section 2.2**;
- Environmental Protection Licence (EPL);
- Key Mining Leases (ML); and
- Mining Regulation 2016 Schedule 8A (MR).

The field inspection was conducted on 12 December and 13 December 2023 by Dianne Munro and Jessica Robinson. Observations from the site inspection and site interviews were noted in conjunction with evidence in **Appendix C** which includes individual compliance tables for SSD-4966, EPL, MR and ML. Each table presents each condition and describes evidence in support of the status (shown as compliant, not compliant or not triggered).

The weather conditions at the time of the inspection at the Taree Airport of Meteorology (BoM) station (located 59 km to the north-east of Stratford) consisted of east south-easterly winds up to 33 km/h and a maximum temperature of 27.9°C. 0 millimetres of rainfall occurred during the preceding week.

Opening and closeout meetings held with key Yancoal staff and RPS in attendance which included:

- Thomas Kirkwood (TK) – Yancoal, Environment and Community Superintendent;

- John Cullen (JC) – Yancoal, Operations Manager;
- Nathan Vaughan (NV) – Yancoal, Technical Services Superintendent;
- Micheal Bird (MB) – Yancoal, Production Superintendent;
- Leonnie Taylor (LT) – Yancoal, HST Superintendent;
- William Arnold (WA) – Yancoal, Drill and Blast Superintendent;
- Don Cant (DC) – Yancoal, Maintenance Superintendent;
- Lauren Whitelaw (LW) - Yancoal, Environment and Community Advisor;
- Dianne Munro (DM) – RPS, Lead Auditor; and
- Jessica Robinson (JR) – RPS, Audit Assistant.

## 1.2 FINDINGS OVERVIEW

A high level of compliance was noted in this IEA and issues were well understood by the auditees with actions largely being taken to address any non-compliances.

No formal enforcement action was taken during the audit period. Actions are being taken to prepare for closure in relation to key higher risk activities including rehabilitation of reject emplacement areas in particular, waste management, water management, and rehabilitation in general.

The field inspection revealed that the site was generally well maintained with evidence of water carts in operation and no visible dust, however noting that little activity was observed to be occurring on site (see plates in **Appendix D**).

The laydown area near the Coal Handling and Preparation Plant and the Stratford Fuel Farm requires ongoing general housekeeping and should be prioritised with general closure in the next audit period. The main workshop area was noticeably well managed.

In the audit period, site rehabilitation is progressing generally in accordance with supporting documents of the Development Consent and RMP. The Western co-disposal area needs to remain a focus for rehabilitation as it is behind its proposed scheduled due to reprocessing of carbonaceous materials in the area.

Some inconsistencies were noted between the RMP figures and development consent layout, however, are likely to be considered “generally in accordance with”. Actual progress follows the RMP. Vegetation is of a high quality and variety. Grasses within both mined rehabilitation areas and offsets areas will require ongoing planning and management to ensure strong establishment of tree and understory.

Potentially Acid Forming (PAF) is being monitored and managed, largely from the previously mined Stratford East Pit including the construction of a clay lined cell to hold PAF material to ensure that in-pit PAF material is stored appropriately below the predicted post-mining groundwater table and is non-polluting.

Ongoing management of PAF during rehabilitation continues to be a focus for the operation, however risks appear to be understood with relevant specialists employed to advise going forward (see **Appendix C** for detailed review of assessment, sampling sheet examples, survey level databases, cell specifications/construction standard, information sheets and other procedure/standards). Recommendations in **Table 5** include implementation of continual and close monitoring of PAF and that waste at the pit top requires additional housekeeping.

There were no exceedances in relation to air quality, noise and blasting during the audit period. There were minor non-compliances due to the temporary failure of an air quality monitoring unit, inadequate total data capture from a single TEOM monitor and the absence of noise monitoring results in the Real-time Noise Management Response Register 2022. All were reported to relevant regulators.

Spill kits, segregated waste bins and skips were readily available, managed and documented.

As operations have reduced at Stratford, the number of complaints received in the audit period was reducing to low. A decline in operations at the Stratford Coal Mine has also resulted in a decline in complaints. 10

complaints were received in 2020, 19 complaints were received in 2021, only three complaints (from two complainants) 2022 and 0 complaints in 2023.

Three incidents occurred in the audit period. In 2021, an uncontrolled discharge of mine related water occurred from dams SD12, SD16 and SD17 reported to Avondale Creek and a breach of the Roseville Link Haul Road culvert crossed over the Avondale Creek. In 2022, an uncontrolled discharge occurred from SD16 reported offsite. All incidents were a result of significant rainfall events, followed procedure and were reported to the EPA. No follow up reports were requested for the incidents (refer to Schedule 3, Condition 27 in **Appendix C** for further detail).

As the site moves to closure in the next audit periods, Yancoal will continue to plan and document Closure Plans for implementation as discussed verbally at this IEA. No documentation in this regard was viewed during this IEA.

Site record keeping in the form of registers and corrective actions, along with environmental systems were very good. Management plans are contemporary and were reviewed in the audit period.

At the time of the audit, Stratford Coal staff were aware of most of the identified non-compliances against Development Consent conditions, licences and approvals and were actively working to address a number of the issues identified in this IEA. This audit has concluded that a high standard of environmental management is generally being applied in Stratford Coal Mine Operations.

### 1.3 ENVIRONMENTAL PERFORMANCE

A review of the Stratford Extension Project 2012 EIS predictions were assessed to determine the environmental performance of Stratford Mining Complex during the audit period. Impacts for all environmental impact areas were generally consistent with EIS predictions (where they were available).

For further detail on environmental performance, refer to **Appendix C**.

#### 1.3.1 Noise and Blasting

The 2012 EIS describes noise and blasting at Section 4.6. Noise was modelled up to Year 10 where in the daytime, operational noise was predicted to exceed the relevant criteria at two privately-owned receivers subject to a landholder agreement. Predicted mine contributed noise emissions were consistent with measured values for all locations. Results of noise monitoring has shown mine contribution to be generally inaudible during the audit period.

The blasting predictions indicate that blasting emissions would generally comply with airblast criteria of 115 dBL and ground vibration of 5 mm/s at nearby private receivers. During the audit period, predicted blast emissions were generally consistent with measured values.

No exceedances of noise and blast criteria occurred during the audit period.

#### 1.3.2 Air Quality

The 2012 EIS assesses air quality at Section 4.7. Air quality was modelled up to Year 10 and included PM<sub>10</sub>, PM<sub>2.5</sub> TSP concentrations and dust deposition.

Results of monitoring for were with EIS predictions during the audit period as no exceedances of air quality criteria occurred during the audit period.

#### 1.3.3 Surface Water

Actual surface water impacts (including in relation to local streams and mine water) were generally consistent with the 2012 EIS predictions at Section 4.5 as stipulated in Section 7.3 of Annual Reviews.

The 2012 EIS stated:

- The Project would result in changes to flows in local creeks due to the progressive extension of the open cut mining operations and associated subsequent capture and re-use of drainage from operational catchment areas.

- The surface water flow regimes in Avondale Creek and Dog Trap Creek, and consequently downstream on the Avon River, would be affected by changes in catchment area as a result of runoff capture in disturbance areas over the life of the Project.
- The surface water flow regimes in Avondale Creek and Dog Trap Creek, and consequently downstream on the Avon River, would be affected by changes in catchment area as a result of runoff capture in disturbance areas over the life of the Project.
- The reduction in average flow in the creeks is likely to be proportional to the reduction in catchment area, however compared to the existing/approved total catchment area excised by the Stratford Mining Complex, the Project is not expected to result in a measurable change to downstream flows in Avondale Creek, Dog Trap Creek or the Avon River. No direct measurement in this regard is required in the WMP or EIS. However, the WMP commits to ensuring that active disturbed areas are minimised during operations. No direct impacts to Dog Trap creek or the Avon River have occurred during the audit period.
- The risk of a contained water overflow (i.e. spill) from the Project was evaluated as part of the site water balance and there were no spills simulated during the 123 climatic realisations simulated. Subject to adherence with the operational protocols (including storage of water in active mine pits if required) and other assumptions inherent in the water balance modelling, there is a very low risk of spill occurring from the contained water storages over the life of the Project life to Avondale Creek. No spill has occurred in the audit period due to overflow with voids utilised as key storages.
- As described in Section 2.12.4, irrigation would only occur on rehabilitated or topsoiled areas from which runoff reports to contained water storages or open pits. No irrigation occurred within the audit period.

### 1.3.4 Groundwater

The 2012 EIS assesses groundwater at Section 4.4 predicts a negligible change on groundwater quality as a result of mining.

Groundwater is described in Section 7.4 in Annual reviews. Groundwater monitoring data during the audit period demonstrates no significant or measurable change in water table level or groundwater quality that could be attributed to mining activities.

No trigger levels or exceedance of performance measures were identified during the audit period.

### 1.3.5 Rehabilitation

Stratford Mining Complex has continued to develop the detailed final landform designs generally consistent with the rehabilitation strategy present in the EIS as well as the rehabilitation objectives in the Development Consent.

Appendix 8 of SSD-4966 shows the biodiversity offsets areas figure for the project including rehabilitation. It was reviewed against Figure 2-1 in Stratford Extension Project EIS and Plan 1 of RMP. The actual layout (location of pits, rehabilitation and disturbance) is generally consistent between the approved layout and RMP documentation.

Ecological monitoring for revegetation areas are conducted by CSIROs *Landscape Function Analysis (LFA) Procedures for monitoring and assessing landscapes, with special references to mine sites and rangelands* (Tongaway and Hindley 2004) which are best practice guidelines for rehabilitation monitoring. Furthermore, analogue or reference sites have been used to determine the composition, structure and function of the desired rehabilitation outcome and alter methods where required. Various recommendations have been made in the last two annual inspections with progress made on each with results appropriately reported in the Annual Reviews. Significant detail is provided in **Appendix C**, Condition 53. Rehabilitation progress is also shown in Plates 1, 6 and 21-25 in **Appendix D**. Appropriately no hazard reduction burning is proposed in offset revegetation areas for 5 years to allow tubestock to establish.

Biodiversity diversity in rehabilitation is monitored by external consultants whom have stated that all rehabilitation quadrats have increased in species diversity since 2019 (with one exception Q5 which has maintained species diversity). Six of seven quadrats displayed an increase or maintenance of species diversity and as such overall riparian habitat has been enhanced. Management of exotic grasses is recommended.



Rehabilitation outcomes observed at BRN could be observed to be best practice outcomes from detail provided in SMC Mine Complex 2023 Rehabilitation Planting Program. Of note, the vegetation structure showed that three rehabilitation areas were continuing to develop and grow with distinct overstorey, midstorey and shrub strata.

### 1.4 ACTIVITIES WITHIN THE AUDIT PERIOD

Stratford was in operations the entirety of the IEA period (2 December 2020 – 13 December 2023). Activities pertaining to the audit period include:

- The Avon North Pit is the only pit currently in operation. Roseville West Pit, Stratford East Pit and Bowen's Road North Pit were in operations briefly in the commencement of the audit period. Coal operations require the utilisation of one large excavator, one small excavator and up to eight trucks. There is an intention to mine coal at the Avon North Pit until Q3 2024;
- The Old Main Pit contained approximately 15 gigalitres of water and acted as the main water storage area for site during the entirety of the audit period. Roseville West Pit was dewatered in the audit period.
- The Bowen's Road North (BRN) Pit and Roseville West Pit were in the process of backfilling;
- The railway loop for all export trains was operational during the entirety of the audit period;
- The Stratford East Pit opened for mining in 2020 and was mined for approximately two years. Post-mining, Stratford undertook management of Potential Acid Forming (PAF) rock. A clay lined PAF cell was constructed to hold PAF material during the audit period.
- Management areas of focus during the period included water management and sediment dams. This included utilising the pumps located on sediment dams on Avondale Creek and installing portable level readers (FarmBots) to measure water level at Sed Dam 14 and Sed Dam 19;
- Approximately two coal export trains left from Stratford per week; and
- Biodiversity enhancement measures have focused primarily on undertaking nest box programs and monitoring and include general land management, weed and pest control methods.

### 1.5 REPORT STRUCTURE

This IEA report is generally structured as follows:

- **Section 1** provides an introduction, describes the requirement for the IEA, activities conducted during the audit period and provides a guide to the structure;
- **Section 2** provides a description and layout of the site and a summary of environmental approvals and management documents;
- **Section 3** outlines the requirements for this IEA, where each has been addressed and details regulatory consultation;
- **Section 4** lists any non-compliances identified; and
- **Section 5** provides a list of recommendations for any identified non-compliances and continuous improvement and the status of previous audit recommendations.

## 2 SITE DESCRIPTION

### 2.1 DEVELOPMENT CONSENT

SSD-4966 for Stratford Extension Project allows the development described in the 'Stratford Extension Project Environmental Impact Statement (EIS) (Stratford Coal, 2012) as follows;

- The continuation and extension of operations, allowing an additional 11 years of mining and up to 2.6 million tonnes per annum;
- Up to 250 on site personnel;
- The extension of mining into three new open cut mining areas (Roseville West Pit Extension, Avon North Open Cut and Stratford East Open Cut);
- The continuation of mining in the Bowen's Road North Open Cut (BRNOC) in the first year of the Project;
- Recovery of CHPP rejects from the western co-disposal area;
- Progressive backfilling of mine voids with waste rock behind advancing open cut mining operations;
- Exploration activities;
- Continued and expanded placement of waste road in the Stratford Waste Emplacement and Northern Waste Emplacement;
- Progressive development of new haul roads and internal roads;
- Coal processing and the existing CHPP;
- Stockpiling and loading of product coal by trains for transport on the North Coast Railway to Newcastle;
- Disposal of CHPP rejects via pipeline to the existing co-disposal area in the Stratford Main Pit and, later in the Project, the Avon North Open Cut void;
- Realignment of a 132 kilovolt power line for the Stratford East Open Cut;
- Continued use to existing water management equipment and structures;
- Development of soil stockpiles, laydown areas and gravel/borrow including modifications and alterations to existing infrastructure as required;
- Monitoring and rehabilitation;
- All activities approved under DA 23-98/99 and DA 39-02-01; and
- Other associated minor infrastructure, plant, equipment and activities, including minor modifications and alterations to existing.

SSD-4966 has been modified on one occasion as follows:

- MOD 1 – Refused; and
- MOD 2 – Stratford Extension Project (Mod 2) dated 13 January 2020 which facilitates a public authority to access water at the Stratford Coal Mine.

**Figure 1** shows the general layout of Stratford as approved in SSD-4966.

## 2.2 MANAGEMENT PLANS, PROGRAMS AND STRATEGIES

SSD-4966 requires the preparation of a series of management plans. All currently approved management plans for the construction and operation (as relevant) phases were reviewed during this IEA, including the:

- 'Environment Management Strategy' (approved January 2022);
- 'Air Quality Management Plan' (approved January 2022);
- 'Biodiversity Management Plan' (approved February 2023);
- 'Blast Management Plan' (approved January 2022);
- 'Heritage Management Plan' (approved January 2023);
- 'Noise Management Plan' (approved October 2022);
- 'Pollution Incident Response Management Plan' (updated October 2022);
- 'Rehabilitation Management Plan' (updated October 2023);
- 'Squirrel Glider Management Plan' (approved July 2023); and
- 'Water Management Plan' (approved October 2021);

All plans have been revised in the audit period.

Management plans, programs and strategies for Stratford Mining Complex are generally adequate and effective in mitigating environmental impacts. Few recommendations were made as the mine enters closure phase and considering all were reviewed and approved by relevant regulators in the audit period.

### 2.2.1 Environmental Management Strategy

The Environmental Management Strategy dated January 2022 was reviewed as part of this audit. No recommendations have been provided (refer to Appendix C).

### 2.2.2 Air Quality Management Plan

The Air Quality and Greenhouse Gas Management Plan dated January 2022 was reviewed by air quality specialist Ian Richardson as part of this audit. Two non-compliances were recorded in relation to insufficient air quality monitoring (refer to Table 3). One recommendation has been provided (refer to Table 5 and Appendix C).

### 2.2.3 Blast Management Plan

The Blast Management Plan dated January 2022 was reviewed by noise and blasting specialist Dale Redwood as part of this audit. No recommendations have been provided during this audit period (refer to Appendix C).

### 2.2.4 Heritage Management Plan

The Heritage Management Plan dated January 2023 was reviewed as part of this audit. No recommendations have been provided (refer to Appendix C).

### 2.2.5 Noise Management Plan

The Noise Management Plan dated October 2022 was reviewed by noise and blasting specialist Dale Redwood as part of this audit. Two recommendations were provided in this audit to incorporate into the next revision of the management plan (refer to Table 5 and Appendix C).

## 2.2.6 Pollution Incident Response Management Plan

The Pollution Incident Response Management Plan dated October 2022 was reviewed as part of this audit. No recommendations have been provided (refer to Appendix C).

## 2.2.7 Rehabilitation Management Plan

The Rehabilitation Management Plan dated October 2023 was reviewed as part of this audit. This was recently approved by relevant regulators and updated to new format and content. No recommendations have been provided (refer to Appendix C).

## 2.2.8 Water Management Plan

The Water Management Plan dated October 2021 was reviewed as part of this audit. One recommendation has been provided (refer to Table 5 and Appendix C).

### 2.2.8.1 Surface Water Management Plan

The Surface Water Management Plan date June 2021 was reviewed as part of this audit. Three surface water exceedances occurred in the audit period (refer to Table 4 and Appendix C).

### 2.2.8.2 Groundwater Management Plan

The Groundwater Management Plan dated June 2021 was reviewed as part of this audit. Groundwater is reported on in Section 7.4 in Annual Reviews. No trigger levels or exceedance of performance measures were identified during the audit period.

## 2.2.9 Biodiversity and Squirrel Glider Management Plans

The Biodiversity Management Plan dated February 2023 was reviewed by ecology specialist Tara Boreham as part of this audit. Two recommendations have been provided (refer to Table 5 and Appendix C).

Existing vegetation is to be enhanced and additional vegetation to be established, including Cabbage Gum open forest within the Avondale Creek riparian area in accordance with Schedule 3 Condition 30. This condition is addressed in Section 5.3 of the SMC Biodiversity Management Plan and is monitored as management zone A3 by Wedgetail Project Consulting. A total of two analogue quadrats (no active revegetation) and five rehabilitation quadrats were monitored in this zone. All rehabilitation quadrats have increased in species diversity since 2019, with the exception of quadrat Q5, which has maintained species diversity. Within analogue quadrat Q15, species diversity has increased, whilst in Q6 it has decreased. As six of seven quadrats displayed an increase or maintenance of species diversity, the adequate implementation of the Biodiversity Management Plan as per Schedule 3, Condition 30 has been met, as overall riparian habitat has been enhanced.

Management of exotic grasses is recommended to control and reduce smothering of native species regrowth, particularly within Q6.

The Squirrel Glider Management Plan dated July 2023 was reviewed as part of this audit. No recommendations have been provided (refer to Appendix C).

Verification of the implementation of the Biodiversity Management Plan, Squirrel Glider Management Plan and Rehabilitation Management Plan was conducted through desktop review. This included the review of monitoring reports provided by consultant carrying out the works on behalf of Stratford. Documents that were reviewed and their summary is provided in **Table 1**.

**Table 1 Biodiversity Documents Reviewed**

Document	Summary of findings	Applicable management plan
Stratford Mine Complex 2022 Rehabilitation Planting Program (Wedgetail Project Consulting 2024):	<p>Provides details and photographic evidence of 2022 revegetation efforts within two SMC Biodiversity Enhancement and Offsets and Rehabilitation Areas:</p> <ul style="list-style-type: none"> <li>• Bowens Road North</li> <li>• Roseville Waste Emplacement</li> </ul> <p>Plants were installed in November and December 2022. A total of 4,858 plants were installed, consisting of 2033 canopy plants of seven different species and 2825 midstorey and shrub plants consisting of nine species selected to replant Spotted Gum - Grey Ironbark Community across these areas.</p>	SMC Rehabilitation Amendment Plan 2023 SMC Biodiversity Management Plan 2023
Stratford Mining Complex 2022 Biodiversity Offsets Strategy Flora Monitoring Report (Wedgetail Project Consulting 2023)	<p>Provides the 2022 monitoring results of vegetation monitoring within the Biodiversity Enhancement Area (BEA) and Biodiversity Offset Area (BOA) in accordance with Section 7 of the BMP.</p> <p>A total of 18 20x20m permanent monitoring quadrats are monitored within:</p> <ul style="list-style-type: none"> <li>• Four Biodiversity Offset Areas</li> <li>• One Biodiversity Enhancement Area.</li> </ul> <p>The monitoring report provides monitoring data from each quadrat from years 2019 to 2022 detailing species cover and richness off:</p> <ul style="list-style-type: none"> <li>• Natives</li> <li>• Exotics</li> <li>• Grass and Grasslike</li> <li>• Tree</li> <li>• Forbs</li> <li>• Fern</li> <li>• Other.</li> </ul> <p>The monitoring report also stipulates the revegetation dates, weed works and recommendations. The report states that the revegetation program to date has been successful with six of the 11 installation quadrats recording survival that, when extrapolated to stems per hectare, equates to densities that have achieved targets.</p>	SMC Rehabilitation Amendment Plan 2023 SMC Biodiversity Management Plan 2023
Stratford Coal Mine: Fauna Surveys of the Offset, Biodiversity Enhancement and Rehabilitation Areas, Spring 2022 (ambis 2023)	<p>This report details of the methods and results of the fauna monitoring program undertaken in the Stratford Offset Areas, Stratford Biodiversity Enhancement Areas and Stratford Rehabilitation Areas. Across the monitoring sites survey techniques including pitfall traps, funnel traps, Elliott A traps, harp traps, ultrasonic call recording, spotlighting, diurnal bird surveys and reptile searches are carried out. Frog surveys are also carried out at suitable locations. Results detected 166 fauna species, of which 16 are threatened or migratory under the BC Act and/or EPBC Act. The fauna surveys confirm that the Stratford Offset, Biodiversity Enhancement and Rehabilitation areas provide foraging and breeding habitat for a range of native vertebrate fauna, including birds, mammals, reptiles, and frogs.</p> <p>Of note, the Squirrel Glider continues to persist, being recorded in five locations in the Offset Area and Biodiversity Enhancement Area and the New Holland Mouse persists in the Biodiversity Enhancement area.</p>	SMC Biodiversity Management Plan 2023 SMC Squirrel Glider Management Plan 2023
Stratford Mining Complex Annual Biodiversity Report 2022 (Yancoal 2022)	<p>This report summarises the aforementioned findings into a succinct report, and compares the results to the performance measures and completion criteria.</p>	SMC Rehabilitation Amendment Plan 2023 SMC Biodiversity Management Plan 2023 SMC Squirrel Glider Management Plan 2023





### 3 IEA REQUIREMENTS

#### 3.1 DEVELOPMENT CONSENT

This IEA and subsequent report has been compiled pursuant to DA SSD-4966 (as modified) and the DPE Audit Guidelines (DPE, 2020) (discussed in **Section 3.2**).

Requirements for independent auditing under Schedule 5, Conditions 9 and 10 of SSD-4966 (as modified) and are listed in Table 2 which also lists where each is addressed in this document.

**Table 2 SSD-4966 Independent Environmental Audit Requirements**

Description	Where Addressed
<b>SSD-4966 Schedule 5 Condition 9 and 10</b>	
9. Prior to 31 December 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:	<b>This IEA</b>
a) be conducted by suitably qualified, experienced, and independent expert/s whose appointment has been endorsed by the Secretary;	<b>Section 1.1 Appendix B Appendix C</b>
b) include consultation with the relevant agencies;	<b>Section 3.3 Appendix E.</b>
c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL/s and/or Mining Lease/s (including any assessment, plan or program required under these approvals);	<b>Section 1.2 Section 2.2 Appendix C.</b>
d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and	<b>Section 4 Appendix C</b>
e) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.	<b>Section 5 Appendix C</b>
<i>Note: This audit team must be led by a suitably qualified auditor, and include experts in noise, blasting, air quality, ecology, and any other fields specified by the Secretary.</i>	<b>Section 1.1 Appendix C</b>
10. Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	<b>Responsibility of Yancoal</b>

#### 3.2 AUDIT GUIDELINES

This IEA report has been prepared in accordance with the Audit Guidelines (DPE, 2020). **Appendix F** lists key requirements and sections of the Audit Guidelines and indicates where each is addressed in this report.

#### 3.3 AGENCY CONSULTATION

The following agencies were approached directly by RPS in November 2023 for input as part of the scoping phase of this IEA (see **Appendix E**):

- Department of Planning and Environment (DPE);
- Environmental Protection Agency (EPA);
- Midcoast Council;
- Resources Regulator; and

## REPORT

- Stratford Coal Community Consultative Committee (CCC).

Where specific issues were raised during consultation, these are listed in Table 3 along with a section on where each has been addressed in this IEA report.

**Table 3 Agency Requirements**

Regulator	Date	Feedback	Addressed
Department of Planning and Environment (DPE)	10/12/2023	DPE requests that the independent environmental audit consider the following issues – <ul style="list-style-type: none"> <li>• Storage and management of residual wastes on site, including but not limited to potentially acid forming material.</li> <li>• Management of incidents including internal reporting as well as notification to relevant agencies, in accordance with the approved EMS.</li> </ul>	<b>Section 1.2 Appendix C</b>
Environmental Protection Agency (EPA)	Request for engagement email sent 22/11/2023.	No feedback received.	<b>N/A</b>
MidCoast Council	Request for engagement email sent 22/11/2023.	No feedback received.	<b>N/A</b>
Resources Regulator	5/12/2023	<p>Thank you for your email dated 27 November 2023 requesting consultation on the independent environmental audit to be undertaken of the Stratford Coal Mine which is covered by the following mining leases:</p> <ul style="list-style-type: none"> <li>• ML1360 (1992)</li> <li>• ML1538 (1992)</li> <li>• ML1409 (1992)</li> <li>• ML1577 (1992)</li> <li>• ML1447 (1992)</li> <li>• ML1733 (1992)</li> <li>• ML1521 (1992)</li> <li>• ML1787 (1992)</li> <li>• ML1528 (1992)</li> </ul> <p>The independent environmental audit is required to assess compliance against the relevant environmental management conditions of the mining leases up to 1 July 2022, including the mining operations plan.</p> <p>From 2 July 2022, the independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. It is noted that the 9 mining leases that comprise the Stratford Coal Mine have been approved by the Regulator to be treated as a single lease for the purposes of Part 2 of Schedule 8A.</p> <p>The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice.</p> <p>It would be appreciated if a copy of the final audit report could be sent to the Regulator at <a href="mailto:nswresourcesregulator@service-now.com">nswresourcesregulator@service-now.com</a> upon completion of the audit.</p>	<b>Appendix C</b> consistent with previous audit
Stratford Coal Community Consultative Committee (CCC)	04/12/2023	<p>I confirm the information regarding the IEA was sent to the CCC and raised at their meeting of 23rd November 2023. Comment was invited and requested by today's date. As no issues were raised at the meeting, nor have I received any advice to the contrary, I can conclude there are no major concerns within the Committee on the mine's operations within the scope of the audit.</p> <p>Thank you for the opportunity to comment.</p>	<b>N/A</b>



## 4 NON-COMPLIANCES AND RECOMMENDATIONS

A summary of the 13 non-compliances against each condition of SSD-4966, EPL5161, Mining Regulation 2016 Schedule 8A and Mining Lease 1787 (consistent with previous IEA) is provided in **Table 4**. Recommendations arising from the non-compliances are also included where required.

**Appendix C** provides a complete tabulated list of conditions of SSD-4966, EPL5161, Mining Regulation 2016 Schedule 8A and Mining Lease 1787 with the compliance status, comments and evidence provided against each.

**Table 4 Stratford IEA Identified Non-Compliances**

Ref	Non-Compliance
<b>SSD-4966</b> Schedule 3, Condition 8	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.
<b>SSD-4966</b> Schedule 3, Condition 23	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.
<b>SSD-4966</b> Schedule 3, Condition 23	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.
<b>SSD-4966</b> Schedule 3, Condition 27 <b>EPL5161</b> L1.1	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 is required.
<b>SSD-4966</b> Schedule 3, Condition 27	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.
<b>SSD-4966</b> Schedule 3, Condition 27	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 therefore no further action is required.
<b>SSD-4966</b> Schedule 3, Condition 32	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.
<b>SSD-4966</b> Schedule 3, Condition 32	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.
<b>SSD-4966</b> Schedule 5, Condition 11	<ul style="list-style-type: none"> <li>All current statutory approvals are required to be made available on the website. Draft EPL was viewed on website. Recommended that the final version of the EPL is uploaded.</li> <li>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. Recommend ensuring the latest five annual reviews are uploaded onto website.</li> </ul>
<b>EPL5161</b> O6.12	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 is scheduled to be undertaken during October 2021. Annual sound power testing must be undertaken yearly whilst operations occurring, unless condition varied.
<b>EPL5161</b> M2.2	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.

## REPORT

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Ref	Non-Compliance
<b>EPL5161</b> M2.3	Contracting company conducted HVAS operation refresher training with contractor field staff and data management staff. No further actions required.
<b>EPL5161</b> R1.9	Oil and grease values could not be found in the EPL data spreadsheet for Points 33, 35, 36, 37, 38, 39, 42 and 43. Recommend updating to include in one location and/or provide alternate location. 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. Recommend that blast reports are sent with Annual Returns.



## 5 CONTINUOUS IMPROVEMENT RECOMMENDATIONS

### 5.1 This IEA

Table 5 includes a consolidated list of continuous improvement recommendations from this IEA. These are recommendations for consideration only and are not mandatory.

Table 5 IEA Recommendations

Ref	Recommendation
SSD-4966 Schedule 3, Condition 24	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.
SSD-4966 Schedule 3, Condition 27	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.
SSD-4966 Schedule 3, Condition 30	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).
SSD-4966 Schedule 3, Condition 33	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.
SSD-4966 Schedule 3, Condition 40	Recommend to review the bond in parallel with Duralie bond every 3 years and lodge with DPE.
SSD-4966 Schedule 3, Condition 43	Viewed Site Induction Script v2 and did not see heritage information.  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.
SSD-4966 Schedule 3, Condition 52	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.
SSD-4966 Schedule 3, Condition 55	Continue detailed and early closure planning work in consultation with relevant regulators.
EPL5161 A1.1	Licence holder to consider whether a licence variation to reduce the scale of the activities is appropriate.
EPL5161 P1.2	No table with utilisation areas in this EPL. Consider if this condition can be removed at next variation.
EPL5161 L4.5	<ul style="list-style-type: none"> <li>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.</li> <li>Any future noise monitoring reports confirm this detail.</li> </ul>

Ref	Recommendation
EPL5161 O5.8	Update Water Management Plan with the relevant requirements of the new EPL5161 conditions as at 15 September 2023.
EPL5161 O6.13	Continue to monitor and manage PAF during closure process as key potential issue.

## 5.2 Previous IEA Recommendations

The status of the previous audit recommendations were considered in this IEA. **Table 6** includes recommendations made within the previous 2020 IEA Report (Barnett & May) and the status of each.

**Table 6** 2020 Previous Audit Recommendations and 2023 Status

Cond no.	Requirement/Condition	2020 Audit Recommendation	2023 Status
<b>2020 Non-Compliance Recommendations</b>			
Schedule 3, Condition 14	The Applicant shall:(d) operate a suitable system to enable the public to get up-to-date information on the proposed blasting Schedule on site, to the satisfaction of the Secretary.	Ensure that the blast hotline information is up to date at all times.	Viewed Stratford Coal website on 2 February 2024. The Blast Information hotline is currently available on the Stratford Coal website. Complete.
Schedule 3, Condition 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act	Ensure that all surface water controls are inspected before, during and after forecast (heavy) rainfall events.	Viewed Diversion Drain post-rainfall inspections dated 3 March 2022 and 29 March 2022. Complete.
Schedule 3, Condition 46	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Bucketts Way in accordance with the terms in Appendix 4.	Continue discussions with Council in relation to payments for Road maintenance on Bucketts Way or seek agreement with Council and DPIE for removal of this Condition.	See response in Appendix C. Payments have been provided for The Bucketts Way annually during the audit period. Complete.
Schedule 3, Condition 47	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Bucketts Way in accordance with the terms in Appendix 4.	Continue discussions with Council in relation to payments for Road maintenance on Wenham Cox Road or seek agreement with Council and DPIE for removal of this Condition.	See response in Appendix C. Payments have been provided for Wenham Cox Road annually during the audit period. Complete.
Schedule 3, Condition 52(a)	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste (including coal reject) generated by the development;	Develop and implement a waste minimisation strategy, covering in particular on-site waste minimisation.	Viewed Waste Management and Minimisation Strategy November 2021. Complete.
Schedule 3, Condition 52(c)	The Applicant shall: (c) monitor and report on the effectiveness of waste minimisation and management	In future Annual Reviews report on the implementation and effectiveness of the waste	Viewed 2020, 2021 and 2022 Annual Reviews. The 2020 Annual Review mentioned recommendation to be implemented in Annual Reviews. 2021

## REPORT

Cond no.	Requirement/Condition	2020 Audit Recommendation	2023 Status
	measures in the Annual Review.	minimization strategy.	and 2022 Annual Reviews report on waste minimisation and performance. Complete
Schedule 3, Condition 55	The Rehabilitation Management Plan must: (d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;	Revise the MOP / Rehabilitation Management Plan to include a section describing how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy.	Viewed Rehabilitation Management Plan dated October 2023. The RMP discusses the integration between rehabilitation and the biodiversity offset strategy. Complete.
Schedule 5, Condition 4(d)	Annual Review (d) identify any trends in the monitoring data over the life of the development;	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of trends in monitoring data over the life of the development.	Viewed 2020, 2021 and 2022 Annual Reviews. The 2020 Annual Review mentioned recommendation to be implemented in Annual Reviews. Trends have been included throughout the 2021 and 2022 Annual Reviews for air quality, water and noise (although not in every subsection of Section 6) Viewed 2021 and 2022 Annual Reviews. Complete.
Schedule 5, Condition 4(e)	Annual Review (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of predicted and actual environmental impacts.	Viewed 2020, 2021 and 2022 Annual Reviews. The 2020 Annual Review mentioned recommendation to be implemented in Annual Reviews. Analysis of data trends and comparison with EA predictions is discussed in key areas in relation to noise, water and air quality in the 2021 and 2022 Annual Reviews. Complete.
Schedule 5, Condition 4(f)	Annual Review (f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance. Note: where no noncompliance's, monitoring exceedances or incidents have occurred during the relevant reporting period the Annual Review could note that no improvement initiatives are planned.	Viewed 2020, 2021 and 2022 Annual Reviews. The 2020 Annual Review mentioned recommendation to be implemented in Annual Reviews. Section 12 summarises environmental targets to be incorporated for the next reporting period in 2021 and 2022 Annual Reviews. Complete.
Schedule 5, Condition 5(a)	Within 3 months of: (a) the submission of an annual review under Condition 4 above; the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	Establish a register that records the reviews of all management plans (as evidence for future audits). Note: the review of each plan does not necessarily result in the revision of every plan. Where no changes to a plan are warranted, the register can note that the review was undertaken and no changes to the plan were required.	See response in Appendix C. Environmental Management Plans Revision Register 2020 – 2023 was sighted at site inspection. Complete.
Schedule 5,	(b) the submission of an	Establish a register that	See response above.

Cond no.	Requirement/Condition	2020 Audit Recommendation	2023 Status
Condition 5(b)	incident report under Condition 7 below; the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	records the reviews of all management plans (as evidence for future audit).	Complete.
<b>EPL Non-Compliance Recommendations</b>			
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Ensure that all surface water controls are inspected and maintained before, during and after forecast (heavy) rainfall events.	Viewed Diversion Drain post-rainfall inspections dated 3 March 2022 and 29 March 2022. Complete.
O4.3	The PIRMP must be tested at least annually or following a pollution incident.	Ensure that the PIRMP is tested within one month of any incident that triggers the implementation of the PIRMP.	See response to O4.1 in Appendix C. Viewed PIRMP testing file note dated June 2023. Complete.
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	Ensure that sampling personnel carefully complete the sampling sheets so that all information required by the EPL is legible.	Viewed EPL spreadsheet on Stratford Coal website on 2 February 2024. Spreadsheet data is legible. Complete.
M2.2	Air Monitoring Requirements	No recommendation required as the TEOM was replaced as soon as was possible to do so.	Noted. PM10 monitor failed during the audit period for a single day during the audit period and contracting company conducted HVAS operation refresher training with contractor field staff and data management staff. No further recommendations. Complete.
M2.3	Water Monitoring Requirements Testing Methods	Ensure that future sampling reports and records incorporate the EPA sampling point designations.	Viewed CBased environmental monitoring reports dated April 2022, February 2023 and November 2023. EPL sampling designation points are located within reports. Complete.
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Update the website and entry signage to ensure that it is clear that the community hotline is also the complaints line.	Viewed Stratford Coal website on 2 February 2024. A statement above the phone number states that “to make a complaint, please contact the Community Information Hotline”. Complete.
M7.2	All blast shots must be recorded on video from a position allowing the collars of the shot, and where possible, any face, and/or toe, to be seen on the video. The licensee must retain a copy of this video for at least 12 months after the blast was initiated.	Ensure that drone and video camera are checked prior to all blasts.	Viewed drive of three example blasts at site inspection. Complete.

**REPORT**

Cond no.	Requirement/Condition	2020 Audit Recommendation	2023 Status
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Ensure that any future written reports to the EPA are submitted within the timeframes specified in the EPL.	One non-compliance in the audit period with relation to reporting the uncontrolled discharge on 8 March 2022. This was reported to the EPA eight days after the incident occurrence. Complete.
<b>ML1778 Recommendations</b>			
ML4	(b) Non-conformance notifications under condition 4(a) must be provided in the form specified on the Department's website within seven (7) days of the mining lease holder becoming aware of the breach.	Ensure that notifications to the Department in relation to non-compliances are provided in the specified form (from the Departments Website).	Not triggered during this audit period as no non-compliances were reported under ML1787. Complete.
ML5	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	Ensure that all reportable environmental incidents are included in the reporting of incidents.	Not triggered during this audit period as no non-compliances were reported under ML1787. Complete.





## Appendix A Audit Itinerary

# DURALIE/STRATFORD COAL MINE IEA 12 – 13 DECEMBER 2023

## SITE VISIT ITINERARY

Unit 2A, 45 Fitzroy Street  
Carrington NSW 2294  
T +61 2 4940 4200

### Invitees

Name	Company	Title
Thomas Kirkwood (TK)	Yancoal Australia	Environment and Community Superintendent
John Cullen (JC)	Yancoal Australia	Operations Manager
Lauren Whitelaw (LW)	Yancoal Australia	Environment and Community Advisor
Dianne Munro (DM)	RPS	Lead Auditor
Jessica Robinson (JR)	RPS	Assistant Auditor
Clayton Richards (CR)	Minesoils	Principal

### Site Inspection Schedule

Day 1 – Tuesday 12 December 2023		
Time	Task	Personnel
6:00 – 8:30 am	<b>Clayton Rehabilitation Site Inspection for Duralie</b>	CR, TK
8:00 – 8:30 am	<b>Arrival on Site</b> <ul style="list-style-type: none"> <li>Visitor induction and set up</li> </ul>	TK, LW, DM, JR
8:30 – 9:00 am	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Introductions (TK)</li> <li>IEA scope and purpose (DM)</li> <li>Confidentiality arrangements (DM)</li> <li>IEA process and timing (DM)</li> </ul>	All
9:00 am – 12:00 pm	<b>Compliance Review</b> <ul style="list-style-type: none"> <li>Duralie PA 08_023 Individual Conditions Review (incl. Rail Haulage Audit)</li> <li>EIS / RMP Consistency</li> </ul>	TK, LW, DM, JR
12:00 – 12:30 pm	<b>Lunch Break</b>	All
12:30 – 5:00 pm	<b>Compliance Review (cont.)</b> <ul style="list-style-type: none"> <li>Duralie PA 08_023 Individual Conditions Review (cont.)</li> <li>Stratford SSD 4966 Individual Conditions Review</li> </ul>	TK, LW, DM, JR

# Agenda

Day 2 – Wednesday 13 December 2023		
Time	Task	Personnel
8:00 – 8.15 am	<b>Day 2 Overview Meeting</b> <ul style="list-style-type: none"> <li>Confirm arrangements for Day 2</li> </ul>	TK, LW, DM, JR
8:15 – 10:45 am	<b>Site Inspection</b> <ul style="list-style-type: none"> <li>Open cut and waste emplacement</li> <li>Workshop</li> <li>Chemical storage areas</li> <li>Waste storage</li> <li>Sewage treatment system</li> <li>Pit top area (general)</li> <li>Wash bay and CHPP</li> </ul>	TK, DM, JR
10:45 am – 1:00 pm	<b>Compliance Review</b> <ul style="list-style-type: none"> <li>SSD 4966 Individual Conditions Review (cont.)</li> <li>EIS / MOP Consistency</li> <li>Mining Leases</li> <li>EPL</li> <li>Management Plans review</li> </ul>	TK, LW, DM, JR
1:00 – 1.15 pm	<b>Lunch Break</b>	All
1:15 – 3:00 pm	<b>Compliance Review (cont.)</b>	TK, LW, DM, JR
3:00 – 3:30 pm (TBC)	<b>Closeout Preparation</b> Auditor preparation for Closeout Meeting	TK, DM, JR
3:30 – 4:00 pm (TBC)	<b>Close out Meeting</b> <ul style="list-style-type: none"> <li>Overview of findings</li> <li>Confirmation of outstanding documents</li> <li>Confirmation IEA completion process</li> </ul>	All



**Appendix B**  
Independent Audit  
Certification Form



## 6. Appendices

### Appendix A – Declaration of Independence Form Template

#### Declaration of Independence - Auditor

Project Name Duralie/Stratford Extension Projects 2023 Independent Environmental Audit

Consent Number PA 08\_2023 and SSD-4966

Description of Project 2023 Independent Environmental Audits for Duralie/Stratford Mining Complex

Project Address Duralie: 1164 Bucketts Way South, Strout Road NSW 2415 Stratford: 3364 The Bucketts Way, Stratford NSW 2422

Proponent Yancoal Australia Pty Ltd

Date 20 November 2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an



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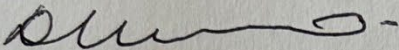
approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

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Name of Proposed Auditor Dianne Munro

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Signature 

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Qualification Certified Auditor #107622, Environmental Management, Compliance, EMS, ISO14001:2015 Audit Exemplar Global

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Company RPS AAP Consulting Pty Ltd



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# 6. Appendices

## Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Duralie/Stratford Extension Projects 2023 Independent Environmental Audit
Consent Number	PA 08_2023 and SSD-4966
Description of Project	2023 Independent Environmental Audits for Duralie/Stratford Mining Complex
Project Address	Duralie: 1164 Bucketts Way South, Strout Road NSW 2415      Stratford: 3364 The Bucketts Way, Stratford NSW 2422
Proponent	Yancoal Australia Pty Ltd
Date	20 November 2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

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approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

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Name of Proposed Auditor Jessica Robinson

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Signature 

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Qualification Master of Sustainable Development

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Company RPS AAP Consulting Pty Ltd

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## 6. Appendices

### Appendix A – Declaration of Independence Form Template

#### Declaration of Independence - Auditor

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Project Name Duralie/Stratford Extension Projects 2023 Independent Environmental Audit

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Consent Number PA 08\_2023 and SSD-4966

---

Description of Project 2023 Independent Environmental Audits for Duralie/Stratford Mining Complex

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Project Address Duralie: 1164 Bucketts Way South, Strout Road NSW 2415 Stratford: 3364 The Bucketts Way, Stratford NSW 2422

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Proponent Yancoal Australia Pty Ltd

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Date 20 November 2023

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I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
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b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

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Name of Proposed Auditor	Dale Redwood
Signature	
Qualification	BSc (Hons), MAAS
Company	Muller Acoustic Consulting Pty Ltd

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# 6. Appendices

## Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Duralie/Stratford Extension Projects 2023 Independent Environmental Audit
Consent Number	PA 08_2023 and SSD-4966
Description of Project	2023 Independent Environmental Audits for Duralie/Stratford Mining Complex
Project Address	Duralie: 1164 Bucketts Way South, Strout Road NSW 2415      Stratford: 3364 The Bucketts Way, Stratford NSW 2422
Proponent	Yancoal Australia Pty Ltd
Date	20 November 2023

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
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b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

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Name of Proposed Auditor Ian Richardson

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Signature



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Qualification

Bachelor of Environmental Science  
Exemplar Global Certified Lead Auditor – Environmental Management Systems (ISO 14001)

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Company RPS AAP Consulting Pty Ltd



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## 6. Appendices

### Appendix A – Declaration of Independence Form Template

#### Declaration of Independence - Auditor

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Project Name Duralie/Stratford Extension Projects 2023 Independent Environmental Audit

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Consent Number PA 08\_2023 and SSD-4966

---

Description of Project 2023 Independent Environmental Audits for Duralie/Stratford Mining Complex

---

Project Address Duralie: 1164 Bucketts Way South, Strout Road NSW 2415 Stratford: 3364 The Bucketts Way, Stratford NSW 2422

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Proponent Yancoal Australia Pty Ltd

---

Date 20 November 2023

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I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

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b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

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Name of Proposed Auditor Tara Boreham

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Signature 

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Qualification Bachelor of Science

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Company RPS AAP Consulting Pty Ltd



## Appendix C Compliance Tables

REPORT

Table 7 DA Table SSD-4966

Cond. no	Requirement/Condition	Status	Comment
Schedule 2, Condition 1	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.	Compliant	Based on the findings of this audit and the site inspection, the Applicant has implemented reasonable and feasible measures to prevent/reduce the occurrence of material harm from the operation of this development. Comments around meeting performance criteria and/or environmental harm are described in this table.
Schedule 2, Condition 2	The Applicant shall carry out the development generally in accordance with the: a) EIS; b) statement of commitments; and c) conditions of this consent. <i>Notes:</i> <ul style="list-style-type: none"> <li>The general layout of the project is shown in Appendix 2; and</li> <li>The statement of commitments is reproduced in Appendix 9</li> </ul>	Compliant	Viewed Appendix 2 of SSD-4966. Viewed Figure 2-1 in Stratford Extension Project EIS and Plan 1 of RMP. The actual layout (location of pits, rehabilitation and disturbance) is consistent with the approved layout and RMP documentation.
Schedule 2, Condition 3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Not Triggered	Not triggered as no inconsistency was identified by Yancoal personnel or regulators in pre-consultation information.
Schedule 2, Condition 4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these documents.	Not Triggered	No requests additional to those related to plans and reports as described below have been made by the Secretary during the audit period (TK pers comms).
Schedule 2, Condition 5	The Applicant may carry out mining operations on the site until 31 December 2025. <i>Note:</i> Under this consent, the Applicant is required to rehabilitate the site and perform additional undertakings to the satisfaction of the Secretary and the Resources Regulator. Consequently, this consent will continue to apply in all other respects other than the right to conduct mining operations until the rehabilitation of the site and these	Compliant	This condition has not yet expired.

## REPORT

Cond. no	Requirement/Condition	Status	Comment
	additional undertakings have been carried out satisfactorily.		
Schedule 2, Condition 6	The Applicant shall not extract more than 2.6 million tonnes of ROM coal from the site in any calendar year.	Compliant	Viewed Annual Reviews for 2020, 2021 and 2022. ROM Coal mined was as follows (Section 4 of AR): 2020: 990,747 Tonnes 2021: 1,279,889 Tonnes 2022: 1,008,842 Tonnes 2023: 884,706Tonnes (TK pers comms)
Schedule 2, Condition 7	The Applicant shall not process on site more than 5.6 million tonnes of ROM coal in any calendar year.	Compliant	Viewed Annual Reviews for 2020, 2021, 2022. (Section 4 of AR): 2020: 990,747 Tonnes (t) of ROM coal was processed, producing 533,662 t of coal. 2021: 1,279,889 t of ROM coal was processed, producing 835,129 t of coal. 2022: 1,008,842 t of ROM coal was processed, producing 686,356 t of coal. 2023: 553,765 t of coal.
Schedule 2, Condition 8	The Applicant shall ensure that: (a) all product coal is transported from the site by rail; (b) no more than an average of 2.5 laden trains leave the site each day over any calendar year; (c) no more than 6 laden trains leave the site in any 24-hour period; and (d) no more than 2 laden trains leave the site during any night <i>Note: This condition does not apply to movements of the Duralie shuttle train.</i>	Compliant	a) All product coal is transported from the site by rail (TK pers comms). b) Viewed Export Train Summary on Stratford website on 8 December 2023 at 1:30 pm. The limit of an average of 2.5 laden trains per year has not been exceeded during the period. c) Viewed Export Train Summary on Stratford website on 18 December 2023 at 12:30 pm. No more than 6 laden trains have left site within a 24-hour period. d) Viewed Export Train Summary on Stratford website on 18 December 2023 at 12:30 pm. There have been no more than 2 laden trains leaving the site at night within the audit period.
Schedule 2, Condition 9	Prior to the end of December 2015, or as otherwise agreed by the Secretary, the Applicant shall surrender all existing development consents for the site in accordance with section 104A of the EP&A Act. <i>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 4A of the EP&amp;A Act. Surrender of a consent should not be understood as implying that works legally constructed under a valid consent can no longer be legally maintained or used.</i>	Compliant	Viewed 2020 Previous Audit report. "Surrender of previous approvals occurred on (assumed date) 11 April 2018".

## REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 2, Condition 10	Prior to the surrender of existing development consents, the conditions of this consent shall prevail to the extent of any inconsistency with the conditions of these consents.	Compliant	Viewed 2020 Previous Audit report. No consents surrendered in audit period.
Schedule 2, Condition 11	<p>The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>Under Part 4A of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works; and</li> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>	Not Triggered	Viewed Annual Reviews 2020, 2021 and 2022. Annual Reviews state that no buildings or infrastructure were constructed. No buildings or infrastructure were constructed in 2023 (TK pers comms).
Schedule 2, Condition 12	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Compliant	Viewed Annual Reviews for 2020, 2021 and 2022. Annual reviews state that no buildings or infrastructure were demolished. No demolition occurred in 2023 (TK pers comms).
Schedule 2, Condition 13	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant shall:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>Note: This condition does not apply to damage to roads caused as a result of general road usage.</p>	Not Triggered	No infrastructure has been damaged or relocated during the audit period. Works were completed in the previous audit period (TK pers comms).
Schedule 2, Condition 14	<p>The Applicant shall ensure that all plant and equipment used at the site is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	Compliant	<p>Site inspection revealed that plant and equipment appeared well maintained, water carts were operating, and minimal dust generation observed (see <b>Plate 8</b> and <b>Plate 20</b>). Viewed the following example YPM3 Routine Work Order Maintenance Documents for:</p> <ul style="list-style-type: none"> <li>Dump Truck – CAT 785C dated 4 December 2023. The Work Order was stated as complete.</li> <li>Water Cart – CAT 777F dated 1 November 2023. The Work Order was stated as complete.</li> </ul> <p>Viewed WPM3 Routine Work Order demonstrating planned maintenance for CHPP Instrumentation and Control Systems on 13 December 2023. Viewed screenshot within Citect demonstrating the enablement of the stockpile spray</p>



REPORT

Cond. no	Requirement/Condition	Status	Comment
			sequence dated 13 December 2023.
Schedule 2, Condition 15	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>While any strategy, plan or program may be submitted on a progressive basis, the Applicant will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</li> <li>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</li> </ul>	Not Triggered	No requests were made within the audit period (TK pers comms).
Schedule 2, Condition 16	Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall implement the existing strategies, plans or programs for the site that have been approved under existing development consents.	Compliant	Refer to conditions relevant to the implementation of individual management plans.
Schedule 2, Condition 17	<p>From 31 March 2015 until mining operations under this consent cease on the site, unless the Secretary agrees otherwise, the Applicant shall pay to GSC a total of \$550 a year for each full-time equivalent employee/contractor on the site. This payment is for the provision of infrastructure and services generated by the development. It is also to be indexed in accordance with the CPI for the December quarter of the previous year (except for the initial payment).</p> <p><i>Note: The number of full-time equivalent employees/contractors is to be calculated for the first time in March 2015, and then recalculated in March each year prior to the next payment.</i></p>	Compliant	<p>Viewed Annual Contribution Calculation spreadsheets for 2021, 2022 and 2023. Invoice calculations were based on the amount of employees multiplied by \$550.</p> <p>Viewed annual invoices to MidCoast Council. 2021 invoice dated 24/05/2021, 2022 invoice dated 08/06/2022 and 2023 invoice dated 31/03/2023. Each invoice contains the amount specified in the calculation sheets.</p> <p>Viewed MidCoast Council vendor payment tracking sheet up to 9 November 2023.</p>
Schedule 2, Condition 18	The Applicant's obligations to make payments to GSC under condition 15 of Schedule 2 of DA 23-98/99 shall cease on 31 March 2015, unless the Secretary agrees otherwise.	Not Triggered	Not triggered as not relevant during the audit period.

REPORT

Cond. no	Requirement/Condition	Status	Comment						
Schedule 2, Condition 19	<p>The Applicant shall use its best endeavours to co-operate with the proponent of the Gloucester Gas Project, with the aim of maximising the outcomes of both developments with respect to:</p> <ul style="list-style-type: none"> <li>• resource recovery;</li> <li>• operational efficiencies;</li> <li>• biodiversity conservation;</li> <li>• and rehabilitation.</li> </ul> <p>to the satisfaction of the Secretary.</p> <p><i>Note: See also the Applicant's Statement of Commitments (Appendix 9).</i></p>	Not Triggered	Not triggered as Gloucester gas project has not proceeded, consistent with previous audit.						
Schedule 3, Condition 1	<p>Upon receiving a written request for acquisition from an owner of the land listed in Table 1, the Applicant shall acquire the land in accordance with the procedures in conditions 5-6 of Schedule 4.</p> <p><small>Table 1: Land subject to acquisition upon request</small></p> <table border="1" data-bbox="376 724 846 788"> <thead> <tr> <th colspan="2" data-bbox="376 724 846 746">Property ID</th> </tr> </thead> <tbody> <tr> <td data-bbox="376 746 613 769">40/51/Cr1 – L. Blanch</td> <td data-bbox="613 746 846 769">42 – D. Blanch</td> </tr> <tr> <td data-bbox="376 769 613 788">Cr7 – Pryce-Jones</td> <td data-bbox="613 769 846 788">Cr 2 – Boorer</td> </tr> </tbody> </table> <p><small>Note: To interpret the location referred to in Table 1 see the applicable figure in Appendix 5.</small></p> <p>However, the obligation to acquire a property does not apply if the Applicant has a negotiated agreement with the owner/s of the relevant land that sets aside acquisition under the terms of this consent, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Property ID		40/51/Cr1 – L. Blanch	42 – D. Blanch	Cr7 – Pryce-Jones	Cr 2 – Boorer	Not Triggered	Not triggered as no acquisition was requested in the audit period (TK pers comms).
Property ID									
40/51/Cr1 – L. Blanch	42 – D. Blanch								
Cr7 – Pryce-Jones	Cr 2 – Boorer								

REPORT

Cond. no	Requirement/Condition	Status	Comment										
Schedule 3, Condition 2	<p>Upon receiving a written request from the owner of any residence on the land listed in Tables 1 and 2, the Applicant shall implement additional noise mitigation measures (such as double glazing, insulation, and/or air conditioning) at the residence in consultation with the owner. These measures must be reasonable and feasible and directed towards reducing the noise impacts of the development on the residence.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p><i>Table 2: Land subject to additional noise mitigation upon request</i></p> <table border="1" data-bbox="371 644 851 762"> <thead> <tr> <th>Property ID</th> <th>Property ID</th> </tr> </thead> <tbody> <tr> <td>31(1) – Isaac</td> <td>60 – Healy / Greenwood</td> </tr> <tr> <td>44 – Cross / Jane</td> <td>36 – Wallace</td> </tr> <tr> <td>37 – Worth</td> <td>29 – Ward</td> </tr> <tr> <td>15(3) – Falla</td> <td></td> </tr> </tbody> </table> <p><i>Note: To interpret the locations referred to in Table 2 see the applicable figure in Appendix 5.</i></p> <p>However, the obligation to implement noise mitigation measures does not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land that sets aside noise mitigation measures under the terms of this consent, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Property ID	Property ID	31(1) – Isaac	60 – Healy / Greenwood	44 – Cross / Jane	36 – Wallace	37 – Worth	29 – Ward	15(3) – Falla		Not Triggered	No written requests have been requested in the audit period (TK pers comms).
Property ID	Property ID												
31(1) – Isaac	60 – Healy / Greenwood												
44 – Cross / Jane	36 – Wallace												
37 – Worth	29 – Ward												
15(3) – Falla													
Schedule 3, Condition 3	<p>The Applicant shall comply with the operating hours in Table 3.</p> <p><i>Table 3: Operating hours</i></p> <table border="1" data-bbox="371 1046 851 1241"> <thead> <tr> <th>Activity</th> <th>Operating Hours</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>Open cut mining operations in the Bovens Road North and Roseville West Extension pits</li> <li>Recovery and transport of CHPP rejects for re-processing</li> <li>Construction of the noise mitigation bunds on the western side of the Avon North, Roseville West Extension and Stratford East pits</li> <li>Open cut mining operations in the Avon North and Stratford East pits</li> <li>Coal processing, loading and dispatch of product coal trains</li> </ul> </td> <td>7 am to 6 pm, 7 days per week</td> </tr> <tr> <td> <ul style="list-style-type: none"> <li>Maintenance activities</li> </ul> </td> <td>week</td> </tr> <tr> <td> <ul style="list-style-type: none"> <li>Water truck access to the Bovens Road Water Fill Point</li> </ul> </td> <td>7 am to 6 pm, Monday to Saturday</td> </tr> </tbody> </table>	Activity	Operating Hours	<ul style="list-style-type: none"> <li>Open cut mining operations in the Bovens Road North and Roseville West Extension pits</li> <li>Recovery and transport of CHPP rejects for re-processing</li> <li>Construction of the noise mitigation bunds on the western side of the Avon North, Roseville West Extension and Stratford East pits</li> <li>Open cut mining operations in the Avon North and Stratford East pits</li> <li>Coal processing, loading and dispatch of product coal trains</li> </ul>	7 am to 6 pm, 7 days per week	<ul style="list-style-type: none"> <li>Maintenance activities</li> </ul>	week	<ul style="list-style-type: none"> <li>Water truck access to the Bovens Road Water Fill Point</li> </ul>	7 am to 6 pm, Monday to Saturday	Compliant	<p>Letters generally correspond with dot points:</p> <p>a) Coal extraction occurred for three months at start of audit period at Roseville West Pit until 17 March 2021. BRN ceased on 25 June 2021 (TK pers comms).</p> <p>b) Transported coal from co-disposal dam by excavators to the ROM stockpile area (TK pers comms).</p> <p>c) Did not occur in the period (TK pers comms).</p> <p>d) Avon North and Stratford East was mined in the period on day and afternoon shift (TK pers comms).</p> <p>e) Transported from co-disposal dam REA for preprocessing at the CHPP (TK pers comms).</p> <p>f) The time of day which the activities were undertaken rely on contractor conditions, as contractors were only permitted to work from 7 am - 5 pm (TK pers comms).</p> <p>g) Bovens road water fill point not used in period (TK pers comms). Viewed</p>		
Activity	Operating Hours												
<ul style="list-style-type: none"> <li>Open cut mining operations in the Bovens Road North and Roseville West Extension pits</li> <li>Recovery and transport of CHPP rejects for re-processing</li> <li>Construction of the noise mitigation bunds on the western side of the Avon North, Roseville West Extension and Stratford East pits</li> <li>Open cut mining operations in the Avon North and Stratford East pits</li> <li>Coal processing, loading and dispatch of product coal trains</li> </ul>	7 am to 6 pm, 7 days per week												
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REPORT

Cond. no	Requirement/Condition	Status	Comment																																																																																																				
			<p>Truck Sheet dated 15 June 2021 depicting hours of works from contractors. DT117 truck sheets demonstrate works commencing at 9:20 am and concluding at 6:30 pm.</p> <p>Viewed Excavator Shift Sheets dated 15 June 2021 which demonstrate start and finish hours are between 7am and 6pm. Sheets demonstrate 10.2 hour operating days.</p>																																																																																																				
<p>Schedule 3, Condition 4</p>	<p>The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 4 at any residence on privately-owned land.</p> <p><small>Table 4: Noise criteria dB(A)</small></p> <table border="1" data-bbox="369 566 875 1053"> <thead> <tr> <th>Land</th> <th>Day LAeq(15 min)</th> <th>Evening LAeq(15 min)</th> <th>Night LAeq(15 min)</th> <th>Night LA1(15 min)</th> </tr> </thead> <tbody> <tr><td>40/51/Cr1 – L. Blanch</td><td>43</td><td>43</td><td>43</td><td>50</td></tr> <tr><td>Cr7 – Pryce-Jones</td><td>43</td><td>43</td><td>43</td><td>49</td></tr> <tr><td>42 – D. Blanch</td><td>42</td><td>42</td><td>42</td><td>50</td></tr> <tr><td>Cr 2 – Boorer</td><td>41</td><td>41</td><td>41</td><td>49</td></tr> <tr><td>31(1) – Isaac</td><td>40</td><td>40</td><td>40</td><td>48</td></tr> <tr><td>36 – Wallace</td><td>39</td><td>39</td><td>39</td><td>47</td></tr> <tr><td>44 – Cross / Jane</td><td></td><td></td><td></td><td></td></tr> <tr><td>60 – Healy / Greenwood</td><td>39</td><td>39</td><td>39</td><td>45</td></tr> <tr><td>37 – Worth</td><td>38</td><td>38</td><td>38</td><td>46</td></tr> <tr><td>29 – Ward</td><td>38</td><td>38</td><td>37</td><td>45</td></tr> <tr><td>23 – Bagnall</td><td>37</td><td>37</td><td>37</td><td>45</td></tr> <tr><td>31(2) – Isaac</td><td></td><td></td><td></td><td></td></tr> <tr><td>296 – Watson</td><td></td><td></td><td></td><td></td></tr> <tr><td>297 – Bosma</td><td></td><td></td><td></td><td></td></tr> <tr><td>298 – Yates</td><td>36</td><td>36</td><td>36</td><td>45</td></tr> <tr><td>15(3) – Falla</td><td>39</td><td>35</td><td>35</td><td>45</td></tr> <tr><td>15(2) – Falla</td><td>36</td><td>35</td><td>35</td><td>45</td></tr> <tr><td>Stratford Village</td><td>37</td><td>36</td><td>35</td><td>45</td></tr> <tr><td>All other privately-owned residences</td><td>35</td><td>35</td><td>35</td><td>45</td></tr> </tbody> </table> <p><small>• To interpret the locations referred to in Table 4 see the applicable figure(s) in Appendix 5. • Stratford village is shown on the figure(s) in Appendix 5.</small></p> <p>Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy. Appendix 6 sets out the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.</p> <p>However, these criteria do not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Land	Day LAeq(15 min)	Evening LAeq(15 min)	Night LAeq(15 min)	Night LA1(15 min)	40/51/Cr1 – L. Blanch	43	43	43	50	Cr7 – Pryce-Jones	43	43	43	49	42 – D. Blanch	42	42	42	50	Cr 2 – Boorer	41	41	41	49	31(1) – Isaac	40	40	40	48	36 – Wallace	39	39	39	47	44 – Cross / Jane					60 – Healy / Greenwood	39	39	39	45	37 – Worth	38	38	38	46	29 – Ward	38	38	37	45	23 – Bagnall	37	37	37	45	31(2) – Isaac					296 – Watson					297 – Bosma					298 – Yates	36	36	36	45	15(3) – Falla	39	35	35	45	15(2) – Falla	36	35	35	45	Stratford Village	37	36	35	45	All other privately-owned residences	35	35	35	45	<p>Compliant</p>	<p>Muller Acoustics review:</p> <p>2020 (December): Sighted Annual Review and Monthly Compliance Monitoring Reports. No exceedances noted.</p> <p>2021: Sighted Annual Review and Monthly Compliance Monitoring Reports. No exceedances noted.</p> <p>2022: Sighted Annual Review and Monthly Compliance Monitoring Reports. No exceedances noted.</p> <p>Noted that compliance survey undertaken on 19 July 2022 identified a SMC noise contribution of 37dB LAeq(15min) (2dB over criteria) at the “Lowrey” monitoring location during day period. Follow-up measurement undertaken in accordance with NMP noted LAeq noise levels below criteria, demonstrating that event did not constitute a sustained exceedance and therefore was not considered to be a breach of the noise criteria.</p> <p>Complaints related to noise occurred in 2021 and 2022 were related to operational noise from Roseville West and BRN. Two real-time noise monitors are utilised; one is located at Craven and the other is located at Stratford Village, and neither monitor indicated an exceedance at the time of complaints. No complaints were submitted EPA within audit period (TK pers comms).</p> <p>2023: Sighted Monthly Compliance Monitoring Reports. No exceedances noted.</p> <p>Reviewed Monthly Compliance Noise Monitoring Reports during audit period. Confirmed that noise monitoring undertaken in accordance with the NMP and provisions of the INP.</p>
Land	Day LAeq(15 min)	Evening LAeq(15 min)	Night LAeq(15 min)	Night LA1(15 min)																																																																																																			
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REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 3, Condition 5	<p>The Applicant shall:</p> <p>(a) implement best management practice to minimise the construction, operational, road and rail noise of the development</p> <p>(b) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this consent;</p> <p>(c) minimise the noise impacts of the development during meteorological conditions under which the noise limits in this consent do not apply (see Appendix 6);</p> <p>(d) only use locomotives and rolling stock that are approved to operate on the NSW rail network in accordance with the noise limits in ARTC's EPL (No. 3142);</p> <p>(e) co-ordinate noise management on site with the noise management of the Gloucester Gas Project to minimise cumulative noise impacts; and</p> <p>(f) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.</p>	Compliant	<p>Muller Acoustics review:</p> <p>a) SMC has prepared a Noise Management Plan (NMP-R04-A, October 2022), which describes the management measures that are implemented to manage noise to acceptable levels. Measures include best management practices, reactive measures (where noise complaints are received), source and transmission controls and receiver noise control (where written request received).</p> <p>As detailed in the Annual Reviews, eight noise complaints were received during December of 2020, 12 noise complaints were received during 2021 and two complaints were received in 2022. A review of the Complaints Register (<a href="https://www.stratfordcoal.com.au/page/community/complaints-register/">https://www.stratfordcoal.com.au/page/community/complaints-register/</a>) identified that there have been no complaints received during 2023. The review of received complaints demonstrates a general downward trend, furthermore, noise compliance monitoring demonstrates that SMC is complying with the relevant noise criteria.</p> <p>Reviewed response to complaints received. Noted that each complaint responded to, including return call to complainant. Mitigation measures as per the NMP enforced.</p> <p>Confirmed that no mitigation implemented as a result of complaints or real time monitoring. All changes to operations have been pre-emptive. Effectiveness of this process has been highlighted by continued compliance and declining complaint levels through the reporting period.</p> <p>b) Section 7.3 of the NMP describes the real-time noise monitoring protocol adopted at SMC, including use of two strategically placed real-time noise monitors. Section 7.3.3 of the NMP describes the real-time monitoring methodology, including identification of Real-time Response Trigger Levels, while Section 7.3.4 of the NMP describes the noise monitoring response protocol.</p> <p>Section 7.5 of the NMP describes the meteorological monitoring and forecasting system adopted at SMC to assist in day-to-day planning of operations and minimise noise impacts during noise enhancing meteorological conditions.</p> <p>Viewed noise prediction report dated 8/12/2023. Viewed OCE report dated 7/12/2023. Risk of noise actions – limiting noise with hornless systems in trucks. Initial email comes out at 6 am (TK pers comms).</p> <p>c) Sighted SMC Real-time Noise Management Response Register, which provided management measures applied following real-time noise trigger. Sighted noise prediction report for 5/10/2023, including daily weather forecasting.</p> <p>d) Noted at previous audit.</p>

REPORT

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			<p>e) Not Triggered - DPE wrote to SCPL in 2017 confirming that as AGL were not proceeding with the Gloucester Gas Project that this Condition and the relevant condition in the SOC were no longer triggered.</p> <p>f) Monthly compliance noise monitoring is undertaken in accordance with the Project Approval, the EPL and the NMP.</p>
Schedule 3, Condition 6	<p>The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(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;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> <li>• compliance with the noise criteria operating conditions of this consent; and</li> <li>• the noise impacts of the project are minimised during meteorological conditions when the noise limits of this consent do not apply</li> </ul> <p>(c) describe the proposed noise management system in detail;</p> <p>(d) include a monitoring program that:</p> <ul style="list-style-type: none"> <li>• includes monitoring of inversion strength at an appropriate sampling rate to determine compliance with noise limits;</li> <li>• provides for the biennial validation of the noise model for the project;</li> <li>• evaluates and reports on:               <ul style="list-style-type: none"> <li>- the effectiveness of the on-site noise management system;</li> <li>- compliance against the noise criteria in this consent; and</li> <li>- compliance with the noise operating conditions;</li> </ul> </li> <li>• includes a program to calibrate and validate real-time noise monitoring results with attended monitoring results over time (so the real-time noise monitoring program can be used as a better indicator of compliance with the noise criteria and as a trigger for further attended monitoring); and</li> <li>• defines what constitutes a noise incident, and includes a protocol for identifying and notifying the Department and</li> </ul>	Compliant	<p>Muller Acoustics review:            Document Number: NMP-R04-A            Effective: October 2022            Approved by DPE on 4/10/2022.</p> <p>a) Letter from EPA (23/12/2021) confirming consultation included as Appendix 1 of the NMP.</p> <p>b) Section 6 of the NMP describes the management measures that are implemented to ensure compliance with the noise criteria (Section 4). Measures include best management practices (proactive measures), reactive measures, source and transmission noise controls, additional mitigation measures (receiver noise control) and management of rail transport. Section 7.5 of the NMP describes the meteorological monitoring and forecasting system adopted at SMC to assist in day-to-day planning of operations and minimise noise impacts during noise enhancing meteorological conditions.</p> <p>c) Reviewed NMP (Revision 4). Noise management measures are described in sufficient detail.</p> <p>d) Section 7 of the NMP describes the noise monitoring program implemented at SMC. The compliance assessment protocol (Section 7.2.4) provides relevant details on temperature inversions to be assessed during each noise survey. Section 9.3 details the noise model validation process, to be undertaken every two years. The results of the noise model validation are reported in the SMC Annual Review. Section 9 describes the Annual Review, including evaluation of effectiveness of management measures. Section 7.2.5 described the verification assessment protocol used to inform the continual calibration and validation of the real-time monitors. Sighted calibration certificates for real-time noise monitors - 108 23724 SVAN Cal 20221013 and 98 21230 SVAN Cal 20230714. Section 7.2.4 describes the compliance assessment protocol including what constitutes a noise incident, and the process for notifying relevant stakeholders.</p> <p>e) Noted at previous audit that DPIE confirmed that this condition was not</p>



REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>relevant stakeholders of any noise incidents; and                      (e) include provisions for a review of the site's real-time noise monitoring and management system within 12 months of the commencement of mining operations under this consent to ascertain if, and how, the system could be designed and used to determine compliance with noise limits.</p>		<p>intentionally included and modified the Approval on 14 January 2021.</p>
<p>Schedule 3, Condition 7</p>	<p>Within 2 years of the commencement of night-time mining operations, and every 2 years thereafter, the Applicant shall engage an independent acoustic expert to undertake a review of compliance with the relevant conditions of consent for night-time operations, to the satisfaction of the Secretary.</p> <p>Should any review report show that night-time mining operations have been/are non-compliant, the Applicant must modify its operations and conduct another independent review with 30 days.</p> <p>If this second review demonstrates compliance, the Applicant may continue its modified night-time mining operations. If not, the Applicant must immediately cease night-time mining operations.</p> <p>Night-time mining operations may only restart if the Secretary is satisfied that the proposed operations would be compliant with the relevant conditions of consent.</p>	<p>Compliant</p>	<p>Muller Acoustics review:                      Nighttime monitoring has been undertaken in the audit period. Sighted Night Time Noise Monitoring Review from September 2020 – August 2022 dated 18 December 2022 by RAPT Consulting. The report stated compliance for nighttime noise.</p>
<p>Schedule 3, Condition 8</p>	<p>The Applicant shall record and make available on its website:</p> <p>(a) when the real-time monitoring and management system detects any potential exceedance of the noise limits;</p> <p>(b) when exemptions from noise limits due to meteorological conditions apply;</p> <p>(c) the specific reasonable and feasible measures that were taken when either (a) or (b) apply; and</p> <p>(d) facilitate the regular review of this information by the CCC, to the satisfaction of the Secretary.</p>	<p><b>Not Compliant</b></p>	<p>Muller Acoustics review:</p> <p>a) SMC website provides link to Real-time Noise Management System (<a href="https://www.stratfordcoal.com.au/page/environment/monitoring-results/">https://www.stratfordcoal.com.au/page/environment/monitoring-results/</a>).</p> <p>Review of SMC Real-time Noise Management Response Register 2022 identified that the <b>register had not been adequately updated on website, with entries for October, November and December excluded</b>. Sighted complete register (SMC Real-time Noise Management Response Register 2022.xlsx). Recommend <b>website updated</b>.</p> <p>b) SMC Real-time Noise Monitoring Response Register identifies when exemptions from noise limits apply due to meteorological conditions.</p> <p>c) SMC Real-time Noise Monitoring Response Register identifies specific management measures taken.</p> <p>d) Sighted meeting agendas and meeting minutes for quarterly CCC meetings (<a href="https://www.stratfordcoal.com.au/page/community/community-consultative-committee/">https://www.stratfordcoal.com.au/page/community/community-consultative-committee/</a>). Confirmed that environmental monitoring reviewed.</p>

Cond. no	Requirement/Condition	Status	Comment															
Schedule 3, Condition 9	<p>The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 5.</p> <table border="1"> <caption>Table 5: Blasting criteria</caption> <thead> <tr> <th>Location</th> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Ground vibration (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Residence on privately-owned land</td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td>115</td> <td>5</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> <tr> <td>All public infrastructure</td> <td>-</td> <td>50 <small>(or a limit determined by the structural design methodology in AS 2187.2-2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Secretary)</small></td> <td>0%</td> </tr> </tbody> </table> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed these criteria, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land	120	10	0%	115	5	5% of the total number of blasts over a period of 12 months	All public infrastructure	-	50 <small>(or a limit determined by the structural design methodology in AS 2187.2-2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Secretary)</small>	0%	Compliant	<p>Muller Acoustics review: Reviewed Annual Returns for 2020 and 2021, and Spreadsheet titled “EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (69).exe”.</p> <p>2020 Annual Review – A total of 5 blasts undertaken during December 2020. No exceedances of blasting limits during December 2020 monitoring period for residences on privately-owned land or public infrastructure.</p> <p>2021 Annual Review – A total of 74 blasts undertaken during 2021. One blast above 115dBZ at “Greenwood” location (&lt;5% of total blasts). There were no exceedances of blasting limits for public infrastructure.</p> <p>2022 Annual Review – A total of 54 blasts undertaken during 2022. There were no exceedances of blasting limits on privately owned land.</p> <p>There were no exceedances of blasting limits for public infrastructure. It is noted that SMC has operated with a blast design informed by ACARP Report C14057 Effect of Blasting on Infrastructure (Terrock, 2008), with a conservative limit of 100mm/s adopted.</p> <p>Noted that blasting ceased in Stratford East Pit (SEP) in June 2022, hence no further monitoring of power lines undertaken.</p> <p>2023: A total of 57 blasts undertaken during 2023. One blast above 115dBZ at B6 (&lt;5% of total blasts). Compliance monitoring at power lines no longer undertaken due to cessation of blasting in SEP.</p>
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance															
Residence on privately-owned land	120	10	0%															
	115	5	5% of the total number of blasts over a period of 12 months															
All public infrastructure	-	50 <small>(or a limit determined by the structural design methodology in AS 2187.2-2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Secretary)</small>	0%															
Schedule 3, Condition 10	The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.	Compliant	<p>Muller Acoustics review: Review of blast record (sighted spreadsheet titled “EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (69).exe”). Confirmed that all blasts occurred during approved hours.</p>															
Schedule 3, Condition 11	<p>The Applicant may carry out a maximum of:</p> <p>(a) 1 blast per day on site; and</p> <p>(b) 3 blasts per week, averaged over a calendar year.</p> <p>This condition does not apply to blasts required to ensure the safety of the mine or its workers.</p> <p><i>Note: For the purposes of this condition a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the mine.</i></p>	Compliant	<p>Muller Acoustics review: Review of blast record (sighted spreadsheet titled “EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (69).exe”). Confirmed that blast frequency did not exceed the approved level during the audit period.</p> <p>Note that four blasts on consecutive days from 12 - 15 January 2021 (inclusive), When averaged over a calendar year, average less than 3 blasts per week.</p>															
Schedule 3, Condition 12	If the Applicant receives a written request from the owner of any privately-owned land within 2 kilometres of any approved open cut pit on site for a property inspection to establish the baseline condition of any	Not Triggered	Not triggered as no requests were made during the audit period (TK pers comms).															

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>buildings and/or structures on his/her land, or to have a previous property inspection report updated, then within 2 months of receiving this request the Applicant shall:</p> <p>(a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to:</p> <ul style="list-style-type: none"> <li>• establish the baseline condition of any buildings and/or structures on the land, or update the previous property inspection report; and</li> <li>• identify any measures that should be implemented to minimise the potential blasting impacts of the development on these buildings and/or structures; and</li> </ul> <p>(b) give the landowner a copy of the new or updated property inspection report.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced, and independent person, or the Applicant or landowner disagrees with the findings of the independent property investigation, either party may refer the matter to the Secretary for resolution.</p>		
Schedule 3, Condition 13	<p>If any owner of privately-owned land claims that the buildings and/or structures on his/her land have been damaged as a result of blasting on site, then within 2 months of receiving this claim in writing from the landowner, the Applicant shall:</p> <p>(a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to investigate the claim; and</p> <p>b) give the landowner a copy of the property investigation report. If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Applicant shall repair the damages to the satisfaction of the Secretary.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or landowner disagrees with the findings of the independent property investigation, either party may refer the matter to the Secretary for resolution.</p>	Not Triggered	Not triggered as no requests were made during the audit period (TK pers comms).

REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 3, Condition 14	<p>The Applicant shall:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> <li>• protect the safety of people and livestock in the surrounding area;</li> <li>• protect public infrastructure and private property in the surrounding area from any damage; and</li> <li>• minimise the dust and fume emissions of any blasting.</li> </ul> <p>(b) ensure that blasting on the site does not damage Aboriginal cultural heritage site CTS-1;</p> <p>(c) minimise the frequency and duration of any required road closures; and</p> <p>(d) operate a suitable system to enable the public to get up-to-date information on the proposed blasting Schedule on site, to the satisfaction of the Secretary.</p>	Compliant	<p>Muller Acoustics review:</p> <p>Reviewed Blast Management Plan (BLMP-R04_A). Approved by DPE January 2022.</p> <p>a) Section 5 of the BLMP describes blast management measures, including interactions with surrounding infrastructure, public safety and protection of livestock, and fume management.</p> <p>As detailed in the Annual Reviews, no blast complaints were received during December 2020, four blast complaints were received during 2021 and one complaint was received in 2022. A review of the Complaints Register (<a href="https://www.stratfordcoal.com.au/page/community/complaints-register/">https://www.stratfordcoal.com.au/page/community/complaints-register/</a>) identified that there have been no complaints received during 2023. Blast monitoring demonstrates that SMC is complying with the relevant blast criteria.</p> <p>Reviewed response to complaints. Confirmed that blasting limits not exceeded at time of complaints.</p> <p>b) Section 5.4 of the BLMP describes monitoring activities at CTS-1. Results of monitoring at CTS-1 provided in Annual Reviews.</p> <p>Internal monitoring for CTS 1 for blast vibration has occurred within the period. No excessive blast vibration was found during monitoring (TK pers comms) CTS 1 is located at the south-east of site in close proximity to the SEP which has concluded mining. Monitor has since been removed as no blasting has occurred at SEP.</p> <p>Viewed BMP dated November 2021 Section 5.4 predicated less than 80 mms/second.</p> <p>Viewed Blast Result data for CTS1. Results are extrapolated. Blasts were modelled by blasting engineer using measurements from the powerline monitor.</p> <p>c) Section 5.3.1 of the BLMP describes the road closure protocol, including objective of minimising road closure periods.</p> <p>d) Blast information hotline number provided on SMC website (<a href="https://www.stratfordcoal.com.au/page/environment/">https://www.stratfordcoal.com.au/page/environment/</a>). Auditor called blast information hotline on 4/12/2023, confirmed that information hotline up to date.</p>
Schedule 3, Condition 15	<p>The Applicant shall not undertake blasting within 500 metres of:</p> <p>(a) any public road; or</p> <p>(b) any land outside of the site not owned by the Applicant, unless the Applicant has:</p> <ul style="list-style-type: none"> <li>• demonstrated to the satisfaction of the Secretary that</li> </ul>	Not Triggered	<p>Muller Acoustics review:</p> <p>a) A blast has occurred on Wenham Cox Road during the audit period, in accordance with written agreement with council – noted in Previous Audit 14 October 2018 letter.</p> <p>In accordance with the SMC Blast Management Plan SCPL have prepared a Blasting Road Closure Management Plan in consultation with MidCoast</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>the blasting can be carried out closer to the road or land without compromising the safety of people or livestock, or damaging buildings and/or structures; and</p> <ul style="list-style-type: none"> <li>• updated the Blast Management Plan to include the specific measures that would be implemented while blasting is being carried out within 500 metres of the land or road; or</li> <li>• a written agreement with the landowner or GSC (in the case of any public road) to allow blasting to be carried out closer to the land or road, and the Applicant has advised the Department in writing of the terms of this agreement.</li> </ul>		<p>Council. b) No blasts occurred within 500m of land not owned by SMC.</p>
Schedule 3, Condition 16	<p>The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA and submitted to the Secretary for approval at least 3 months prior to the commencement of mining operations in the new mining areas, unless otherwise agreed by the Secretary;</p> <p>(b) describe the measures that would be implemented to ensure compliance with the blasting criteria and operating conditions of this consent;</p> <p>(c) propose and justify any alternative ground vibration limits for public infrastructure in the vicinity of the site (if relevant);</p> <p>(d) include a monitoring program for evaluating and reporting on compliance with the blasting criteria and operating conditions; and</p> <p>(e) include a specific blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated.</p>	Compliant	<p>Muller Acoustics review: Document Number: BLMP-R04-A Effective: January 2022 Approved by DPE on 21/01/2022.</p> <p>a) Letter from EPA (15/11/2021) confirming consultation included as Appendix 1 of the BLMP.</p> <p>b) Section 5 of the BLMP describes the management measures that are implemented to ensure compliance with the blast criteria and operating conditions (Section 3). Noted that 2021 Annual Review recorded a Level 2A blast fume was recorded on 11 February 2021. The fume did not leave site. However, not a non-compliance as the fume did not leave site (TK pers comms). Viewed Stratford Coal Blast Fume Investigation dated 11 February 2021 at Avon North. Viewed control measures including using wet product, to minimise time between drilling and loading and refrain from loading clay smut. As control measures were identified, no further actions are required.</p> <p>c) Not triggered.</p> <p>d) Section 6 of the BLMP describes the blast monitoring program for evaluating and reporting on compliance with blast criteria and operating conditions. Viewed 20/4/23 Calibration certificate by Texcel for 2433 and 2442.</p> <p>e) Section 5.5 and 7.1.1 describe the blast fume management protocol and contingency plan. A detailed blast fume management procedure is provided in Attachment 2 of the BLMP.</p>
Schedule 3, Condition 17	The Applicant shall ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	Not Triggered	Not triggered as no offensive odours were emitted during the audit period (TK pers comms).

Cond. no	Requirement/Condition	Status	Comment															
Schedule 3, Condition 18	<p>The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 6 at any residence on privately-owned land.</p> <p><i>Note:</i>                      “Reasonable and feasible avoidance measures” includes, but is not limited to, the operational requirements in conditions 23 and 24 to develop and implement a real-time air quality management system that ensures operational responses to the risks of exceedance of the criteria.</p> <table border="1"> <caption>Table 6: Air quality criteria</caption> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>Annual</td> <td><sup>a,d</sup> 30 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>24 hour</td> <td><sup>b</sup> 60 µg/m<sup>3</sup></td> </tr> <tr> <td>Total suspended particulates (TSP)</td> <td>Annual</td> <td><sup>a,d</sup> 90 µg/m<sup>3</sup></td> </tr> <tr> <td><sup>c</sup> Deposited dust</td> <td>Annual</td> <td><sup>b</sup> 2 g/m<sup>2</sup>/month    <sup>a,d</sup> 4 g/m<sup>2</sup>/month</td> </tr> </tbody> </table> <p><i>Notes to Table 6:</i>                      a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources).                      b Incremental impact (ie increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development).                      c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter – Gravimetric Method.                      d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.</p>	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a,d</sup> 30 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>b</sup> 60 µg/m <sup>3</sup>	Total suspended particulates (TSP)	Annual	<sup>a,d</sup> 90 µg/m <sup>3</sup>	<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month <sup>a,d</sup> 4 g/m <sup>2</sup> /month	Not Triggered	<p>Viewed Annual Reviews 2020, 2021 and 2022. There were no air quality exceedances during the period.</p> <p>There were two complaints related to dust during the audit period. One dust related complaint occurred on 12 January 2021: Complainant stated that dust was bad the previous night and day of complaint. “SCPL forwarded details of complaint to the Mining Supervisor. E&amp;C Supt inspected Wenham Cox Rd/Bowens Rd immediately after complaint.</p> <p>There was no evidence of visible dust or direct lighting from the public road. SCPL continue to implement management and mitigation measures for noise.”</p> <p>One dust related complaint occurred on 24 March 2022 among other complaints. Stratford offered to conduct a property investigation but did not hear back from the complainant. No further action required.</p> <p>Viewed EPL5161 Monitoring Data up to 30 November 2023 on the Stratford website on 21 December 2023 at 9:15 am. No exceedances of TEOM data have occurred within the audit period.</p>
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Schedule 3, Condition 19	<p>If the development causes an exceedance of the air quality criteria in Table 6, the Applicant shall, upon receiving a written request for air quality mitigation measures from the landowner, undertake air quality mitigation measures directed towards reducing the potential human health and amenity impacts of the development at a residences.</p> <p>These measures may include (for example):                      (a) air conditioning, including heating;                      (b) insulation;</p>	Not Triggered	<p>Viewed Annual Reviews 2020, 2021 and 2022.</p> <p>Not triggered as no air quality exceedances occurred within the audit period.</p>															



REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>(c) first flush water systems;</p> <p>(d) installation and regular replacement of water filters;</p> <p>(e) cleaning of rainwater tanks;</p> <p>(f) clothes dryers; and</p> <p>(g) regular cleaning or any residence and its related amenities, such as barbeque areas and swimming pools.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p>		
<p>Schedule 3, Condition 20</p>	<p>The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 6 at any occupied residence on mine-owned land unless:</p> <p>(a) the tenant and landowner (if the residence is owned by another mining or petroleum company) has been notified of any health risks associated with such exceedances in accordance with the notification requirements under Schedule 4 of this consent;</p> <p>b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;</p> <p>(c) air mitigation measures such as those listed in condition 20 are installed at the residence, if requested by the tenant or landowner (if the residence is owned by another mining or petroleum company);</p> <p>(d) air quality monitoring is regularly undertaken to inform the tenant or landowner (where owned by another mining or petroleum company) of the actual particulate emissions at the residence; and</p> <p>(e) data from this monitoring is presented to the tenant or landowner in an appropriate format for a medical practitioner to assist the tenant and/or landowner (where owned by another mining or petroleum company) in making informed decisions on health risks associated with occupying the property, to the satisfaction of the Secretary.</p>	<p>Compliant</p>	<p>Viewed Annual Reviews 2020, 2021 and 2022.</p> <p>No exceedances occurred within the audit period.</p> <p>Site inspection revealed little visible dust with water carts in operations.</p> <p>Viewed OCE reports dated 4 October 2023, 31 October 2023 and 7 December 2023.</p>

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<p>Schedule 3, Condition 21</p>	<p>If particulate matter emissions generated by the development exceed the criteria, or contribute to an exceedance of the cumulative criteria, in Table 7 at any residence on privately-owned land, or on more than 25% of any privately owned land where there is an existing dwelling or where a dwelling could be built under existing planning controls, then upon receiving a written request for acquisition from the landowner the Applicant shall acquire the land in accordance with the procedures in conditions 5-6 of Schedule 4.</p> <table border="1" data-bbox="376 544 842 660"> <caption>Table 7. Air quality land acquisition criteria</caption> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>Annual</td> <td><sup>a,d</sup> 30 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>24 hour</td> <td><sup>b</sup> 50 µg/m<sup>3</sup></td> </tr> <tr> <td>Total suspended particulates (TSP)</td> <td>Annual</td> <td><sup>a,d</sup> 90 µg/m<sup>3</sup></td> </tr> <tr> <td><sup>c</sup> Deposited dust</td> <td>Annual</td> <td><sup>b</sup> 2 g/m<sup>2</sup>/month     <sup>a,d</sup> 4 g/m<sup>2</sup>/month</td> </tr> </tbody> </table> <p><b>Notes to Table 7:</b></p> <p><i>a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources).</i></p> <p><i>b Incremental impact (ie increase in concentrations due to the development alone, with up to 5 allowable exceedances of the criteria over the life of the development.</i></p> <p><i>c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter – Gravimetric Method.</i></p> <p><i>d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.</i></p>	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a,d</sup> 30 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>b</sup> 50 µg/m <sup>3</sup>	Total suspended particulates (TSP)	Annual	<sup>a,d</sup> 90 µg/m <sup>3</sup>	<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month <sup>a,d</sup> 4 g/m <sup>2</sup> /month	<p>Not Triggered</p>	<p>Viewed Annual Reviews 2020, 2021 and 2022. Not triggered as no exceedances occurred within the audit period.</p>
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<p>Schedule 3, Condition 22</p>	<p>The Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) implement best practice management to minimise the off-site odour, fume and dust emissions of the development;</li> <li>(b) implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site;</li> <li>(c) minimise the surface disturbance of the site;</li> <li>(d) minimise any visible off-site air pollution generated by the development;</li> </ul>	<p>Compliant</p>	<p>a) Although minimal operations occurring, the site inspection revealed no significant dust issues and evidence of water cart activity was observed (see Plates in Appendix D). See response to Schedule 2, C14 regarding maintenance.</p> <p>b) Viewed Air Quality Management Plan dated January 2022. Section 6 details management measures. Viewed Dust Predication Report Sentinex report dated 17 December 2023. Viewed OCE Report dated 7 December 2022. No new machines have been purchased within the audit period (TK pers comms).</p>															

REPORT

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	<p>(e) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting, predictive and real-time air dispersion modelling and real-time air quality monitoring data to guide the day-to-day planning of mining operations and implementation of both proactive and reactive air quality mitigation measures (such as relocate, modify and/or suspend) to ensure compliance with the relevant conditions of this consent; and</p> <p>(f) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note d to Tables 6 and 7 above), to the satisfaction of the Secretary.</p>		<p>c) Viewed Air Quality Management Plan dated January 2022. Section 1.1 states that no new disturbance areas (within the approved surface disturbance areas) are proposed. The site visit confirmed this.</p> <p>d) Viewed Air Quality Management Plan dated January 2022. Appendix 2 provides a summary pollution reduction programs.</p> <p>e) Real time monitoring TEOMS report exceedances through an alarm process. Viewed Stratford data dated on Vista Data Vision (real time system). One monitor is located in Stratford Village on Avon Street and the other is located in Craven (viewed AQMP Section 7.3). Viewed EPL5161 Monitoring Data up to 30 November 2023 on the Stratford website on 21 December 2023 at 10:15 am. The alarm was raised twice during the audit period. Occurrences are described below.</p> <p>21 October 2023 – strong to very strong wind indicating widespread regional air quality issues. Not related to mining operations.</p> <p>11 December 2023 –bushfire related alarm. Viewed real time dust monitor response register for 2023. Not related to mining operations (TK pers comms). Viewed TEOM Calibration Certificates dated 27 October 2021, 27 October 2022 and 11 October 2023.</p> <p>f) Meteorological station was sighted at site inspection (see <b>Plate 9</b>). Real time monitoring system allows for responsive action (TK pers comms).</p>
Schedule 3, Condition 23	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(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;</p> <p>(b) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this consent;</p> <p>(c) describe the proposed air quality management system; and</p> <p>(d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• adequately supports the proactive and reactive air quality management system;</li> </ul>	<b>Not Compliant</b>	<p>Viewed Air Quality Management Plan dated January 2022.</p> <p>a) Approval letter dated 21 January 2022 from DPE. Viewed EPA response to consultation letter dated 11 November 2021</p> <p>b) Section 6 describes mitigation measures</p> <p>c) The air quality management system is detailed in sections 6-10.</p> <p>d) Section 7 details the Air Quality Monitoring Program. This includes a description of the two real-time noise monitors and details real time triggers. Section 7.6 outlines the protocol for determining exceedances and Section 8 details the contingency plan is an exceedance was to occur. Viewed 2020, 2021 and 2022 Annual Reviews.</p> <p>2021: A noncompliance was recorded on 23 December 2021 due to <b>“Less than required PM10 monitoring undertaken at HVAS unit-Point 13”</b>. <b>“Monitoring unit failed to operate on a single prescribed day resulting in less than required samples”</b>. <b>The monitor has continued to function after this occurrence (TK pers comms) and therefore no further actions are required.</b></p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<ul style="list-style-type: none"> <li>• evaluates and reports on:               <ul style="list-style-type: none"> <li>- the effectiveness of the air quality management system; and</li> <li>- compliance with the air quality operating conditions; and</li> <li>- defines what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents.</li> </ul> </li> </ul>		<p>2022:</p> <p>A noncompliance was recorded due to outages at the "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.</p> <p>SMC has completed a TEOM overhaul and are further investigating options to improve the reliability of data capture for the Craven TEOM. This included 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 (TK pers comms).</p>
Schedule 3, Condition 24	<p>For the life of the development, the Applicant shall ensure that there is a meteorological station in the vicinity of the site that:</p> <p>(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</p> <p>(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.</p>	Compliant	<p>Meteorological station was sighted at site inspection (see <b>Plate 9</b>).</p> <p>a) Viewed Stratford Sentinex Repository on 12 December 2023 at 10:52 am. Viewed Stratford met data dated 12 December 2023 (real time data). TK advises that meteorological stations are no longer referenced in Approved Methods for Sampling of Air Pollutants in NSW guideline.</p> <p>These documents have been replaced by noise policy for industry (2017). This policy references: AS 3580.14-2011: Methods for sampling and analysis of ambient air, Meteorological monitoring for ambient air quality monitoring applications. <b>Recommend AQMP updated at next review to clarify this to ensure relevant regulators support this approach and confirm compliance.</b></p> <p>b) Viewed Field Calibration Reports dated 12 October 2021, 24 October 2022 and 16 October 2023 for weather station, which include temperature data.</p> <p>Viewed Air Quality Management Plan dated January 2022. Appendix 1 includes AQMP consultation letter with EPA dated 11 November 2021.</p>
Schedule 3, Condition 25	<p>The Applicant shall ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations on site to match its available water supply.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licenses for the development.</i></p>	Compliant	<p>Viewed 2020, 2021 and 2022 Annual Reviews. Viewed Site Water Balance data in annual reviews.</p> <p>TK advises that the Stratford Coal Mine is operating at a water surplus. Site inspection revealed ample water storage (see <b>Plate 5, Plate 17 and Plate 18</b>).</p>
Schedule 3, Condition 26	<p>The Applicant shall provide a compensatory water supply to the owner of any privately-owned land whose water supply is adversely and directly impacted (other than a negligible impact) as a result of the development, in consultation with</p>	Not Triggered	<p>Not triggered as no claims for compensatory water supply have been received during the audit period (TK pers comms).</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>NOW, and to the satisfaction of the Secretary.</p> <p>The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent to the loss attributed to the development. Equivalent water supply should be provided (at least on an interim basis) within 24 hours of the loss being identified.</p> <p>If the Applicant and the landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>If the Applicant is unable to provide an alternative long-term supply of water, then the Applicant shall provide alternative compensation to the satisfaction of the Secretary.</p>		
<p>Schedule 3, Condition 27</p>	<p>Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.</p>	<p><b>Not Compliant</b></p>	<p>Viewed 2020, 2021 and 2022 Annual Reviews.</p> <p>2021:  <b>“An uncontrolled discharge of mine related water from dams SD12, SD16 and SD17 reporting to Avondale Creek” occurred on 20 March 2021 due to a heavy rainfall event.</b> “Water quality sampling was undertaken at the time of the spill and the incident reported to regulators as required”.</p> <p><b>“Reported in accordance with SSD- 4966 and PIRMP”.</b> Viewed incident report to EPA dated 26 March 2021. <b>No follow up report was requested and no further action is required.</b></p> <p>2021:  <b>A “Breach of the Roseville Link Haul Road culvert crossing over Avondale Creek at the SMC, which occurred on Saturday 20 March 2021 during a significant rainfall event.”</b></p> <p><b>“Reported in accordance with SSD- 4966 and PIRMP.</b></p> <p>Breach occurred on Saturday 20 March 2021 during a significant rainfall event”. Viewed Incident Report to EPA dated 26 March 2021. <b>No follow up report was requested and no further action is required.</b></p> <p>Viewed drainage structure implemented in place of previous haul road during site inspection (see <b>Plate 3</b> and <b>Plate 4</b>).</p> <p><b>Recommend that the relocated dirty water pipeline across the Avondale Creek’s risk assessment be reconsidered and mitigation implemented as required.</b></p> <p><b>Recommend that disassembled culvert be removed from the area (see Plate 4).</b></p> <p>2022:</p>

REPORT

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			<p><b>“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”.</b> “Water quality sampling was undertaken at the time of the spill and the incident reported to regulators as required”. Viewed Incident Report to EPA dated 15 March 2022 to EPA (submitted one day after the seven-day permitted timeframe). <b>No further requirements or report was requested and therefore no further actions is required.</b></p> <p>No water related incidents have occurred in 2023 (TK pers comms).</p>
Schedule 3, Condition 28	The Applicant shall only carry out irrigation on parts of the site that drain directly to mine water storages, and in accordance with the relevant requirements of an approved Water Management Plan.	Not Triggered	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as no irrigation occurred within the audit period.
Schedule 3, Condition 29	The Applicant shall not carry out any mining operations within 40 metres of Avondale or Dog Trap Creeks, with the exception of the construction and/or use of the proposed and existing haul road crossings of Avondale Creek shown in the figure(s) in Appendix 3.	Not Triggered	Not triggered as no mining occurred within areas described within this condition (TK pers comms).
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.	Compliant	<p>RPS Ecology review:</p> <p>This condition is addressed in Section 5.3 of the Stratford Mining Complex Biodiversity Management Plan (BMP; Stratford Coal 2023) and monitored as per section 7 of the BMP.</p> <p>Section 5.3 of the BMP (Stratford Coal 2023) states that the management zone ‘A3 Coastal Floodplain Forest Revegetation’ includes revegetation through the establishment of flora species characteristic of the Subtropical Coastal Floodplain Forest of the NSW North Coast Bioregion in accordance with Schedule 3, Condition 30 of the Consent.</p> <p>The re-establishment of flora species in Management Zone A3 – Revegetation Areas Biodiversity Enhancement Area was completed in 2017 (Q5) and 2019 (Q7).</p> <p>Monitoring in 2022 by WPC showed that revegetation in Q5 was progressing well with an estimated canopy stem density of 575 trees/ha. Q5 displayed the highest native species richness and tree cover of all revegetation areas, however, is still less than reference sites. Q7 has displayed native species diversity increases and tree cover increases since planting. <b>All plots show a proliferation of exotic grasses, which may require management to ensure native species are not smothered.</b></p> <p><b>Of concern reference Q6 has decreased in native species diversity by half since 2019 and increased in exotic species diversity. Weed control</b></p>

REPORT

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			<p><b>works have been recommended for this management zone and are integral to prevent further degradation.</b> Vegetation in Offset Area 1 (Q15) is in a resilient and stable condition.</p> <p>Existing vegetation is to be enhanced and additional vegetation to be established, including Cabbage Gum open forest within the Avondale Creek riparian area in accordance with Schedule 3 Condition 30. This condition is addressed in Section 5.3 of the SMC Biodiversity Management Plan and is monitored as management zone A3 by Wedgetail Project Consulting. A total of two analogue quadrats (no active revegetation) and five rehabilitation quadrats were monitored in this zone. All rehabilitation quadrats have increased in species diversity since 2019, with the exception of quadrat Q5, which has maintained species diversity. Within analogue quadrat Q15, species diversity has increased, whilst in Q6 it has decreased. As six of seven quadrats displayed an increase or maintenance of species diversity, Schedule 3, Condition 30 has been met, as overall riparian habitat has been enhanced.</p> <p>Management of exotic grasses is recommended to control and reduce smothering of native species regrowth, particularly within Q6.</p> <p>Viewed:            SMC Annual Biodiversity Monitoring Report 2022            SMC Biodiversity Management Plan 2023            SMC Annual Review 2022            Revegetation Report (WPC 2022)            Stratford Mining Complex 2022 Biodiversity Offsets Strategy Flora Monitoring Report 2022 (WPC 2022)</p>
Schedule 3, Condition 30A	<p>The Applicant may allow a public authority to collect and transport water offsite by road:</p> <p>a) where this water is intended for use for a public purpose; and</p> <p>b) up to a maximum rate of 25 road registered water trucks per day.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li><i>The transport and use of water by the public authority may be subject to separate regulatory requirements, including processes under Part 5 of the EP&amp;A Act, and relevant controls, restrictions and/or exemptions under the POEO Act.</i></li> <li><i>This condition does not restrict or affect water that may</i></li> </ul>	Not Triggered	<p>Not triggered as collection and transport of water offsite has not occurred. Communications with Mid Coast Council have recommenced (TK pers comms). However, no correspondence in the audit period (TK pers comms). Raised in CCC minutes dated 23 November 2023.</p> <p>Offsite water supply point (pipe and offtake) placed in 2020) is located at Bowens Road, although has not been used and is currently locked off. Deemed to be useful for watering roads, as it does not meet stock requirements (TK pers comms).</p>



REPORT

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	<i>be taken under the provisions of the Rural Fires Act 1997.”</i>																										
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Table 4 states that “the water management system is constructed and maintained generally in accordance with the design described in the SWB and SWMP”.</p> <p>b) Refers to the Roseville/BRN Haul Road in 2021. Viewed construction summary of haul road letter from Kleinfelder dated 30 August 2021. The letter contains requirements pertaining to policy within the table.</p> <p>Viewed consideration of erosion and sediment controls in the Stratford Open Cut Haul Road Crossing Stormwater Culvert Civil Works Site Plan dated 17 June 2021.</p> <p>Viewed Stratford Clearance Plan of Roseville Haul Road dated 16 September 2021. Viewed Stratford East Pre-Clearance Habitat Survey by Kleinfelder dated 24 June 2021. Viewed environmental inspection report 22 September 2021.</p> <p>Viewed summary of hydrologic and hydraulic flood modelling for Roseville Haul Road from HEC dated 14 June 2021.</p> <p>Viewed Stratford Environmental Inspection Record for Roseville Haul Road work site dated 22 September 2021. No further actions were required.</p> <p>c) Not triggered as none built during the audit period.</p> <p>d) Clean water diversion infrastructure is located Avon North pit which has been maintained during the period.</p> <p>Stratford East drain was constructed in 2020 (TK pers comms).</p> <p>e) No stream diversion of tributary to Avondale Creek was constructed in the audit period (TK pers comms).</p> <p>f) Out of pit emplacement was last undertaken in April 2021 (TK pers comms).</p> <p>Viewed 2020, 2021 and 2022 Annual Reviews.</p> <p>No intentional discharge of surface water has occurred within the audit period.</p> <p>Section 4.4.4 of 2022 Annual review states that “reject materials are pumped via pipeline to the Main Pit”. The site inspection revealed no discharge Main Pit (see <b>Plate 2</b>).</p> <p>Viewed Rehabilitation Management Plan dated October 2023. 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REPORT

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			<p>polluting”.</p> <ul style="list-style-type: none"> <li>• Viewed Avon North Pit – PAF Assessment document dated 10 August 2021.</li> <li>• Viewed PAF Cell Specs and Construction standard document dated 1 March 2023.</li> <li>• Viewed PAF Definition and Material Analysis document dated 23 August 2021.</li> <li>• Viewed PAF Sampling and Analysis document dated 2 September 2021.</li> </ul> <p>Viewed Stratford East PAF information sheets dated 11 March 2021 detailing the locations of PAF at Stratford East and PAF occurrence near seams and boreholes.</p> <p>Viewed Stratford Coal PAF Sampling Sheet dated August 2021.</p> <p>Viewed Stratford East Pit water storage levels spreadsheet between 28 September 2022 to 16 December 2023. Surveyed levels have not exceeded safe operating level.</p> <p>g) Site inspection revealed that chemicals and were stored in banded areas (see <b>Plate 13</b>).</p> <p>h) Viewed Water Management Plan dated October 2021. Section 5.1.3 details site-specific-in-stream water quality objectives.</p>
Schedule 3, Condition 32	<p>The Applicant shall prepare and implement a Water Management Plan for the development to the satisfaction of the Secretary.</p> <p>This plan must:</p> <p>(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;</p> <p>(b) be submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary; and</p> <p>c) in addition to the standard requirements for management plans (see condition 3 of Schedule 5), include a:</p> <p>(i) Site Water Balance, that:</p> <ul style="list-style-type: none"> <li>• includes details of: <ul style="list-style-type: none"> <li>○ sources and security of water supply, including details of Water Access Licenses held, and contingency supply for future reporting periods;</li> <li>○ water use and management on site;</li> <li>○ any off-site water discharges; and</li> </ul> </li> </ul>	<b>Not Compliant</b>	<p>Viewed Water Management Plan dated October 2021.</p> <p>a) Viewed DPE approval letter of plan dated 18 October 2021.</p> <p>b) Not triggered as not applicable to this audit period</p> <p>c)</p> <p>i) The Site Water Balance is located in Appendix 1 of the WMP and includes:</p> <ul style="list-style-type: none"> <li>• sources and security of water supply (Sections 2.3, 6 and 8).</li> <li>• water use and management on site (Sections 5 and 7).</li> <li>• any off-site water discharges (Section 9).</li> <li>• reporting procedures (Sections 12.3 and 13 and Attachment A).</li> <li>• investigates and implements all reasonable and feasible measures to minimise water use on site (Section 7).</li> </ul> <p>ii) The Surface Water Management Plan is located in Appendix 2 of the WMP and includes:</p> <ul style="list-style-type: none"> <li>• detailed baseline data (Sections 3 and 4).</li> <li>• a description of the water management system including the: <ul style="list-style-type: none"> <li>– clean water diversion systems (Section 7.6).</li> <li>– erosion and sediment (Section 6, 6.1 and 6.12).</li> <li>– mine water management systems (Sections 6.10 and 7.10).</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ reporting procedures, including the preparation of a site water balance for each calendar year; and</li> <li>● investigates and implements all reasonable and feasible measures to minimise water use on site;</li> <li>(ii) Surface Water Management Plan, that includes:               <ul style="list-style-type: none"> <li>● detailed baseline data on water flows and quality in the watercourses that could potentially be affected by the development;</li> <li>● a detailed description of the water management system, including the:                   <ul style="list-style-type: none"> <li>○ clean water diversion systems;</li> <li>○ erosion and sediment controls (mine water system); and</li> <li>○ mine water management systems, including irrigation areas;</li> </ul> </li> <li>● detailed plans, including design objectives and performance criteria for:                   <ul style="list-style-type: none"> <li>○ design and management of final voids;</li> <li>○ design and management for the emplacement of coal reject materials and potential acid-forming or sulfate-generating materials;</li> <li>○ management of sodic and dispersible soils;</li> <li>○ diversion of the key tributary of Avondale Creek;</li> <li>○ reinstatement of drainage lines on the rehabilitated areas of the site; and</li> <li>○ control of any potential water pollution from the rehabilitated areas of the site</li> </ul> </li> <li>● performance criteria for the following, including trigger levels for investigating any associated potentially adverse impacts:                   <ul style="list-style-type: none"> <li>○ mine water management system;</li> <li>○ downstream surface water quality;</li> <li>○ downstream flooding impacts, and</li> <li>○ stream and riparian vegetation health for the Avon River and its tributaries, including Avondale and Dog Trap Creeks;</li> </ul> </li> <li>● a program to monitor and report on:                   <ul style="list-style-type: none"> <li>○ effectiveness of the mine water management</li> </ul> </li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>● detailed plans, including design objectives and performance criteria for:               <ul style="list-style-type: none"> <li>– design and management of final voids (Section 7.7).</li> <li>– design and management for the emplacement of coal reject materials and potential acid-forming or sulphate generating materials (Sections 7.2 and 7.3).</li> <li>– management of sodic and dispersible soils (Section 7.4).</li> <li>– diversion of the key tributary of Avondale Creek (Section 7.7).</li> <li>– reinstatement of drainage lines on the rehabilitated areas of the site (Section 7.9).</li> <li>– control of any potential water pollution from the rehabilitated areas of the site (Section 7.9).</li> </ul> </li> <li>Viewed Stratford Surface Water Monitoring Results dated November 2023.</li> <li>● Performance criteria for the following, including trigger levels for investigating any associated potentially adverse impacts:               <ul style="list-style-type: none"> <li>– mine water management (Section 5.1.1).</li> <li>– downstream surface water quality (Section 5.1.3).</li> <li>– downstream flooding impacts (Section 5.1.4).</li> <li>– stream and riparian vegetation health for the Avon River and its tributaries (Section 5.1.5).</li> </ul> </li> <li>● a program to monitor and report on (Sections 8 – 11)               <ul style="list-style-type: none"> <li>– effectiveness of the mine water management system,</li> <li>– effectiveness of the stream diversion for the key tributary of Avondale Creek,</li> <li>– surface water flows (with a focus on base flow and low flows) and quality in the watercourses potentially affected by the development, and</li> <li>– downstream flooding impacts.</li> </ul> </li> <li>● reporting procedures for the results of the monitoring program (Section 12)</li> <li>● a plan to respond to any exceedances of the performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development (Sections 5, 8 and 10).</li> <li>iii) The Groundwater Management Plan               <ul style="list-style-type: none"> <li>● detailed baseline data of groundwater levels, yield and quality in the region that could be affected by the development, including licensed privately-owned groundwater bores and a detailed survey/Schedule of groundwater dependent ecosystems (Section 3 and 4).</li> <li>● groundwater assessment criteria including trigger levels for investigating</li> </ul> </li> </ul>

REPORT

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	<p>system;</p> <ul style="list-style-type: none"> <li>○ effectiveness of the stream diversion for the key tributary of Avondale Creek;</li> <li>○ surface water flows (with a focus on base flow and low flows) and quality in the watercourses potentially affected by the development; and</li> <li>○ downstream flooding impacts;</li> </ul> <ul style="list-style-type: none"> <li>● reporting procedures for the results of the monitoring program; and</li> <li>● a plan to respond to any exceedances of the performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development;</li> </ul> <p>(iii) Groundwater Management Plan that includes:</p> <ul style="list-style-type: none"> <li>● detailed baseline data of groundwater levels, yield and quality in the region that could be affected by the development, including licensed privately-owned groundwater bores and a detailed survey/Schedule of groundwater dependent ecosystems;</li> <li>● groundwater assessment criteria including trigger levels for investigating any potentially adverse groundwater impacts; <ul style="list-style-type: none"> <li>○ a program to monitor and report on: <ul style="list-style-type: none"> <li>○ groundwater inflows to the open cut pits;</li> <li>○ the seepage/leachate from water storages, emplacements and final voids;</li> <li>○ background changes in groundwater yield/quality against mine-induced changes; and</li> <li>○ impacts of the development on: <ul style="list-style-type: none"> <li>- regional and local (including alluvial) aquifers;</li> <li>- groundwater supply of potentially affected landowners; and</li> <li>- groundwater dependent ecosystems and riparian vegetation;</li> </ul> </li> </ul> </li> <li>● a program to validate the groundwater model for the development, including an independent review of the model every 3 years, and comparison of monitoring results with modelled predictions; and</li> <li>● a plan to respond to any exceedances of the</li> </ul> </li> </ul>		<p>any potentially adverse groundwater impacts (Section 5.1).</p> <ul style="list-style-type: none"> <li>● a program to monitor and report on (Sections 7 – 10): <ul style="list-style-type: none"> <li>– groundwater inflows to the open cut pits,</li> <li>– the seepage/leachate from water storages, emplacements and final voids,</li> <li>– background changes in groundwater yield/quality against mine-induced changes, and</li> <li>– impacts of the development on: <ul style="list-style-type: none"> <li>● regional and local (including alluvial) aquifers,</li> <li>● groundwater supply of potentially affected landowners, and</li> <li>● groundwater dependent ecosystems and riparian vegetation.</li> </ul> </li> </ul> </li> </ul> <p>Viewed Stratford Groundwater Results dated November 2023.</p> <ul style="list-style-type: none"> <li>● a program to validate the groundwater model for the development, including an independent review of the model every 3 years, and comparison of monitoring results with modelled predictions (Section 6,2).</li> </ul> <p>Viewed Stratford Groundwater Modelling Presentation dated 11 February 2021 by SLR which includes predictions and validations of the groundwater model. Stated that the calibration statistics are satisfactory, the model update and validation have been completed, and the model can be used for Stage 2 (of operations including Stratford East Pit).</p> <ul style="list-style-type: none"> <li>● a plan to respond to any exceedances of the performance criteria (Section 5,7,8), and</li> </ul> <p>iv) Not triggered as Gloucester Gas Project has not been undertaken. Viewed 2020, 2021 and 2022 Annual Reviews. No exceedances occurred within the audit period. Two non-compliances occurred in December 2020 within the audit period.</p> <p>21 December 2020:  <b>“Rainwater runoff in the construction area for the Stratford East temporary clean water drain breached the containment bund discharging to a clean water area.</b>  Runoff to report to a grassed area downslope. The point of discharge is approximately 1.2km to the nearest water course and remains within the Mining Lease area.  of rainfall was recorded in the 24 hours prior.  <b>The temporary clean water drain construction was in accordance with the approved clearing permit and the erosion and sediment control plan.”</b>  30 December 2020:</p>

Cond. no	Requirement/Condition	Status	Comment												
	<p>performance criteria; and</p> <p>(iv) protocol that has been prepared in consultation with the owners of nearby resource developments, including the Gloucester Gas Project, to:</p> <ul style="list-style-type: none"> <li>• minimise and manage the cumulative water quality and quantity impacts of these developments;</li> <li>• review opportunities for water sharing/water transfers between these developments;</li> <li>• co-ordinate water quality monitoring programs as far as practicable;</li> <li>• undertake joint investigations/studies in relation to complaints/exceedances of trigger levels where cumulative impacts are considered likely; and</li> <li>• co-ordinate modelling programs for validation, re-calibration and re- running of the groundwater and surface water models using approved mine and gas production operation plans.</li> </ul> <p><i>Note: The protocol can be developed in stages and will need to be subject to ongoing review, dependent upon the determination of, and commencement of, other mining developments in the area.</i></p>		<p><b>“Rainwater runoff in the construction area for the Stratford East temporary clean water drain breached the containment bund discharging to a clean water area.</b> In one section the containment bund sustained a minor breach allowing runoff to report to a grassed area downslope. The point of discharge is approximately 1.2km to the nearest water course and remains within the Mining Lease area. 14.8mm of rainfall was recorded in the 24 hours prior. <b>Sump improvement and pumping continued during the night to reduce the water level and allow greater water capture.</b>” See response to Schedule 3, Condition 27 for details on uncontrolled discharges during the audit period.</p> <p>Viewed Surface Water Monitoring Map in WMP 2021 dated June 2021. Avondale Creek is monitored at W9.</p> <p>Viewed Groundwater Monitoring map in WMP dated June 2021. Groundwater monitoring through Avondale Creek is conducted through RB bores and GW bores. Groundwater monitoring for BRN is conducted through the MW bores and the F2 bores monitor Avon North Open Cut. Groundwater bores are also located in Stratford (TK pers comms).</p>												
<p>Schedule 3, Condition 33</p>	<p>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.</p> <p><small>Table 9: Summary of the biodiversity offset strategy</small></p> <table border="1" data-bbox="376 1023 842 1155"> <thead> <tr> <th>Area</th> <th>Offset Type</th> <th>Minimum Size (ha)</th> </tr> </thead> <tbody> <tr> <td>Biodiversity Offset Area, including Offset Areas 1, 2, 3 and 4</td> <td>Existing vegetation to be enhanced and additional vegetation to be established.</td> <td>935 Includes 490 ha of existing native vegetation.</td> </tr> <tr> <td>Biodiversity Enhancement Area</td> <td>Existing vegetation to be enhanced and additional vegetation to be established, including Cabbage Gum open forest within the Avondale Creek riparian area.</td> <td>240</td> </tr> <tr> <td>Rehabilitation Area</td> <td>Native woodland vegetation communities to be re-established.</td> <td>350</td> </tr> </tbody> </table> <p><small>Note: For the purposes of this consent the vegetation community referred to in the EIS as Cabbage Gum open forest on flats of the North Coast or New England Tablelands is considered equivalent to Subtropical Coastal Rainforest of the NSW North Coast Bioregion ECC under the TSC Act.</small></p>	Area	Offset Type	Minimum Size (ha)	Biodiversity Offset Area, including Offset Areas 1, 2, 3 and 4	Existing vegetation to be enhanced and additional vegetation to be established.	935 Includes 490 ha of existing native vegetation.	Biodiversity Enhancement Area	Existing vegetation to be enhanced and additional vegetation to be established, including Cabbage Gum open forest within the Avondale Creek riparian area.	240	Rehabilitation Area	Native woodland vegetation communities to be re-established.	350	<p>Compliant</p>	<p>RPS Ecology review: Refer to Figure 1 Appendix 8.</p> <p>This condition is addressed in Sections 3.2 and 5 of the SMC Biodiversity Management Plan 2023, which states that:</p> <ul style="list-style-type: none"> <li>• Biodiversity Offset Area, including Offset Areas 1, 2, 3 and 4 must include a minimum 935 ha (including 490 ha of existing native vegetation);</li> <li>• Biodiversity Enhancement area must include a minimum of 240 ha; and</li> <li>• The Rehabilitation Area must include a minimum of 350 ha.</li> </ul> <p>The Stratford Mine Complex 2022 Rehabilitation Planting Program states that 14 ha of planting has occurred at Bowens Road North NS Roseville Waste Emplacement in 2022 (see Plate 4).</p> <p>A breakdown of the area within each management area and vegetation community is not provided within the SMC Biodiversity Management Plan 2023. <b>It is recommended that these details are provided within a table, in a similar manner to the Duralie Biodiversity Management Plan 2022 at next review.</b></p> <p>The SMC Biodiversity Management Plan 2022 states that all management actions were completed in 2020, with the exception of Revegetation in Zone</p>
Area	Offset Type	Minimum Size (ha)													
Biodiversity Offset Area, including Offset Areas 1, 2, 3 and 4	Existing vegetation to be enhanced and additional vegetation to be established.	935 Includes 490 ha of existing native vegetation.													
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REPORT

Cond. no	Requirement/Condition	Status	Comment
			<p>A and A1.                      Revegetation in Zone A and A1 is still ongoing. Whist Zone A2, A3 and B requires monitoring and maintenance.                      Within all management zone, with the exception of remnant vegetation within offset area 2 and 3 (Q1 and Q9), exotic vegetation continues to dominate and increase. This is largely due to the proliferation of exotic grasses (WPC 2022). <b>Management may be required to prevent smothering and further degradation of natives. Future rehabilitation efforts should consider the use of weed suppression prior to, and during planting, such as mulching.</b>  <b>DM: Cattle grazing to control grasses within offset areas is not current permitted in accordance with the BMP. Consider whether a justified amendment to relevant state and federal regulators could be made and BMP updated.</b>                      Viewed:                      SMC Annual Biodiversity Monitoring Report 2022                      SMC Biodiversity Management Plan 2023                      SMC Annual Review 2022                      Duralie Management Plan 2022                      Stratford Mine Complex 2022 Rehabilitation Planting Program, Wedgetail Project Consulting 2024                      Stratford Mining Complex 2022 Biodiversity Offsets Strategy Flora Monitoring Report 2022 (WPC 2022)                      The SMC Rehabilitation Management Plan 2023                      Shapefiles for Biodiversity Enhancement area</p>
Schedule 3, Condition 34	<p>At least 3 months prior to the commencement of mining operations in the new mining areas, the Applicant shall notify the owner of Property 44 (Cross / Jane) that they may request the Applicant to acquire their property.                      Upon receiving a written request from the owner to acquire their property, the Applicant shall acquire this property in accordance with conditions 5 and 6 of Schedule 4.                      Should the Applicant acquire Property 44, then the property, exclusive of the residence and its immediate surrounds, shall be added to the Biodiversity Offset Strategy for the development described in condition 34 above, and managed in accordance with the requirements applicable to this Strategy.                      Should the Applicant not acquire Property 44 in accordance</p>	Not Triggered	<p>RPS Ecology review:                      Response in 2020 Previous Audit report states that discussions were being made at the time in relation to the potential acquisition.                      The acquisition of Property 44 has not occurred during the audit period (TK pers comms).</p>



REPORT

Cond. no	Requirement/Condition	Status	Comment
	with this condition, then the Applicant shall use its best endeavours to enter into an agreement with the owner that conserves, enhances and provides long-term security for the native vegetation on the property. This agreement must require that the vegetation on this property is managed in accordance with the Biodiversity Management Plan in condition 40.		
Schedule 3, Condition 35	The Applicant shall ensure the establishment of vegetation in the Biodiversity Offset Area and Biodiversity Enhancement Area includes the establishment of flora species characteristic of the Cabbage Gum Open Forest community as described in the note below Table 9.	Compliant	<p>RPS Ecology review:</p> <p>This condition is addressed in Sections 3.2 and 5 of the SMC Biodiversity Monitoring Plan 2023. Establishment of this vegetation is managed under Zone A3.</p> <p>The re-establishment of flora species in Management Zone A3 – Revegetation Areas Biodiversity Enhancement Area was completed in 2017 (Q5) and 2019 (Q7) and consist of species characteristic of Cabbage Gum Open Forest community (see Plate 6).</p> <p>Monitoring in 2022 by WPC showed that revegetation in Q5 was progressing well with an estimated canopy stem density of 575 trees/ha. Q5 displayed the highest native species richness and tree cover of all revegetation areas, however, is still less than reference sites. Q7 has displayed native species diversity increases and tree cover increases since planting. All plots show a proliferation of exotic grasses, which may require management to ensure native species are not smothered.</p> <p>Viewed:</p> <p>SMC Annual Biodiversity Monitoring Report 2022  SMC Biodiversity Management Plan 2023  SMC Annual Review 2022  Revegetation Report (WPC 2022)  Stratford Mining Complex 2022 Biodiversity Offsets Strategy Flora Monitoring Report 2022 (WPC 2022)</p>
Schedule 3, Condition 36	<p>Prior to 30 June 2016, unless the Secretary agrees otherwise, the Applicant shall make suitable arrangements to protect the Biodiversity Offset Area in perpetuity to the satisfaction of the Secretary.</p> <p><i>Note: For the purposes of this consent suitable arrangements may include a biobanking agreement or the use of Public Positive Covenants in combination with Restrictions In Use of Land on the land titles of the Offset lands. Other arrangements such as dedication of land under the National Parks and Wildlife Act 1974, Trust Agreements under the Nature Conservation Trust Act 2001</i></p>	Not Triggered	<p>RPS Ecology review:</p> <p>Not triggered. Completed in 2019.</p> <p>Viewed:</p> <p>SMC Annual Biodiversity Monitoring Report 2022  SMC Biodiversity Management Plan 2023  SMC Annual Review 2022</p>



REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p><i>or a Property Vegetation Plan registered on title under the Native Vegetation Act 2003 would be considered for their suitability by the Secretary.</i></p>		
<p>Schedule 3, Condition 37</p>	<p>The Applicant shall ensure that the Biodiversity Offset Area and Biodiversity Enhancement Area provides suitable habitat for all the threatened fauna species recorded in the surface development area, namely the:</p> <ul style="list-style-type: none"> <li>• Glossy-black Cockatoo;</li> <li>• Speckled Warbler;</li> <li>• Grey-crowned Babbler (eastern subspecies);</li> <li>• Varied Sittella;</li> <li>• Brush-tailed Phascogale;</li> <li>• Squirrel Glider;</li> <li>• Long-nosed Potoroo; and</li> <li>• New Holland Mouse.</li> </ul>	<p>Compliant</p>	<p>RPS Ecology review:</p> <p>This condition is addressed in Sections 3.2 and 4.1.3 of the SMC Biodiversity Monitoring Plan 2023 and within the SMC Squirrel Glider Management Plan.</p> <p>The current nest box program has a total of 202 nest boxes of which 168 target the squirrel glider and 34 target other hollow dependent fauna species installed between 2019 and 2021. The nest boxes have shown &gt;90% occupancy and presence of the threatened Squirrel Glider and Brush-tailed Phascogale. Occupancy of other non-threatened mammal species such as possums, bush rats and microbats were recorded, as well as bird and frog species (AMBS 2023a).</p> <p>The SMC Annual Biodiversity Report 2022 states that Allocasuarina spp. plantings within Offset Area 3 and plantings within Squirrel Glider Vegetation Pathways (Management Zone A1) were complete in 2020, with monitoring and management required.</p> <p>AMBS 2023b reported that 16 threatened and/or migratory fauna species were recorded. This included the Glossy-black Cockatoo, Varied Sittella, Brush-tailed Phascogale, Squirrel Glider and New Holland Mouse. The Speckled Warbler, Grey-crowned Babbler and Long-nosed Potoroo were not detected in the spring 2022 surveys.</p> <p>Viewed:</p> <p>SMC Annual Biodiversity Monitoring Report 2022  SMC Biodiversity Management Plan 2023  SMC Annual Review 2022  Nest Box Program for the Stratford Offset and Biodiversity Enhancement Areas, Annual Report for 2022 (AMBS 2023a)  Stratford Coal Mine: Fauna Surveys of the Offset, Biodiversity Enhancement and Rehabilitation Areas, Spring 2022 (AMBS 2023b)</p>
<p>Schedule 3, Condition 38</p>	<p>The Applicant shall prepare and implement a Squirrel Glider Management Plan to the satisfaction of the Secretary. This Plan must be prepared in consultation with BCD (Biodiversity Conservation Division, within the Department) and approved by the Secretary prior to any clearing within 500 metres of a Squirrel Glider colony and shall include:</p> <p>(a) measures to establish the home range of each colony;</p>	<p>Compliant</p>	<p>RPS Ecology review:</p> <p>The Squirrel Management Plan was updated in July 2023. OEH was consulted during the preparation of the plan and DPIE approved the plan on 19 October 2018 and the plan was updated to describe current status of SMC and include relevant contemporary changes on 5 July 2023.</p> <p>a) Section 4.2 of the Squirrel Management Plan describes the measures to</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>(b) a census of suitable tree hollows in home ranges and offset areas suitable for Squirrel Gliders;</p> <p>(c) establishing the food resources utilised by each colony;</p> <p>(d) measures to enhance food resources utilised by Squirrel Gliders, particularly for Offset Area 1;</p> <p>(e) a vegetation clearing protocol to protect individual Squirrel Gliders;</p> <p>(f) relocation of trees containing suitable tree hollows;</p> <p>(g) installation of suitable nest boxes at a ratio of least 3:1 for each suitable hollow destroyed by the development and their long-term management</p> <p>(h) measures to assess the rate of tree hollow development within the Offset Areas;</p> <p>(i) implementation of Yancoal's proposed Glider crossings of haul roads with the establishment of suitable vegetation adjacent to each crossing;</p> <p>(j) implementation of Yancoal's proposals to enhance vegetation, particularly in Offset Area 3, to create recruitment and dispersal pathways for Squirrel Gliders; and</p> <p>(k) installation of Gliders crossings of The Bucketts Way and Main Northern Railway, should Yancoal acquire Property 44, unless their installation is prevented by the relevant transport authority.</p>		<p>identify the home range of each squirrel colony.</p> <p>b) Section 7.1 of the Squirrel Management Plan describes the tree hollow census within home range.</p> <p>c) Section 6.1 of the Squirrel Management Plan describes survey of suitable tree hollows in the off-set areas.</p> <p>d) Section 6.2 of the Squirrel Management Plan describes measures to enhance food resources utilised by Squirrel Gliders.</p> <p>e) Section 5 of the Squirrel Management Plan describes the vegetation clearing protocol.</p> <p>f) Section 5 of the Squirrel Management Plan describes relocation of trees containing suitable tree hollows.</p> <p>g) Section 7.2 of the Squirrel Management Plan describes the installation of suitable nest boxes.</p> <p>h) Section 7.3 of the Squirrel Management Plan describes measures to assess the rate of tree hollow development.</p> <p>i) Section 8.2 of the Squirrel Management Plan describes proposed Glider crossings of haul roads.</p> <p>j) Section 8.1 of the Squirrel Management Plan describes the vegetation enhancement strategy.</p> <p>k) Section 8.2 of the Squirrel Management Plan describes installation of Gliders crossings of The Bucketts Way and Main Northern Railway.</p> <p>Viewed: SMC Squirrel Glider Management Plan Revision SGMP-R02-A dated 5 July 2023</p>
Schedule 3, Condition 39	<p>The Applicant shall prepare and implement a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with BCD, and be submitted to the Secretary for approval prior to 31 December 2015;</p> <p>(b) describe the short, medium, and long- term measures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• manage the remnant vegetation and habitat on the site; and</li> <li>• implement the biodiversity offset strategy;</li> </ul> <p>(c) include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and triggering remedial action (if necessary);</p>	Compliant	<p>RPS Ecology review:</p> <p>a) The Biodiversity Management Plan has been prepared. OEH was consulted during the preparation of the plan and DPIE approved the plan on 19 October 2018. This plan was updated to describe current status of SMC and biodiversity strategy progress which was provided to DPE and approved on 24 February 2023.</p> <p>b) Sections 4 and 5 of the Biodiversity Management Plan describes biodiversity.</p> <p>c) Section 6 of the Biodiversity Management Plan describes the performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and action trigger levels.</p> <p>d) The Biodiversity Management Plan covers the following areas as follows:</p> <ul style="list-style-type: none"> <li>• Sections 4.8 and 5.3 – strategy for enhancing the existing habitat.</li> </ul>

Cond. no	Requirement/Condition	Status	Comment
	<p>(d) include a detailed description of the measures that would be implemented over the next 3 years for:</p> <ul style="list-style-type: none"> <li>• enhancing the quality of existing vegetation and fauna habitat;</li> <li>• establishing native vegetation and fauna habitat in the Biodiversity Offset Area, Biodiversity Enhancement Area and Rehabilitation Area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary);</li> <li>• enhancing the landscaping of the site and along public roads to minimise visual and lighting impacts, particularly along Glen Road;</li> <li>• protecting vegetation and soil outside approved disturbance area;</li> <li>• maximising the salvage of resources within the approved disturbance area – including vegetative and soil – for beneficial reuse in the biodiversity offset strategy;</li> <li>• collecting and propagating seed;</li> <li>• minimising the impacts to fauna on site, including undertaking pre- clearance surveys;</li> <li>• managing any potential conflicts between the proposed restoration works in the Biodiversity Offset Area and any Aboriginal heritage values (both cultural and archaeological);</li> <li>• managing salinity;</li> <li>• controlling weeds and feral pests;</li> <li>• controlling erosion;</li> <li>• managing grazing and agriculture;</li> <li>• controlling access; and</li> <li>• managing bushfire risk;</li> </ul> <p>(e) include a program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;</p> <p>(f) identify the potential risks to the successful implementation of the biodiversity offset strategy, and include a description of the contingency measures that</p>		<ul style="list-style-type: none"> <li>• Section 4.10 revegetation / enhancement of the off-set areas.</li> <li>• Section 4.1.1 Enhancing site landscape and public roads.</li> <li>• Section 4.1.4 Vegetation and topsoil salvage.</li> <li>• Section 4.1.5 Seed collection and propagation.</li> <li>• Sections 4.1.2 and 4.1.3 Clearance surveys.</li> <li>• Section 5.5 Managing biodiversity offset areas and indigenous heritage sites.</li> <li>• Section 4.9 Salinity management.</li> <li>• Sections 4.4, 4.5, 5.6 and</li> <li>• 5.7 weed and pest management.</li> <li>• Sections 4.6 and 5.8 Erosion and sediment control.</li> <li>• Section 4.2 and 5.1 Managing grazing and cropping.</li> <li>• Sections 4.3 and 5.1 managing site access.</li> <li>• Sections 4.7 and 5.9 Bushfire management.</li> </ul> <p>e) Sections 6 and 7 of the Biodiversity Management Plan describes the monitoring and reporting program.</p> <p>f) Section 7.2 of the Biodiversity Management Plan describes biodiversity risks.</p> <p>g) Section 8.5 of the Biodiversity Management Plan describes monitoring and reporting responsibilities.</p> <p>Viewed: SMC Biodiversity Management Plan 2023 Revision 3</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>would be implemented to mitigate against these risks; and (g) include details of who would be responsible for monitoring, reviewing, and implementing the plan.</p> <p><i>Note: The Biodiversity Management Plan and Rehabilitation Management Plan need to be substantially integrated for achieving biodiversity objectives for the rehabilitated mine-site.</i></p>		
<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:</p> <ul style="list-style-type: none"> <li>(a) calculating the full cost of implementing the Biodiversity Offset Strategy (other than land acquisition costs); and</li> <li>(b) employing a suitably qualified quantity surveyor to verify the calculated costs.</li> </ul> <p>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.</p> <p>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.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• <i>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.</i></li> <li>• <i>The sum of the bond may be reviewed in conjunction with any revision to the biodiversity offset strategy.</i></li> </ul>	<p>Compliant</p>	<p>Viewed 2020 Previous Audit report. The report states that “the required bond has been calculated in accordance with the Approval and lodged with DPIE”. The bank guarantee was done in 2019 and is in the process of review. The bond is required to be reviewed every three years, but review has not been finalised in the audit period.</p> <p><b>Recommended to review and revise if necessary, the bond every 3 years and lodge with DPE.</b></p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 3, Condition 41	<p>The Applicant shall implement the Bowens Road North Offset Strategy, as described in the modification application Bowens Road North Mod 4 and accompanying Environmental Assessment titled Bowens Road North Open Cut June 2010 Modification, in conjunction with the biodiversity offset strategy for the Duralie Extension Project and comply with the relevant requirements for the implementation of this strategy in the Duralie Extension project approval (see MP 08_0203).</p> <p><i>Note: The lands to which the Bowens Road North Offset Strategy applies are shown conceptually in Figure 2 of Appendix 8 and are located about 20 km south of the Stratford Mine and contiguous with more extensive lands of the Duralie Mine Offset Strategy.</i></p>	Compliant	<p>RPS Ecology review:</p> <p>This condition is addressed in Sections 3.2 and 4.1.3 of the SMC Biodiversity Monitoring Plan 2023 and Section 4.2 of the Duralie Biodiversity Management Plan 2022.</p> <p>The lands to which the Bowens Road North Offset Strategy applies (29 ha), are located about 20 km south of the SMC and contiguous with more extensive lands of the Duralie Mine Offset Strategy. The Bowens Road North Offset Strategy is in conjunction with the biodiversity offset strategy for the Duralie Extension Project.</p> <p>Viewed: SMC Biodiversity Management Plan 2023 Duralie Biodiversity Management Plan 2022</p>
Schedule 3, Condition 42	<p>The Applicant shall ensure that the development does not cause any direct or indirect impact on identified Aboriginal sites located outside the approved disturbance area of the development on the site.</p>	Compliant	<p>Viewed Heritage Management Plan dated October 2022. Viewed Figure 3 map of heritage sites. Sites ST3 and ST4 are fenced. Viewed photographs from last inspection Jun 2018 demonstrating fencing around ST3 and ST4.</p>
Schedule 3, Condition 43	<p>The Applicant shall prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;</p> <p>(b) be prepared in consultation with OEH and local Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);</p> <p>(c) be submitted to the Secretary for approval prior to 31 December 2015, unless the Secretary agrees otherwise;</p> <p>d) include the following:</p> <ul style="list-style-type: none"> <li>• a detailed archaeological salvage program for Aboriginal sites/objects within the approved disturbance area, including methodology and procedures/protocols for: <ul style="list-style-type: none"> <li>○ 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);</li> <li>○ salvage of scarred trees (sites ST-2; ST-4 shown on the figure in Appendix 7);</li> <li>○ monitoring of topsoil stripping during construction</li> </ul> </li> </ul>	Compliant	<p>Viewed updated Heritage Management Plan dated 23 January 2023.</p> <p>a) Section 1.2 states that the Plan was prepared by Mr Jamie Reeves of Niche Environment and Heritage Pty Ltd, who was approved by DPE. Appointed in 2015, outside of audit period (TK pers comms).</p> <p>b) Section 2.1.3 states that consultation undertaken was undertaken with Heritage NSW and Aboriginal stakeholders. DPE approval letter dated 30 January 2023 is contained in Attachment 1. Appendix A includes a consultation register incorporating Aboriginal stakeholders. No comments were received. Viewed DPE letter 20 April 2022 stating there were no further comments.</p> <p>c) see 2020 Previous Audit report</p> <p>d) A detailed archeological archaeological salvage program is included within the plan and includes:</p> <ul style="list-style-type: none"> <li>– 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) (Section 4.3).</li> <li>– salvage of scarred trees (sites ST-2; ST-4 shown on the figure in Appendix 7) (Section 4.4).</li> <li>– monitoring of topsoil stripping during construction associated with the Wenham Cox / Bowens Road realignment in the vicinity of Dog Trap Creek (Section 5.2).</li> <li>– site assessment and reporting (Section 4.3).</li> </ul>

Cond. no	Requirement/Condition	Status	Comment
	<p>associated with the Wenham Cox / Bowens Road realignment in the vicinity of Dog Trap Creek;</p> <ul style="list-style-type: none"> <li>○ site assessment and reporting;</li> <li>○ protection, storage, management and long-term protection of salvaged Aboriginal objects; and</li> <li>○ addressing relevant statutory requirements under the National Parks and Wildlife Act 1974; and</li> </ul> <ul style="list-style-type: none"> <li>● a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>○ protecting, monitoring and managing Aboriginal sites outside the approved disturbance area (including sites OS-1, OS-2, ST-1, ST-3, IF-5, PAD-1, PAD-2, CTS-1 shown on the figure in Appendix 7);</li> <li>○ maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage items on site and in the Biodiversity Offset Area;</li> <li>○ managing the discovery of any human remains or previously unidentified Aboriginal objects on site, including (in the case of human remains) stop work provisions and notification protocols;</li> <li>○ ongoing consultation with local Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage both on-site and in the Biodiversity Offset Area; and</li> <li>○ ensuring any workers on site receive suitable heritage inductions prior to carrying out any activities which may disturb Aboriginal sites, and that suitable records are kept of these inductions.</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>– protection, storage, management and long-term protection of salvaged Aboriginal objects (Section 4.8 and 4.9).</li> <li>– addressing relevant statutory requirements under the National Parks and Wildlife Act 1974 (this HMP).</li> <li>● a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>– protecting, monitoring and managing Aboriginal sites outside the approved disturbance area (including sites OS-1, OS-2, ST-1, ST-3, IF-5, PAD-1, PAD-2, CTS-1 shown on the figure in Appendix 7) (Section 4)</li> <li>– maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage items on site and in the Biodiversity Offset Area (Section 4.1.5)</li> <li>– managing the discovery of any human remains or previously unidentified Aboriginal objects on site, including (in the case of human remains) stop work provisions and notification protocols (Section 4.7)</li> <li>– ongoing consultation with local Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage both on-site and in the Biodiversity Offset Area (Section 4.1.3). No access to the site by Aboriginal stakeholders has been requested during the audit period (TK pers comms).</li> <li>– ensuring any workers on site receive suitable heritage inductions prior to carrying out any activities which may disturb Aboriginal sites, and that suitable records are kept of these inductions (Section 6).</li> </ul> </li> </ul> <p><b>Recommend to update PADs to polygons before closure to ensure extents known and disturbance avoided.</b></p> <p><b>Viewed Site Induction Script v2 and did not see heritage information. Recommend updated to include key training to ensure awareness prior to closure works commencing.</b></p>
Schedule 3, Condition 44	<p>The Applicant shall construct the proposed realignment of:</p> <p>(a) Bowens Road to Wenham Cox Road to the east of the Avon North pit; and</p> <p>b) Wheatleys Lane and Bowens Road to the west of the Roseville West pit extension, to the satisfaction of GSC.</p>	Not Triggered	Viewed 2020 Previous Audit report. Not triggered as not constructed during the audit period.
Schedule 3, Condition 45	<p>Prior to 31 December 2015, unless the Secretary agrees otherwise, the Applicant shall:</p> <p>(a) improve the warning signage, re-paint line markings and install raised reflective markers at the intersection of the Stratford Mine Access Road and The Bucketts Way; and</p>	Not Triggered	Viewed 2020 Previous Audit report which states that the required upgrades were completed in 2019.



REPORT

Cond. no	Requirement/Condition	Status	Comment
	(b) upgrade/repair road drainage on the southwestern corner of the intersection of Wenham Cox Road and Wheatleys Lane to ensure it does not pose an unacceptable safety risk to traffic, to the satisfaction of GSC.		
Schedule 3, Condition 46	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Bucketts Way in accordance with the terms in Appendix 4.	Compliant	Viewed annual invoices including funds for Condition 46 (The Bucketts Way) and Condition 47 (Wenham Cox Road) to MidCoast Council dated 27 May 2021, 8 June 2022 and 31 March 2023.
Schedule 3, Condition 47	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC annual contributions for the maintenance of Wenham Cox Road. The contribution shall be based on the proportion of all heavy vehicles using this road due to the Applicant's mining operations and exploration activities, or a figure of \$5000 per annum (2014 dollars, subject to annual indexation in accordance with the CPI), as the Applicant decides. Any dispute about this condition shall be referred to the Secretary for resolution.	Compliant	See response to Schedule 3, Condition 46.
Schedule 3, Condition 48	The Applicant shall monitor and report on: (a) the amount of coal transported from the site; and (b) the date and time of each train movement to and from the site to the satisfaction of the Secretary.	Compliant	a) Viewed Export Train Coal Transported on the Stratford website on 21 December 2023 at 2:15 pm which summarises the monthly product coal transported from site. b) Viewed Export Train Summary on the Stratford website on 21 December 2023 at 2:15 pm which details the dates and times of export train movements.
Schedule 3, Condition 49	Prior to 31 December 2015, the Applicant shall submit a detailed Transport Monitoring Program for the development, which has been prepared in consultation with GSC and GLC, to the Secretary for approval. This Program shall monitor heavy vehicle movements to and from the mine and on The Bucketts Way to the north and south of the mine and require these data to be reported directly to the Applicant, GSC and GLC.	Not Triggered	Viewed 2020 Previous Audit report which states that "a detailed transport monitoring program was prepared by GTA Consultants (16 Feb 2018) who consulted with Council. A copy of the program is located on the Stratford Coal Mine website. It is noted that the program does not include timing of the survey". Viewed Transport Monitoring Program dated 16 February 2018. The Transport Monitoring Program has not been updated in the audit period. Not triggered as monitoring was triggered in 2018 which is outside of the current audit period as per 2020 Previous Audit report.

REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 3, Condition 50	<p>The Applicant shall:</p> <p>(a) implement all reasonable and feasible measures to minimise the visual and off- site lighting impacts of the development;</p> <p>(b) ensure no fixed outdoor lights shine above the horizontal;</p> <p>(c) ensure no in-pit mobile lighting rigs shine above the pit wall and other mobile lighting rigs do not shine above the horizontal;</p> <p>(d) ensure that all external lighting associated with the development complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting or its latest version;</p> <p>(e) provide for the establishment and monitoring of trees and shrubs:</p> <ul style="list-style-type: none"> <li>• along the Glen Road; and</li> <li>• at other areas identified as necessary for the maintenance of satisfactory visual amenity; and</li> </ul> <p>(f) ensure that the visual appearance of all buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape, to the satisfaction of the Secretary.</p>	Compliant	<p>a) See responses below.</p> <p>b) Viewed example OCE report dated 7 Dec 23 stating that lights are facing away from neighbouring properties. Viewed 2020, 2021 and 2022 Annual Reviews. There were two lighting complaints dated 16 December and 22 December 2020. There were four lighting complaints (from 28 no of complainants) dated 12 January, 22 May, 28 June and 12 August 2021. No complaints have occurred since that time.</p> <p>c) Confirmed at previous audit.</p> <p>d) Confirmed at previous audit.</p> <p>e) Planting for visual purposes occurred in the period on Wenham Cox Road during the audit period (TK pers comms).</p> <p>f) Site inspection revealed that buildings sighted were painted in neutral tones to blend in with the surrounding landscape.</p>
Schedule 3, Condition 51	<p>51. The Applicant shall:</p> <p>(a) ensure that the development is suitably equipped to respond to any fires on site; and</p> <p>(b) assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as possible if there is a fire in the surrounding area.</p>	Compliant	<p>a) Water carts are used for fire on site and there is an onsite fire trailer (TK pers comms).</p> <p>b) No bushfires where assistance was required occurred during the audit period (TK pers comms). A bushfire on adjacent land to Duralie Coal Mine (approximately 14 km from Stratford Mining Complex) occurred during the site visit. The Stratford Mining Complex was not impacted (TK pers comms).</p>
Schedule 3, Condition 52	<p>The Applicant shall:</p> <p>(a) implement all reasonable and feasible measures to minimise the waste (including coal reject) generated by the development;</p> <p>(b) ensure that the waste generated by the development is appropriately stored, handled, and disposed of; and</p> <p>(c) monitor and report on the effectiveness of waste minimisation and management measures in the Annual Review.</p>	Compliant	<p>a) Viewed Waste Management and Minimisation Strategy dated Nov 2021. Waste management and minimization measures are detailed in Section 4.1. Priorities are focusing on repurposing materials or selling rather than scrapping (TK pers comms). <b>Site inspection revealed some residual coal adjacent the rail loader which requires investigation and confirmation that associated runoff remains on site</b> (see visibility as access allowed in <b>Plate 10</b>). <b>Recommended this is managed to prevent further residual coal residing on site from the railway.</b></p> <p>b) All waste is managed by JR Richards (see <b>Plate 15</b>).</p> <p>c) Viewed Annual Reviews 2020, 2021, 2022 and 2023. The non-compliance was recognised in the 2020 Annual Review. Waste reporting was outlined in</p>

Cond. no	Requirement/Condition	Status	Comment																
			Section 4.5.4 in the 2021 AR, and in Section 6.7.1 in the 2022 AR. Site inspection revealed that the workshop was tidy and well organised (see <b>Plate 11, Plate 12, Plate 16 and Plate 19</b> ). <b>Closure waste management requires additional housekeeping at the pit top (see Plate 7).</b>																
Schedule 3, Condition 53	<p>The Applicant shall rehabilitate the site to the satisfaction of the Resources Regulator. This rehabilitation must be generally consistent with the proposed Rehabilitation Strategy described in the EIS and comply with the objectives in Table 10 (below).</p> <table border="1" data-bbox="369 555 835 1158"> <caption>Table 10 Rehabilitation objectives</caption> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Mine site (as a whole)</td> <td>                     Safe, stable and non-polluting                      Constructed landforms drain to the natural environment                      Minimise visual impact of final landforms as far as is                 </td> </tr> <tr> <td>Final voids</td> <td>                     reasonable and feasible and be sympathetic to the original Gloucester valley landform                      Minimise the size and depth of final voids so far as is reasonable and feasible                      Minimise the drainage catchment of final voids so far as is reasonable and feasible                      Minimise high wall instability risk so far as is reasonable and feasible                      The size and depth of final voids must be designed having regard to their function as long-term groundwater sinks, to maximise groundwater flows across back-filled pits to the void and to not be a source of saline groundwater for aquifers and streams                      Designed and constructed to ensure adequate freeboard to ensure no spillage under any foreseeable conditions                      Minimise risk of flood interaction for all flood events up to and including the Probable Maximum Flood                 </td> </tr> <tr> <td>Surface infrastructure</td> <td>To be decommissioned and removed, unless the Deputy Secretary, Resources and Energy agrees otherwise</td> </tr> <tr> <td>Agricultural land</td> <td>Establish a minimum of 300 hectares of land with Class 4 agricultural suitability</td> </tr> <tr> <td>Other land</td> <td>                     Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprising:                     <ul style="list-style-type: none"> <li>a wildlife corridor (shown as Biodiversity Enhancement Area in the figure in Appendix 8);</li> <li>local native plant species; and</li> <li>a landform consistent with the surrounding environment</li> </ul> </td> </tr> <tr> <td>Stratford and Glen heritage railway corridors</td> <td>Road and transmission alignments to avoid heritage railway corridors</td> </tr> <tr> <td>Community</td> <td>                     Rehabilitation activities to avoid or minimise impacts                      Ensure public safety, with an emphasis on final voids                      Minimise the adverse socio-economic effects associated with mine closure                 </td> </tr> </tbody> </table>	Feature	Objective	Mine site (as a whole)	Safe, stable and non-polluting Constructed landforms drain to the natural environment Minimise visual impact of final landforms as far as is	Final voids	reasonable and feasible and be sympathetic to the original Gloucester valley landform Minimise the size and depth of final voids so far as is reasonable and feasible Minimise the drainage catchment of final voids so far as is reasonable and feasible Minimise high wall instability risk so far as is reasonable and feasible The size and depth of final voids must be designed having regard to their function as long-term groundwater sinks, to maximise groundwater flows across back-filled pits to the void and to not be a source of saline groundwater for aquifers and streams Designed and constructed to ensure adequate freeboard to ensure no spillage under any foreseeable conditions Minimise risk of flood interaction for all flood events up to and including the Probable Maximum Flood	Surface infrastructure	To be decommissioned and removed, unless the Deputy Secretary, Resources and Energy agrees otherwise	Agricultural land	Establish a minimum of 300 hectares of land with Class 4 agricultural suitability	Other land	Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprising: <ul style="list-style-type: none"> <li>a wildlife corridor (shown as Biodiversity Enhancement Area in the figure in Appendix 8);</li> <li>local native plant species; and</li> <li>a landform consistent with the surrounding environment</li> </ul>	Stratford and Glen heritage railway corridors	Road and transmission alignments to avoid heritage railway corridors	Community	Rehabilitation activities to avoid or minimise impacts Ensure public safety, with an emphasis on final voids Minimise the adverse socio-economic effects associated with mine closure	Compliant	<p>Viewed Rehabilitation Management Plan dated October 2023. Section 4.1, Table 6 describes criteria in table as per the rehabilitation criteria below.</p> <p>a)</p> <ul style="list-style-type: none"> <li>Removal of infrastructure - Retained infrastructure is safe, stable and non-polluting.</li> <li>Landform stability – Construct final mine landforms that drain in a stable manner to the natural environment – adequately drained final landforms consistent with the surrounding agricultural landscape as evidenced by survey.</li> <li>Landform stability – minimal visual impact of the final landform as far as is reasonable and feasible.</li> </ul> <p>b)</p> <ul style="list-style-type: none"> <li>Landform stability – minimize to the greatest extent practicable the size and depth of final voids (area is not greater than approximately 44ha for Avon North Open Cut, 11 ha for Roseville West Pit and 44ha for Main Pit and the depth is not deeper than approximately 176 m for Avon North Open Cut, 89 m for Roseville West Pit and 84 m for Main Pit.</li> <li>Surface water - Minimise to the greatest extent practicable the drainage catchment of final voids – area of drainage catchments is not greater than approximately 196 ha (Avon North Open Cut), 25 ha (Roseville West Pit) and 118 ha (Main Pit).</li> <li>Landform stability – Minimise high wall, low wall, end wall and in-pit spoil slope instability risk so far as is reasonable and feasible – slope angles for these are indicated in the table.</li> <li>Groundwater – designed as long-term groundwater sinks or flows through system and to maximise groundwater flows across back-filled pits and emplacements to the final void – local groundwater system flowing to final voids or flow through.</li> <li>Surface water – designed and constructed to ensure adequate freeboard to ensure no spillage under any foreseeable conditions – voids are non-spilling as confirmed by predictive final void water balance.</li> <li>Surface water – minimize to the greatest extent practicable risk of flood interaction – probability of inundation is negligible as determined by</li> </ul>
Feature	Objective																		
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REPORT

Cond. no	Requirement/Condition	Status	Comment
			<p>independent flood modelling.</p> <p>c) Section 1.10 summarises the strategies to decommission or demolish surface infrastructure.</p> <p>d)</p> <ul style="list-style-type: none"> <li>• Agricultural revegetation - Rehabilitated pasture is developing similar to that found in the relevant reference site based on measure of LFA indices, self-sustaining and trajectory towards Class 4 lands.</li> <li>• The land capability and agricultural suitability classification for the relevant nominated agricultural pursuit for each domain is established (i.e. Class 4 agricultural suitability).</li> <li>• The requirement for at least 300 hectares is demonstrated in Vegetation Community Boundaries in Figure 5.</li> </ul> <p>e)</p> <ul style="list-style-type: none"> <li>• Ecological rehabilitation - Levels of native ecosystem function have been established that demonstrate the rehabilitation is self-sustainable – EFA results indicate that the vegetation is natural and developing characteristics similar to that found in the relevant reference site.</li> <li>• Ecological rehabilitation - The vegetation composition of the Native Ecosystem rehabilitation areas contains species that are commensurate with unmined reference sites of remnant vegetation in the local area. Native ecosystem areas on trajectory towards self-sustaining ecosystem and/or measures of ecosystem function (e.g. EFA indices) equivalent to unmined reference sites of remnant vegetation.</li> </ul> <p>f) Viewed Figure 6 in the Plan. The Glen Railway Remnants are located outside of/on the border of the general layout area. Stratford Timber Railway Remnants are located north-west and to the east of the general layout, outside the project area. Section 3.3. states that these areas are located outside of the SMC disturbance area.</p> <p>g) Public safety measures are outlined in Section 6.2.2</p> <p>h) Section 1.17 describes the closure Socio-Economic Impact Assessment undertaken and minimisation of socioeconomic affects associated with closure is indicated in Table 5.</p> <p>Viewed EIS, Figure 5 and contemporary aerial of Stratford.</p> <p>Variations from EIS plans were documented and accepted through the RMP process. Old Main Pit long term void, which will now be retained, was originally characterised as backfill. Roseville west will be partially backfilled, and Stratford East will be completely backfilled. Avon North will be a void. Changes were discussed with the Resources Regulator. The same overall volume is anticipated and overall changes have been identified to have</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
			<p>better environmental outcomes (TK pers comms).                      Key changes in final landform are Stratford East Pit and Old Main Pit which is listed in the Forward Program and Rehabilitation Objectives.                      Viewed RMP dated October 2023 which shows final landform (Plan 1). The layout is generally consistent with the aerial image reviewed.</p> <p><b>2021 Monitoring Report</b>                      A review of 'Stratford Rehabilitation EFA Monitoring Report 2021' (Kleinfender) whose purpose is to perform "...<i>monitoring and assessment of the rehabilitation areas ... to demonstrate the effectiveness of the rehabilitation techniques and track the progression towards achieving the performance and completion criteria...</i>" determined:</p> <ul style="list-style-type: none"> <li>• Ten transects were selected for data collection from seven ages of rehabilitation, four waste emplacements and two vegetation types.                             <ul style="list-style-type: none"> <li>○ The 2022 Annual Review noted "The rehabilitation transects were assessed again in June 2022 as part of the eighth annual round of monitoring in accordance with Section 8 of the RMP."</li> </ul> </li> <li>• Infiltration Index and Nutrient Cycling Index scores followed a similar pattern with the SWE 1996/97 rehabilitation area, the BRN 2006-08 and 2011 rehabilitation areas recording higher values, but not yet at analogue values, while the BRN 2014 rehabilitation, RWE 2005 rehabilitation and the most recent rehabilitation, the ANWE recorded much lower index scores.</li> <li>• Pasture rehabilitation LFA index scores were equivalent to the analogue areas, indicating that these areas have achieved successful rehabilitation.</li> <li>• Vegetation structure results were compared to a single analogue transect/area this year. The major change noted in the analogue transect was a large increase in germination of shrub level plants increasing the stem density from 918 stems/ha in 2020 to 5, 827 stems/ha in 2021. Total stem density was 6, 636 stems/ha with 60 overstory stems/ha and 749 midstory stems/ha.</li> <li>• The data showed that the SWE 1996/97 Stratford Woodland (T16) and the northern section of the BRN 2006-08 rehabilitation areas (T25) have native flora structure that most closely resembles the analogue vegetation. Both of these areas recorded self-recruitment of species from all strata indicating a self-sustaining ecosystem.</li> <li>• The most recently rehabilitated area located on the ANWE2020 rehabilitation (T36) has excellent diversity in all strata including the groundcover where native grasses were included in the seed mix.</li> <li>• Some if not all of the woody weeds such as Lantana, Inkweed, Wild Tobacco plus Moth Vine were observed in most of the rehabilitation areas with the SWE 1996/97 and BRN 2006-08 rehabilitation areas the most</li> </ul>

REPORT

Cond. no	Requirement/Condition	Status	Comment
			<p>affected.</p> <ul style="list-style-type: none"> <li>• Overall, the rehabilitation of the SMC is progressing with the pasture rehabilitation areas supporting commercial grazing. The native flora rehabilitation areas have a combination of excellent and poorer rehabilitation, with remedial actions underway to compensate and improve these areas.</li> <li>• The remaining areas of rehabilitation at the SMC require remedial actions to achieve revegetation to woodland. Specifically, the RWE northern and southern emplacements and the BRN 2011 and 2014 rehabilitation areas do not have the required density, diversity or structure.               <ul style="list-style-type: none"> <li>○ The 2023 Annual Review noted that during 2022, SCPL prepared a scope and schedule for the revegetation works to be implemented in the Biodiversity Areas. Wedgetail was engaged to assist with both the site planning and implementation of the revegetation works including: Mapping of the priority revegetation areas completed in 2020; and Calculation of seed and tube-stock requirements based on the indicative lists of flora species in the BMP appendices.</li> </ul> </li> </ul> <p>Furthermore, a scope and schedule for the revegetation works to be implemented 2023 has been prepared during the second half of 2022.</p> <p>The Stratford Mine Complex 2023 Rehabilitation Planting Program Monitoring report states that revegetation of Avondale Creek Corridor North, Offset Area 1 and Offset Area 1 was completed. The scope and schedule for revegetation works was completed in 2024 (TK pers comms).</p> <ul style="list-style-type: none"> <li>• Stratford Coal has recognised that these areas require remediation and will have a planting program targeting these areas starting in early 2022. This will reduce the exotic groundcover. Likewise, a weed control program will be instigated over the same period. Recommendation from previous years' monitoring for the instigation of environmental or cool season burns.               <ul style="list-style-type: none"> <li>○ The 2023 Annual Review states that "During 2023 no hazard reduction burning has been undertaken. Following the revegetation works, the aim is to exclude fire from the offset areas for at least 5 years to allow for tubestock and seedlings to establish."</li> </ul> </li> <li>• Installation of nest boxes for habitat enhancement has also been suggested for the SWE 1996/97 and BRN 2006-08 rehabilitation areas.               <ul style="list-style-type: none"> <li>○ The 2023 Annual Review states "The current nest box program has a total of 202 boxes and involves: Five (5) nest boxes targeting Squirrel Glider (<i>Petaurus norfolcensis</i>), installed December 2018. Twenty-Five (25) nest boxes targeting Squirrel Glider (<i>Petaurus norfolcensis</i>), installed May 2019. Fifty-four (54) nest boxes targeting Squirrel Glider (<i>Petaurus norfolcensis</i>) and Sixteen (16) nest boxes</li> </ul> </li> </ul>



REPORT

Cond. no	Requirement/Condition	Status	Comment
			<p>targeting a variety of hollow-dependent fauna, installed April 2020. Eighty-four (84) nest boxes targeting Squirrel Glider (<i>Petaurus norfolcensis</i>) and eighteen (18) nest boxes targeting a variety of hollow-dependent fauna, installed February and March 2021.</p> <p><b>2022 Monitoring Report</b></p> <p>A review of draft 'Stratford Mining Complex 2022 Rehabilitation EFA Monitoring Report' (Wedgetail Consulting 2023) concluded:</p> <ul style="list-style-type: none"> <li>• Pasture Rehabilitation areas LFA results were equivalent to or an improvement when compared to the analogue and the previous year's survey even allowing for different transects being surveyed as per normal practice.</li> <li>• The vegetation structure showed that three rehabilitation areas were continuing to develop and grow with distinct overstorey, midstorey and shrub strata. These were T17 on the SWE rehabilitation area, T24 on the BRN 2006-08 rehabilitation area and T36 on the ANWE rehabilitation area.</li> <li>• The BRN 2011 rehabilitation area (T27) recorded a decrease in stem density continuing the pattern observed over the previous monitoring events. This has been attributed to a lack of survival of overstorey species, with the remaining Acacias gradually senescing but unable to germinate due to the very dense exotic grassy groundcover.</li> <li>• The RWE transects, T19 and T20 both recorded reductions in stem density from 2020 when these transects were last surveyed. Shallow topsoil, aspect and dense exotic groundcover in combination or separately were responsible for poor survival and inability to self-recruit.</li> <li>• These areas of low density and survival, additional planting programs are recommended to achieve revegetation targets. SMC staff are aware of this issue, with delayed 2022 planting program completed in 2023 (TK pers comms) included sections of the BRN 2011 and 2014 rehabilitation areas and the RWE 2005 north and south emplacements. RVW works are conveyed in Plate 21 of Appendix D.</li> <li>• Control works for lantana and Wild Tobacco are recommended.             <ul style="list-style-type: none"> <li>○ The 2023 Annual Review states that "weed control activities in 2023 targeted blackberry, lantana, privet, wild tobacco, Giant Parramatta Grass and control of the Cadagi Tree".</li> <li>○ The 2023 Rehabilitation Report submitted to the Resources Regulator states that "weed control has been undertaken across all rehabilitation areas targeting lantana and wild tobacco".</li> </ul> </li> <li>• A modest planting program to increase diversity by installing shrub species is recommended.</li> </ul>

REPORT

Cond. no	Requirement/Condition	Status	Comment
			<ul style="list-style-type: none"> <li>○ The 2023 Annual Review states that “the ground preparation work was undertaken prior to tubestock planting and involved slashing by tractor to reduce the biomass and then deep ripping to break the soil surface and provide a soil bed for easier tubestock installation. This was conducted prior to planting at the beginning of April 2023. Plants were installed beginning April 26th and continued through to May 12th. A total of 14, 950 plants installed across the planting areas. These consisted of 6, 940 canopy stems made up of 12 species and 8, 010 midstorey and shrub species made up of 17 species across two vegetation communities”. RVW works are depicted in <b>Plate 21 of Appendix D</b>.</li> <li>○ The 2023 Rehabilitation Report submitted to the Resources Regulator states that “additional tubestock planting in targeted areas of Domain A (Native Ecosystem) rehabilitation was undertaken to improve biodiversity and stem density”.</li> <li>● The pasture rehabilitation areas can support commercial grazing. Pasture maintenance by slashing to reduce woody weeds, mainly natives such as <i>A. ulicifolia</i>, is the only recommendation for these areas. This has been completed and is depicted in Plate 22 and Plate 23 of Appendix D.             <ul style="list-style-type: none"> <li>○ The 2023 Annual Review states that “during the reporting period maintenance activities focussed on the improvement of pasture rehabilitation across the Stratford Waste Emplacement and included slashing and the removal of woody acacia regrowth. Slashing was also undertaken on the rehabilitated Codam pasture area”.</li> <li>○ The 2023 Rehabilitation Report submitted to the Resources Regulator states that “during the ARP, maintenance activities in areas dedicated to Domain B (Agricultural – Grazing) focussed on the improvement of pasture across the Stratford Waste Emplacement and included slashing and the removal of woody acacia regrowth. Slashing was also undertaken on the rehabilitated Codam pasture area”.</li> </ul> </li> </ul>
Schedule 3, Condition 54	<p>The Applicant shall progressively rehabilitate the site, including the Western Co-disposal Area, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies must be employed where areas prone to dust generation are not subject to active mining operations but cannot yet be permanently rehabilitated.</p> <p><i>Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to further</i></p>	Compliant	<p>Site inspection revealed temporary dust management on site (see <b>Plate 1</b>). Viewed Rehabilitation Management Plan dated October 2023. Section 6.1 outlines the life of mine rehabilitation schedule.</p> <p>Priorities for the Western Co-disposal area include removing coal product for reprocessing. Rehabilitation has not yet commenced (TK pers comms) which is consistent with the RMP (Section 6.2.3 c).</p> <p>Reprocessing is expected to commence in Q1 2024. The southern end of the co-disposal area was seeded in previous audit period. Northern section is still utilised for processing (TK pers comms).</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<i>disturbance in future.</i>		
Schedule 3, Condition 55	<p>The Applicant shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Resources Regulator. This plan must:</p> <p>(a) be prepared in consultation with the Department, DPIE Water, BCD, and GSC;</p> <p>(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;</p> <p>(c) be prepared in accordance with any relevant DRG guideline;</p> <p>(d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;</p> <p>(e) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary);</p> <p>(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;</p> <p>(g) include interim rehabilitation where necessary to minimise the area exposed for dust generation;</p> <p>(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</p> <p>(i) build to the maximum extent practicable on the other management plans required under this consent.</p> <p><i>Note: The Biodiversity Management Plan and Rehabilitation Management Plan require substantial integration to achieve biodiversity objectives for the rehabilitated mine site.</i></p>	Compliant	<p>Viewed updated Rehabilitation Management Plan (RMP) dated October 2023. This RMP condition is required under the Mining Regulation 2016 Schedule 8A.</p> <p>a) Viewed DPE consultation letter 19 August 2022, Midcoast Council dated 23 Sept 2022. Viewed Tables 7 and 8 of RMP summarising consultation.</p> <p>b) No mining in new areas occurred during the audit period. Last new mining area was Stratford East put in Q1 2020. Associated MOP/RMP was submitted November 2018 (TK pers comms).</p> <p>c) Section 4.2 states that “this RMP has been prepared in a form as specified by the Secretary using the Form and Way – Rehabilitation Management Plan for Large Mine (the Form and Way Guidelines) (NSW Resources Regulator, 2021).</p> <p>d) Section 1.11 outlines the integration of closure with the Biodiversity Offset Strategy.</p> <p>e) Section 4 details rehabilitation completion criteria.</p> <p>f) Compliance with conditions is detailed throughout the RMP. A multi-focal approach to rehabilitation is detailed in Section 4.</p> <p>g) Section 6.1 outlines the life of mine rehabilitation schedule.</p> <p>h) Section 8 details the rehabilitation monitoring program.</p> <p>i) Plans such as the Biodiversity Management Plan and Heritage Management Plan have been integrated throughout the RMP.</p> <p>The RMP will be updated for the closure phase in the next audit period (TK pers comms).</p> <p>Recommend to continue detailed closure planning in consultation with relevant regulators.</p>
Schedule 4, Condition 1	<p>Within 1 month of the date of this consent, unless the Secretary agrees otherwise, the Applicant shall:</p> <p>(a) notify in writing the owners of:</p> <ul style="list-style-type: none"> <li>the land listed in Table 1 of Schedule 3 that they have the right to require the Applicant to acquire their land at</li> </ul>	Compliant	Compliance was achieved in 2020 Previous Audit report.

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>any stage during the development;</p> <ul style="list-style-type: none"> <li>any residence listed in condition 2 of Schedule 3, including those on the land listed in Table 1 of Schedule 3, that they have the right to request the Applicant for additional noise mitigation measures to be installed at their residence at any stage during the development; and</li> <li>any privately-owned land within 2 kilometres of the approved open cut mining pit/s that they are entitled to ask for an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated;</li> </ul> <p>(b) notify the tenants of any mine-owned land of their rights under this consent; and</p> <p>(c) send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the owners and/or existing tenants of any land (including mine-owned land) where the predictions in the EIS identify that dust emissions generated by the development are likely to be greater than the relevant air quality criteria in Schedule 3 at any time during the life of the development.</p>		
Schedule 4, Condition 2	<p>Prior to entering into any tenancy agreement for any land owned by the Applicant that is predicted to experience exceedances of the recommended dust and/or noise criteria, or for any of the land listed in Table 1 that is subsequently purchased by the Applicant, the Applicant shall:</p> <p>(a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time); and</p> <p>(b) advise the prospective tenants of the rights they would have under this consent, to the satisfaction of the Secretary.</p>	Not Triggered	Not triggered as no tenancy agreements occurred during the audit period (TK pers comms).
Schedule 4, Condition 3	<p>As soon as practicable after obtaining monitoring results showing:</p> <p>(a) an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, and provide regular monitoring results to each affected landowner until the development is again complying with the relevant criteria; and</p> <p>(b) an exceedance of the relevant air quality criteria in Schedule 3, the Applicant shall send a copy of the NSW</p>	Not Triggered	Viewed 2020, 2021 and 2020 Annual Reviews. Not triggered as no exceedances occurred within the audit period.

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and/or existing tenants of the land (including the tenants of any mine-owned.</p>		
<p>Schedule 4, Condition 4</p>	<p>If an owner of privately-owned land considers the development to be exceeding the criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.</p> <p>If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision, the Applicant shall:</p> <p>(a) commission a suitably qualified, experienced and independent expert, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"> <li>• consult with the landowner to determine his/her concerns;</li> <li>• conduct monitoring to determine whether the development is complying with the relevant impact</li> <li>• assessment criteria in Schedule 3; and</li> <li>• if the development is not complying with these criteria then:               <ul style="list-style-type: none"> <li>○ determine if more than one mine or development is responsible for the exceedance, and if so</li> <li>○ the relative share of each mine or development regarding the impact on the land; and</li> <li>○ identify the measures that could be implemented to ensure compliance with the relevant criteria; and</li> </ul> </li> </ul> <p>(b) give the Secretary and landowner a copy of the independent review.</p> <p>Should noise monitoring undertaken under this condition, and/or regular noise compliance monitoring at a residence, indicate that the development is responsible for sustained exceedances of the noise criteria in Table 4 of Schedule 3 (defined as 3 or more exceedances within a 2 year period) then the Applicant must offer the landowner additional noise mitigation measures in accordance with, condition 2 of Schedule 3.</p>	<p>Not Triggered</p>	<p>Muller Acoustics review: Not triggered as no independent reviews were required during the audit period.</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 4, Condition 5	<p>Within 3 months of receiving a written request from a landowner with acquisition rights, the Proponent shall make a binding written offer to the landowner based on:</p> <p>(a) the current market value of the landowner's interest in the land at the date of this written request, as if the land was unaffected by the project, having regard to the:</p> <ul style="list-style-type: none"> <li>• existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and</li> <li>• presence of improvements on the land and/or any approved building or structure which has been physically commenced on the land at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the implementation of any additional noise mitigation measures under Condition 4 of Schedule 3;</li> </ul> <p>(b) the reasonable costs associated with:</p> <ul style="list-style-type: none"> <li>• relocating within the Great Lakes or Gloucester local government areas, or to any other local government area determined by the Secretary; and</li> <li>• obtaining legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and</li> </ul> <p>(c) reasonable compensation for any disturbance caused by the land acquisition process.</p> <p>However, if at the end of this period, the Proponent and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution.</p> <p>Upon receiving such a request, the Secretary will request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to:</p> <ul style="list-style-type: none"> <li>• consider submissions from both parties;</li> <li>• determine a fair and reasonable acquisition price for the land and/or the terms upon which the land</li> </ul>	Not Triggered	Not triggered as no acquisitions were made during the audit period (TK pers comms).



REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>is to be acquired, having regard to the matters referred to in paragraphs (a)-(c) above;</p> <ul style="list-style-type: none"> <li>• prepare a detailed report setting out the</li> <li>• reasons for any determination; and</li> <li>• provide a copy of the report to both parties.</li> </ul> <p>Within 14 days of receiving the independent valuer's report, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.</p> <p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, they may refer the matter to the Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Secretary will determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in paragraphs (a)-(c) above, the independent valuer's report, the detailed report disputing the independent valuer's determination, and any other relevant submissions.</p> <p>Within 14 days of this determination, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the Secretary's determination.</p> <p>If the landowner refuses to accept the Proponent's binding written offer under this condition within 6 months of the offer being made, then the Proponent's obligations to acquire the land shall cease, unless the Secretary determines otherwise.</p>		
Schedule 4, Condition 6	The Proponent shall pay all reasonable costs associated with the land acquisition process described in Condition 5 above, including the costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of this plan at the Office of the Registrar-General.	Not Triggered	Not triggered as acquisition has not occurred during the audit period (TK pers comms).
Schedule 5, Condition 1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval within 3	Compliant	Viewed EMS Strategy updated January 2022. a) Confirmed at prior audit. b) Section 3 describes the Environmental Management Strategy Framework.

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>months of the date of this approval, unless otherwise agreed by the Secretary;</p> <p>(b) provide the strategic framework for the environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance;</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> <li>• a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.</li> </ul>		<p>c) Section 2 describes the Statutory Requirements.</p> <p>d) Section 4 describes the environmental management structure including roles and responsibilities of key personnel.</p> <p>e)</p> <ul style="list-style-type: none"> <li>• Section 5 summarises the requirement to keep the local community and relevant agencies informed.</li> <li>• Section 6 outlines the complaints management procedure and the resolution process.</li> <li>• Section 7 outlines the protocol for management and reporting of non-compliances.</li> <li>• Section 9 summarises the emergency response systems.</li> </ul> <p>f)</p> <ul style="list-style-type: none"> <li>• Copies of management plans are available on the Stratford Coal website.</li> <li>• Figure 3 demonstrates sites for environmental monitoring.</li> </ul>
Schedule 5, Condition 2	<p>The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the</p>	Compliant	Viewed 2020, 2021 and 2020 Annual Reviews. No exceedances occurred within the audit period.

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>Department describing those options and any preferred remediation measures or other course of action; and                      (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>		
<p>Schedule 5, Condition 3</p>	<p>The Applicant shall ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>• any relevant limits or performance measures/criteria;</li> <li>• the specific performance indicators that are proposed to be used to judge the performance of, or</li> <li>• guide the implementation of, the development or any management measures;</li> </ul> <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>• impacts and environmental performance of the development;</li> <li>• effectiveness of any management measures (see c above);</li> </ul> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>• incidents;</li> <li>• complaints;</li> <li>• non-compliances with statutory requirements;</li> </ul> <p>and</p>	<p>Compliant</p>	<p>Viewed Water Management Plan dated October 2021.</p> <p>a) detailed baseline data is contained in Appendices 1 – 3</p> <p>b) a description of</p> <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions) is located in Section 2; and</li> <li>• any relevant limits or performance measures/criteria is located in Section 3 and Appendices 1 to 3;</li> <li>• the specific performance indicators that are proposed to be used to judge the performance of, or</li> <li>• guide the implementation of, the development or any management measures; are located in Section 3 and Appendices 1 to 3.</li> </ul> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria is contained in Section 4 and Appendices 1 to 3.</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>• impacts and environmental performance of the development;</li> <li>• effectiveness of any management measures (see c above) is located in Sections 5 – 8 and Appendices 1-3;</li> </ul> <p>e) a contingency plan to manage any unpredicted impacts and their consequences is located in Section 7 and Appendices 1 – 3.</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the development over time is located in Section 8</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>• incidents (Section 9);</li> <li>• complaints (Section 9);</li> <li>• non-compliances with statutory requirements (Section 9); and</li> <li>• exceedances of the impact assessment criteria and/or performance criteria (Sections 5,7 and 8 and Appendices 1-3; and</li> </ul> <p>h) a protocol for periodic review of the plan is located in Section 8.2.</p> <p>Viewed Biodiversity Management Plan dated February 2023.</p> <p>a) detailed baseline data is located in Section 3.</p>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<ul style="list-style-type: none"> <li>• exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul> <p>(h) a protocol for periodic review of the plan</p>		<p>b) a description of</p> <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions) is located in Section 2;</li> <li>• any relevant limits or performance measures/criteria are located in Section 6;</li> <li>• the specific performance indicators that are proposed to be used to judge the performance of, or</li> <li>• guide the implementation of, the development or any management measures; are located in Section 6.</li> </ul> <p>c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria is contained in Sections 4-6</p> <p>d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>• impacts and environmental performance of the development;</li> <li>• effectiveness of any management measures (see c above) is located in Sections 7 and 8;</li> </ul> <p>e) a contingency plan to manage any unpredicted impacts and their consequences is located in Section 7.2</p> <p>f) a program to investigate and implement ways to improve the environmental performance of the development over time is located in Section 8</p> <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>• incidents;</li> <li>• complaints;</li> <li>• non-compliances with statutory requirements; and</li> <li>• exceedances of the impact assessment criteria and/or performance criteria are located in Section 8 and SMC Environmental Management Strategy and PIRMP</li> </ul> <p>h) a protocol for periodic review of the plan is located in Section 8.4.</p>
Schedule 5, Condition 4	<p>By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous</p>	Compliant	<p>Viewed Annual Reviews 2020, 2021 and 2022.</p> <p>2020 – signed 27 April 2021. Viewed DPE letter dated 30 March 2021 approving an extension of time to submit the 2020 Annual Review until 30 April 2021.</p> <p>2021 – signed 31 March 2022</p> <p>2022 – signed 31 March 2023</p> <p>a)</p> <ul style="list-style-type: none"> <li>• Section 4 of Annual Reviews includes an operations summary within the</li> </ul>

REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>calendar year, which includes a comparison of these results against the:</p> <ul style="list-style-type: none"> <li>• the relevant statutory requirements, limits or performance measures/criteria;</li> <li>• the monitoring results of previous years; and</li> <li>• the relevant predictions in the EIS;</li> </ul> <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the development</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the development.</p>		<p>period</p> <ul style="list-style-type: none"> <li>• Section 12 of Annual Reviews specify activities proposed for the next annual review period.</li> <li>• Section 5 specifies actions required from the previous annual review.</li> </ul> <p>b)</p> <ul style="list-style-type: none"> <li>• Monitoring records are located in the Appendices in Annual Reviews.</li> <li>• Complaints records are located in Appendix 7.</li> <li>• Section 3 of the Annual Reviews outline relevant regulatory requirements.</li> <li>• Section 6 assesses the environmental performance within the period.</li> </ul> <p>c) Table 1.2 includes a summary of non-compliances.</p> <p>d) Trends in monitoring data is mentioned throughout the Annual Review.</p> <p>e) Was previously a non-compliance for 2020 Annual Review. 2021 and 2022 Annual Reviews incorporate comparison with EA predictions.</p> <p>f) Section 12 of Annual Reviews summarise proposed activities in the next audit period.</p>
Schedule 5, Condition 5	<p>Within 3 months of:</p> <p>(a) the submission of an annual review under Condition 4 above;</p> <p>(b) the submission of an incident report under Condition 7 below;</p> <p>(c) the submission of an audit report under Condition 9 below; or</p> <p>(d) any modification to the conditions of this consent, (unless the conditions require otherwise), the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.</p> <p><i>Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.</i></p>	Compliant	<p>a) Viewed Annual Reviews. Three Annual Reviews were submitted within the audit period.</p> <p>b) Three water incidents occurred within the audit period (see response to Schedule 3, Condition 27).</p> <p>c) The previous IEA has been submitted within the audit period. Previous 2020 IEA Report is dated 16 February 2021.</p> <p>d) No modifications have occurred to the consent during the audit period (TK pers comms).</p> <p>Viewed Environmental Management Plans Revision Register for 2020 - 2023.</p>

## REPORT

Cond. no	Requirement/Condition	Status	Comment
Schedule 5, Condition 6	<p>The Applicant shall operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version).</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent; and</i></li> <li><i>The CCC should be comprised of an independent chair and appropriate representation from the Applicant, GSC, recognised environmental groups and the local community to the satisfaction of the Secretary.</i></li> </ul>	Compliant	The CCC is currently operating, and meetings generally occur quarterly. Viewed Stratford Coal website on 10 January 2024 at 12:00 pm. Most recent meeting was held on 23 November 2023.
Schedule 5, Condition 7	<p>The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.</p>	Compliant	<p>Three incidents were recorded during the audit period (see response to Schedule 3, Condition 27).</p> <p>Viewed incident report dated 26 March 2021 for sediment dams and disturbed area dams reporting to Avondale creek which occurred on 20 March 2021.</p> <p>Viewed incident report dated 26 March 2021 for the breach of the Roseville Link Haul Road culvert crossing over Avondale creek which occurred on 20 March 2021.</p> <p>Viewed incident report dated 15 March 2022 for water from sediment dam 16 reporting to a nearby pasture paddock which occurred on 8 March 2022. Viewed email to EPA stating that incident occurred at 6:20 pm. Reporting of this incident occurred at 3:20 pm, and is therefore within the seven day time period (TK pers comms).</p>
Schedule 5, Condition 8	<p>The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.</p>	Compliant	Environmental performance is addressed in Annual Reviews. Noise monitoring results are published monthly on the Stratford Coal website, viewed 10 January 2024 at 12 pm.
Schedule 5, Condition 9	<p>Prior to 31 December 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p>	Compliant	<p>Viewed 2020 Previous Audit report.</p> <p>a) The 2020 IEA was undertaken by Barnett &amp; May. Appendix C contains a DPE approval letter dated 23 October 2020 for the approval of the audit team.</p>



REPORT

Cond. no	Requirement/Condition	Status	Comment
	<p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL/s and/or Mining Lease/s (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.</p> <p><i>Note: This audit team must be led by a suitably qualified auditor, and include experts in noise, blasting, air quality, ecology, and any other fields specified by the Secretary.</i></p>		<p>b) Section 4.3.2 outlines consultation with relevant agencies.</p> <p>c) Environmental performance of Stratford Mining Complex was assessed against SSD 4966, EPL 5161 and ML 1787 and is located in Appendix A.</p> <p>d) A Management Plan Compliance Summary is located in Section 7.</p> <p>e) Non-compliances and recommendations are located in Section 6.2</p>
Schedule 5, Condition 10	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	Compliant	<p>Viewed DPE letter regarding the previous IEA report and Response to Audit Recommendations dated 24 June 2021. The RAR required amendments to include action completion dates.</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"> <li>• the EIS;</li> <li>• all current statutory approvals for the development;</li> <li>• approved strategies, plans or programs required under the conditions of this consent;</li> <li>• 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;</li> <li>• a complaints register, which is to be updated on a monthly basis;</li> </ul>	<b>Not Compliant</b>	<p>Viewed Stratford Coal website on 10 January 2024 at 12:45 pm. The following are located on the website:</p> <ul style="list-style-type: none"> <li>• Stratford Extension Project EIS.</li> <li>• Relevant statutory approvals (<b>recommend that the final version of the EPL is uploaded as the draft copy is currently on the website</b>).</li> <li>• Approved plans or programs are uploaded under 'Environmental Management Plans, Strategies and Programs'.</li> <li>• Monitoring results are uploaded under 'Monitoring Results'.</li> <li>• A complaints register for 12 months to December 2023 is uploaded on the website.</li> <li>• CCC minutes are uploaded under 'Stratford Coal Community Consultative Committee'.</li> <li>• <b>The last four annual reviews are currently uploaded on the website (2019 – 2022).</b></li> <li>• Independent Environmental Audits and Responses to Recommendations</li> </ul>

**REPORT**

Cond. no	Requirement/Condition	Status	Comment
	<ul style="list-style-type: none"> <li>• minutes of CCC meetings;</li> <li>• the last five annual reviews;</li> <li>• any independent environmental audit, and the Applicant's response to the recommendations in any audit;</li> <li>• any other matter required by the Secretary; and</li> </ul> <p>(b) keep this information up to date, to the satisfaction of the Secretary.</p>		<p>uploaded under 'Environmental Audits'.</p>

REPORT

Table 8 EPL Licence Table 5161

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings									
<b>1 Administrative Conditions</b>													
<b>A1 What the licence authorises and regulates</b>													
EPL01	A1.1	<p>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.</p> <p>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.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Coal works</td> <td>Coal works</td> <td>0 - 2000000 T annual handling capacity</td> </tr> <tr> <td>Mining for coal</td> <td>Mining for coal</td> <td>&gt; 500000 - 2000000 T annual production capacity</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Coal works	Coal works	0 - 2000000 T annual handling capacity	Mining for coal	Mining for coal	> 500000 - 2000000 T annual production capacity	<p>See response to Schedule 2, Condition 7 of SSD 4966.</p> <p><b>Recommend the Licence holder consider whether a licence variation to reduce the scale of the activities is appropriate.</b></p>	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Coal works	Coal works	0 - 2000000 T annual handling capacity											
Mining for coal	Mining for coal	> 500000 - 2000000 T annual production capacity											
EPL02	A1.2	<p>The development consent for the premises notes that the licensee must not extract more than 2.6 million tonnes of Run of Mine (ROM) coal at the premises and must not process on site more than 5.6 million tonnes of ROM coal in any calendar year. For the purposes of this licence, the licensee must not:</p> <ol style="list-style-type: none"> <li>Handle more than 2,000,000 tonnes of coal within any 12 month period.</li> <li>Produce more than 2,000,000 tonnes of coal within any 12 month period.</li> </ol> <p><i>Note: The limits above are consistent with an application for variation of the licence. These volumes will be revised upon request as long as they remain consistent with consent SSD - 4966.</i></p>	<p>See response to Schedule 2, Condition 6 of SSD-4966.</p>	Compliant									
<b>A2 Premises or plant to which this licence applies</b>													
EPL03	A2.1	<p>The licence applies to the following premises:</p>	<p>Viewed Stratford Mining Complex EPL 5161 Environmental Monitoring Locations figure dated 16 April 2021.</p>	Compliant									

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		<p><b>Premises Details</b></p> <p>STRATFORD COAL MINE</p> <p>BUCKETTS WAY</p> <p>STRATFORD</p> <p>NSW 2422</p> <p>PREMISES BOUNDARY AS SHOWN ON PLAN TITLED "STRATFORD MINING COMPLEX EPL 5161 ENVIRONMENTAL MONITORING LOCATIONS" DATED 16 APRIL 2021. EPA REFERENCE DOC22/8468.</p>		
<b>A3 Other activities</b>				
EPL04	A3.1	<p>This licence applies to all other activities carried on at the premises, including:</p> <p><b>Ancillary Activity</b></p> <p>Chemical Storage</p>	Refers to all chemical storages including diesel and explosives (TK pers comms).	Note
<b>A4 Information supplied to the EPA</b>				
EPL05	A4.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Original Application not available to view. Application for original EPL (1997) assumed consistent with original development application.	Compliant
<b>2 Discharges to Air and Water and Applications to Land</b>				
<b>P1 Location of monitoring/discharge points and areas</b>				
EPL06	P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.	Confirmed sites are correct and currently monitored (TK pers comms). Viewed EPL5161 (Stratford Mining Complex) Monitoring Data.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings																								
		<p style="text-align: center;"><i>Air</i></p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>13</td> <td>PM10 Monitoring</td> <td></td> <td>HVAS shown as PM10 Point 13 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468</td> </tr> <tr> <td>14</td> <td>PM10 Monitoring</td> <td></td> <td>HVAS shown as PM10 Point 14 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468</td> </tr> <tr> <td>27</td> <td>PM10 Monitoring</td> <td></td> <td>TEOM shown as PM10 Point 27 (TEOM1) on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468</td> </tr> <tr> <td>28</td> <td>PM10 Monitoring</td> <td></td> <td>HVAS shown as PM10 Point 28 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468</td> </tr> <tr> <td>29</td> <td>PM10 Monitoring</td> <td></td> <td>HVAS shown as PM10 Point 29 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468</td> </tr> </tbody> </table>	EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	13	PM10 Monitoring		HVAS shown as PM10 Point 13 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468	14	PM10 Monitoring		HVAS shown as PM10 Point 14 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468	27	PM10 Monitoring		TEOM shown as PM10 Point 27 (TEOM1) on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468	28	PM10 Monitoring		HVAS shown as PM10 Point 28 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468	29	PM10 Monitoring		HVAS shown as PM10 Point 29 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA reference DOC22/8468		
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EPL07	P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	No table with utilisation areas in this EPL. <b>Recommended consider if this condition can be removed at next variation.</b>	Compliant																								
EPL08	P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Viewed Figure 4 in Surface Water Management Plan dated October 2021 depicting Surface Water Monitoring Points. Surface water monitoring points are aligned with table description. Viewed Figure 5 in Groundwater Management Plan dated October 2021. All bores in table were depicted in the figure. Viewed Figure 4 in Surface Water Management Plan dated October 2021 depicting discharge quality monitoring points.	Compliant																								

REPORT

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REPORT

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		19 Groundwater Monitoring Bore	Bore GW8 shown as Groundwater Bore Point 19 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		20 Groundwater Monitoring Bore	Bore RB3 shown as Groundwater Bore Point 20 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		21 Groundwater Monitoring Bore	Bore GW2 shown as Groundwater Bore Point 21 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		22 Groundwater Monitoring Bore	Bore GW3 shown as Groundwater Bore Point 22 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		23 Groundwater Monitoring Bore	Bore GW4 shown as Groundwater Bore Point 23 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		24 Groundwater Monitoring Bore	Bore GW5 shown as Groundwater Bore Point 24 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		25 Groundwater Monitoring Bore	Bore GW7 shown as Groundwater Bore Point 25 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		26 Groundwater Monitoring Bore	Bore MW4 shown as Groundwater Bore Point 26 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		33 Discharge Quality Monitoring Discharge Quality Monitoring	DAD 4 - Disturbed Area Dam shown as Discharge Quality Point 33 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	
		35 Discharge Quality Monitoring Discharge Quality Monitoring	SD12 - Sediment Dam shown as Discharge Quality Point 35 on figure "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations", dated 16 April 2021. EPA reference DOC22/8468	

REPORT

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EPL09	P1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	Met station viewed at the site inspection (see <b>Plate 9</b> ). Inversion towers are at differing heights.	Compliant																																

REPORT

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		<p style="text-align: center;"><i>Noise/Weather</i></p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>30</td> <td>Meteorological Station</td> <td>SMC Weather Station shown as Meteorological Station Point 30 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468</td> </tr> <tr> <td>31</td> <td>Meteorological Station</td> <td>Inversion Tower - Lower shown as Meteorological Station Point 31 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468</td> </tr> <tr> <td>32</td> <td>Meteorological Station</td> <td>Inversion Tower - upper shown as Meteorological Station Point 32 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468</td> </tr> </tbody> </table>	EPA identification no.	Type of monitoring point	Location description	30	Meteorological Station	SMC Weather Station shown as Meteorological Station Point 30 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468	31	Meteorological Station	Inversion Tower - Lower shown as Meteorological Station Point 31 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468	32	Meteorological Station	Inversion Tower - upper shown as Meteorological Station Point 32 on plan "Stratford Mining Complex EPL 5161 Environmental Monitoring Locations" dated 16 April 2021. EPA Reference DOC22/8468		
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<b>3 Limit Conditions</b>																
<b>L1 Pollution of waters</b>																
EPL10	L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	See response to Schedule 3, Condition 27 of SSD-4966.	<b>Not Compliant</b>												
EPL11	L1.2	Exceedance of the quality limit specified in this licence for the discharge of total suspended solids from a licence monitoring point is permitted if the discharge occurs solely as a result of rainfall at the premises exceeding a total of 40 (licensee to provide) millimetres over any consecutive 5 day period.	Applies for uncontrolled discharge incidents. See response to Schedule 3, Condition 27 of SSD-4966.	Compliant												
EPL12	L1.3	There must be no discharges to surface waters from minewater storage dams including the Stratford Main Pit and Stratford East Dam.	Not occurred within the audit period (TK pers comms).	Compliant.												
EPL13	L1.4	Adequate freeboard must be maintained at all times to all minewater storage dams, including the Stratford Main Pit and Stratford East Dam, to minimise the risk of discharge to surface waters.	Not audited (new condition as at 15 September 2023). Viewed Water Level Surveys spreadsheet from 24 November 2021 to 6 December 2023. Survey results demonstrated water levels for Stratford East Dam and Old Main Pit did not exceed safe operating levels.	Not Triggered												
EPL14	L1.5	Following the cessation of mining activities there must be no discharge of minewater from the premises. Note: The 2012 EIS for the Stratford Extension Project noted the polluting potential of waters that will be stored in the former Roseville Pit, the former Avon North Pit and the former Stratford East Pit following the end of mine life, but noted the final void waterbodies are not predicted to spill under any of the simulated climatic sequences and such voids would be designed not to overflow to the downstream watercourses.	Not audited (new condition as at 15 September 2023).	Not Triggered												

REPORT

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<b>L2 Concentration limits</b>																												
EPL15	L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Not audited (new condition as at 15 September 2023). Not triggered as discharges were a result of overflow events due to 40 metres of rain. See response to L1.2.	Not Triggered																								
EPL16	L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Not audited (new condition as at 15 September 2023). Not triggered as discharges were a result of overflow events due to 40 mm of rain. See response to L1.2.	Not Triggered																								
EPL17	L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	Not audited (new condition as at 15 September 2023). Not triggered as discharges were a result of overflow events due to 40 metres of rain. See response to L1.2.	Not Triggered																								
EPL18	L2.4	<p>Water and/or Land Concentration Limits</p> <p>POINT 33,35,36,37,38,39,42,43</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Oil and Grease</td> <td>Visible</td> <td></td> <td></td> <td></td> <td>non-visible</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 - 8.5</td> </tr> <tr> <td>Total suspended solids</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and Grease	Visible				non-visible	pH	pH				6.5 - 8.5	Total suspended solids	milligrams per litre				50	Not audited (new condition as at 15 September 2023). Only applies to three discharge events, however do not apply due to condition L1.2 being greater than 40mls of rain.	Not Triggered
Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																							
Oil and Grease	Visible				non-visible																							
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EPL19	L2.5	If the licensee uses turbidity (NTU) in place of TSS to determine compliance with Condition L2.4, the licensee must develop a statistical correlation which identifies the relationship between NTU and TSS for water quality in the sediment basin/s in order to determine the NTU equivalent of the TSS limit for the associated discharge point before its use.	Not audited (new condition as at 15 September 2023).	Not Triggered																								
EPL20	L2.6	The licensee must provide the EPA with a copy of the statistical correlation assessment methodology and results before using NTU in place of TSS.	Not audited (new condition as at 15 September 2023).	Not Triggered																								
EPL21	L2.7	The licensee must develop and implement a method to enable the ongoing verification of the relationship between NTU and TSS.	Not audited (new condition as at 15 September 2023).	Not Triggered																								
EPL22	L2.8	The licensee must provide the EPA with any amendments the licensee makes to the statistical correlation as a result of the ongoing verification required by Condition L2.7 before using the revised statistical correlation.	Not audited (new condition as at 15 September 2023).	Not Triggered																								
<b>L3 Waste</b>																												
EPL23	L3.1	The licensee may dispose of up to 400 end-of life mining heavy plant tyres on the premises in each annual return year. Only waste tyres generated at the premises may be disposed of in accordance with this condition	Not audited (new condition as at 15 September 2023).	Not Triggered																								
<b>L4 Noise limits</b>																												

REPORT

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EPL24	L4.1	<p>Noise from the premises must not exceed:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day LAeq (15 minute)</th> <th>Evening LAeq (15 minute)</th> <th>Night LAeq (15 minute)</th> <th>Night LA1 (1 minute)</th> </tr> </thead> <tbody> <tr> <td>CR7 - Pryce-Jones</td> <td>43</td> <td>43</td> <td>43</td> <td>49</td> </tr> <tr> <td>Receiver 60 - Healy / Greenwood</td> <td>39</td> <td>39</td> <td>39</td> <td>45</td> </tr> <tr> <td>Receiver 44 - Cross / Jane</td> <td>39</td> <td>39</td> <td>39</td> <td>47</td> </tr> <tr> <td>Receiver 23 - Bagnall</td> <td>37</td> <td>37</td> <td>37</td> <td>45</td> </tr> <tr> <td>Stratford Village</td> <td>37</td> <td>36</td> <td>35</td> <td>45</td> </tr> <tr> <td>All other privately owned residences</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Note: To identify the exact locations referred to in the table above see the applicable figure(s) in Appendix 5 of Development Consent SSD-4966. A copy of this figure has been saved as EPA file DOC18/13944-01.</p> <p>Note: The noise limits specified in the table above are those listed in Condition 4 Schedule 3 of Development Consent (SSD-4966) granted by the Planning Assessment Commission as delegate for the Minister for Planning 29 May 2015.</p> <p><i>Note: Land subject to acquisition upon request listed in the condition 1 of Schedule 3 of Development Consent (SSD-4966) dated 29 May 2015 includes;</i></p> <p><i>40/51/CR1 - L. Blanch,</i>  <i>42 - D. Blanch,</i>  <i>Cr7 - Pryce-Jones, and</i>  <i>Cr 2 - Boorer</i></p> <p><i>Note: Land subject to additional noise mitigation upon request listed in Condition 2 of Schedule 3 of Development Consent (SSD-4966) dated 29 May 2015 includes;</i></p> <ul style="list-style-type: none"> <li><i>• 40/51/CR1 - L. Blanch;</i></li> <li><i>• 42 - D. Blanch;</i></li> <li><i>• Cr7 - Pryce-Jones;</i></li> <li><i>• Cr2 - Boorer;</i></li> <li><i>• 31(1) - Isaac;</i></li> <li><i>• 44 - Cross / Jane;</i></li> <li><i>• 37 - Worth;</i></li> <li><i>• 15(3) Falla;</i></li> <li><i>• 60 - Healy / Greenwood;</i></li> </ul>	Location	Day LAeq (15 minute)	Evening LAeq (15 minute)	Night LAeq (15 minute)	Night LA1 (1 minute)	CR7 - Pryce-Jones	43	43	43	49	Receiver 60 - Healy / Greenwood	39	39	39	45	Receiver 44 - Cross / Jane	39	39	39	47	Receiver 23 - Bagnall	37	37	37	45	Stratford Village	37	36	35	45	All other privately owned residences	35	35	35	45	See response to Schedule 3, Condition 4 of SSD-4966.	Compliant
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REPORT

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		<ul style="list-style-type: none"> <li>• 36 - Wallace; and</li> <li>• 29 - Ward</li> </ul>		
EPL25	L4.2	<p>Noise from the premises is to be measured or computed at the most noise-affected point at the property boundary of the receptors listed in L2.1, or a distance within 30 metres of the residence where the boundary is more than 30 metres from the residence of the most affected receiver to determine compliance with this condition.</p> <p>For the purpose of noise measures required for this condition, the LAeq noise level must be measured or computed for the required period (ie, 15 minutes or full day, evening or night) using "FAST" response on the sound level meter.</p> <p>For the purpose of the noise limits for this condition, 5 dB (A) must be added to the measured level if the noise is substantially tonal, impulsive, intermittent or low frequency in nature. Where two or more of these characteristics are present the maximum addition to the measured noise level is limited to 10dB(A).</p>	<p>Viewed Stratford website on 11 January 2024 at 11:00 am. Noise monitoring reports are available under 'Monitoring Results'.</p> <p>Noise monitoring is undertaken by SLR. Viewed Monthly Compliance Noise Monitoring – November 2023 report. Section 3.3 states that noise monitoring is undertaken in accordance with the Noise Management Plan.</p> <p>Viewed Noise Management Plan dated October 2022. Section 7 details the monitoring program.</p> <p>All monitoring locations (minus one receiver who has denied access to the property) are within 30 m of the receptors listed in L2.1. For this receiver, in accordance with the NSW Industrial Policy (2000) noise modelling has been implemented to assess compliance. The noise model is calibrated using the operator attended noise monitoring results (where available) and weather conditions at the time of monitoring for the other two properties (TK written advice).</p>	Compliant
EPL26	L4.3	<p>The noise limits set out in the Noise Limits table apply under all meteorological conditions except for the following:</p> <ol style="list-style-type: none"> <li>Wind speeds greater than 3 metres/second at 10 metres above ground level; or</li> <li>Temperature inversion conditions up to 3°C/100m and wind speeds greater than 2 metres/second at 10 metres above ground level; or</li> <li>Greater than 3°C/100m temperature inversion conditions.</li> </ol>	<p>Viewed Noise Management Plan dated October 2022. Section 4.1.6 outlines these applicable meteorological conditions.</p>	Compliant
EPL27	L4.4	<p>For the purposes of the previous condition:</p> <ol style="list-style-type: none"> <li>The meteorological data to be used for determining meteorological conditions is the data recorded by the meteorological weather stations established for this premises for the purposes of this EPL.</li> <li>Temperature inversion conditions on this premises are measured using the meteorological stations depicted as "Inversion Tower - Lower" and "Inversion Tower - Upper" on plan titled "Stratford Mining Complex EPL 5161 - Environmental Monitoring Locations" dated 8 June 2018. EPA reference DOC18/13944-06.</li> <li>Degrees C/100m temperature inversion conditions are to be determined by direct measurement of temperature lapse rate as referred to in Part E2 of Appendix E to the Industrial Noise Policy.</li> </ol>	<p>Viewed Noise Management Plan dated October 2022.</p> <ol style="list-style-type: none"> <li>Section 4.1.6 of the Plan states that "except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological station"</li> <li>Section 5.4 states that "The temperature inversion system consists of two 10 metre (m) high meteorological towers located at an elevation differential of approximately 50 m with temperature probes, and an anemometer for measuring wind speed and direction.</li> <li>Section 5.4 states that temperature inversion system calculates the real-time continuous lapse rate no more</li> </ol>	Compliant



REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
			favourably to the data that will be obtained by the use of a 60 m tower. Viewed Monthly Compliance Noise Monitoring Report dated November 2023 by SLR. a) Meteorological data is taken from the SMC automatic weather station b) Viewed screenshot of Inversion data on Sentinex dated 8 December 2023. Graph demonstrates lower and upper tower data and a calculated inversion by direct measurement. c) See above.	
EPL28	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.	Viewed Noise Management Plan dated October 2022. Viewed Appendix 1 Record of Consultation with EPA dated 23 December 2021. <b>Recommend at next update to NMP include this detail.</b> <b>Recommend any future noise monitoring reports confirm this detail.</b> All acoustic instrumentation employed throughout the monitoring programme has been designed to comply with the requirements of AS IEC 61672.1 – 2019 Electroacoustics—Sound level meters, AS IEC 60942 2017 Electroacoustics – Sound calibrators and carried current NATA or manufacturer calibration certificates. Instrument calibration was checked before and after each measurement survey, with the variation in calibrated levels not exceeding ±0.5 dBA. All operator-attended noise measurements were conducted using a one-third octave integrating Brüel & Kjær Type 2250L (s/n 3003389) together with a Svantek SV30A acoustical calibrator (s/n 39462) (TK pers comms).	Compliant
EPL29	L4.6	To determine compliance: a) with the Leq(15 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located: i) approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or ii) within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable iii) within approximately 50 metres of the boundary of a National Park or a	See response to L4.2.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		Nature Reserve. b) with the LA1(1 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) the noise measurement equipment must be located in a position that is: i) at the most affected point at a location where there is no dwelling at the location; or ii) at the most affected point within an area at a location prescribed by part (a) or part (b) of this condition.		
EPL30	L4.7	An exceedance of a noise limit prescribed in this licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the Noise Limits Table is detected: a) in an area at a location other than an area prescribed by the condition above and/or; b) at a point other than the most affected point at a location. Note: For the purposes of this licence the rail loop is considered part of the premises.	Viewed 2020, 2021 and 2022 Annual Reviews. No exceedances have occurred during the audit period.	Compliant
EPL31	L4.8	For the purposes of determining the noise generated at the premises the modification factors in Noise Policy for Industry (2017) Fact Sheet C must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Viewed Stratford website on 11 January 2024 at 12:00 pm. Noise monitoring reports are available under 'Monitoring Results'. Noise monitoring is undertaken by SLR. Viewed Monthly Compliance Noise Monitoring – November 2023 report. Section 2.2 notes the requirement under the Noise Policy Industry (NPfI) to employ modifications in the NPfI Fact Sheet C. It is noted that "As such appropriate modifying factors such as low frequency noise have been assessed against NPfI requirements."	Compliant
<b>L5 Blasting</b>				
EPL32	L5.1	The overpressure level from blasting operations carried out in or on the premises must not exceed 115 dB(L) for more than 5% of the total number of blasts carried out on the premises within the 12 months annual reporting period	See response to Schedule 3, Condition 9 of SSD-4966.	Compliant
EPL33	L5.2	The airblast overpressure level from blasting operations in or on the premises must not exceed 120 dB(L) at any time at any residence or noise sensitive location (such as a school or hospital) that is not owned by the licensee or subject of a private agreement between the owner of the residence or noise sensitive location and the licensee as to an alternative overpressure level.	See response to Schedule 3, Condition 9 of SSD-4966.	Compliant
EPL34	L5.3	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed 5mm/second for more than 5% of the	See response to Schedule 3, Condition 9 of SSD-4966.	Compliant

REPORT

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		total number of blasts carried out on the premises within the 12 months annual reporting period.		
EPL35	L5.4	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed 10mm/second at any time at any residence or noise sensitive location (such as a school or hospital) that is not owned by the licensee or subject of a private agreement between the owner of the residence or noise sensitive location and the licensee as to an alternative ground vibration level.	See response to Schedule 3, Condition 9 of SSD-4966.	Compliant
EPL36	L5.5	The Licensee must not carry out more than: a) 1 blast on each day unless an additional blast is required due to a misfire; and b) 3 blasts a week, averaged over a calendar year.	See response to Schedule 3, Condition 11 of SSD-4966.	Compliant
EPL37	L5.6	Blasting operations at the premises may only take place between 9am and 5pm Monday to Saturday inclusive. No blasting is to be undertaken on Sundays or Public Holidays.  Where compelling reasons exist the EPA may approve in writing a blast to occur outside the abovementioned hours.	See response to Schedule 3, Condition 10 of SSD-4966.	Compliant
EPL38	L5.7	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances: 1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or 2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.	See response to Schedule 3, Condition 22 of SSD 4966. No offensive blast fume was emitted during the audit period (TK pers comms). Viewed 2020, 2021 and 2022 Annual Reviews. No complaints were received in the audit period on offensive odour.	Compliant
<b>L6 Hours of operation</b>				
EPL39	L6.1	The Licensee shall comply with the operating hours identified below:	See response to Schedule 3, Condition 3 of SSD-4966.	Compliant

## REPORT

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<b>L7 Potentially offensive odour</b>																		
EPL40	L7.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Not audited in previous audit (new condition as at 15 September 2023). See response to L5.7.	Not Triggered														
<b>4 Operating Conditions</b>																		
<b>O1 Activities must be carried out in a competent manner</b>																		
EPL41	O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	See response to Schedule 3, Condition 52 of SSD 4966.	Compliant														
<b>O2 Maintenance of plant and equipment</b>																		
EPL42	O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	See response to Schedule 2, Condition 14 of SSD 4966.	Compliant														
<b>O3 Dust</b>																		
EPL43	O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	See response to Schedule 3, Condition 22 in SSD 4966. Although minimal operations occurring, the site inspection revealed no significant dust issues and water carts were observed (see Plates in Appendix D).	Compliant														
EPL44	O3.2	All trafficable areas, coal storage areas and vehicle manoeuvring areas in or on the premises must be maintained, at all times, in a condition that will minimise the generation, or emission from the premises, of wind-blown or	Site inspection revealed little visible dust with water carts in operations (See <b>Plate 1</b> ).	Compliant														

## REPORT

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		traffic generated dust.	Two complaints on air quality during the audit period.	
EPL45	O3.3	The licensee must ensure that it has sufficient water for all stages of the operations, and if necessary, adjust the scale of the operations on site to match its available water supply.	See response to Schedule 3, Condition 25 in SSD 4966.	Compliant
<b>O4 Emergency response</b>				
EPL46	O4.1	<p>The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.</p> <p>The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.</p> <p>The PIRMP must be tested at least annually or following a pollution incident.</p>	<p>PIRMP was updated in 2023 and tested (TK pers comms). Viewed PIMP testing file note 15 June 2023. Mock event – spill of mine related water from SD14 into clean water catchment. PIRMP protocol was followed.</p> <p>The latest incident in PIRMP register has been added (TK pers comms).</p>	Compliant
<b>O5 Process and management</b>				
EPL47	O5.1	<p><b>Stormwater Management</b></p> <p>The licensee must maximise the diversion of clean water around disturbed areas of the site.</p>	<p>Viewed Stratford East diversion (see <b>Plate 17</b> and <b>Plate 18</b>) which has been maintained in the audit period. Avon North has undergone vegetation management and slight desilting during the audit period (TK pers comms).</p> <p>Viewed Surface Water Management Plan dated October 2021. Section 7.6 addresses the clean water diversion systems.</p>	Compliant
EPL48	O5.2	The licensee must design, install and maintain the clean water system to capture and convey the 1 in 100 year ARI flood.	<p>Viewed Surface Water Management Plan dated October 2021 which states that “the water management system is constructed and maintained generally in accordance with the design described in Section 7.6 and the SWB”.</p> <p>View response to Schedule 3, Condition 27 in SSD 4966, in particular the 2021 “Breach of the Roseville Link Haul Road culvert crossing over Avondale Creek”.</p>	Compliant
EPL49	O5.3	The drainage from all areas at the premises which will liberate suspended solids when stormwater runs over these areas must be diverted into	Viewed Surface Water Management Plan dated October 2021. Section 6 includes the water management system	Compliant

REPORT

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		adequately sized sedimentation basins.	and states that a key component of the water management strategy at Stratford is “procedures, structures and devices for the control of erosion and sediment movement including suitably designed sediments dams”. See response to Schedule 3, Condition 27 of SSD-4966 discussing overflow events due to significant rainfall.	
EPL50	O5.4	The sedimentation basins must be maintained to ensure that their design capacity is available for the storage of all runoff from cleared areas; all runoff from coal stockpiles and other contaminated areas.	Desilting has occurred within sediment dams 13, 14, and 19 within the audit period (TK pers comms). Viewed Stratford Weekly Plan Final dated 22 June 2023 stating the desilting sediment dam 14 is scheduled to occur. Viewed Stratford Weekly Plan Final dated 29 June 2023 demonstrating the desilting of sed dam 14.	Compliant
EPL51	O5.5	Sedimentation basins shall be treated, if required, to reduce the Total Suspended Solids level to the licenced concentration limit before being discharged to the environment. Treatment can be with gypsum or any other material that has been approved by the EPA.	Not audited (new condition as at 15 September 2023).	Not Triggered
EPL52	O5.6	The licensee must ensure the design storage capacity of the sedimentation basins installed on the premises is reinstated within 5 days of the cessation of a rainfall event that causes runoff to occur on or from the premises.	Not audited (new condition as at 15 September 2023)	Not Triggered
EPL53	O5.7	Each sedimentation basin must have a marker (the “sedimentation basin marker”) that identifies the upper level of the sediment storage zone.	Not audited (new condition as at 15 September 2023). Viewed photographs of DAD19, DAD20, Sed Dam 13 and Sed Dam 20 incorporating markers. Viewed DAD19 detail survey sheet by Ditchfield Contracting dated 4 November 2021. Viewed DAD20 survey sheet dated 4 November 2021. Viewed Sed Dam 4 detail survey sheet by Ditchfield Contracting dated 4 November 2021. Viewed Sed Dam 13 detail survey sheet by Ditchfield Contracting dated 4 November 2021. Viewed Sed Dam 14 detail survey sheet by Ditchfield Contracting dated 4 November 2021 Viewed Sed Dam 17 detail survey sheet by Ditchfield Contracting dated 4 November 2021.	Not Triggered
EPL54	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.	Not audited (new condition as at 15 September 2023). <b>Recommend to update Water Management Plan with the requirements of these new conditions.</b>	Not Triggered



## REPORT

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EPL55	O5.9	The licensee must ensure that sampling point(s) for water discharged from the sediment basin(s) are provided and maintained in an appropriate condition to permit: a) the clear identification of each sediment basin and discharge point; b) the collection of representative samples of the water discharged from the sediment basin(s); and c) access to the sampling point(s) at all times by an authorised officer of the EPA.	Not audited (new condition as at 15 September 2023).	Not Triggered
EPL56	O5.10	<b>Waste management</b> The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored at the premises is assessed and classified in accordance with the NSW EPA Waste Classification Guidelines as in force from time to time.	Waste is managed by JR Richards (see <b>Plate 15</b> ). <b>See response to Schedule 3, Condition 52 of SSD-4966.</b>	Compliant
EPL57	O5.11	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Site inspection revealed that recycled waste was segregated from general waste (see <b>Plate 15</b> See response to Schedule 3, Condition 52 of SSD 4966.	Compliant
EPL58	O5.12	The licensee is authorised to dispose of heavy plant tyre waste generated on the premises, in the waste rock/overburden emplacements. The licensee must: a) ensure that heavy plant waste tyres are re-used on the premises as much as practical; b) ensure that any surplus heavy plant waste tyres can be emplaced by being spread out within the waste rock/overburden emplacements and buried as deep as practical, covered by at least 20 metres of inert material beneath any final rehabilitation surface; c) place heavy plant waste tyres at least 15 metres away from coarse reject material or tailings emplacement areas; d) not emplace any heavy plant waste tyres directly on the pit floor, or in a location that is likely to impede or contaminate saturated aquifers; e) not emplace any heavy plant waste tyres in a position that compromises the stability of the final rehabilitation landform; f) not place any heavy plant waste tyres within 15 metres of heated or potentially acid forming materials; g) not place any heavy plant waste tyres in an area likely to leach to any watercourse; and h) record the co-ordinates (easting, northing and elevation) of each disposal location.	Not audited (new condition as at 15 September 2023).	Not Triggered

REPORT

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<b>O6 Other operating conditions</b>				
EPL59	O6.1	<b>Mine Wastewaters Irrigation</b> The irrigation system must be installed, maintained and operated to ensure that any runoff as a result of rainfall reports to the mine-water dam known as Stratford East Dam.	Viewed Surface Water Management Plan dated October 2021. Section 7.10 discusses irrigation areas. Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as no irrigation occurred within the audit period.	Not Triggered
EPL60	O6.2	Application of wastewaters must only be applied at a rate that can be assimilated by the irrigation area and its evapotranspiration capacity.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as irrigation has not occurred during the audit period.	Not Triggered
EPL61	O6.3	There must be no ponding or runoff from the irrigation area as a result of the application of mine wastewaters.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as irrigation has not occurred during the audit period.	Not Triggered
EPL62	O6.4	Each irrigation pump must be fitted with a flow meter capable of indicating both total and event mine wastewater volumes applied to the irrigation area.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as irrigation has not occurred during the audit period.	Not Triggered
EPL63	O6.5	The licensee must record the amount of wastewater applied by each irrigation event. The application rate, the start and stop dates and times, and weather conditions, including rainfall, temperature and humidity, must be recorded.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as irrigation has not occurred during the audit period.	Not Triggered
EPL64	O6.6	<b>Bundling</b> All above-ground tanks containing material that is likely to cause environmental harm must be banded or have an alternative spill containment system in place.	Site inspection revealed bunding of tanks viewed (see <b>Plate 13</b> ). See response to O6.7.	Compliant
EPL65	O6.7	Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.	There currently are two tanks on site waste oil tank at maintenance, and fuel depot at maintenance. Viewed diesel tank at site inspection (see <b>Plate 14</b> ). Viewed Workshop Waste Oil Bund Survey email from Stratford Senior Mining Engineer dated 3 January 2024. The email states: <ul style="list-style-type: none"> <li>By survey, there is an average 46mm cross fall from south to north on the floor of the bund.</li> <li>This adds an additional effective depth of the bund of 23mm across the area of the bund.</li> <li>Calculated volume of bund is (8100mm x 9500mm x (160mm + 23mm) = 14,081 Litres.</li> <li>Total tank storage is 12000L.</li> <li>The bund satisfies the 110% total stored volume bund capture requirement".</li> </ul>	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
			Viewed Fuelfix and Tanks2Go 95,000L Self-Bunded Tank fact sheet containing basic properties of self-bunded tanks.	
EPL66	O6.8	<p><b>Noise</b></p> <p>The licensee must:</p> <p>(a) implement best management practice to minimise the construction, operational, road and rail noise of the development;</p> <p>(b) in accordance with documentation produced for the Stratford Extension Project (SSD-4966), dozers operating in specific areas must be restricted to certain gears at night;</p> <p>© operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this licence; and</p> <p>(d) minimise the noise impacts of the development during meteorological conditions under which the noise limits in the licence do not apply.</p> <p><i>NOTE: In addition to the real-time monitoring installed at Stratford and Craven villages the licensee must install real-time noise monitors to measure noise impacts in the vicinity of Receiver 23-Bagnall and Receiver 60-Healy/Greenwood during periods when noise impacts from waste rock dumping is predicted to approach noise limits.</i></p>	See response to Schedule 3, Condition 5 of SSD-4966.	Compliant
EPL67	O6.9	<p>The licensee must record and make available on its website:</p> <p>(a) when the real-time monitoring and management system detects any potential exceedance of the noise limits;</p> <p>(b) when exemptions from noise limits due to meteorological conditions apply; and</p> <p>(c) the specific reasonable and feasible measures that were taken when either (a) or (b) apply.</p>	<p>Viewed Noise Management Plan dated October 2022 on the Stratford Coal Website.</p> <p>a) Section 7.2.4 details compliance assessment protocol associated with the detection of an exceedance.</p> <p>b) Section 7.5 discusses exemptions in relation to meteorological conditions.</p> <p>c) Section 8.1 discusses potential contingency measures in the event that a) or b) apply.</p>	Compliant
EPL68	O6.10	All necessary noise amelioration measures detailed in the Stratford Extension Project SSD-4966 documentation, for example construction of noise bunds in specific locations, must be implemented prior to activities being undertaken in these areas.	Site inspection incorporated a visit to the Roseville Haul Road bund (see <b>Plate 3</b> ).	Compliant
EPL69	O6.11	To reduce noise from mobile fleet and conveyors, prior to the Stratford Extension Project commencing the fleet and conveyors must be upgraded as detailed in Table 27 of Stratford Extension Project Environmental Impact Statement – Appendix C – Noise and Blasting Assessment (SLR Consulting 2012).	Viewed 2020 Previous Audit report. This activity occurred in the previous audit.	Not Triggered

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		<i>Note: The abovementioned measures were identified by the proponent as feasible and reasonable measures to reduce noise levels to meet criteria.</i>		
EPL70	O6.12	<p>The licensee must:</p> <ul style="list-style-type: none"> <li>a. conduct an annual testing program of the mobile equipment on site to ensure that noise attenuation measures remain effective;</li> <li>b. restore the effectiveness of any noise attenuation if it is found to be defective; and</li> <li>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).</li> </ul> <p><i>Note: The abovementioned measures were identified by the proponent as feasible and reasonable measures to reduce noise levels to meet criteria.</i></p>	<p>Viewed 2021, 2022 and 2023 Annual Returns.</p> <p>2021:  <b>“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”.</b>                      “The annual sound power testing program is scheduled to be undertaken during October 2021”.</p> <p>a) Viewed:                      2021 Plant and Equipment Sound Power Level Testing Report dated 14 February 2022.                      2022 Plant and Equipment Sound Power Level Testing Report dated 19 October 2022.                      2023 Plant and Equipment Sound Power Level Testing Report dated 18 October 2023.</p> <p>b) Viewed email dated 14 December 2022 demonstrating test results. Viewed 2023 corrective actions from monitoring results.</p> <p>c) Reports discuss results of testing.</p>	<b>Not Compliant</b>
EPL71	O6.13	<p><b>Potential Acid Forming (PAF) Waste Rock</b></p> <p>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 waters.</p>	Viewed Surface Water Management Plan dated October 2021. Section 7.2 of the Plan discussed the management of PAF materials. <b>Recommend to continue to monitor and manage during closure process as key potential issue.</b>	Compliant
EPL72	O6.14	PAF material must not be disposed above groundwater level without EPA specifically approving in writing the location and design of the out-of-pit PAF waste cells.	Viewed Surface Water Management Plan dated October 2021. Section 7.2 states that “detailed designs of the containment cell and the cell capping layer have been prepared by ATC Williams Pty Ltd ... and were provided to the EPA in October 2020”. See response to Schedule 3, Condition 31 of SSD 4966.	Compliant
<b>5 Monitoring and Recording Conditions</b>				
<b>M1 Monitoring records</b>				
EPL73	M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Viewed EPL 5161 (Stratford Mining Complex) Monitoring Data on Stratford Coal website on 31 January 2024 at 3:30 pm.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings																
EPL74	M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Viewed Stratford Coal website on 19 January 2024 at 3:15 pm. Viewed EPL5161 Stratford Mining Complex Monitoring data. a) Spreadsheet data is legible. b) Data is available from 2017 onwards. c) Monitoring data is accessible and available on the Stratford Coal website.	Compliant																
EPL75	M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Viewed August 2022 monitoring summary. Viewed sample surface sheets for water dated 29/8/22 and 30/6/23. a) dates of samples were present in sheets b) times of collected samples were recorded c) EPL points recorded d) name of sample collector was recorded	Compliant																
<b>M2 Requirement to monitor concentration of pollutants discharged</b>																				
EPL76	M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Noted.																	
EPL77	M2.2	Air Monitoring Requirements <b>POINT 13,14,28,29</b> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td>micrograms per cubic metre</td> <td>Every 6 days</td> <td>AM-18</td> </tr> </tbody> </table> <b>POINT 27</b> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td>micrograms per cubic metre</td> <td>Continuous</td> <td>AM-22</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Every 6 days	AM-18	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	AM-22	Viewed 2021, 2022 and 2023 Annual Returns. 2022: “Less than required PM10 monitoring undertaken as per EPL 5161 - M2.2 Air Monitoring Requirements at HVAS unit - Point 13. <b>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</b> ”. “Nearby Stratford TEOM, EPL point 27 ... was operational on the day of the non-compliance”. “Contracting company conducted HVAS operation refresher training with contractor field staff and data management staff”.	<b>Not Compliant</b>
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Pollutant	Units of measure	Frequency	Sampling Method																	
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EPL78	M2.3	Water and/ or Land Monitoring Requirements	Viewed EPL monitoring data on Stratford website on 24 January at 2 pm. <b>Point 1,2,3,4,5,6,40,41.</b> Point 5 incurred two non-compliances for less than required monitoring (view below).	<b>Not Compliant</b>																

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Noted that Point 3 was not sampled in September or October 2022.</p> <p><b>Point 1,2,3,4,6,40,41.</b></p> <p>Conductivity was measured at minimum monthly or during an event if there was flow present. Noted that Point 3 was not sampled in September or October 2022.</p> <p><b>Point 2,5</b></p> <p>Viewed Annual Returns for 2021, 2022 and 2023. Continuous monitoring reported was reported in annual returns.</p> <p><b>Point 15,17,18,19,20,21,22,23,24,25,26.</b></p> <p>Parameters in the table were measured every six months, aside from Point 20, 21,22,23,24,25 and 26. Values are absent in November 2022, May 2023 and November 2023 for Points 21- 25.</p> <p><b>Point 33,35,36,37,38,39,42,43.</b></p> <p>Point 35 was measured in March 2021, Point 36 and 37 were measured in March 2021 and Point 38 was measured in March 2022 in the event of spills. <b>Oil and grease values could not be found in the EPL data spreadsheet. Recommend updating to include in one location and/or provide alternate location.</b></p> <p>Special Frequency 1 for 33 or 42 are not triggered as not occurred during the audit period (TK pers comms). Viewed 2021, 2022 and 2023 Annual Returns.</p> <p>2021:</p> <p><b>“Less than required Conductivity monitoring undertaken at Point 5.</b> Continuous monitoring required and <b>only four out of twelve months were analysed</b> during the reporting period”.</p> <p>“The continuous Conductivity probe at Point 5 has been replaced and is now operational as per environmental monitoring requirements for surface water sampling. Monthly servicing and maintenance of Point 5 is scheduled to be undertaken.”</p> <p>2022:</p> <p><b>“Less than required Conductivity monitoring</b></p>	
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REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
			<p><b>undertaken as per M2.3 Water Monitoring Requirements at Point 5”.</b></p> <p>Continuous monitoring required with data captured and analysed for 6 months (183 days) of the 12-month reporting period.</p> <p>“EC probe and internal data logger damaged during March 2022 flood event. <b>No adverse effects would have occurred as result of the non-compliance</b> which was confirmed by monthly conductivity grab samples obtained throughout the reporting period”.</p> <p><b>“The continuous Conductivity probe at Point 5 has been replaced and is now operational as per environmental monitoring requirements for surface water sampling”.</b></p>	
EPL79	M2.4	<p>In the event that rainfall on the premises exceeds 25 millimetres in any 24 hour period, the Licensee must as soon as is practicable after the rainfall event is recorded:</p> <p>a) monitor the surface water quality at monitoring points 1, 2, 3, 4, 5, 6, 40 and 41 for each of the parameters referred to in condition M2.3.</p> <p>For the purposes of this condition, a maximum of one rainfall event sample, at each of the above sites, is required in any 21 day period.</p>	<p>Viewed example alert from WeatherMation greater than 25 mm viewed alert dated 26/10/2023. Recorded 25.4 mm in the previous 24 hours.</p> <p>Viewed monitoring sheet dated 27/10/2023 taken for the purposes of monitoring after a rainfall event. Monitoring undertaken by Cbased.</p> <p>Viewed Stratford Coal website on 15 January 2024 at 11:30 am. EPL data spreadsheet contained under 'Environmental Protection Licence Data'.</p>	Compliant
<b>M3 Testing methods – concentration limits</b>				
EPL80	M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p><i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2022 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i></p>	<p>Viewed example Cbased Monthly dust deposition, HVAS, surface and groundwater monitoring reports dated April 2022, February 2023 and November 2023.</p> <p>Section 1.2 states that dust deposition sampling and analysis is in accordance with AS3580.9.6 “Methods for Sampling and Analysis of Ambient Air. Determination of Suspended Particulates—PM10 High Volume Air sampler with size selective inlet - Gravimetric method (equivalent to EPA AM-18)”.</p>	Compliant
EPL81	M3.2	Subject to any express provision to the contrary in this licence, monitoring for	Viewed Cbased Monthly dust deposition, HVAS, surface	Compliant

REPORT

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		the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	and groundwater monitoring reports dated April 2022, February 2023 and November 2023. It is stated throughout the report that monitoring has been undertaken in accordance with the Approved Methods.																																	
<b>M4 Weather monitoring</b>																																				
EPL82	M4.1	<p>The licensee must maintain and operate equipment on the premises for the purpose of monitoring each weather parameter specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:                      Meteorological Monitoring at Points 30, 31 and 32</p> <table border="1"> <thead> <tr> <th>PARAMETER</th> <th>UNITS OF MEASURE</th> <th>FREQUENCY</th> <th>SAMPLING METHOD</th> </tr> </thead> <tbody> <tr> <td>Air temperature</td> <td>Degrees celsius</td> <td>Continuous</td> <td>AM-4</td> </tr> <tr> <td>Wind direction</td> <td>Degrees</td> <td>Continuous</td> <td>AM-2 &amp; AM-4</td> </tr> <tr> <td>Rainfall</td> <td>mm</td> <td>Continuous</td> <td>AM-4</td> </tr> <tr> <td>Temperature lapse over a minimum vertical height interval of 50m.</td> <td>Degrees celsius</td> <td>Continuous</td> <td>Part E2, Appendix E of the NSW Industrial Noise Policy</td> </tr> <tr> <td>Wind Speed</td> <td>m/s</td> <td>Continuous</td> <td>AM-2 &amp; AM-4</td> </tr> <tr> <td>Sigma Theta</td> <td>Degrees</td> <td>Continuous</td> <td>AM-2 &amp; AM-4</td> </tr> <tr> <td>Relative Humidity</td> <td>%</td> <td>Continuous</td> <td>AM-4</td> </tr> </tbody> </table> <p><i>Note: Methods AM-2 and AM-4 are specified in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales.</i></p>	PARAMETER	UNITS OF MEASURE	FREQUENCY	SAMPLING METHOD	Air temperature	Degrees celsius	Continuous	AM-4	Wind direction	Degrees	Continuous	AM-2 & AM-4	Rainfall	mm	Continuous	AM-4	Temperature lapse over a minimum vertical height interval of 50m.	Degrees celsius	Continuous	Part E2, Appendix E of the NSW Industrial Noise Policy	Wind Speed	m/s	Continuous	AM-2 & AM-4	Sigma Theta	Degrees	Continuous	AM-2 & AM-4	Relative Humidity	%	Continuous	AM-4	<p>Viewed Weather Station Stratford data dated 2023 which incorporated all data parameters except for temperature lapse.</p> <p>Viewed temperature lapse data in 108 M3 and M4 met spreadsheet 2023.</p> <p>Data is measured at two stations at different heights (TK pers comms).</p>	Compliant
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EPL83	M4.2	<p>M4.2 Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.</p> <p>Note: The rainfall monitoring data collected in compliance with Condition M5.1 can be used to determine compliance with Condition L1.2.</p>	Not audited (new condition as at 15 September 2023).	Not Triggered																																
<b>M5 Recording of pollution complaints</b>																																				
EPL84	M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<p>Viewed 2020, 2021 and 2022 Annual Reviews. Complaints are contained in Annual Reviews.</p> <p>Viewed Stratford Coal website on 15 January 2023 at 2:15 pm. Complaints from 2023 are uploaded under 'Complaints Register'.</p>	Compliant																																
EPL85	M5.2	<p>The record must include details of the following:</p> <p>a) the date and time of the complaint;</p> <p>b) the method by which the complaint was made;</p> <p>c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</p>	<p>Viewed internal complaints register sighting date, time, persons name, nature of complaint.</p> <p>e) Viewed action taken against noise complaint. Yancoal provided an email response to DPE. Yancoal also provided a direct follow up to complainant. Viewed log to demonstrate follow up was undertaken via phone call and</p>	Compliant																																

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	email. Viewed 2023 complaints register, which contains no complaints. Viewed 2022 Annual Review. There were 2 noise complaints, 1 noise and 1 blasting complaint. Complaints are from different individuals and there have been no follow up issues. Viewed 2021 Annual Review. There were 12 noise complaints, 4 blasting, 1 air quality and 4 lighting complaints. Viewed 2020 Annual Review. There were 8 noise complaints and 2 lighting complaints in December 2020.	
EPL86	M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Viewed four years of complaints in Intelex system.	Compliant
EPL87	M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not triggered as EPA officer has not requested records during the audit period.	Not Triggered
<b>M6 Telephone complaints line</b>				
EPL88	M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Viewed telephone complaints line on Stratford website on 13 December 2023 at 8:00 am. It states above the phone number "to make a complaint please contact the Community Information Hotline".	Compliant
EPL89	M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	See response to M6.1. The complaints number is also included in newspaper advertisements (TK pers comms).	Compliant
EPL90	M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Noted.	
<b>M7 Blasting</b>				
EPL91	M7.1	The licensee must monitor all blasts carried out in or on the premises at or near the nearest residence or noise sensitive location (such as a school or hospital) that is likely to be most affected by the blast and that is not owned by the licensee or subject of a private agreement between the owner of the residence or noise sensitive location and the licensee relating to alternative blasting limits.	Blasting conducted in accordance with Schedule 3, Condition 9 of SSD-4966. 3 C14 Blasting occurred at locations approved in Blast Management Plan dated November 2021 Attachment 1 contains consultation with EPA.	Compliant
EPL92	M7.2	All blast shots must be recorded on video from a position allowing the collars of the shot, and where possible, any face, and/or toe, to be seen on the video. The licensee must retain a copy of this video for at least 12 months after the	Viewed video of blasts dated 25 May 2022 and 10 October 2023.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		blast was initiated.		
<b>M8 Other monitoring and recording conditions</b>				
EPL93	M8.1	To determine compliance with the Noise Limits shown in this licence, attended noise monitoring must be undertaken in accordance with all relevant conditions of this licence: a) at the nearest and/or most affected locations listed in the Noise Limits Table; and b) occur quarterly beginning 1 January each year.	Viewed Monthly Compliance Noise Monitoring Report dated November 2023 by SLR. a) Table 1 of Section 2.4 incorporates noise limits at nominated attended monitoring locations. b) Noise monitoring is conducted on a monthly basis and copies of reports are available online.	Compliant
<b>Reporting Conditions</b>				
<b>R1 Annual return documents</b>				
EPL94	R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Viewed 2021, 2022 and 2023 Annual Returns. Annual Returns comply with the EPA format.	Compliant
EPL95	R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Viewed screenshot of Annual Returns on EPA website. All Annual Returns were submitted during the audit period.	Compliant
EPL96	R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form	Licence has not been transferred during the audit period (TK pers comms).	Not Triggered

## REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		for this purpose.		
EPL97	R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Licence has not been surrendered or revoked during the audit period (TK pers comms).	Not Triggered
EPL98	R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Viewed EPA Annual Return submission confirmation emails dated 16 August 2021, 23 August 2022 and 21 August 2023. Annual Returns were submitted by 28 August.	Compliant
EPL99	R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Viewed copies of previous four Annual Returns.	Compliant
EPL100	R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Viewed 2020, 2021 and 2022 Annual Returns. The 2021, 2022 and 2023 Annual Returns were signed by two Directors.	Compliant
EPL101	R1.8	The licensee must supply with the Annual Return a report, which provides: a) an analysis and interpretation of monitoring results; and b) actions to correct identified adverse trends.	Viewed 2020, 2021 and 2022 Annual Reviews. Annual reviews are provided to the EPA. The Annual Reviews incorporate: a) an analysis and interpretation of monitoring results; and b) actions to correct identified trends	Compliant
EPL102	R1.9	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: a) the date and time of the blast; b) the location of the blast on the premises; c) the blast monitoring results at each blast monitoring station; and d) an explanation for any missing blast monitoring results.	Blast monitoring is available to the EPA via the website and within annual reports. <b>However, blast Reports were not specifically provided with each annual return. Recommend that blast reports are sent with Annual Returns.</b>	<b>Not Compliant</b>
<b>R2 Notification of environmental harm</b>				
Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.				
EPL103	R2.1	Notifications must be made by telephoning the Environment Line service on	See response to Schedule 3, Condition 27 in SSD-4966.	Compliant

## REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		131 555.		
EPL104	R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	See response to Schedule 5, Condition 7 in SSD-4966.	Compliant
<b>R3 Written report</b>				
EPL105	R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Written reports have not been requested by the EPA during the audit period (TK pers comms).	Not Triggered
EPL106	R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	This has not occurred during the audit period (TK pers comms).	Not Triggered
EPL107	R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Requests have not been made by the EPA during the audit period (TK pers comms).	Not Triggered
EPL108	R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Further report not required by the EPA during the audit period (TK pers comms).	Not Triggered
<b>R4 Other reporting conditions</b>				

## REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
EPL109	R4.1	<p><b>Blast reporting</b></p> <p>The licensee must report any exceedance of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.</p>	<p>Viewed 2020, 2021 and 2022 Annual Reviews.</p> <p>Not triggered as no blasting exceedances occurred within the audit period.</p>	Not Triggered
EPL110	R4.2	<p><b>Noise monitoring report</b></p> <p>A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant which:</p> <p>a) assesses compliance with the noise limits in the Noise Limits Table; and</p> <p>b) outlines any management actions taken within the monitoring period to address any exceedances of the limits contained in the Noise Limits Table.</p>	<p>Monthly noise monitoring reports are emailed to Northops (TK pers comms). Viewed emails dated 17 October 2023 and 21 June 2023 to Northops regional containing noise reports.</p>	Compliant
<b>7 General Conditions</b>				
<b>G1 Copy of licence kept at the premises or plant</b>				
EPL111	G1.1	A copy of this licence must be kept at the premises to which the licence applies	<p>Viewed Stratford Coal website on 15 January 2024 at 3:30 pm. The draft copy is currently on the website under 'Stratford Project Approval Documents'.</p> <p><b>Recommend to upload the current version of the licence to the Stratford website.</b></p> <p>A copy is also available on Intelix (TK pers comms).</p>	Compliant
EPL112	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not triggered as EPA officer has not requested to see licence in the audit period (TK pers comms).	Not Triggered
EPL113	G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	See response to G1.1.	Compliant



REPORT

Table 9 Mining Regulation 2016 – Schedule 8A

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
<b>PART 2 STANDARD CONDITIONS</b>				
<b>Division 1 – Protection of the Environment and Rehabilitation</b>				
<b>4 Must prevent harm to environment</b>				
MR01	1)	The holder of a mining lease must take all reasonable measures to prevent, or if that is not reasonably practicable, to minimise, harm to the environment caused by activities under the mining lease.	See response to Schedule 2, Condition 1 of SSD-4966.	Compliant
MR02	2)	In this clause-- "harm" to the environment has the same meaning as in the Protection of the Environment Operations Act 1997. .	Noted.	
<b>5 Rehabilitation to occur as soon as reasonably practicable after disturbance</b>				
MR03	1)	The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.	See response to Schedule 3, Condition 54 of SSD-4966.	Compliant
<b>6 Rehabilitation must achieve final land use</b>				
MR04	1)	The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area.	See response to Schedule 3, Condition 55 of SSD-4966.	Compliant
MR05	2)	The holder of the mining lease must ensure any planning approval has been obtained that is necessary to enable the holder to comply with subclause (1).	See response to Schedule 3, Condition 55 of SSD-4966.	Compliant
MR06	3)	The holder of the mining lease must identify and record any reasonably foreseeable hazard that presents a risk to the holder's ability to comply with subclause (1). Note--: Clause 7 requires a rehabilitation risk assessment to be conducted whenever a hazard is identified under this subclause.	Risks are summarised in Section 3 of the Rehabilitation Management Plan dated October 2023. Critical controls and associated actions are specified in Attachment A.	Compliant
MR07	4)	In this clause— "final land use" for the mining area means the final landform and land uses to be achieved for the mining area-- (a) as set out in the rehabilitation objectives statement and rehabilitation completion criteria statement, and (b) for a large mine--as spatially depicted in the final landform and rehabilitation plan, and (c) if the final land use for the mining area is required by a	Viewed Rehabilitation Management Plan dated October 2023. a) Rehabilitation objectives and rehabilitation completion criteria are located in Section 4 of the RMP. b) Final landform features (Plan 1) and final landform contours (Plan 2) are contained within the RMP. c) Noted.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		condition of development consent for activities under the mining lease--as stated in the condition. "planning approval" means-- (a) a development consent within the meaning of the Environmental Planning and Assessment Act 1979 , or (b) an approval under that Act, Division 5.1.		
<b>Division 2 – Risk Assessment</b>				
<b>7 Rehabilitation risk assessment</b>				
MR08	1)	The holder of a mining lease must conduct a risk assessment (a "rehabilitation risk assessment" ) that-- (a) identifies, assesses and evaluates the risks that need to be addressed to achieve the following in relation to the mining lease-- (i) the rehabilitation objectives, (ii) the rehabilitation completion criteria, (iii) for large mines--the final land use as spatially depicted in the final landform and rehabilitation plan, and (b) identifies the measures that need to be implemented to eliminate, minimise or mitigate the risks.	Viewed Rehabilitation Management Plan dated October 2023. a) i) and ii) Rehabilitation objectives and proposed completion criteria are located in Table 6 of the RMP. iii) Final land use is spatially depicted in Plan 1 – Final Landform Features and Plan 2 – Final Landform Contours. b) Section 3 of the RMP summarises rehabilitation risks and critical controls and actions for risks listed are examined in the Closure & Rehabilitation Risk Assessment in Attachment A.	Compliant
MR09	2)	The holder of the mining lease must implement the measures identified.	Noted.	
MR10	3)	The holder of a mining lease must conduct a rehabilitation risk assessment-- (a) for a large mine--before preparing a rehabilitation management plan, and (b) for a small mine--before preparing the rehabilitation outcome documents for the mine, and (c) whenever a hazard is identified under clause 6(3)--as soon as reasonably practicable after it is identified, and (d) whenever given a written direction to do so by the Secretary.	Viewed Rehabilitation Management Plan dated October 2023. The risk assessment is located in Section 3 of the RMP.	Compliant
<b>Division 3 – Rehabilitation Documents</b>				
<b>8 Application of division</b>				
MR11	1)	This Division does not apply to a mining lease unless-- (a) the security deposit required under the mining lease is greater than the minimum deposit prescribed under the Act, section 261BF in relation to that type of mining lease, or	Noted. a) Does apply (TK pers comms). b) No written directions have been given in the audit period (TK pers comms) and therefore this is not triggered.	

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		(b) the Secretary gives a written direction to the holder of the mining lease that this Division, or a provision of this Division, applies to the mining lease.		
<b>9 General requirements for documents</b>				
MR12	1)	A document required to be prepared under this Division must-- (a) be in a form approved by the Secretary, and Note--: The approved forms are available on the Department's website. (b) include any matter required to be included by the form, and (c) if required to be given to the Secretary--be given in a way approved by the Secretary.	Viewed Rehabilitation Management Plan dated October 2023. Section 4.2 states that "in accordance with Clause 9, Schedule 8A of the Mining Regulation 2016, this RMP has been prepared in a form as specified by the Secretary using the Form and Way – Rehabilitation Management Plan for Large Mine (the Form and Way Guidelines) (NSW Resources Regulator, 2021)." Rehabilitation supporting documents include the Approved Rehabilitation Objectives Statement (viewed approval dated 22 August 2023), Final Landform and Rehabilitation Plan (located in Section 5 of the RMP), Annual Rehabilitation Report (reports against objectives and forward program, located under 'Annual Reviews on Stratford website) and Annual Forward Program (located under 'Environmental Management Plans, Strategies and Plans on Stratford website). The Rehabilitation Cost Estimate is reviewed annually (TK pers comms).	Compliant
<b>10 Rehabilitation management plans for large mines</b>				
MR13	1)	The holder of a mining lease relating to a large mine must prepare a plan (a "rehabilitation management plan" ) for the mining lease that includes the following-- (a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area, (b) a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation, (c) a summary of rehabilitation risk assessments conducted by the holder, (d) the risk control measures identified in the rehabilitation risk assessments, (e) the rehabilitation outcome documents for the mining lease, (f) a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.	Viewed Rehabilitation Management Plan dated October 2023. a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area is located in Section 6.2. b) a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation is located in Section 5. c) a summary of rehabilitation risk assessments conducted by the holder is located in Section 3. d) the risk control measures identified in the rehabilitation risk assessments are located in Section 3. e) the rehabilitation outcome documents for the mining lease are located in Sections 4 and 5. f) a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored is located in Section 4.	Compliant
MR14	2)	If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must include a proposed	Not triggered as ROBS have been approved. Viewed email from Resources Regulator dated 1 August 2022 confirming receipt.	Not Triggered

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		version of the document.	Viewed email dated 22 August 2023 stating that ROBJs have been approved. Changes of pits/voids approved in this email. Other associated rehabilitation documents include: <ul style="list-style-type: none"> <li>Final Landform and Rehabilitation Plan (viewed Section 5 of the Rehabilitation Management Plan dated October 2023).</li> <li>Annual Rehabilitation Report, which reports against objectives and forward program is located on Stratford website (viewed 15 January 2024 at 4:30 pm) under 'Environmental Management Plans, Strategies and Programs'.</li> <li>Annual Forward Program located on Stratford Coal website (viewed 15 January 2024 at 4:30 pm) under 'Environmental Management Plans, Strategies and Programs'.</li> </ul>	
MR15	3)	A rehabilitation management plan is not required to be given to the Secretary for approval.	Noted.	
MR16	4)	The holder of the mining lease-- (a) must implement the matters set out in the rehabilitation management plan, and (b) if the forward program specifies timeframes for the implementation of the matters--must implement the matters within those timeframes.	a) Noted. b) Noted.	
<b>11 Amendment of rehabilitation management plans</b>				
MR17	1)	The holder of a mining lease must amend the rehabilitation management plan for the mining lease as follows-- (a) to substitute the proposed version of a rehabilitation outcome document with the version approved by the Secretary--within 30 days after the document is approved, (b) as a consequence of an amendment made under clause 14 to a rehabilitation outcome document--within 30 days after the amendment is made, (c) to reflect any changes to the risk control measures in the prepared plan that are identified in a rehabilitation risk assessment--as soon as practicable after the rehabilitation risk assessment is conducted, (d) whenever given a written direction to do so by the Secretary--in accordance with the direction.	Not triggered as amendments were not required during the audit period due to the reasons outlined above (TK per comms).	Not Triggered
<b>12 Rehabilitation outcome documents</b>				
MR18	1)	The holder of a mining lease must prepare the following	a) See response to MR14.	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		documents (the "rehabilitation outcome documents" ) for the mining lease and give them to the Secretary for approval-- (a) the "rehabilitation objectives statement" , which sets out the rehabilitation objectives required to achieve the final land use for the mining area, (b) the "rehabilitation completion criteria statement" , which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives, (c) for a large mine, the "final landform and rehabilitation plan" , showing a spatial depiction of the final land use.	b) Not triggered as no areas yet complete. c) Viewed Rehabilitation Management Plan dated October 2023 containing final landform and rehabilitation plans.	
MR19	2)	If the final land use for the mining area is required by a condition of development consent for activities under the mining lease, the holder of the mining lease must ensure the rehabilitation outcome documents are consistent with that condition.	Viewed Rehabilitation Management Plan dated October 2023. Section 2.2 provides the final land use options assessment. Approved final land uses include "agricultural – grazing, native ecosystem, final void and water storage areas (excluding final voids)". Changes have been made since the EIS in relation to final land use, however these changes result in the same number of voids, vegetation areas and native bushland (TK pers comms).	Compliant
<b>13 Forward program and annual rehabilitation report</b>				
MR20	1)	The holder of a mining lease must prepare a program (a "forward program" ) for the mining lease that includes the following-- (a) a schedule of mining activities for the mining area for the next 3 years, (b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years, (c) a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs.	Viewed Rehabilitation Forward Program on Stratford Coal website on 23 January 2023 at 8:30 am. a) A schedule of mining activities is located the forward program. b) A forecast of rehabilitation activities over three years is located in the forward program. Spatial data is uploaded on the Regulator's online portal. c) Active disturbance areas required for rehabilitation are located on Page 14.	Compliant
MR21	2)	The holder of a mining lease must prepare a report (an "annual rehabilitation report" ) for the mining lease that includes-- (a) a description of the rehabilitation undertaken over the annual reporting period, (b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period, (c) a report demonstrating progress made towards the achievement of the following-- (i) the objectives set out in the rehabilitation objectives statement, (ii) the criteria set out in the rehabilitation completion criteria	Not triggered as rehabilitation has not commenced. Viewed 2020, 2021 and 2022 Annual Reviews. Rehabilitation activities are located in Section 8.	Not Triggered

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		statement, (iii) for large mines--the final land use as spatially depicted in the final landform and rehabilitation plan.		
MR22	3)	If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must rely on a proposed version of the document.	Not triggered as all required rehabilitation documents have been approved. See response to MR14.	Not Triggered
MR23	4)	The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary.	The Forward Program was submitted under Resources Regulator portal. Rehabilitation report is not yet triggered (TK pers comms).	Not Triggered
MR24	5)	In this clause-- "annual reporting period" means each period of 12 months commencing on-- (a) the date on which the mining lease is granted, or (b) if the Secretary approves another date in relation to the mining lease--the other date.	Noted.	
<b>14 Amendment of rehabilitation outcome documents and forward program</b>				
MR25	1)	This clause applies to-- (a) a rehabilitation outcome document if it has been approved by the Secretary, and (b) a forward program if it has been given to the Secretary.	Noted.	
MR26	2)	The holder of a mining lease must not amend a document to which this clause applies that relates to the mining lease unless-- (a) the Secretary gives the holder a written direction to do so, or (b) the Secretary, on written application by the holder, gives a written approval of the amendment.	Not triggered as amendments have not occurred during the audit period (TK pers comms).	Not Triggered
MR27	3)	The holder of the mining lease must amend the document in accordance with the Secretary's direction or approval.	Not triggered as amendments have not occurred during the audit period (TK pers comms).	Not Triggered
MR28	4)	Nothing in this clause prevents the holder of a mining lease preparing a draft amendment for submission to the Secretary for approval.	Not triggered as amendments have not occurred during the audit period (TK pers comms).	Not Triggered
<b>15 Times at which documents must be prepared and given</b>				
MR29	1)	The holder of a mining lease must do the following before the end of the initial period-- (a) prepare a rehabilitation management plan, and (b) prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as the rehabilitation period has not formally commenced.	Not Triggered

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		Secretary for approval, and (c) prepare a forward program and give it to the Secretary.		
MR30	2)	The holder of the mining lease must prepare a forward program and annual rehabilitation report and give them to the Secretary before-- (a) 60 days after the last day of each annual reporting period, commencing with the annual reporting period in which the forward program was given to Secretary under subclause (1)(c), or (b) a later date approved by the Secretary.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as the rehabilitation period has not formally commenced.	Not Triggered
MR31	3)	A rehabilitation completion criteria statement relating to completion of rehabilitation during a period covered by a forward program must be given to the Secretary for approval when the forward program is required to be given to the Secretary.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as the rehabilitation period has not formally commenced.	Not Triggered
MR32	4)	The holder of the mining lease must prepare updated rehabilitation outcome documents for the mining lease and give them to the Secretary for approval before-- (a) 60 days after a development consent is modified following an application referred to in clause 20(1)(b), or (b) a later date approved by the Secretary.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as the rehabilitation period has not formally commenced.	Not Triggered
MR33	5)	A rehabilitation completion criteria statement is not required to be given to the Secretary under subclause (4) unless a rehabilitation completion criteria statement has already been given to the Secretary under subclause (3).	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as the rehabilitation period has not formally commenced.	Not Triggered
MR34	6)	The Secretary may, by written notice, direct the holder of a mining lease to prepare, or give to the Secretary, a document required to be prepared under this Division at a time other than that specified in this clause.	Not triggered as no written notices have been issued by the Secretary during the audit period (TK pers comms).	Not Triggered
MR35	7)	The holder of the mining lease must comply with the direction.	Noted.	
MR36	8)	In this clause-- "initial period" means the period commencing when the mining lease is granted and ending-- (a) 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or (b) if this Division applies to the mining lease because of an increase in the required security deposit-- (i) when the surface of the mining area is disturbed by activities under the mining lease, or	Noted.	



**REPORT**

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		(ii) at a later date approved by the Secretary.		
<b>16 Certain documents to be publicly available</b>				
MR37	1)	This clause applies to the following documents-- (a) a rehabilitation management plan, (b) a forward program, (c) an annual rehabilitation report.	Viewed Stratford website on 23 January 2024 at 9 am. a) The Rehabilitation Management Plan dated October 2023 is located under 'Environmental Management Plans, Strategies and Programs'. b) The Forward Program from 1 January 2022 to 31 December 2024 is located under 'Environmental Management Plans, Strategies and Programs'. c) Annual Rehabilitation Report 2022 is located under 'Annual Reviews'.	Compliant
MR38	2)	The holder of a mining lease must make a document to which this clause applies publicly available by-- (a) publishing it on its website in a prominent position, or (b) if the holder does not have a website-- providing a copy of it to a person-- (i) on the written request of a person, and (ii) without charge, and (iii) within 14 days after the request is received.	a) Documents are published in easy to access locations on the Stratford website. See response to MR37. b) Not triggered.	Compliant
MR39	3)	If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published-- (a) for a rehabilitation management plan--within 14 days after it is prepared or amended, or (b) for a forward program or an annual rehabilitation report--within 14 days after it is given to the Secretary or amended,	Viewed Stratford website on 23 January 2024 at 9 am. The website specifies when documents were published. a) The Rehabilitation Management Plan dated 24 October 2023 was published 31 October 2023, within 14 days of amendment. b) The Forward Program from 1 January 2022 to 31 December 2024 was published and prepared on 12 December 2022 . c) Annual Rehabilitation Report 2022 was prepared on 11 May 2023 published on 17 May 2023.	Compliant
MR40	4)	Personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a document made available to a person under this clause.	Noted.	
<b>Division 4 – Records, reporting and notification</b>				
<b>17 Records demonstrating compliance</b>				
MR41	1)	The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the	Actions will be put in Intelex or spreadsheet. No actions to document within the audit period (TK pers comms).	Not Triggered

## REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		<p>conditions set out in this Part.</p> <p><i>Note--: The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.</i></p>		
<b>18 Report on non-compliance</b>				
MR42	1)	<p>The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with--</p> <p>(a) a condition of the mining lease, or</p> <p><i>Note--: The Act, section 364A contains provisions relating to the use and disclosure of information provided under this condition.</i></p> <p>(b) a requirement of the Act or this Regulation relating to activities under the mining lease.</p>	Not triggered as no non-compliances occurred with relation to the conditions of a) or b) (TK pers comms).	Not Triggered
MR43	2)	The holder of the mining lease must provide the report within 7 days after becoming aware of the non-compliance.	Not triggered. See response to MR42.	Not Triggered
MR44	3)	<p>The holder of the mining lease must ensure the report--</p> <p>(a) identifies the condition of the mining lease, or the requirement of the Act or this Regulation, to which the non-compliance relates, and</p> <p>(b) describes the non-compliance and specifies the date or dates on which, or the period during which, the non-compliance occurred, and</p> <p>(c) describes the causes or likely causes of the non-compliance, and</p> <p>(d) describes the action that has been taken, or will be taken, to mitigate the effects, and to prevent any recurrence, of the non-compliance.</p>	Not triggered. See response to MR42.	Not Triggered
<b>19 Nominated contact person</b>				
MR45	1)	<p>The holder of a mining lease must nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Act.</p> <p><i>Note--: The Act, section 383 sets out the ways in which notices or other documents may be issued or given to, or served on, a person for the purposes of the Act.</i></p>	<p>Viewed email receipt of submissions of nominated contact person on the Resources Regulator portal on 23 December 2022, 11 July 2022 and 21 March 2023.</p> <p>Viewed nominated contact letter to the Secretary on 21 December 2022, Details on nominated contact person included phone number, postal and email address.</p>	Compliant
MR46	2)	<p>The holder of the mining lease must give written notice to the Secretary of--</p> <p>(a) the full name and contact details of the nominated person--</p> <p>within 28 days after the date on which the standard conditions</p>	See response above,	Compliant

**REPORT**

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		apply to the mining lease under clause 31A of this Regulation, and (b) any change in nomination or in the nominated person's contact details--within 28 days after the change occurs.		
MR47	3)	The holder of the mining lease must ensure that the contact details for the nominated person include the person's phone number and postal and email addresses.	See response above,	Compliant
<b>20 Additional requirements—application for or to modify development consent</b>				
MR48	1)	The holder of a mining lease must give written notice to the Secretary within 10 days after-- (a) making an application for development consent that relates to the mining area, or (b) making an application for modification of a development consent-- (i) under the Environmental Planning and Assessment Act 1979 , section 4.55(2), and (ii) that proposes to modify a condition of the consent that relates to rehabilitation of the mining area in a way that may affect an obligation under the mining lease relating to rehabilitation of the mining area.	Not triggered as development is State significant.	Not Triggered
MR49	2)	This clause does not apply if the development is State significant development.	Not triggered as development is State significant.	Not Triggered

REPORT

Table 10 Mining Lease 1787

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
<b>1 Notice to Landholders</b>				
ML01	1)	<p>a) Within a period of three months from the date of grant/renewal of this mining lease, the lease holder must serve on each landholder a notice in writing indicating that this mining lease has been granted/renewed and whether the lease includes the surface. A plan identifying each landholder and individual land parcel subject to the lease area, and a description of the lease area must accompany the notice.</p> <p>b) If there are ten or more landholders, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this mining lease has been granted/renewed; state whether the lease includes the surface and must contain a plan and description of the lease area. If a notice is made under condition 1(b), compliance with condition 1(a) is not required.</p>	<p>Viewed Mining Lease 1787 on Stratford website.</p> <p>Not triggered as the mining lease was not renewed in the period.</p>	Not Triggered
<b>2 Rehabilitation</b>				
ML02	1)	Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.	See response to Schedule 3, Condition 53 of SSD-4966.	Compliant
<b>3 Mining Operations Plan and Annual Rehabilitation Report</b>				
ML03	1)	<p>(a) The lease holder must comply with an approved Mining Operations Plan (MOP) in carrying out any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The lease holder must apply to the Minister for approval of a MOP. An approved MOP must be in place prior to commencing any significant surface disturbing activities, including mining operations, mining purposes and prospecting.</p> <p>(b) The MOP must identify the post mining land use and set out a detailed rehabilitation strategy which:</p> <p>(i) identifies areas that will be disturbed;</p> <p>(ii) details the staging of specific mining operations, mining purposes and prospecting;</p> <p>(iii) identifies how the mine will be managed and rehabilitated to achieve the post mining land use;</p> <p>(iv) identifies how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment; and</p> <p>(v) reflects the conditions of approval under:</p> <ul style="list-style-type: none"> <li>• the Environmental Planning and Assessment Act 1979;</li> <li>• the Protection of the Environment Operations Act 1997; and</li> </ul>	<p>a) Rehabilitation Plan overrides the MOP (TK pers comms).</p> <p>See response to MR13 above.</p> <p>b)</p> <p>See response to Schedule 3, Condition 55 in SSD-4966.</p> <p>c) Viewed 2020 Previous audit report. "The MOP satisfies the general requirements of the ESG3: Mining Operations Plan (MOP) Guidelines September 2013."</p> <p>d) Noted.</p> <p>e) Noted.</p> <p>f) Rehabilitation progress is reported annually in Section 8 of Annual Reviews.</p>	Compliant

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		<p>• any other approvals relevant to the development including the conditions of this mining lease.</p> <p>(c) The MOP must be prepared in accordance with the ESG3: Mining Operations Plan (MOP) Guidelines September 2013 published on the Department’s website at <a href="http://www.resourcesandenergy.nsw.gov.au/miners-and-explorers/rules-andforms/pgf/environmental-guidelines">www.resourcesandenergy.nsw.gov.au/miners-and-explorers/rules-andforms/pgf/environmental-guidelines</a></p> <p>(d) The lease holder may apply to the Minister to amend an approved MOP at any time.</p> <p>(e) It is not a breach of this condition if:</p> <p>(i) the operations which, but for this condition 3(e) would be a breach of condition 3(a), were necessary to comply with a lawful order or direction given under the Environmental Planning and Assessment Act 1979, the Protection of the Environment Operations Act 1997, the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 or the Work Health and Safety Act 2011; and Work Health and Safety Regulation 2011</p> <p>(ii) the Minister had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.</p> <p>(f) The lease holder must prepare a Rehabilitation Report to the satisfaction of the Minister.</p> <p>The report must:</p> <p>(i) provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP;</p> <p>(ii) be submitted annually on the grant anniversary date (or at such other times as agreed by the Minister); and</p> <p>(iii) be prepared in accordance with any relevant annual reporting guidelines published on the Department’s website at <a href="http://www.resourcesandenergy.nsw.gov.au/miners-andexplorers/rules-and-forms/pgf/environmental-guidelines">www.resourcesandenergy.nsw.gov.au/miners-andexplorers/rules-and-forms/pgf/environmental-guidelines</a></p> <p><i>Note: The Rehabilitation Report replaces the Annual Environmental Management Report.</i></p>		
<b>4 Non-Compliance Reporting</b>				
ML04	1)	<p>(a) The lease holder must notify the Department upon becoming aware of any breaches of the conditions of this mining lease or breaches of the Mining Act or Regulations;</p> <p>(b) Notifications under condition 4(a) must be provided in the form specified on the Department’s website within seven (7) days of the mining lease holder</p>	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as no non-compliances were reported under ML1787 during the audit period.	Not Triggered

REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		becoming aware of the breach.		
<b>5 Environmental Incident Report</b>				
ML05	1)	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	Viewed 2020, 2021 and 2022 Annual Reviews. Not triggered as no non-compliances were reported under ML1787 during the audit period. See responses in EPL 5161 table. EPL Issued under the Protection of the Environment Operations Act (1997).	Not Triggered
<b>6 Extraction Plan</b>				
ML06	1)	<p>(a) In this condition:</p> <p>(i) approved Extraction Plan means a plan, being:</p> <p>A. an extraction plan or subsidence management plan approved in accordance with the conditions of a relevant development consent and provided to the Secretary; or</p> <p>B. a subsidence management plan relating to the mining operations subject to this lease:</p> <p>I. submitted to the Secretary on or before 31 December 2014; and</p> <p>II. approved by the Secretary.</p> <p>(ii) relevant development consent means a development consent or project approval issued under the Environmental Planning &amp; Assessment Act 1979 relating to the mining operations subject to this lease.</p> <p>(b) The lease holder must not undertake any underground mining operations that may cause subsidence except in accordance with an approved Extraction Plan.</p> <p>(c) The lease holder must ensure that the approved Extraction Plan provides for the effective management of risks associated with any subsidence resulting from mining operations carried out under this lease.</p> <p>(d) The lease holder must notify the Secretary within 48 hours of any:</p> <p>(i) incident caused by subsidence which has a potential to expose any person to health and safety risks;</p> <p>(ii) significant deviation from the predicted nature, magnitude, distribution, timing and duration of subsidence effects, and of the potential impacts and consequences of those deviations on built features and the health and safety of any person</p> <p>(iii) significant failure or malfunction of a monitoring device or risk control measure set out in the approved Extraction Plan addressing:</p> <p>A. built features;</p>	Not triggered as no underground mining has been undertaken during the audit period.	Not Triggered

## REPORT

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		B. public safety; or C. subsidence monitoring.;		
<b>7 Resource Recovery</b>				
ML07	1)	The lease holder must optimise recovery of the minerals that are the subject of this mining lease to the extent economically feasible.	Mining has been undertaken in accordance with the approved. No instructions have been received from regulator (TK pers comms).	Compliant
<b>8 Group Security</b>				
ML08	1)	<p>The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any kind under the mining lease, including obligations of all or any kind under the mining lease that may arise in the future.</p> <p>The amount of the security deposit to be provided as a group security has been assessed by the Minister at <b>\$12,367,000</b>.</p> <p>The leases covered by the group security include:</p> <ul style="list-style-type: none"> <li>Mining Lease 1360 (Act 1992)</li> <li>Mining Lease 1409 (Act 1992)</li> <li>Mining Lease 1447 (Act 1992)</li> <li>Mining Lease 1521 (Act 1992)</li> <li>Mining Lease 1528 (Act 1992)</li> <li>Mining Lease 1538 (Act 1992)</li> <li>Mining Lease 1577 (Act 1992)</li> <li>Mining Lease 1733 (Act 1992)</li> </ul> <p>This group security is extended to apply to this lease.</p>	<p>Viewed notice of variation form Regional NSW dated 6 July 2023 agreeing to the amended bond amount, which is higher than the amount required within this condition. The assessed deposit is \$21,139,000.00.</p> <p>Viewed Resources Regulator Notification of assessment for security deposit (Assessed Deposit) dated 2 June 2023.</p>	Compliant
<b>9 Cooperation Agreement</b>				
ML09	1)	<p>The lease holder must make every reasonable attempt, and be able to demonstrate its attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as:</p> <ul style="list-style-type: none"> <li>• access arrangements</li> <li>• operational interaction procedures</li> <li>• dispute resolution</li> <li>• information exchange</li> <li>• well location</li> <li>• timing of drilling</li> <li>• potential resource extraction conflicts; and</li> </ul>	Not triggered as there are no overlapping titles associated with Stratford.	Not Triggered



**REPORT**

Ref No.	Cond No.	Condition Details	Comments & Evidence	Audit Findings
		<ul style="list-style-type: none"> <li>rehabilitation issues.</li> </ul>		
<b>Exploration Reporting</b>				
ML10	1)	<p>Note: Exploration Reports (Geological and Geophysical)</p> <p>The lease holder must lodge reports to the satisfaction of the Minister in accordance with section 163C of the Mining Act 1992 and in accordance with clause 59 of the Mining Regulation 2016.</p> <p>Reports must be prepared in accordance with Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.</p>	<p>Viewed Annual Exploration Reports dated 20 January 2021, 20 January 2022 and 20 January 2023.</p> <p>Reports state that “every effort has been made to prepare and lodge this report pursuant to Section 163C of the Mining Act 1992, the Mining Regulation 2016 (NSW) and various Guidelines/Procedures issued from time to time by the Department”.</p>	Compliant



## Appendix D Site Inspection Plates



**Plate 1 – Temporary rehabilitation area**



**Plate 2 – Main Pit**





Plate 3 – Roseville Haul Road rehabilitated area with mine water transfer pipeline



Plate 4 – Disassembled culvert atop of Roseville Haul Road and rehabilitated area





**Plate 5 – Roseville West Pit**



**Plate 6 – Rehabilitation including Cabbage Gum**





Plate 7 – Waste and recycling around pit top



Plate 8 – Vehicle wash area





**Plate 9 – Meteorological monitoring station**



**Plate 10 – Stratford loadout point**





Plate 11 – Flammable liquid storage



Plate 12 – Workshop waste storage well managed





Plate 13 – Bunded chemical storage area



Plate 14 – Bunded diesel tank storage area





Plate 15 – General waste bins



Plate 16 – Hydraulic hose and oil waste bins





**Plate 17 – Stratford East Pit (downstream)**



**Plate 18 – Stratford East Pit (upstream)**





Plate 19 – Workshop area

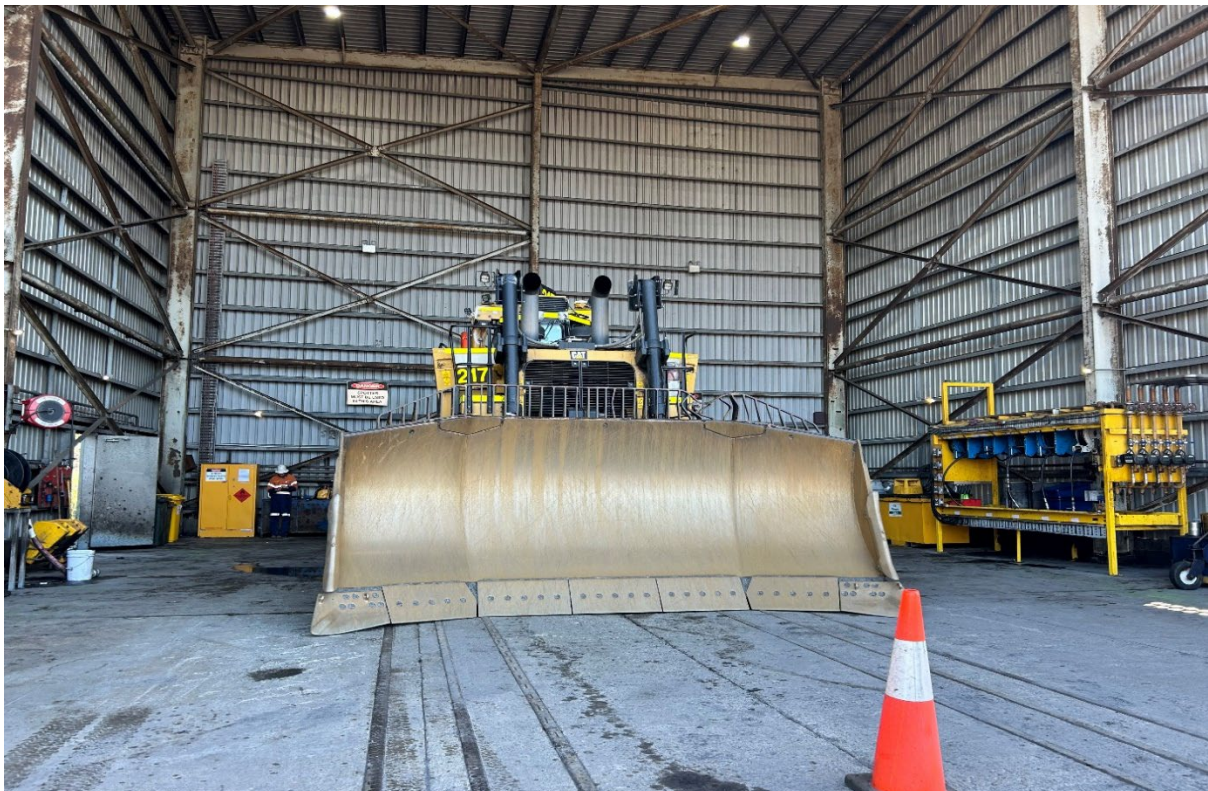


Plate 20 – Service bay





**Plate 21 – Rehabilitated RVW Waste Emplacement Areas Following Maintenance Works (Yancoal, 2023)**



**Plate 22 – Rehabilitated OMP Waste Emplacement Pasture Areas Following Slashing Works, (Yancoal 2022)**





**Plate 23 – Rehabilitated OMP Waste Emplacement Pasture Areas Following Slashing Works (Yancoal 2022)**

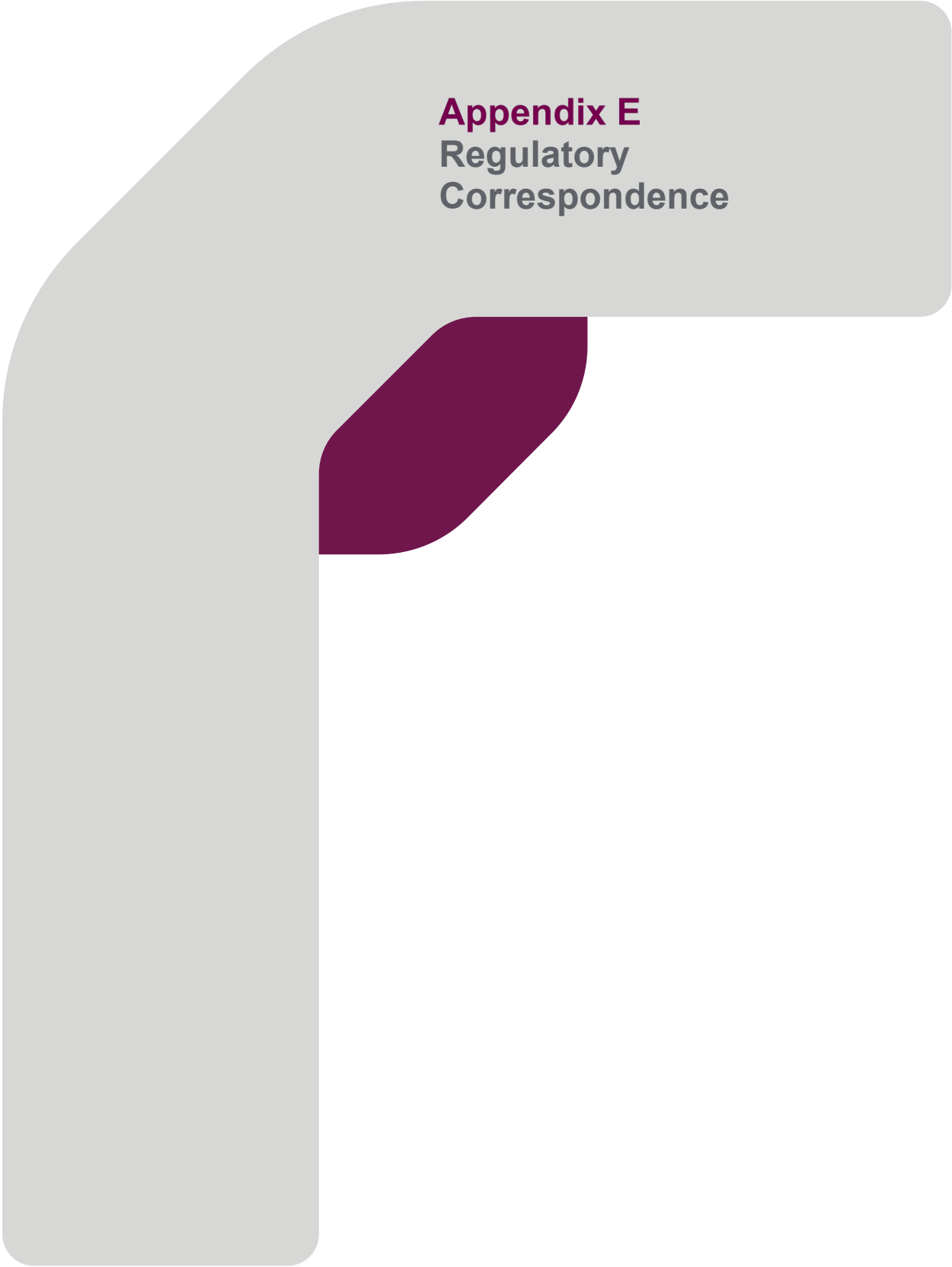


**Plate 24 – Bowens Road North Rehabilitation**





**Plate 25 – Bucketts Way West Offset**



## Appendix E Regulatory Correspondence

Our ref: SSD-4966-PA-27

Thomas Kirkwood  
Environment and Community Advisor  
Stratford Coal Pty Ltd  
Worimi Country  
PO Box 168  
GLOUCESTER NSW 2422

21/11/2023

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Sent via the Major Projects Portal only

Subject: Stratford and Duralie Coal Mines - Independent Audit proposal

Dear Mr Kirkwood,

I refer to your letter, SSD-4966-PA-27, submitted to the NSW Department of Planning and Environment (NSW Planning) on 2 November 2023 requesting the Planning Secretary's approval of suitably qualified, experienced and independent person/s to conduct an Independent Environmental Audit of the Stratford Coal Mine, as well as an Independent Environmental Audit and Rail Haulage Audit of Duralie Coal Mine, as required by development consent SSD-4966 as modified (the consent) and project approval 08\_0203 as modified (the approval) respectively.

NSW Planning has reviewed the independent auditor nominations and, based on the information you have provided, is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

In accordance with Schedule 5, Condition 9 of the consent for Stratford Coal Mine, and Schedule 5, Conditions 8 and 9A of the approval for Duralie Coal Mine, as nominee of the Planning Secretary I endorse the following independent audit team:

- Diane Munro, lead auditor
- Jessica Robinson, audit support
- Ian Richardson, air quality specialist
- Tara Boreham, biodiversity specialist
- Dale Redwood, noise and blasting specialist
- Clayton Richards, rehabilitation

Please ensure this correspondence is appended to the independent environmental and rail haulage audit reports mentioned above.

The independent audit must be prepared, undertaken, and finalised in accordance with the conditions of the consent and approval, and the *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.

Should you wish to discuss this matter, please contact Jennifer Sage, Senior Compliance Officer on 0400 245 170 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters  
Team Leader Northern  
Compliance

As nominee of the Planning Secretary

**From:** [Jennifer Sage](#)  
**To:** [Jessica Robinson](#)  
**Cc:** [Dianne Munro](#)  
**Subject:** RE: Stratford Coal Mine Independent Environmental Audit - Regulatory Engagement Request  
**Date:** Sunday, 10 December 2023 6:23:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

**CAUTION:** This email originated from outside of RPS.

Hello Jessica

Thanks for your email requesting input from DPE on issues to be covered by the IEA.

DPE requests that the independent environmental audit consider the following issues –

- Storage and management of residual wastes on site, including but not limited to potentially acid forming material.
- Management of incidents including internal reporting as well as notification to relevant agencies, in accordance with the approved EMS.

Feel free to contact me if you have any questions or comments.

Regards  
Jen

### **Jennifer Sage**

Senior Compliance Officer  
Development Assessment  
**Department of Planning and Environment**

**M** 0400 245 170 **T** (02) 6575 3420 **E** [jennifer.sage@dpie.nsw.gov.au](mailto:jennifer.sage@dpie.nsw.gov.au)

**Working days** Monday to Thursday



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

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**From:** Jessica Robinson <[Jessica.Robinson@rpsgroup.com.au](mailto:Jessica.Robinson@rpsgroup.com.au)>  
**Sent:** Wednesday, 22 November 2023 3:23 PM  
**To:** Jennifer Sage <[jennifer.sage@dpie.nsw.gov.au](mailto:jennifer.sage@dpie.nsw.gov.au)>  
**Cc:** [heidi.watters@dpie.nsw.gov.au](mailto:heidi.watters@dpie.nsw.gov.au); Dianne Munro <[Dianne.Munro@rpsgroup.com.au](mailto:Dianne.Munro@rpsgroup.com.au)>  
**Subject:** Stratford Coal Mine Independent Environmental Audit - Regulatory Engagement Request

Good afternoon Jennifer,

RPS has been approved by the Department of Planning and Environment to conduct the 2023 Independent Environmental Audit (IEA) for the Stratford Extension Project in accordance with Schedule 9 of SSD 4966:

*9. Prior to 31 December 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:*

*(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*

*(b) include consultation with the relevant agencies;*

*(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL/s and/or Mining Lease/s (including any assessment, plan or program required under these approvals);*

*(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and*

*(e) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.*

*Note: This audit team must be led by a suitably qualified auditor, and include experts in noise, blasting, air quality, ecology, and any other fields specified by the Secretary.*

In accordance with Condition (9b) of SSD 4966, could you please provide comment on any specific environmental issues you would like covered as part of the IEA.

We look forward to your response. If you could respond by **4 December**, it would be appreciated.

Please do not hesitate to call Dianne Munro - Lead Auditor as required on:

Email: [Dianne.Munro@rpsgroup.com.au](mailto:Dianne.Munro@rpsgroup.com.au)

Phone: 0437 898 884

Regards,

Jessica.

**Jessica Robinson**

Environmental Consultant  
RPS | Australia Asia Pacific  
Unit 2A, 45 Fitzroy Street  
Carrington NSW 2294, Australia  
T +61 2 4940 4200 M +61 455 146 476  
E [jessica.robinson@rpsgroup.com.au](mailto:jessica.robinson@rpsgroup.com.au)



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We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters

and community. We pay our respect to them and their cultures and to Elders past and present.

[Click here](#) to find out more about our Reconciliation Action Plan.

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AREQ0048040

Ms Dianne Munro  
RPS Australia East Pty Ltd  
Unit 2A, 45 Fitzroy Street  
Carrington NSW 2294

By email: [Dianne.Munro@rpsgroup.com.au](mailto:Dianne.Munro@rpsgroup.com.au)

Dear Ms Munro,

**Subject: Stratford Coal Mine – Independent Environmental Audit**

Thank you for your email dated 27 November 2023 requesting consultation on the independent environmental audit to be undertaken of the Stratford Coal Mine which is covered by the following mining leases:

- ML1360 (1992)
- ML1409 (1992)
- ML1447 (1992)
- ML1521 (1992)
- ML1528 (1992)
- ML1538 (1992)
- ML1577 (1992)
- ML1733 (1992)
- ML1787 (1992)

The independent environmental audit is required to assess compliance against the relevant environmental management conditions of the mining leases up to 1 July 2022, including the mining operations plan.

From 2 July 2022, the independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. It is noted that the 9 mining leases that comprise the Stratford Coal Mine have been approved by the Regulator to be treated as a single lease for the purposes of Part 2 of Schedule 8A.

The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice.

It would be appreciated if a copy of the final audit report could be sent to the Regulator at [nswresourcesregulator@service-now.com](mailto:nswresourcesregulator@service-now.com) upon completion of the audit.



2

Yours sincerely

**Jenny Ehmsen**  
Principal Compliance Auditor  
5 December 2023

**From:** [mmacdonald-hill@bigpond.com](mailto:mmacdonald-hill@bigpond.com)  
**To:** [Jessica Robinson](#)  
**Cc:** [Dianne Munro](#)  
**Subject:** Stratford Coal Mine IEA  
**Date:** Monday, 4 December 2023 7:43:07 AM

---

**CAUTION:** This email originated from outside of RPS.

Hi Jessica,

I confirm the information regarding the IEA was sent to the CCC and raised at their meeting of 23<sup>rd</sup> November 2023. Comment was invited and requested by today's date. As no issues were raised at the meeting, nor have I received any advice to the contrary, I can conclude there are no major concerns within the Committee on the mine's operations within the scope of the audit. Thank you for the opportunity to comment.

*Margaret MacDonald-Hill*  
0448 414 888



## Appendix F Audit Guidelines

## AUDIT GUIDELINES

This IEA report has also been prepared in accordance with the Audit Guidelines (DPE, 2020). The table below lists key requirements from the Audit Guidelines, the relevant section of the Guidelines which references the requirement and indicates where each is addressed in this report.

### Audit Guideline Requirements

Section	Description	Where Addressed
3.1	<p>Independent Audits must only be undertaken by a suitably qualified, experienced and independent auditor. The independent lead auditor may be supported by a provisional auditor subject to the Planning Secretary's agreement.</p> <p>Conditions of consent may require Independent Audits to be undertaken by an auditor and one or more technical specialists. The appointment of the auditor and technical experts must be agreed in writing by the Planning Secretary before each audit is commissioned. Each member of the audit team must receive the Department's agreement.</p> <p>Every audit will require the audit team to be endorsed, unless otherwise agreed by the Planning Secretary i.e. – this is not a one-off approval.</p>	<p><b>Appendix B</b>  <b>Appendix C</b>  <b>Appendix E</b></p>
3.2	<p>The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.</p> <p>Comments received during such consultation must be recorded and reported in the Independent Audit Report. Specific environmental issues raised during consultation should be investigated and findings of the investigation must be reported in the Independent Audit Report. There may be instances where the consulted parties requests are not reasonable and are outside of scope. In these situations, the auditor must provide justification of how they have considered the matters raised during consultation in the audit report. This justification may be provided in a table format.</p>	<p><b>Section 3.3</b>  <b>Appendix E</b></p>
3.3	<p>An Independent Audit must include:</p> <ol style="list-style-type: none"> <li>1. an assessment of compliance with:               <ol style="list-style-type: none"> <li>(a) all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;</li> <li>(b) all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and</li> </ol> </li> </ol>	<p><b>Appendix C</b></p>
3.3	<ol style="list-style-type: none"> <li>2. a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:               <ol style="list-style-type: none"> <li>(a) actual impacts compared to predicted impacts documented in the environmental impact assessment;</li> <li>(b) the physical extent of the development in comparison with the approved boundary;</li> <li>(c) incidents, non-compliances and complaints that occurred or were made during the audit period;</li> <li>(d) the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when</li> </ol> </li> </ol>	<p><b>Appendix C</b></p>

Section	Description	Where Addressed
	developing the scope of the audit; and (e) feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;	
3.3	The status of implementation of previous Independent Audit findings, recommendations and actions (if any);	<b>Section 5.1 Appendix C</b>
3.3	A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and	<b>This IEA Report</b>
3.3	Any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.	<b>Appendix C</b>
3.3	Audits must commence with an opening meeting and conclude with a closing meeting. The meetings must be attended by a representative of the proponent at manager level or above, the auditor and technical specialists (if any). During the opening meeting the objectives of the audit, the scope of the audit, the resources required and methodology to be applied must be discussed. At the closing meeting, preliminary audit findings must be presented, recommendations (if appropriate) must be made, and any post-audit actions must be confirmed. A register of attendees (including their name and position title) for the opening and closing meetings is to be recorded and a copy of the registers provided with the audit report	<b>Appendix A</b>
3.5	Independent Audits must include interviews with key personnel involved in project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. However, note that interviews are generally not sufficient evidence to verify compliance with a condition of consent and additional supporting evidence should be provided. Auditors must be provided with reasonable access to the key site personnel as required by an Independent Audit scope.	<b>Appendix A Appendix C</b>
3.6	Independent Audits must include a physical site inspection. The site inspection must cover all development areas and environmental aspects that form part of the scope of the audit. The proponent must provide the auditor with reasonable access to all requested development areas and activities, understanding that the inspections must be accompanied by the designated site representative and that some areas may not be physically accessible for safety or operational reasons. If the auditor considers restricted access has limited their ability to adequately undertake the audit as scoped, it must be noted in the Independent Audit Report. Recommendations to overcome the restricted access (where feasible) must be proposed for subsequent independent audits	<b>Appendix C Appendix D</b>