

RAVENSWORTH SOUTH COAL MINE

INDEPENDENT ENVIRONMENTAL
AUDIT

for AGL Macquarie Pty Limited

4 September 2024



DOCUMENT CONTROL

Document Status

Version	Description	Reviewed By	Approved By	Date Issued
01	Independent Environmental Audit	NC	DW	04/09/24

Document Details

Project Name	Ravensworth South Coal Mine
Document Title	Independent Environmental Audit
Client	AGL Macquarie Pty Limited
Client Address	Locked Bag 14120 MCMC, Melbourne VIC 8001
Author	James Bailey & Associates Pty Ltd
Author Address	6/127-129 John Street, Singleton NSW 2330
Our Reference	240904 Rav South IEA Main Report_final

LIMITATIONS OF REPORT

In preparing this Independent Environmental Audit on behalf of AGL Macquarie Pty Limited, James Bailey and Associates has assessed all activities appropriate and necessary to evaluate the environmental status of the site during the audit period. James Bailey and Associates has addressed all technical matters which might reasonably be considered to be relevant to such an audit conducted to standards which apply in New South Wales. Based on discussions with appropriate staff and a review of available documentation, it is James Bailey and Associates' opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, James Bailey and Associates 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 James Bailey and Associates' interpretation of the documentation reviewed, 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.

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 particular circumstances constitute a breach of relevant legislation.

CONTENTS

1. INTRODUCTION	1
1.1 Background	1
1.2 Audit Team	1
1.3 Audit Objectives	1
1.4 Audit Scope	2
1.5 Audit Period.....	2
2. AUDIT METHODOLOGY	4
2.1 Overview	4
2.2 IEA Preparation	4
2.3 Compliance Evaluation	4
2.4 Site Inspection	5
2.4.1 Opening Meeting.....	5
2.4.2 Site Overview and Orientation Session	5
2.4.3 IEA Interviews.....	5
2.4.4 Focused Site Inspection	5
2.4.5 Site Documentation Review	5
2.4.6 Follow Up Auditing	5
2.4.7 Exit Briefing	5
2.5 Audit Consultation.....	6
2.6 Compliance Status Descriptors	6
3. AUDIT FINDINGS	7
3.1 Approval and Document List.....	7
3.2 Compliance Performance.....	7
3.3 Summary of Agency Notices and Orders.....	7
3.4 Actions from Previous Audit	7
3.5 Non-Compliances During the Audit Period	7
3.6 Environmental Performance	9
3.6.1 Site Inspection Summary	9
3.6.2 Environmental Management Documents	9
3.6.3 Waste Management	9
3.6.4 Erosion and Sediment Control	9
3.6.5 Water Management.....	10
3.6.6 Air Quality	10
3.6.7 Biodiversity.....	10
3.6.8 Visual Amenity and Lighting	11
3.6.9 Bushfire Management	11
3.6.10 Aboriginal Heritage	11
3.6.11 Mine Rehabilitation	11
3.6.12 Environmental Incidents	12
3.6.13 Environmental Complaints	12
3.6.14 Environmental Impact Comparison.....	12
4. RECOMMENDATIONS	13

TABLES

Table 1	DA 86/51 IEA Requirements	2
Table 2	Feedback from Regulatory Consultation	6
Table 3	Summary of Compliance.....	7
Table 4	IEA Non-Compliances	8
Table 5	IEA Recommendations	13

FIGURES

Figure 1	DA 86/51 Project Layout	3
----------	-------------------------------	---

APPENDICES

Appendix A	Endorsement of IEA Team
Appendix B	IEA Declaration
Appendix C	IEA Compliance Tables
Appendix D	Stakeholder Engagement Correspondence
Appendix E	IEA Site Visit Agenda
Appendix F	Site Inspection Plates

1. INTRODUCTION

1.1 BACKGROUND

James Bailey & Associates (JBA) has been commissioned by AGL Macquarie Pty Limited (AGLM) to conduct an Independent Environmental Audit (IEA) of Ravensworth South Coal Mine (RSCM).

RSCM is owned and operated by AGLM. RSCM ceased operations in 2000, which left a number of voids from the incomplete filling of the mined area with overburden, which included Void 5. The rehabilitation of Void 5 commenced in 2014.

The Modification 1 to DA 86/51 (MOD1) determined on 19 April 2023, approved:

- Changes to the ash emplacement methodology within Void 5; and
- Removal of redundant pumping infrastructure within Void 5.

Figure 1 shows the layout of the Project as approved under DA 86/51 (MOD1).

The IEA has been conducted generally in accordance with the NSW DPIE *'Independent Audit Post Approval Requirements May 2020'* (IEA Guidelines).

1.2 AUDIT TEAM

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Tegan Brown of JBA. Specialist sub-consultants included:

- Biodiversity – Cumberland Ecology
 - Gitanjali Katrak;
 - Matt Freeman;
- Rehabilitation – Minesoils
 - Clayton Richards;
- Water Management – Alluvium
 - Georgia Burkin; and
 - Neal Albert.

A copy of the Department of Planning, Housing and Infrastructure (DPHI) endorsement of the IEA team is included in **Appendix A**. The Independent Environmental Audit Report Declarations for this IEA is included as **Appendix B**.

1.3 AUDIT OBJECTIVES

The IEA assesses RSCM activities during the audit period (see **Section 1.5**) and compliance with key regulatory approvals for the Project. The IEA assessed the status of conditions and commitments from:

- DA 86/51 (MOD1);
- DA 86/51 EIS Statement of Commitments;
- DA 86/51 management plans, strategies and programs;

- Mining Lease (ML) 1485; and
- Water licences and approvals.

1.4 AUDIT SCOPE

The IEA scope is defined under Schedule 2, Part C, Condition 9 of DA 86/51 which is reproduced below in **Table 1**.

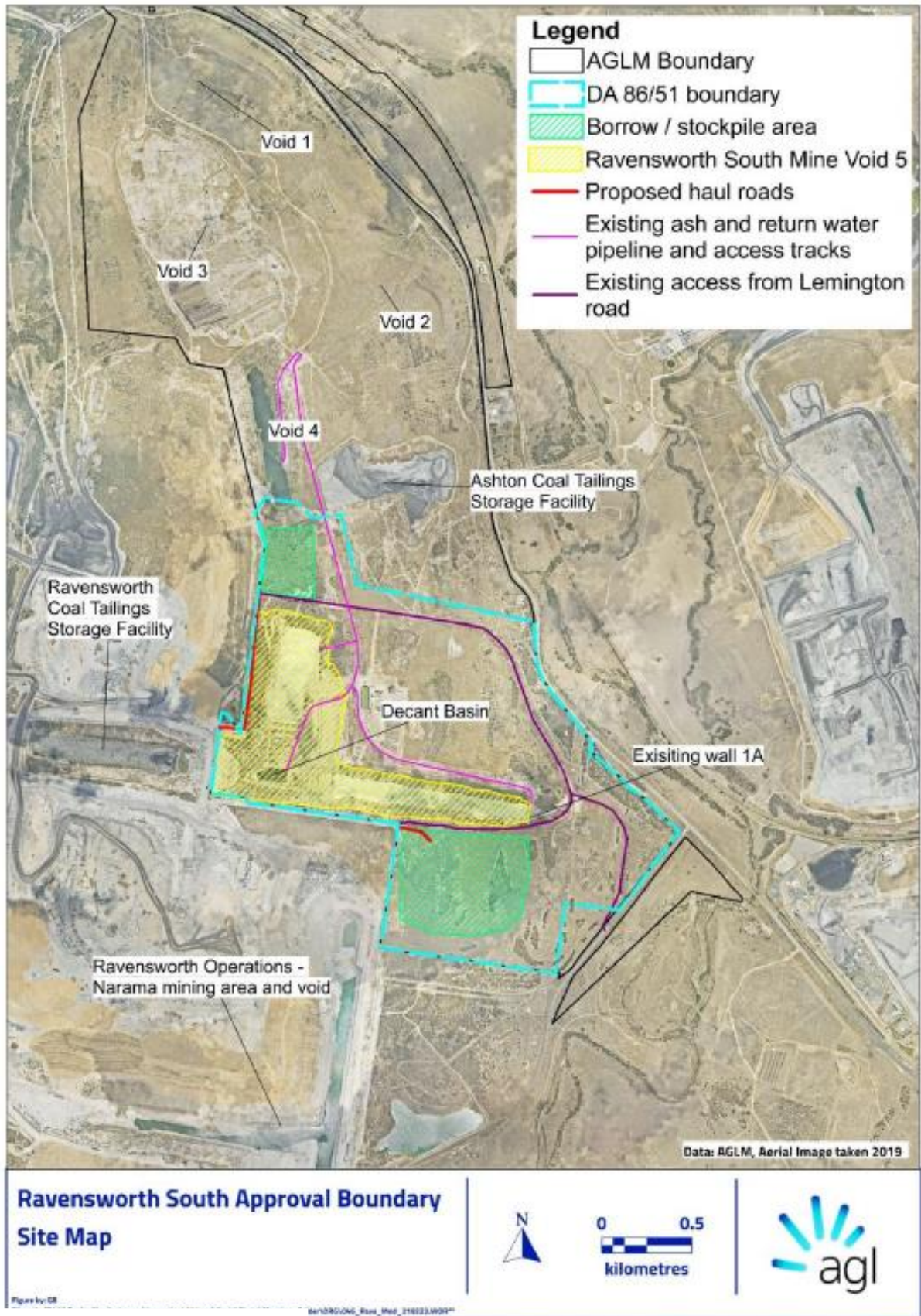
1.5 AUDIT PERIOD

The IEA covers the period from 19 April 2023 to 21 May 2024, the date of the audit site visit (the audit period).

Table 1 DA 86/51 IEA Requirements

Condition	Requirement	Report Section
C9	Within one year of approval of Mod 1, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:	This IEA
	(a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;	
	(b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary;	Section 1.2
	(c) be carried out in consultation with the relevant agencies;	Appendix D
	(d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals);	Section 3 and Appendix C
	(e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent;	Section 3 and Appendix C
	(f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and	Section 4 and Appendix C
	(g) be conducted and reported to the satisfaction of the Planning Secretary.	Responsibility of AGLM

Figure 1 DA 86/51 Project Layout



2. AUDIT METHODOLOGY

2.1 OVERVIEW

This IEA was undertaken in accordance with the requirements of DA 86/51 (see **Section 1.4**) and the IEA Guidelines. **Appendix A** includes a copy of DPHI endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of AGLM activities during the audit period was determined by assessment of key approval documents regulating site activities (see **Section 3.1**) and a desktop review of all plans, strategies, programs, monitoring data and correspondence relevant to the audit period. The desktop review was used as a basis for this IEA report and identified potential compliance issues that were verified during the Project site inspection and in interviews with key AGLM personnel.

The audit methodology also included consultation with NSW DPHI, Environment Protection Authority (EPA), and Singleton Council to seek any specific environmental issues that should be a focus of the IEA (see **Section 2.5**).

2.2 IEA PREPARATION

Preparation of the IEA involved:

- Submission of an information request to AGLM for the provision of evidence to verify the compliance status of RSCM project activities during the audit period;
- Engagement with key regulatory agencies for the Project regarding any specific issues that should be a particular focus of the IEA;
- Submission of an audit agenda to AGLM (see **Appendix E**) and confirmation over the scope of the site inspection component of the IEA;
- Desktop review of documentation provided by AGLM to determine the compliance status of approval and licencing conditions, identify good site practice and opportunities for improvement, in accordance with the requirements of the IEA Guidelines; and
- Preparation of compliance tables and protocols for the site inspection, including a checklist of specific regulatory requirements obtained from documents provided.

2.3 COMPLIANCE EVALUATION

The IEA consisted of a detailed desktop review of approval documentation and a site inspection. The findings of this IEA were based on verifiable evidence collected by:

- Review of documentation provided by AGLM (including document reference, revision numbers, dates and authors);
- Interviews with key site personnel; and
- Inspections of the RSCM site, activities and processes, including by JBA on 21 May 2024. Selected images taken during the site inspection are included in **Appendix F**.

Keith Simkin and Matthew Parkinson were the primary AGLM contacts for the audit and were present during the audit site inspections, along with Matt Jones.

A list of the key documentation reviewed for the IEA is found in **Section 3.1**. The evidence that was used to determine the compliance status with respect to each condition has been documented in the tables provided in **Appendix C**, along with relevant observations, notes and recommended opportunities for improvement.

2.4 SITE INSPECTION

A physical site inspection of RSCM was conducted on 21 May 2024 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

2.4.1 Opening Meeting

The IEA site inspection commenced with an opening meeting; attendees included Dorian Walsh (JBA), Tegan Brown (JBA), Keith Simkin (AGLM), Matthew Parkinson (AGLM) and Matt Jones (AGLM). The briefing included clarification of the audit objectives, scope, resources required and the methodology of the IEA.

2.4.2 Site Overview and Orientation Session

An orientation session was conducted by AGLM site personnel to provide JBA with a general overview of the Project during the audit period, an indication of the environmental setting, near neighbours, safety and emergency requirements and known environmental issues.

2.4.3 IEA Interviews

The IEA included interviews with key AGLM personnel involved with the management and operation of the Project. The IEA interviews during the site inspection were conducted to assist with verifying the compliance status of the Project. AGLM and Project personnel interviewed as part of the IEA included:

- Keith Simkin (Advisor Environment);
- Matthew Parkinson (Manager Environment and Approvals) and
- Matt Jones (Projects Construction Coordinator – Civil, Ash Management)

2.4.4 Focused Site Inspection

A focused site inspection was conducted following the initial site overview and opening meeting. The purpose of the site inspection was to review specific operation and environmental aspects of the Project and to assess RSCM environmental management systems and performance in detail.

2.4.5 Site Documentation Review

Relevant site documentation was reviewed with AGLM personnel during the site inspection interviews to verify compliance. Key documents reviewed included DA 86/51 (MOD1) environmental assessments, monitoring results, correspondence with regulatory agencies, Environmental Management Plans and procedures.

2.4.6 Follow Up Auditing

Follow up interviews and document reviews were conducted to clarify any outstanding compliance issues to be resolved prior to inclusion in the final IEA report.

2.4.7 Exit Briefing

An exit briefing was conducted prior to JBA departure from the site. Attendees of exit briefing included Dorian Walsh, Tegan Brown, Keith Simkin and Matthew Parkinson. The exit meeting included the discussion of preliminary audit findings, recommendations and explanation of actions required by AGLM and by JBA to complete the audit process required under the IEA Guidelines.

2.5 AUDIT CONSULTATION

Correspondence was sent to the DPHI, EPA and Singleton Council requesting their input into the scope of the IEA. Response was received from DPHI (see **Appendix D**), with comments provided in **Table 2**.

Table 2 Feedback from Regulatory Consultation

Comment	Response
DPHI	
<p>To date, there have been no audits of the Ravensworth South Coal Mine. We consider that the audit should focus on mine rehabilitation, water management and biodiversity, reflecting the technical expertise included in the audit team.</p>	<p>The audit team included biodiversity, rehabilitation and water specialists (see Section 1.2). Observations made in relation to these aspects of the Project are summarised in Sections 3.6.5 (water), Section 3.6.7 (biodiversity) and Section 3.6.11. Further comment on relevant DA 86/51 conditions and commitments provided in Appendix C.</p>

2.6 COMPLIANCE STATUS DESCRIPTORS

The compliance status of each condition reviewed during the IEA was assessed based on evidence provided and determined in accordance with the descriptors provided in the IEA Guidelines. No other terms have been used to describe the compliance status of conditions within this IEA.

3. AUDIT FINDINGS

3.1 APPROVAL AND DOCUMENT LIST

AGLM documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 21 May 2024. Approvals and documents assessed during the audit were related to:

- DA 86/51 approval conditions;
- DA 86/51 environmental assessment documents;
- DA 86/51 environmental management plans and procedures;
- AGLM environmental monitoring data; and
- AGLM correspondence with regulatory agencies and other records of consultation.

The tables included in **Appendix C** discuss the documentation that was used to determine compliance with the conditions of DA 86/51 assessed during the IEA.

3.2 COMPLIANCE PERFORMANCE

Table 3 provides a summary of compliance for key AGLM approvals and licensing during the audit period. A description of each identified non-compliance is provided in **Section 3.5** and **Appendix C**.

Table 3 Summary of Compliance

Document	C	NC	NT	Note	Total
DA 86/51 Conditions	27	4	19	3	53
DA 86/51 EIS Commitments	12	7	4	-	23
ML 1485	1	2	3	-	6

3.3 SUMMARY OF AGENCY NOTICES AND ORDERS

No notices or orders regarding RSCM were issued to AGLM during the audit period.

3.4 ACTIONS FROM PREVIOUS AUDIT

This IEA is the first to be completed for DA 86/51(MOD1) and as such, there are no previous actions to review.

3.5 NON-COMPLIANCES DURING THE AUDIT PERIOD

Table 4 lists the non-compliances identified during the audit period. Recommendations made in relation to these non-compliances are provided in **Section 4**, with further context provided in **Appendix C**.

Table 4 IEA Non-Compliances

Ref	Non-Compliance
DA 86/51	
Schedule 2, Condition A2(a)	Non-compliances (NC) with DA 86/51 conditions were identified during this IEA.
Schedule 2, Condition B4(c)	Evidence was not available at the time of the audit to confirm that reasonable efforts have been made to co-ordinate air quality management on the site with nearby mines.
Schedule 2, Condition B8(f)	Section 6.1.3 of the WMP mentions that erosion and sediment control structures are currently in place (for the existing stage) but does not describe these measures. The section only describes the future measures where new disturbance will be undertaken.
Schedule 2, Condition C3(c)	The Project WMP and Rehabilitation Strategy do not include reference to relevant commitments made in the EIS or MOD1 Modification Report.
Schedule 2, Condition C3(g)	No program to investigate and implement ways to improve environmental performance of the Project is included in the Rehabilitation Strategy.
DA 86/51 EIS Commitments	
GW1	Lab results and chain of custody documentation for groundwater monitoring was not available at the time of the audit.
SW3	Section 6.1.3 of the WMP mentions that erosion and sediment control structures are currently in place (for the existing stage) but does not describe these measures. The section only describes the future measures where new disturbance will be undertaken.
AQ3	No evidence was available at the time of the IEA to confirm that regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network has occurred during the audit period.
AQ4	There was no evidence available at the time of the IEA to confirm that vehicles, plant and equipment are operated in a proper and efficient manner.
NV3	Sighted a copy of the Environmental Compliance Training Presentation dated 2024, however this document does not include a specific section on noise mitigation.
	No evidence was available at the time of the IEA to confirm that low noise plant and equipment have been selected during the audit period.
B5	Evidence that vehicles were cleaned prior to mobilisation to site was not available at the time of audit.

Ref	Non-Compliance
V3	There were no records available at the time of the audit to confirm that AGLM are continuing to maintain screen plantings within their landholding.
ML 1485	
Condition 3	Evidence of co-operation agreements with overlapping title holders was not available at the time of audit.
Exploration Reporting	Copies of ML1485 exploration reporting was not available at the time of the audit.

3.6 ENVIRONMENTAL PERFORMANCE

3.6.1 Site Inspection Summary

The site inspection of RSCM was undertaken on 21 May 2024. Selected images taken during the site inspection are included as **Appendix F**. Non-compliances identified during the site inspection are described in **Table 4**.

3.6.2 Environmental Management Documents

The adequacy of AGLM environmental management documents for the Project and the implementation of these plans was reviewed as a component of this IEA. In general, the review of the environmental management documentation found that RSCM is operating in accordance with the environmental procedures and systems required under DA 86/51.

Management plans and strategies reviewed as part of this IEA included the AGLM Rehabilitation Strategy, Environmental Management Strategy (EMS) and Water Management Plan (WMP).

Non-compliances identified in relation to Project management plans are listed in **Table 4**.

3.6.3 Waste Management

Discussions with key AGLM personnel confirmed that waste generated by the project is removed from site under a contract with Remondis Australia Pty Ltd and taken to an appropriate licensed waste facility. The desktop review confirmed that AGLM are retaining EPA Online Waste Tracking System Transport Certificates which records the volumes and categories of waste being removed from the Project site.

The site inspection confirmed that the site is generally being maintained in a tidy condition and that there were segregated waste skip bins on the Project site at the time of the audit, see **Appendix F**.

Discussions with key AGLM personnel confirmed that no waste has been received onsite apart from the coal ash transfers to Void 5 as approved under DA 86/51.

3.6.4 Erosion and Sediment Control

An Erosion and Sediment Control Plan (ESCP) is included in Section 6 of the Water Management Plan (WMP), recommendations against the ESCP have been included in **Table 5**.

Erosion and sediment control works in the project site during the audit period were the existing controls such as limiting stripping and other measures, with designs following the Blue Book guidelines in the original designs of the Void 5. However, the evidence of the existing controls is not detailed in the WMP or any other documents. Improvement recommendations for the monitoring of existing erosion and sediment controls and for those required in future operations on site have been made in **Table 5**.

There are four small sediment dams at the Project site and no new sediment dams were installed during the audit period.

3.6.5 Water Management

Water at the project site is managed in accordance with the approved WMP.

Discussions with key AGLM personnel confirmed that:

- Water demands of the audit site during the audit period included clean water use for four to five AGLM staff and dust suppression water;
- There were two sources of water supply to the audit site during the audit period: direct rainfall and decant water in Void 5 which was from ash slurry received from Bayswater power station;
- There had not been new development to the audit site during the audit period, therefore, the audit site was operating under its existing condition with sufficient water; and
- There has been no discharge during the audit period and that all water drains back to the void.

There was no evidence available at the time of the IEA to confirm that runoff water did not drain to the creeks mentioned in the WMP during the audit period. A recommendation has been included in **Table 5** for AGLM to retain evidence showing that runoff water does not drain into the creeks mentioned within the WMP.

During the site inspection, it was confirmed that there are two diesel storages (with respective capacities of 5,000L and 10,000L) on the Project site (see **Plate 5** and **Plate 7** of **Appendix F**). It has been recommended that protocols to manage potential risk from these storages is added into AGLM documentation. No chemicals were sighted outside of bunding during the site inspection. AGLM retain records of regular inspections of Project vehicles and equipment.

3.6.6 Air Quality

The desktop review confirmed that Air Quality management measures are included within the Project Environmental Management Strategy (EMS).

No offensive odours were detected on the site during the IEA site inspection. Discussions with key AGLM personnel confirmed that there has been no complaints received during the audit period in relation to odour.

Water carts were observed operating at the time of the site inspection on Project access tracks (see **Appendix F**). Discussions with key AGLM personnel confirmed that when it is necessary, activities are suspended or modified during dry and windy weather conditions to minimise dust. Discussions with AGLM personnel also confirmed that there are two real time dust monitors that are maintained to provide data to inform operational changes.

Discussions with key AGLM personnel also confirmed that during the audit period spraying of polymer for dust suppression at the eastern arm of void 5 has been undertaken. The site inspection confirmed that polymer can be sprayed onto the ash surface by truck which uses the 'causeway' which was developed specifically for treating the eastern arm of Void 5 (see **Appendix F**). There was no visible dust emissions at the time of the site inspection (see **Appendix F**).

Discussions with AGLM key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts.

Recommendations made in relation to air quality management are included in **Table 5**.

3.6.7 Biodiversity

Discussions with key AGLM personnel and the desktop review confirmed that there has been no new disturbance required during the audit period. All future disturbance would be required to go through AGLM Ground and Vegetation Approval application process before commencement.

It was identified during the site inspection that boundaries of the Project footprint were clearly delineated to prevent any unnecessary clearing beyond the existing disturbance footprint. It was noted that access to the site is restricted by gates and fencing for restriction of public access and associated impacts from domestic pets, waste dumping and damage to adjoining vegetation.

40 km/hr speed limit signage was observed on Project access roads at the time of the site inspection to minimise the potential for vehicle collisions with fauna (see **Appendix F**).

A number of measures to mitigate impacts on flora and fauna from noise, vibration, waste, light and air pollution were identified during the site inspection and desktop review. Lighting has been reduced and there has been no fixed or mobile lighting during the audit period. Noise and air quality impact minimisation measures are outlined within the EMS.

No waste management issues were noted during the site inspection.

3.6.8 Visual Amenity and Lighting

Discussions with key AGLM personnel confirmed that there has not been a requirement for fixed or mobile lighting on site during the audit period as all work was completed during daylight hours only.

The site inspection confirmed that there is a visual bund and tree plantings to screen views to the Void 5 eastern arm from the New England Highway. Tree screening was sighted during the site inspection (see **Appendix F**).

No complaints were received during the audit period in relation to visual amenity or lighting impacts.

3.6.9 Bushfire Management

Discussions with key AGLM personnel confirmed that there was a grass fire which occurred at site on 27 October 2023. The desktop review confirmed that AGLM informed DPHI of the event and that follow-up biodiversity and rehabilitation monitoring is being completed to assess the impacts of the bushfire.

Desktop review confirmed that contractors have been engaged to complete vegetation management on the site. The site inspection confirmed that firebreaks are in place (see **Appendix F**).

3.6.10 Aboriginal Heritage

Discussions with key AGLM personnel confirmed that no new Aboriginal objects were identified on the site during the audit period. Discussions with key AGLM personnel also confirmed that there has been no human remains found during the audit period.

3.6.11 Mine Rehabilitation

AGLM engaged GHD to prepare a Rehabilitation Strategy which summarises the proposed approach to rehabilitation for the project to address the DA 86/51 requirements. The strategy focuses on the proposed approach to rehabilitation of Void 5 following the approved changes from the Modification Report.

The IEA desktop review confirmed that the Rehabilitation Management Plan (RMP) was submitted 31 July 2022. Recommendations against the Rehabilitation Strategy RMP have been included in **Table 5**. The desktop review confirmed that a Trigger Action Response Plan (TARP) is included in Section 10 of the RMP, aimed at identifying and mitigating unexpected variations to the planned rehabilitation outcomes. The RMP also provides details on rehabilitation research, modelling and trials with further monitoring results available publicly within the Annual Reviews for the Project.

During the site inspection it was confirmed that there were no stockpiles currently present on site, however it was noted that all non-active areas (except burnt and spontaneous combustion impacted areas) were stabilised with vegetation to prevent dust (see **Appendix F**).

Screen plantings were inspected on site during the site inspection and it was confirmed that they are being maintained effectively (see **Appendix F**).

3.6.12 Environmental Incidents

No environmental incidents requiring notification to regulatory agencies were recorded during the audit period.

3.6.13 Environmental Complaints

No community complaints were received regarding Project activities during the audit period.

3.6.14 Environmental Impact Comparison

Project activities during the audit period were found to be being undertaken generally in accordance with those described in DA 86/51 (MOD1) environmental assessment documents.

A review of DA 86/51 (MOD1) conditions and commitments completed for this IEA is detailed in **Appendix C**.

4. RECOMMENDATIONS

A summary of the non-compliances with AGLM approvals identified during the audit period is provided in **Table 4**. Recommendations made to respond to these non-compliances, as well as opportunities identified to improve AGLM’s general environmental performance, are provided in **Table 5**.

Table 5 IEA Recommendations

Ref	Recommendation Description
DA 86/51	
Schedule 2, Condition B1(a)	It is recommended that the AGLM Environmental Compliance Training presentation is reviewed and updated to include a specific section in relation to minimising noise impacts from the Project.
Schedule 2, Condition B1(b)	It is recommended that AGLM implement reasonable and feasible noise attenuation measures on all plant and equipment that will operate in noise sensitive areas and retain records of this attenuation being maintained.
Schedule 2, Condition B4(a)	It is recommended that records are retained that document the regular inspection of areas affected by spontaneous combustion.
Schedule 2, Condition B4(c)	It is recommended that AGLM consult with nearby mines over the co-ordination of air quality impact management. Records of this consultation should be retained.
Schedule 2, Condition B6	It is recommended that AGLM: <ul style="list-style-type: none"> • Include a map with runoff direction and sediment dam locations in the WMP; and • Implement a procedure for treating and discharging water if the Project sediment dams are full, to comply with Section 7 in the WMP, which notes that “all water collected from worksites will be treated and discharged (where possible)”.
Schedule 2, Condition B7	It is recommended that AGLM: <ul style="list-style-type: none"> • Complete and document regular inspections of erosion and sediment control works on site and any corrective actions required; and • Design, construct and maintain new dams and erosion and sediment controls required for the project generally in compliance with Blue Book requirements.
	It is recommended that AGLM review the status of site sediment dams and complete maintenance works for these storages, if required. It is also recommended that AGLM retain records to show that maintenance and inspection of erosion and sediment control structures and sediment dams are being completed.
Schedule 2, Condition B8(f)	It is recommended that the WMP is updated to confirm the size and location of existing sediment dams on site.
	It is recommended that the Project WMP is reviewed and updated to confirm that flood management structures are not required for the Project.
	It is recommended that records for pumping during the audit period are retained.

Ref	Recommendation Description
Schedule 2, Condition B21	It is recommended that areas of weed infestations identified in the 2023 Annual Rehabilitation Reporting are removed, and infill planting carried out if required.
Schedule 2, Condition B22(h)	It is recommended the Rehabilitation Strategy is updated include more detail about opportunities to refine and improve the final landform outcomes over time in future revisions of the document.
Schedule 2, Condition B22(i)	It is recommended that a copy of the Project risk assessment is included in the Rehabilitation Strategy, either as a table in Section 12, or as an appendix to the document.
Schedule 2, Condition C3(a)	It is recommended that a summary of baseline monitoring data is added to the Rehabilitation Strategy in a future revision of the document, as an appendix.
Schedule 2, Condition C3(b)	It is recommended that the RMP include a table in Section 1, following Section 1.2, which includes the specific DA 86/51 conditions relevant to rehabilitation, and where they are addressed in the document.
Schedule 2, Condition C3(c)	It is recommended that EIS commitments are included in the WMP and Rehabilitation Strategy at the next revision of each document.
	It is also recommended that any relevant commitments or recommendations identified in the EIS and Modification Report (Mod 1) are included within the RMP.
Schedule 2, Condition C3(g)	It is recommended that the Rehabilitation Strategy is revised and updated to include a program to investigate and implement ways to improve the environmental performance of the development over time.
DA 86/51 EIS Commitments	
GW1	It is recommended that groundwater monitoring lab results and chain of custody records are retained.
	It is recommended that the additional groundwater monitoring bore and any associated performance criteria are referenced in the Project WMP once it has been installed.
SW3	See recommendations made against DA 86/51 Conditions B7 and B8 above.
AQ3	It is recommended that regular inspection and removal of debris from plant and equipment is undertaken to avoid the tracking of materials onto the adjacent road network and records are retained.
AQ4	It is recommended that pre starts are completed for all plant and equipment before use and that copies are retained by AGLM contractors.
	It is recommended that training records / operator competencies are retained to confirm that all vehicle, plant and equipment are operated in a proper and efficient manner.
NV3	It is recommended that the Environmental Compliance Training Presentation is reviewed and updated to include a specific section on noise mitigation considerations.
	It is recommended that evidence is retained to confirm the selection of low noise plant and equipment.
B5	It is recommended that AGLM complete and document the cleaning of all heavy vehicles prior to arrival on site.

Ref	Recommendation Description
V3	It is recommended that AGLM retain evidence to confirm that inspections and any required maintenance works for tree screening areas are undertaken.
ML 1485	
Condition 3	It is recommended that AGLM make attempts to enter into agreements with other relevant parties who hold mining authorities that overlap ML 1485.
Exploration Reporting	It is recommended that AGLM retain copies of relevant Exploration Reporting for ML 1485.

APPENDIX A
ENDORSEMENT OF IEA TEAM

NSW Planning ref: DA86-51-PA-14

Matthew Parkinson
Manager Environment and Approvals
AGL MACQUARIE PTY LIMITED
Wonnarua Country
New England Highway
Muswellbrook New South Wales 2333
DATEWILLBEINSERTEDHERE

Sent via the Major Projects Portal only

Subject: Ravensworth South/No.2 – Independent Environmental Audit team endorsement

Dear Mr Parkinson

I refer to your request for the Planning Secretary's endorsement of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit (IEA) of the Ravensworth South/No.2 Mine, submitted as required by condition C9 of DA86-51 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 29 April 2024.

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

Consequently, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Dorian Walsh – lead auditor
- Tegan Brown – auditor
- Gitanjali Katrak – biodiversity specialist
- Matt Freeman – biodiversity specialist
- Clayton Richards – rehabilitation specialist
- Georgia Burkin – water management specialist
- Neal Albert – water management specialist

Please ensure this correspondence is appended to the IEA report.

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

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 0400 245 170 or email compliance@planning.nsw.gov.au

Yours sincerely

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

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

APPENDIX B
IEA DECLARATION

APPENDIX C
IEA COMPLIANCE TABLES

Table C1 Project Approval DA 86/51

Cond	Project Approval DA 86/51	Status	Evidence
SCHEDULE 2: PART A - ADMINISTRATIVE CONDITIONS			
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT			
A1.	In addition to meeting the specific performance measures and criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	C	A review of Ravensworth South (Project) records and inspection of DA 86/51 project site found that reasonable and feasible controls are in place to prevent and / or minimise material harm to the environment from site operations. Comments on Project environmental controls are provided under the relevant conditions below.
TERMS OF CONSENT			
A2.	The development may only be carried out:	NC	Non-compliances (NC) with DA 86/51 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.
	(a) in compliance with the conditions of this consent;		
	(b) in accordance with all written directions of the Planning Secretary;	NT	KS (pers comms) confirmed that there has been no written directions made by DPHI during the audit period.
	(c) generally in accordance with the EIS and Modification Report (Mod 1); and	C	A review of Project documentation found that the Project is being carried out generally in accordance with the EIS and Mod 1 Modification Report.
	(d) generally in accordance with the Development Layout in Appendix 2.	C	The site layout is generally consistent with the general development layout shown in Appendix 2 of DA 86/51.

Cond	Project Approval DA 86/51	Status	Evidence
A3.	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and	NT	KS (pers comms) confirmed that there has been no written directions during the audit period in relation to the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to DA 86/51.
	(b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	NT	KS (pers comms) confirmed that there has been no written directions during the audit period from DPHI in relation to the implementation of any actions or measures contained in any such document referred to in condition A3(a).
A4.	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and any document/s listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	NT	KS (pers comms) confirmed that no inconsistencies were identified during the audit period.
LIMITS OF CONSENT			
Operations			
A5.	Emplacement activities may be carried out on the site, within the approved disturbance boundary.	C	Emplacement activities during the audit period have occurred within the 'Ravensworth South Mine Void 5' area identified in Appendix 2 of DA 86/51. KS confirmed that disturbance for the 'borrow / stockpile areas' and associated haul roads has not commenced.
A6.	No coal may be extracted, processed or stockpiled at, or transported from, the site. <i>Notes:</i> <ul style="list-style-type: none"> <i>Under this consent, the Applicant is required to decommission and rehabilitate the site and carry out other requirements in relation to emplacement activities. Consequently, this consent will continue to apply in all respects other than to permit the carrying out of emplacement activities until the rehabilitation of the site and other requirements have been carried out to the required standard.</i> 	C	KS (pers comms) confirmed that coal extraction, processing and transport has not been undertaken on site.

Cond	Project Approval DA 86/51	Status	Evidence
	<ul style="list-style-type: none"> • <i>Emplacement activities and rehabilitation are also regulated under the Mining Act 1992.</i> 		
Hours of Operation			
A7.	The Applicant may undertake emplacement activities 24 hours a day, 7 days a week.	C	Noted.
Identification of Approved Disturbance Area			
A8.	Within three months of approval of Mod 1, or approval of any subsequent modification to this consent, the Applicant must provide to the Department a survey plan of the boundaries of the approved disturbance areas.	C	<p>Sighted a copy of Ravensworth South Coal Mine Approved Disturbance Areas Setout Plan prepared by Tony Mexon & Associates dated 25 May 2023. The plan identifies MOD1 disturbance areas.</p> <p>Sighted email from DPE Planning Portal to MP dated 30 June 2023 which notes a post approval document named Survey Plan has been lodged with the Department.</p>
EVIDENCE OF CONSULTATION			
A9.	Where conditions of this consent require consultation with an identified party, the Applicant must:	C	<p>Evidence of consultation provided by AGLM is described against the relevant conditions below. This includes evidence of consultation being attached to Project documents including the:</p> <ul style="list-style-type: none"> • Water Management Plan (Schedule 2, Condition B8) • Rehabilitation Strategy (Schedule 2, Condition B22); • Rehabilitation Management Plan (Schedule 2, Condition B23); • Environmental Management Strategy (Schedule 2, Condition C1).
	(b) provide details of the consultation undertaken, including:	C	See Schedule 2, Condition A9(a) above.
	(i) the outcome of that consultation, matters resolved and unresolved; and		
	(ii) details of any disagreement remaining between the party consulted and the Applicant and how the	C	See Schedule 2, Condition A9(a) above.

Cond	Project Approval DA 86/51	Status	Evidence
	Applicant has addressed the matters not resolved.		
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS			
A10.	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	NT	KS (pers comms) confirmed that there has been no staging of plans, strategies or programs during the audit period.
	(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined);	NT	KS (pers comms) confirmed that no strategy, plan or program has been combined during the audit period.
	(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	NT	KS (pers comms) confirmed that no strategy, plan or program has been updated during the audit period.
A11.	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	NT	See Schedule 2, Condition A10 above.
A12.	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	NT	See Schedule 2, Condition A10 above.
PROTECTION OF PUBLIC INFRASTRUCTURE			
A13.	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and	NT	KS (pers comms) confirmed that no public infrastructure has been damaged by carrying out the development during the audit period.
	(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	NT	KS (pers comms) confirmed that no public infrastructure has needed to be relocated as a result of the development during the audit period.
DEMOLITION			
A14.	All demolition must be carried out in accordance with <i>Australian Standard AS 2601-2001 The Demolition</i>	NT	KS (pers comms) confirmed that there has

Cond	Project Approval DA 86/51	Status	Evidence
	<i>of Structures</i> (Standards Australia, 2001).		been no demolition during the audit period.
COMPLIANCE			
A15.	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	C	<p>KS (pers comms) noted a project-specific compliance package has been completed and is currently being rolled out as of July 1, and a memo was emailed to AGLM personnel informing them of the site-specific training package.</p> <p>Sighted a copy of the AGLM Environmental Compliance Training presentation dated 2024 which explains the key environmental obligations, environmental monitoring and reporting and environmental compliance and management procedures.</p> <p>Sighted KS internal email dated 29 April 2024 which includes a memo relating to Project consent. The email requests that the memo is provided to any relevant contractors/ other workers that are operating in the area. The memo notes that:</p> <ul style="list-style-type: none"> • Ravensworth South consent is in place and regulates activities at Void 5, mainly relating to ash deposition and rehabilitation; • Environmental management plans are in place: <ul style="list-style-type: none"> – EMS; – WMP; and – Rehabilitation Strategy.

Cond	Project Approval DA 86/51	Status	Evidence
			<ul style="list-style-type: none"> The consent and these management plan contain environmental conditions that need to be followed; These plans relate to aspects such as: <ul style="list-style-type: none"> Minimising the emission of dust; Managing water and sediment; Minimising odour; Lighting and noise management; Visual impacts; and Aboriginal heritage.
APPLICABILITY OF GUIDELINES			
A16.	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of inclusion (or later update) in the condition.	Note only	Noted.
A17.	Notwithstanding Condition A16, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, in respect of ongoing monitoring and management obligations, agree to or require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	NT	KS (pers comms) confirmed that the Secretary has not required updated compliance guidelines.
SCHEDULE 2: PART B – SPECIFIC ENVIRONMENTAL CONDITIONS			
NOISE			
Noise Operating Conditions			
B1.	The Applicant must: (a) take all reasonable steps to minimise noise from operational activities, including low frequency noise and other audible characteristics, as well as road noise associated with the development;	C	KS (pers comms) confirmed that no work is completed outside business hours. MJ (pers comms) confirmed that machinery maintenance records are available and that minimal plant and equipment is in operation on site compared to surrounding projects. Sighted examples of maintenance records, including:

Cond	Project Approval DA 86/51	Status	Evidence
			<ul style="list-style-type: none"> • Copy of Plant service / repair register, serial number B1Po2585 and dated from 2020 to 2024 which records maintenance for 2007 Caterpillar 740 Articulated Dump Truck – Water Cart. • Coates Hire Service History Listing dated 18 March 2024 which records repairs and routine inspections. <p>KS (pers comms) confirmed that there have been no noise complaints received during the audit period.</p> <p>Sighted a copy of the Ravensworth South Coal Mine Modification EMS dated 21 February 2024 (EMS) which notes that Earthmoving activities will be confined to daylight hours.</p> <p>The EMS also notes that training will be implemented to induct staff on noise sensitivities, as well as regular toolbox talks.</p> <p>Sighted a copy of the Environmental Compliance Training presentation dated 2024. It is recommended that the AGLM Environmental Compliance Training presentation is reviewed and updated to include a specific section in relation to minimising noise impacts from the Project.</p> <p>KS (pers comms) confirmed that the current noise management strategy for site is to not operate at night and minimise surface works. KS (pers comms) also confirmed that the major disturbance works for Modification 1 have not yet commenced and the site is located a</p>

Cond	Project Approval DA 86/51	Status	Evidence
			considerable distance from sensitive receptors. The EMS also describes noise management measure including co-operation with surrounding operations to minimise cumulative noise levels at surrounding sensitive receivers.
	(b) implement reasonable and feasible noise attenuation measures on all plant and equipment that will operate in noise sensitive areas; and	C	The EMS notes that noise management measures includes select low-noise plant and equipment and ensuring equipment mufflers operate in a proper and efficient manner. MP confirmed that operations in noise sensitive areas did not commence during the audit period (i.e. activities outside of the Void 5 footprint). It is recommended that AGLM implement reasonable and feasible noise attenuation measures on all plant and equipment that will operate in noise sensitive areas and retain records of this attenuation being maintained.
	(c) take all reasonable steps to minimise the noise impacts of the development in noise sensitive areas during the evening and night.	C	KS (pers comms) confirmed that Project operations during the audit period only occurred during daylight hours.
BLASTING			
B2.	The Applicant must not carry out blasting on the site.	C	KS (pers comms) confirmed that blasting was not required during the audit period.
AIR QUALITY AND GREENHOUSE GAS			
Odour			
B3.	The Applicant must ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	C	No offensive odours were detected during the site inspection.

Cond	Project Approval DA 86/51	Status	Evidence
			KS (pers comms) confirmed that no odour complaints have been received during the audit period.
Air Quality Operating Conditions			
B4.	<p>The Applicant must:</p> <p>(a) take all reasonable steps to:</p> <p>(i) minimise odour, fume and particulate matter (including PM₁₀ and PM_{2.5}) emissions of the development, paying particular attention to minimising wheel-generated haul road emissions;</p>	C	<p>MJ (pers comms) confirmed that there is a 40KL watercart available for dust suppression of Project access tracks and conditioning material. A water cart was sighted operating during the IEA site inspection, see Plate 1.</p> <p>KS (pers comms) confirmed that spraying of polymer for dust suppression of material emplaced at the eastern arm of Void 5 has been undertaken, with access developed for the northern arm to allow for application.</p> <p>KS (pers comms) confirmed that polymer can be sprayed onto the ash surface by truck which uses the 'Causeway' developed specifically for treating the eastern arm of Void 5. Sighted a copy of email from Daracon dated 18 April 2024 which notes that hydro spraying of polymer at the ash dam Void 5 has been completed. (see Plate 2).</p> <p>KS (pers comms) confirmed that there are two real time air quality monitors for that send alarms as a warning system that goes through to the Project environment team and a TARP is in place for elevated dust.</p> <p>Sighted copy of SF03 – Prework Brief & Toolbox Sign In / Out Sheet dated 4 March 2024 that notes the site closed at 2:00 pm due to high winds and airborne dust.</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>KS (pers comms) confirmed that there has been no complaints received in relation to odour, fume or dust during the audit period.</p> <p>The EMS includes air quality management measures. Table 11 of the EMS notes that the following will be carried out to manage wind erosion from Void 5 cap, borrow pit areas and haulage roads:</p> <ul style="list-style-type: none"> • Watering stockpiles and exposed surfaces; and • Progressive rehabilitation of exposed surfaces (as feasible). <p>Table 11 of the EMS also notes that while hauling materials, the following will be undertaken:</p> <ul style="list-style-type: none"> • Regular watering of unsealed haulage routes; and • Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network. <p>MJ (pers comms) confirmed truck & dog carry no clay-based materials and nothing is tracked onto roads outside of the site. MJ (pers comms) confirmed that street sweepers are used multiple times per week and can be requested to clean up site access points.</p> <p>MJ (pers comms) confirmed that all operators of truck & dog need to sweep off running boards etc. and that they have the ability to wash down the vehicle with the watercart on site.</p>

Cond	Project Approval DA 86/51	Status	Evidence
	(ii) eliminate or minimise the risk of spontaneous combustion;	C	<p>Viewed areas where previous spontaneous combustion was being monitored or treated (see Plate 10).</p> <p>MJ (pers comms) confirmed that inspections are completed for spontaneous combustion each shift, with thermal scanners used as required. It is recommended that records are retained that document the regular inspection of areas affected by spontaneous combustion.</p>
	(iii) minimise any visible off-site air pollution generated by the development; and	C	<p>See Condition B4 (a) above.</p> <p>Table 11 of the EMS notes that during loading and unloading of materials, the following actions will be undertaken:</p> <ul style="list-style-type: none"> • Minimising drop heights; and • Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions. <p>MJ (pers comms) when it is necessary activities are suspended or modified during dry and windy weather conditions, which is recorded in sign in / sign out sheets.</p> <p>Sighted copy of Prework Brief & Toolbox Sign In / Out Sheet dated 4 March 2024 which notes the site was closed due to high winds and airborne dust.</p> <p>KS (pers comms) confirmed all works are undertaken with standard civil construction equipment with unloading done on ground / surface level.</p>

Cond	Project Approval DA 86/51	Status	Evidence
	(iv) minimise the extent of potential dust generating surfaces exposed on the site at any given point in time;	C	<p>See Schedule 2, Condition B4 (a) above regarding the application of dust suppressant on the Void 5 emplacement area.</p> <p>KS (pers comms) confirmed that development of the borrow pit areas and associated haul roads identified in DA 86/51 MOD1 did not commence during the audit period.</p>
	(b) ensure that all 'non-road' mobile diesel equipment used in undertaking the development minimise diesel emissions to the greatest extent practicable; and	C	<p>Table 3 of the EMS describes the compliance requirement of ensuring that all 'non-road' mobile diesel equipment used in undertaking the development minimise diesel emissions to the greatest extent practicable.</p> <p>MJ (pers comms) confirmed that regular maintenance is completed on all 'non road' mobile diesel equipment (see Schedule 2, Condition B1 above).</p>
	(c) make all reasonable efforts to co-ordinate air quality management on the site with the air quality management at nearby mines to minimise cumulative air quality impacts.	NC	<p>The EMS notes the need for AGLM to make all reasonable efforts to co-ordinate air quality management on the site with the air quality management at nearby mines to minimise cumulative air quality impacts.</p> <p>Evidence was not available at the time of the audit to confirm that reasonable efforts have been made to co-ordinate air quality management on the site with nearby mines.</p> <p>It is recommended that AGLM consult with nearby mines over the co-ordination of air quality impact management. Records of this consultation should be retained.</p>

Cond	Project Approval DA 86/51	Status	Evidence
WATER			
Water Supply			
B5.	<p>The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.</p> <p><i>Note:</i> <i>Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain all necessary water licences for the development, including during rehabilitation and post mine closure.</i></p>	C	<p>The Project Water Management Plan (WMP) dated 21/4/2024 outlines the approach for Water Supply and notes that site water requirements would be drawn from existing AGLM entitlements, associated with the ongoing operation of Bayswater Power Station. The WMP also notes that the Project does not involve groundwater abstraction and any required harvesting of surface water is covered by existing entitlement, and no new water licences would be required.</p> <p>The water balance flow diagram in the Appendix 3 of the Ravensworth Environmental Management Plan Report 2023 (REMPR-2023) shows that Void 5 had sufficient water during the 2023 period. The water volume in this water balance, however, is only estimated.</p> <p>AGLM staff informed Alluvium during audit interviews that:</p> <ul style="list-style-type: none"> • The water demands of the audit site during the audit period included clean water use for 4-5 AGLM staff and dust suppression water. • There were two sources of water supply to the Project during the audit period: direct rainfall and decant water in Void 5 which was from ash slurry received from Bayswater Power Station. • There had not been new disturbance

Cond	Project Approval DA 86/51	Status	Evidence
			during the audit period, therefore, the audit site was operating under its existing condition with sufficient water.
Water Discharges			
B6.	The Applicant must ensure that all surface discharges from the site comply with: (a) discharge limits (both volume and quality) set for the development in any EPL; or	C	<p>The WMP outlines the surface discharge management in accordance with EPL 779. AGLM staff informed the Alluvium that there were likely no surface water discharges to the environment as runoff water would be infiltrated to vegetated surface and drains to sediment dams, while decant water was pumped back to Void 4. However, Section 4.2 in the WMP indicates that surface water runoff from Project is anticipated to drain to Bowmans Creek and Bayswater Creek located east and west of the sites.</p> <p>In terms of water quality, there was no records of pollution over the audit period. AGLM staff showed the internal online system to share records of incidents in AGLM sites (My HSE) during the interview without any records related to water in the audit period.</p> <p>It is recommended that AGLM:</p> <ul style="list-style-type: none"> • Include a map with runoff direction and sediment dam locations in the WMP; and • Implement a procedure for treating and discharging water if the Project sediment dams are full, to comply with Section 7 in the WMP, which notes that "all water collected from

Cond	Project Approval DA 86/51	Status	Evidence										
			worksites will be treated and discharged (where possible)".										
	(b) relevant provisions of the POEO Act and Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	C	AGLM staff informed Alluvium during audit interviews that the surface water was managed to meet the EPL 779 requirements and the POEO Act and Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002 had not been considered for the Project.										
Water Management Performance Measures													
B7.	The Applicant must ensure that the development complies with the performance measures in Table 1.												
	<p><i>Table 1: Water management performance measures</i></p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Performance Measure</th> </tr> </thead> <tbody> <tr> <td>Water management – General</td> <td> <ul style="list-style-type: none"> Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems Minimise the use of clean and potable water on the site Maximise water recycling, reuse and sharing opportunities Design, install, operate and maintain water management systems in a proper and efficient manner Minimise risks to the receiving environment and downstream water users </td> </tr> <tr> <td>Erosion and sediment control works</td> <td> <ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i>, <i>Volume 2C: Unsealed Roads (DECC, 2008)</i>, and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i> Design, install and maintain any new infrastructure within 40 metres of watercourses in accordance with the guidance series for <i>Controlled Activities on Waterfront Land (DPI Water, 2012)</i> </td> </tr> <tr> <td>Sediment dams</td> <td> <ul style="list-style-type: none"> Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004)</i> and <i>2E Mines and Quarries (DECC, 2008)</i> and the requirements under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i> </td> </tr> <tr> <td>Mine water storages</td> <td> <ul style="list-style-type: none"> Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water New storages designed to contain the 100 year ARI storm event and minimise permeability </td> </tr> </tbody> </table>	Feature	Performance Measure	Water management – General	<ul style="list-style-type: none"> Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems Minimise the use of clean and potable water on the site Maximise water recycling, reuse and sharing opportunities Design, install, operate and maintain water management systems in a proper and efficient manner Minimise risks to the receiving environment and downstream water users 	Erosion and sediment control works	<ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i>, <i>Volume 2C: Unsealed Roads (DECC, 2008)</i>, and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i> Design, install and maintain any new infrastructure within 40 metres of watercourses in accordance with the guidance series for <i>Controlled Activities on Waterfront Land (DPI Water, 2012)</i> 	Sediment dams	<ul style="list-style-type: none"> Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004)</i> and <i>2E Mines and Quarries (DECC, 2008)</i> and the requirements under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i> 	Mine water storages	<ul style="list-style-type: none"> Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water New storages designed to contain the 100 year ARI storm event and minimise permeability 	C	<p>Water Management - General</p> <ul style="list-style-type: none"> AGLM staff informed Alluvium during audit interviews that dirty water (i.e., ash slurry water) was contained within the decant dam while clean water (i.e., surface runoff) was separated by topography. Table 8 – Section 7.4.1 in the WMP outlines that reviewing water use records is a measure to minimise potable water use in the audit site. AGLM have applied polymers for dust suppressant product on Void 5 eastern arm in 2024, which also reduces clean water use (see Plate 2). AGLM staff informed Alluvium during audit interviews that water used in the Project site was recycled water from ash slurry. Section 1.1 of the WMP indicates that water from the Project is
Feature	Performance Measure												
Water management – General	<ul style="list-style-type: none"> Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems Minimise the use of clean and potable water on the site Maximise water recycling, reuse and sharing opportunities Design, install, operate and maintain water management systems in a proper and efficient manner Minimise risks to the receiving environment and downstream water users 												
Erosion and sediment control works	<ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i>, <i>Volume 2C: Unsealed Roads (DECC, 2008)</i>, and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i> Design, install and maintain any new infrastructure within 40 metres of watercourses in accordance with the guidance series for <i>Controlled Activities on Waterfront Land (DPI Water, 2012)</i> 												
Sediment dams	<ul style="list-style-type: none"> Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004)</i> and <i>2E Mines and Quarries (DECC, 2008)</i> and the requirements under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i> 												
Mine water storages	<ul style="list-style-type: none"> Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water New storages designed to contain the 100 year ARI storm event and minimise permeability 												

Cond	Project Approval DA 86/51	Status	Evidence
			<p>shared with Void 4 and Bayswater Power Station for reuse.</p> <ul style="list-style-type: none"> The Alluvium auditors sighted during the audit interview the OSI PI database and My HSE, the internal AGLM platforms to share monitoring data, recording compliance and non-compliances. Table 8 – Section 7.4.1 in the WMP outlines the monitoring program used identify potential water quality issues. The surface water and groundwater quality monitoring gauges in the Project site were sighted by the Alluvium auditors during the site visit. <p>Erosion and Sediment Control Works</p> <ul style="list-style-type: none"> The AGLM staff informed Alluvium that erosion and sediment control works in the audit site during the audit period were the existing controls such as limiting stripping and other measures, with designs of structures following the Blue Book guidelines in the original designs of the Void 5. However, the evidence to confirm that existing erosion and sediment control works are Blue Book compliant is not detailed in the WMP. It is recommended that AGLM: <ul style="list-style-type: none"> – Complete and document regular inspections of erosion and sediment control works on site and any corrective actions required; and

Cond	Project Approval DA 86/51	Status	Evidence
			<ul style="list-style-type: none"> – Design, construct and maintain new dams and erosion and sediment controls required for the project generally in compliance with Blue Book requirements. • AGLM staff confirmed that no new infrastructure had been installed in the audit period within 40m of watercourses. <p>Sediment Dams</p> <ul style="list-style-type: none"> • There are four small sediment dams in the audit site and no new sediment dams have been installed during the audit period. There is no information regarding the maintenance of the sediment dams in the WMP. It is recommended that AGLM review the status of site sediment dams and complete maintenance works for these storages, if required. It is also recommended that AGLM retain records to show that maintenance and inspection of erosion and sediment control structures and sediment dams are being completed. <p>Mine Water Storages</p> <p>AGLM staff confirmed that new mine water storages had not been installed during the audit period therefore the condition for mine water storages had not been triggered.</p>
Water Management Plan			
B8.	The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	C	Correspondence in Appendix A of the WMP confirms the plan was submitted to DPHI

Cond	Project Approval DA 86/51	Status	Evidence
	(a) be submitted for approval within 6 months of the approval of Mod 1;		for approval on 19/09/23, within six months of the approval of MOD1.
	(b) be prepared by a suitably qualified and experienced person/s;	C	The WMP was prepared by AECOM.
	(c) be prepared in consultation with DPE Water;	C	Consultation with DPE Water is included in Appendix A of the WMP.
	(d) describe the measures to be implemented to ensure that the Applicant complies with the water management performance measures (see Table 1);	C	Section 7 of the WMP refers to several 'measures' for water management that will be designed/implemented to ensure compliance with the performance measures. AGLM staff informed Alluvium during audit interviews that the new water management measures identified in Section 8 of the WMP had not been implemented at the time of audit. The requirement for these measures had not been triggered as disturbance for the Project elements described in MOD1 had not commenced.
	(e) build on existing monitoring programs, where practicable;	C	<p>Section 7.3 of the WMP outlines that the monitoring programs in the WMP will be part of existing environmental AGLM monitoring programs in accordance with EPL 799 conditions.</p> <p>AGLM staff confirmed for Alluvium during audit interviews that existing monitoring programs in the audit site include:</p> <ul style="list-style-type: none"> • One manual quarterly groundwater monitoring gauge for water quality (at the Project site gate). • Two monthly surface water monitoring locations for water quality in the Void 5 dams. <p>The AGLM staff showed Alluvium the OSI</p>

Cond	Project Approval DA 86/51	Status	Evidence
			Pi database, which is used as the site operation database to store Project water quality monitoring data.
	<p>(f) include a:</p> <p>(i) Erosion and Sediment Control Plan that:</p> <ul style="list-style-type: none"> • is consistent with the requirements of <i>Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book</i> (Landcom, 2004) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008); • identifies activities that could cause soil erosion, generate sediment or affect flooding; • describes measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, and manage flood risk; • describes the location, function, and capacity of erosion and sediment control structures and flood management structures; and • describes what measures would be implemented to maintain (and if necessary decommission) the structures over time; 	NC	<p>(i) The Erosion and Sediment Control Plan (ESCP) is included in Section 6 of the WMP.</p> <ul style="list-style-type: none"> • Section 6 of the WMP indicates that the ESCP is in accordance with Project Approvals and these guidelines. • Section 4.5 of the WMP describes potential impacts to water and soil that could occur due to the Project. • Section 6.1.3 of the WMP mentions that erosion and sediment control structures are currently in place (for the existing stage) but does not describe these measures. The section only describes the future measures where new disturbance will be undertaken. It is recommended that the WMP is updated to confirm the size and location of existing sediment dams on site. • Flood management structures are not described and located in the plan for current or future development. The capacity for any required structures is not described. <p>It is recommended that the Project WMP is reviewed and updated to confirm that flood management structures are not required for the Project.</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<ul style="list-style-type: none"> Maintenance of the erosion and sediment control structures is outlined in Section 6.1.4.
	<p>(ii) Surface Water Management Plan that includes:</p> <ul style="list-style-type: none"> a detailed description of the surface water management system; details of the water licensing requirements for all water storages (i.e. exempt, harvestable rights or licenced); surface water performance criteria, including trigger levels for identifying and investigating any potentially adverse impacts (or trends) associated with the development, for: <ul style="list-style-type: none"> downstream surface water flows and quality; stream and riparian vegetation health; and post-mining water pollution from rehabilitated areas of the site; a program to monitor and evaluate: <ul style="list-style-type: none"> compliance with the relevant performance measures listed in Table 1; controlled and uncontrolled discharges and seepage/leachate from the site; and the effectiveness of the surface water management system and the measures in the Erosion and Sediment Control Plan; and a trigger action response plan to respond to any exceedances of the relevant performance measures or performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development. 	C	<p>(ii) The Surface Water Management Plan (SWMP) is included in Section 7 of the WMP.</p> <ul style="list-style-type: none"> Section 7 outlines a high-level SWMP and indicates that a detailed SWMP will be developed for relevant MOD₁ works. Water licensing requirements are outlined in Section 5 of the WMP. Surface water impact assessment criteria for pH, turbidity and salinity with trigger limits are outlined in Table 9 of Section 7. Table 10 in Section 7.5 of the WMP includes a TARP for investigation of any exceedances of surface water impact assessment criteria. There is currently no monitoring of uncontrolled and controlled discharges and seepage/leachate from the site. The AGLM staff informed Alluvium during the site visit that the volume of recycled water pumped back to Void 4 during the audit period was roughly estimated based on pumped curve and number of pumped hours with a known pump height. It is recommended that records for pumping during the audit period are retained. There are KPIs for effectiveness of water management – general and erosion and sediment control works in Table 8 – Section 7.4.1. KS (pers

Cond	Project Approval DA 86/51	Status	Evidence																									
			<p>comms) confirmed that there has been no disturbance for the borrow pits approved under DA 86/51 Modification 1.</p> <ul style="list-style-type: none"> A Project water TARP is included in Section 7.5 of the WMP. 																									
BIODIVERSITY																												
Biodiversity Credits Required																												
B9.	<p>Prior to disturbance of native vegetation within the disturbance areas listed in Table 2 (as shown on Figure 3 in Appendix 4), the Applicant must retire the biodiversity credits specified in Table 2 below. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act.</p>	C	<p>MP (pers comms) confirmed that Stage 1 credits (Central Disturbance Area Credits in Table 2 of DA 86/51) have been retired. Other stages have not yet been triggered.</p> <p>Sighted copy of email dated 10/11/23 from the NSW Biodiversity Conservation Trust which notes that the payment into the Biodiversity Conservation Fund has been received and a section 6.33 certificate is attached.</p> <p>Sighted copy of BCT 'Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation' document dated 8/11/23 for DA 86/51 (BCT Reference: BCF610).</p>																									
	<p><i>Table 2: Biodiversity credit requirements</i></p> <table border="1"> <thead> <tr> <th>Credit Type</th> <th>Central Disturbance Area Credits</th> <th>Southern Disturbance Area Credits</th> <th>Northern Disturbance Area Credits</th> <th>Total Credits</th> </tr> </thead> <tbody> <tr> <td>Ecosystem Credits</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PCT 1801: Spotted Gum – Narrow-leaved Ironbark – Red Ironbark shrub – grass open forest of the central and lower Hunter (Forested Rehabilitation)</td> <td>46</td> <td>130</td> <td>25</td> <td>201</td> </tr> <tr> <td>Species Credits</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Southern Myotis (<i>Myotis macropus</i>)</td> <td>21</td> <td>0</td> <td>0</td> <td>21</td> </tr> </tbody> </table>	Credit Type	Central Disturbance Area Credits	Southern Disturbance Area Credits	Northern Disturbance Area Credits	Total Credits	Ecosystem Credits					PCT 1801: Spotted Gum – Narrow-leaved Ironbark – Red Ironbark shrub – grass open forest of the central and lower Hunter (Forested Rehabilitation)	46	130	25	201	Species Credits					Southern Myotis (<i>Myotis macropus</i>)	21	0	0	21		
Credit Type	Central Disturbance Area Credits	Southern Disturbance Area Credits	Northern Disturbance Area Credits	Total Credits																								
Ecosystem Credits																												
PCT 1801: Spotted Gum – Narrow-leaved Ironbark – Red Ironbark shrub – grass open forest of the central and lower Hunter (Forested Rehabilitation)	46	130	25	201																								
Species Credits																												
Southern Myotis (<i>Myotis macropus</i>)	21	0	0	21																								

Cond	Project Approval DA 86/51	Status	Evidence
B10.	With the agreement of the Planning Secretary, the Applicant may carry over surplus retired credits to satisfy the credit requirements of a later stage. This may occur, for example, where approved clearing for an earlier stage was not undertaken, but the impact has already been offset.	NT	KS (pers comms) confirmed that application to carry over retired credits has not been made.
B11.	With the agreement of the Planning Secretary, biodiversity credits associated with any undisturbed areas agreed under condition B10 as not to be subject to any surface disturbance may be removed from the total credit obligations in Table 2.	NT	See Schedule 2, Condition B10 above.
HERITAGE			
Protection of Aboriginal Heritage			
B12.	If suspected human remains are discovered on the site, then all work surrounding the area must cease, and the area must be secured. The Applicant must immediately notify NSW Police Force and Heritage NSW, and work must not recommence in the area until authorised by NSW Police Force and Heritage NSW.	C	Sections 1.6.2 and 6 of the EMS notes the compliance requirements to be followed if suspected human remains are discovered on the site. KS (pers comms) confirmed that no human remains have been found during the audit period.
B13.	If any previously unknown Aboriginal object is discovered on the site, or suspected to be on the site: (a) all work in the immediate vicinity of the object or place must cease immediately;	NT	Section 6 of the EMS includes the environmental management measure of if any previously unknown Aboriginal object is discovered on the site, or suspected to be on the site. KS (pers comms) confirmed no previously unknown Aboriginal objects have been identified on the site during the audit period.
	(b) a 10 metre buffer area around the object or place must be cordoned off; and	NT	See Schedule 2, Condition B13 above. Section 6 of the EMS includes the environmental management measure of If any previously unknown Aboriginal object is discovered on the site, or suspected to be on the site: (b) a 10-metre buffer area around the object or place must be cordoned off; and

Cond	Project Approval DA 86/51	Status	Evidence
	(c) Heritage NSW must be contacted immediately.	NT	See Schedule 2, Condition B13 above. Section 6 of the EMS includes the environmental management measure of If any previously unknown Aboriginal object is discovered on the site, or suspected to be on the site: (c) Heritage NSW must be contacted immediately
B14.	Work in the immediate vicinity may only recommence if: (a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or	NT	See Schedule 2, Condition B13 above. Section 6 of the EMS includes the environmental management measure of Work in the immediate vicinity may only recommence if: (a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or
	(b) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object or Aboriginal place and makes a written direction in that regard.	NT	See Schedule 2, Condition B13 above. Section 6 of the EMS includes the environmental management measure of (b) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object or Aboriginal place and makes a written direction in that regard.
B15.	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, and those records are kept up to date, in the Aboriginal Heritage Information Management System (AHIMS) Register.	C	Section 6 of the EMS includes the environmental management measure of AGLM must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, and those records are kept up to date, in the Aboriginal Heritage

Cond	Project Approval DA 86/51	Status	Evidence
			<p>Information Management System (AHIMS) Register.</p> <p>MJ (pers comms) confirmed that there is a permit to work system in place.</p> <p>KS (pers comms) confirmed that the GDVA template approved for the site includes a requirement for archaeological surveys and controls.</p> <p>Sighted copy of GDVA Application Form template Ref: AGLM-HSW-FRM-009.01.1 which questions if an archaeological survey has been conducted over the area or if there are any extant archaeological sites in the area.</p>
VISUAL			
Visual Amenity and Lighting			
B16.	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the visual and off-site lighting impacts of the development;</p>	C	<p>Section 6 of the EMS confirms that AGLM must:</p> <p>(a) take all reasonable steps to minimise the visual and off-site lighting impacts of the development.</p> <p>KS (pers comms) confirmed that lighting is not required on site as there have been no night-time works during the audit period.</p> <p>MP (pers comms) confirmed that there is a visual bund and plantings to screen views from the NEH to Void 5 eastern arm.</p> <p>Tree screening was sighted during the site inspection (see Plate 11).</p>
	<p>(b) ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;</p>	NT	<p>Section 6 of the EMS notes AGLM must:</p> <p>(b) ensure no fixed outdoor lights shine directly above the horizontal or above</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>the building line or any illuminated structure.</p> <p>Discussions with key AGLM personnel confirmed that no fixed outdoor lighting has been identified as positioned above horizontal or shining above the building line or any illuminated structure during the audit period.</p> <p>No fixed outdoor lighting was identified as directed above horizontal during the site inspection.</p>
	(c) ensure no mobile lighting rigs shine directly above the void wall and other mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes);	NT	<p>Section 6 of the EMS notes AGLM must:</p> <p>(c) ensure no mobile lighting rigs shine directly above the void wall and other mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes).</p> <p>KS (pers comms) confirmed no mobile lighting rigs have been required during the audit period.</p> <p>No mobile lighting was sighted during the site inspection.</p>
	(d) ensure that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting;	NT	<p>Section 6 of the EMS notes AGLM must:</p> <p>(d) ensure that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting.</p> <p>KS (pers comms) confirmed that no external lighting has been required for the Project during the audit period.</p> <p>No external lighting was sighted during the</p>

Cond	Project Approval DA 86/51	Status	Evidence
			site inspection.
	(e) ensure that the visual appearance of any new buildings, structures, facilities or works (including paint colours and specifications) constructed following approval of Mod 1 are aimed at blending as far as possible with the surrounding landscape.	C	<p>Section 6 of the EMS notes AGLM must:</p> <p>(e) ensure that the visual appearance of any new buildings, structures, facilities or works (including paint colours and specifications) constructed following approval of Mod 1 are aimed at blending as far as possible with the surrounding landscape.</p> <p>KS (pers comms) confirmed that no structures have been constructed during the audit period.</p>
WASTE			
B17.	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the waste generated by the development;</p>	C	<p>Section 6 of the EMS notes AGLM must:</p> <p>(a) take all reasonable steps to minimise the waste generated by the development.</p> <p>KS (pers comms) confirmed that minimal waste is generated from the Project, with any material managed as part of the Bayswater / Liddell total waste management contract by Remondis. Sighted copy of Remondis Total Waste Management Report May 2023 which confirms bin rental and removal of different waste types including scrap metal, paper and cardboard, empty oil drums and general waste.</p> <p>Sighted copy of Remondis Total Waste Management Report December 2023 which confirms bin rental and removal of different waste types including scrap</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>metal, paper and cardboard, empty oil drums and general waste.</p> <p>MJ (pers comms) confirmed that waste management is under contract and that Hunter Septics manage the sewage removal from site.</p> <p>Waste skip bins were sighted at the time of the site inspection, see Plate 12.</p>
	(b) classify all waste generated at the site in accordance with the Waste Classification Guidelines (EPA, 2014); and	C	<p>Section 6 of the EMS notes AGLM must:</p> <p>(b) classify all waste generated at the site in accordance with the Waste Classification Guidelines (EPA, 2014).</p> <p>KS (pers comms) confirmed that the site has a total waste contract in place with Remondis. Sighted copies of AGLM Macquarie Bayswater & Liddell Power Station Executive Waste Summary dated October and December 2023. These waste reports classify different wastes by waste streams and provide evidence of off-site disposal.</p>
	(c) dispose of all waste generated at the site to an appropriately licensed waste facility.	C	<p>KS (pers comms) confirmed that all waste generated on site is disposed of to an appropriately licensed waste facility.</p> <p>Section 6 of the EMS notes AGLM must:</p> <p>(a) dispose of all waste generated at the site to an appropriately licensed waste facility.</p> <p>Sighted example copy of NSW EPA Transport Certificates, including:</p> <ul style="list-style-type: none"> No. 2T01338313 which notes the removal of containers and drums by

Cond	Project Approval DA 86/51	Status	Evidence
			<p>Remondis Australia Pty Ltd on 5 October 2023.</p> <ul style="list-style-type: none"> No. 2T01387893 which notes the removal of containers and drums by Remondis Australia Pty Ltd on 1 December 2023. <p>Sighted a copy of a letter from Hunter Septics dated 27/06/24 which verifies that septic waste was removed by Hunter Septics from the KCE Ravensworth site on the 19 June 2024 and was disposed of at the Kurri treatment facility.</p>
B18.	<p>Apart from the coal ash being emplaced as part of the emplacement activities and except as expressly permitted in an applicable EPL, specific resource recovery order or exemption under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>, the Applicant must not receive any waste at the site for storage, treatment, processing, reprocessing or disposal.</p>	C	<p>Section 6 of the EMS notes apart from the coal ash being emplaced as part of the emplacement activities and except as expressly permitted in an applicable EPL, specific resource recovery order or exemption under the Protection of the Environment Operations (Waste) Regulation 2014, AGLM must not receive any waste at the site for storage, treatment, processing, reprocessing or disposal.</p> <p>KS (pers comms) confirmed that no waste apart from the approved coal ash transfers has been received on site during the audit period.</p>
DANGEROUS GOODS			
B19.	<p>The Applicant must ensure that the storage, handling, and transport of:</p> <p>(a) dangerous goods is carried out in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and</p>	C	<p>Section 6 of the EMS notes AGLM must ensure that the storage, handling, and transport of:</p> <p>(a) dangerous goods is carried out in accordance with the relevant Australian Standards, particularly AS1940 and</p>

Cond	Project Approval DA 86/51	Status	Evidence
			AS1596, and the Dangerous Goods Code. Viewed storages for small volumes of chemicals stored on site. Manufacturer specifications indicate compliance with the relevant AS (see Plate 5 and Plate 7).
	(b) explosives are managed in accordance with the requirements of the Resources Regulator.	NT	Section 6 of the EMS notes AGLM must ensure that the storage, handling, and transport of: (b) explosives are managed in accordance with the requirements of the Resources Regulator. KS (pers comms) confirmed that blasting has not been undertaken during the audit period.
BUSHFIRE MANAGEMENT			
B20.	The Applicant must: (a) ensure that the development: (i) provides for asset protection in accordance with the relevant requirements in the Planning for Bushfire Protection (RFS, 2006) guideline; and	C	Section 6 of the EMS notes AGLM must: (a) ensure that the development: (i) provides for asset protection in accordance with the relevant requirements in the Planning for Bushfire Protection (RFS, 2006) guideline. KS (pers comms) confirmed that there is a Bushfire Management Plan in place. Sighted a copy of the AGLM Bushfire Risk Management Plan dated 15 July 2021. Sighted a copy of Valley Land and Civil tax invoice dated 10 May 2024 for vegetation management. Sighted a copy of Koru Environmental Assessment of Fire-impacted Rehabilitation at Ravensworth Ash Disposal Area report dated 31 December 2023. The report notes that Koru

Cond	Project Approval DA 86/51	Status	Evidence
			<p>Environmental undertook an inspection of the site on 1 December 2023 in order of assess and document the extent of impacts, determine potential flow-on effects on achieving rehabilitation completion criteria, and provide high level recommendations to assist and manage rehabilitation recovery.</p>
	<p>(ii) ensure that there is suitable equipment to respond to any fires on the site; and</p>	<p>C</p>	<p>Section 6 of the EMS notes AGLM must: (ii) ensure that there is suitable equipment to respond to any fires on the site</p> <p>KS (pers comms) confirmed that the EMP dated 2023 describes the 2023 bushfire and was provided to MSC. Sighted a copy of the 2023 EMP which section 6.1.6 describes the 2023 bushfire.</p> <p>MP (pers comms) confirmed that there is active management of weeds and non-natives, focussing on woodland areas.</p> <p>MJ (pers comms) confirmed that firebreaks are in place and that HV Civil has been commissioned for APZ maintenance.</p> <p>Sighted a copy of Koru Environmental Assessment of Fire-impacted Rehabilitation at Ravensworth Ash Disposal Area report dated 31 December 2023.</p> <p>KS (pers comms) confirmed that there is a Bayswater Fire Protection Plan in place.</p> <p>Sighted copy of Bayswater Fire Protection Systems – Asset System Plan dated 8 December 2020.</p> <p>Sighted copy of Fire Risk Assessment for Caterpillar 740B Articulated Water Truck</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>dated 21 February 2020.</p> <p>Sighted a copy of Coates Hazard and Risk Assessment for forklifts dated 25 September 2023. The assessment covers the hazard of high temperature or fire and suggested control measures.</p> <p>Sighted a copy of the Bayswater Fire Protection Systems Asset System Plan dated 7 October 2020. Section 5 of the Plan describes fire protection and monitoring systems.</p>
	(b) assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.	C	<p>Section 6 of the EMS notes AGLM must:</p> <p>(c) assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.</p> <p>Sighted email from the NSW EPA dated 25 October 2023 which notes that a precautionary report of a grass fire on AGLM land has occurred that that the RFS and emergency services has been notified.</p>
REHABILITATION			
Rehabilitation Objectives			
B21.	The Applicant must rehabilitate the site in accordance with the conditions imposed on the mining lease(s) associated with the development under the Mining Act 1992. This rehabilitation must be generally consistent with the proposed rehabilitation activities described in the document/s listed in condition A2(c) and the final landform shown in Appendix 3, and must comply with the objectives in Table 3.	NT	<p>KS (pers comms) confirmed that there has been no rehabilitation during the audit period.</p> <p>MJ (pers comms) confirmed that the Rehabilitation Management Plan (RMP) requires updating to be specific to the site.</p> <p>Sighted copy of the 2023 Annual Rehabilitation Report which describes the site as 'moving towards achieving the final land use as soon as reasonably practicable.'</p> <p>The 2023 Annual Rehabilitation Report</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>found that the pasture sites were deemed as acceptable, however all woodland sites did not meet the minimum stem density requirements, and one site was classified as requiring major intervention due to exotic tree infestations.</p> <p>It is recommended that areas of weed infestations identified in the 2023 Annual Rehabilitation Reporting are removed, and infill planting carried out if required.</p> <p>During the site inspection there were areas burnt by fire in October 2023 which impacted vegetation, however it was noted several species were recovering well onsite. Some acacia species were not recovering as well although this could have been due to these being towards the end of their life cycle.</p> <p>During the site inspection there were also bare patches of ground impacted by spontaneous combustion and these areas have their challenges for establishing and maintaining vegetation. These spontaneous combustion events are generally caused by underground mining subsidence, which allows air into sections of the overburden dump which contain higher parts of carbonaceous material. The auditor has confidence in the sites focus and abilities to manage these areas and once stable (cool) rehabilitate successfully.</p> <p>The rehabilitation monitoring indicated land and soil capability is in line with required condition 'Achieve land and soil capabilities that are equivalent or better than pre mining' (Table 3 Rehabilitation</p>

Cond	Project Approval DA 86/51	Status	Evidence										
			<p>Objectives). It is noted that this will be very challenging to achieve, especially for the tailings dam and overburden emplacements, given the lack of topsoil and growth media available. The rockiness and soil depth parameter in the rehab monitoring report indicated this value to be Class 1, which indicates nil rock outcrop or surface rock and at least 1.0 m of soil in the profile. It is recommended that this is reviewed and demonstrated using test pits, as it is uncertain this depth of soil is currently present on rehabilitation areas on site.</p> <p>It is most likely soil depth will be the limiting LSC factor and may not currently meet the requirements for LSC Class 4 which is <30% localised rock outcrop and 0.5 m to 0.75 m soil depth.</p>										
	<p><i>Table 3: Rehabilitation objectives</i></p> <table border="1" data-bbox="280 890 1064 1337"> <thead> <tr> <th data-bbox="280 890 495 916">Feature</th> <th data-bbox="495 890 1064 916">Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="280 916 495 1018">All areas of the site affected by the development</td> <td data-bbox="495 916 1064 1018"> <ul style="list-style-type: none"> • Safe, stable and non-polluting • Fit for the intended post-mining land use/s • Establish the final landform and post-mining land use/s as soon as practicable after cessation of emplacement activities </td> </tr> <tr> <td data-bbox="280 1018 495 1120">Areas proposed for native ecosystem re-establishment</td> <td data-bbox="495 1018 1064 1120"> <ul style="list-style-type: none"> • Minimise post-mining and emplacement activity environmental impacts • Establish/restore self-sustaining native woodland ecosystems • Establish local plant community types • Establish: <ul style="list-style-type: none"> - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible </td> </tr> <tr> <td data-bbox="280 1120 495 1222">Areas proposed for agricultural land</td> <td data-bbox="495 1120 1064 1222"> <ul style="list-style-type: none"> • Establish/restore grassland areas to support sustainable agricultural activities • Use species found in the local area that are suitable for pasture production • Achieve land and soil capabilities that are equivalent or better than pre-mining • Locate adjacent to surrounding agricultural land, where practicable </td> </tr> <tr> <td data-bbox="280 1222 495 1337">Final Landform</td> <td data-bbox="495 1222 1064 1337"> <ul style="list-style-type: none"> • Stable for the intended post-mining land use/s • Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable • Incorporate micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable • Maximise surface water drainage to the natural environment i.e. free draining </td> </tr> </tbody> </table>	Feature	Objective	All areas of the site affected by the development	<ul style="list-style-type: none"> • Safe, stable and non-polluting • Fit for the intended post-mining land use/s • Establish the final landform and post-mining land use/s as soon as practicable after cessation of emplacement activities 	Areas proposed for native ecosystem re-establishment	<ul style="list-style-type: none"> • Minimise post-mining and emplacement activity environmental impacts • Establish/restore self-sustaining native woodland ecosystems • Establish local plant community types • Establish: <ul style="list-style-type: none"> - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible 	Areas proposed for agricultural land	<ul style="list-style-type: none"> • Establish/restore grassland areas to support sustainable agricultural activities • Use species found in the local area that are suitable for pasture production • Achieve land and soil capabilities that are equivalent or better than pre-mining • Locate adjacent to surrounding agricultural land, where practicable 	Final Landform	<ul style="list-style-type: none"> • Stable for the intended post-mining land use/s • Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable • Incorporate micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable • Maximise surface water drainage to the natural environment i.e. free draining 		
Feature	Objective												
All areas of the site affected by the development	<ul style="list-style-type: none"> • Safe, stable and non-polluting • Fit for the intended post-mining land use/s • Establish the final landform and post-mining land use/s as soon as practicable after cessation of emplacement activities 												
Areas proposed for native ecosystem re-establishment	<ul style="list-style-type: none"> • Minimise post-mining and emplacement activity environmental impacts • Establish/restore self-sustaining native woodland ecosystems • Establish local plant community types • Establish: <ul style="list-style-type: none"> - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible 												
Areas proposed for agricultural land	<ul style="list-style-type: none"> • Establish/restore grassland areas to support sustainable agricultural activities • Use species found in the local area that are suitable for pasture production • Achieve land and soil capabilities that are equivalent or better than pre-mining • Locate adjacent to surrounding agricultural land, where practicable 												
Final Landform	<ul style="list-style-type: none"> • Stable for the intended post-mining land use/s • Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable • Incorporate micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable • Maximise surface water drainage to the natural environment i.e. free draining 												

Cond	Project Approval DA 86/51	Status	Evidence
	<ul style="list-style-type: none"> Minimise visual impacts, where practicable Surface infrastructure of the development <ul style="list-style-type: none"> To be decommissioned and removed, unless the Resources Regulator agrees otherwise Rehabilitation materials <ul style="list-style-type: none"> Materials from areas disturbed as a part of works authorised under Mod 1 (including topsoils, substrates and seeds) are to be recovered, managed and reused as rehabilitation resources, to the greatest extent practicable Water quality <ul style="list-style-type: none"> Water retained on the site is fit for the intended post-mining land use/s Water discharged from the site is suitable for receiving waters and fit for aquatic ecology and riparian vegetation Community <ul style="list-style-type: none"> Ensure public safety Minimise adverse socio-economic effects associated with mine closure 		
Rehabilitation Strategy			
B22.	The Applicant must prepare a Rehabilitation Strategy for all land disturbed by the development to the satisfaction of the Planning Secretary. This plan must:	C	Mod 1 was approved 19 April 2023. Viewed DPHI letter dated 9 February 2024 approving the Rehabilitation Strategy (Revision 0) submitted by AGLM on 18 October 2023.
	(a) be submitted for approval within 6 months of the approval of Mod 1;	C	The 2024 Rehabilitation Strategy was prepared by GHD and approved by DPHI.
	(b) be prepared by a suitably qualified and experienced person/s;	C	The draft Rehabilitation Strategy was supplied to both the Singleton Council and the Resources Regulator via email on 12 September 2023
	(c) be prepared in consultation with the Resources Regulator and Council;	C	Section 4 Table 3 of the Rehabilitation Strategy provides the rehabilitation objectives for the entire site, the final landform, post mining land use including agriculture, and water quality.
	(d) build upon the Rehabilitation Objectives in Table 3, describe the overall rehabilitation outcomes for the site, and address all aspects of rehabilitation including final landform, post-mining land use/s and water management;	C	The Rehabilitation Strategy has sections on landform establishment, revegetation development, surface water management and stakeholder engagement. Surface water and stakeholder engagement are addressed only quite briefly.
	(e) align with strategic rehabilitation and mine closure objectives and address the principles of the Strategic Framework for Mine Closure (ANZMEC and MCA, 2000);	C	Section 8 of the Rehabilitation Strategy addresses the plan for surface water
	(f) describe how the Applicant will ensure that surface water from the free-draining final landform will	C	

Cond	Project Approval DA 86/51	Status	Evidence
	not result in downstream water quality impacts;		drainage in the final landform with designs for a free draining landform and settlement dams for large rainfall events. (All clean water surface flows will flow to the east of Void 5 where it will then flow to the existing settlement dams. During larger rainfall events, the clean water will flow through settlement dam/s prior to leaving site).
	(g) include details of target vegetation communities and species to be established within the proposed revegetation areas;	C	Section 7.2 of the Rehabilitation Strategy provides the target species and proposed seeding rates. Section 10 provides the completion criteria for revegetation objectives.
	(h) investigate opportunities to refine and improve the final landform outcomes over time;	C	Section 5 of the Rehabilitation Strategy states that AGLM is still investigating suitable opportunities for the site with the proposed industrial energy hubs planned for AGL holdings. It is noted that there is no other mentions of opportunities for improvement. It is recommended the Rehabilitation Strategy is updated include more detail about opportunities to refine and improve the final landform outcomes over time in future revisions of the document.
	(i) include a risks and opportunities assessment and risk register;	C	A risk assessment was undertaken for the project and is referred to in Section 12 of the Rehabilitation Strategy. There is a single line each on the main risks and opportunities of the project. It is recommended that a copy of the Project risk assessment is included in the Rehabilitation Strategy, either as a table in Section 12, or as an appendix to the

Cond	Project Approval DA 86/51	Status	Evidence
			document.
	(j) include a post-mining land use strategy to investigate and facilitate post-mining beneficial land uses for the site, that: (i) align with regional and local strategic land use planning objectives and outcomes;	C	Post mining land use strategy provided in Section 5 of the Rehabilitation Strategy (i) Addressed in Section 5
	(ii) support a sustainable future for the local community;	C	(ii) Addressed in Section 5 of the Rehabilitation Strategy. Post mining land use will be grazing and native woodland, with ash emplacement to be utilised in void 5.
	(iii) utilise existing mining infrastructure, where practicable; and	C	(iii) Addressed in Section 5 and 6.1 of the Rehabilitation Strategy. Void to be used for ash emplacement.
	(iv) avoid disturbing self-sustaining native ecosystems, where practicable;	C	(iv) Addressed in Section 6.3 of the Rehabilitation Strategy. Potential disturbance of vegetation to install 2 haul roads linking 2 potential borrow areas for material to be used as capping material over Void 5. The Rehabilitation Strategy commits to undertaking this disturbance in line with DA 86/51.
	(k) include a stakeholder engagement plan to guide rehabilitation and mine closure planning processes and outcomes;	C	A Stakeholder Engagement Plan is included in Appendix B of the Rehabilitation Strategy.
	(l) investigate ways to minimise adverse socio-economic effects associated with rehabilitation; and	C	Section 11 of the Rehabilitation Strategy identifies that the Stakeholder Engagement Plan is designed to be utilised in order to identify and minimise adverse socio-economic effects associated with rehabilitation.
	(m) include a program to periodically review and update this strategy at least every three years.	C	Addressed Section 13.2 of the Rehabilitation Strategy. This section includes a commitment to reviewed at a

Cond	Project Approval DA 86/51	Status	Evidence
			minimum of every 3 years, or following submission of incident report, audit report, or any modification of the development consent.
Rehabilitation Management Plan			
B23.	The Applicant must prepare a Rehabilitation Management Plan for the development, in accordance with the provisions under the Mining Act 1992.	C	Sighted a copy of the Rehabilitation Management Plan dated 2 July 2022. The Rehabilitation Management Plan was submitted on 31 July 2022
SCHEDULE 2: PART C – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING			
ENVIRONMENTAL MANAGEMENT			
Environmental Management Strategy			
C1.	The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be submitted for approval within 6 months of the approval of Mod 1;	C	Sighted a copy of the EMS dated 21 February 2024. KS (pers comms) confirmed that there has been no trigger during the audit period for a review of the EMS.
	(b) provide the strategic framework for environmental management of the development;	C	Section 1.5 of the EMS notes that the EMS has been prepared to provide a strategic framework for the environmental management of MOD1. The EMS describes how MOD1 activities will comply with all relevant statutory requirements, manage potential environmental impacts, and ensure appropriate controls are in place to minimise and prevent risks to the environment. Section 3 of the EMS describes the environmental management framework.
	(c) identify the statutory approvals that apply to the development;	C	Section 1.5 of the EMS notes that The EMS describes how MOD1 activities will comply

Cond	Project Approval DA 86/51	Status	Evidence
			<p>with all relevant statutory requirements, manage potential environmental impacts, and ensure appropriate controls are in place to minimise and prevent risks to the environment.</p> <p>Section 1.6 of the EMS describes relevant approvals and conditions.</p>
	(d) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	C	Section 3.3 of the EMS describes the key roles and responsibilities for both AGLM and its contractors and sub-contractors working on this Project.
	(e) set out the procedures to be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	C	Section 4 of the EMS describes community and stakeholder consultation. Section 4.1 of the EMS notes that AGLM procedure Environment Communications (AGL-HSE-PRO-008.06) describes the protocols for external communications to and from relevant stakeholders and interested parties.
	(ii) receive record, handle and respond to complaints;	C	<p>Section 4.1 of the EMS notes that AGLM's Community Engagement Strategy enables community members to submit feedback through multiple channels. AGLM also has a dedicated online forum, email address and a 24/7 contact number to ensure community members can provide feedback and raise any issues through a method that they are comfortable with.</p> <p>Section 4.1 of the EMS also notes that AGLM has developed a Community Complaints Framework to ensure that feedback and complaints are managed in a uniform way.</p> <p>KS (pers comms) confirmed that there is an</p>

Cond	Project Approval DA 86/51	Status	Evidence
			24-hour Enquiries and Complaints Hotline for all stakeholders to contact AGLM with questions or concerns.
	(iii) resolve any disputes that may arise during the course of the development;	C	<p>Section 4.3 of the EMS notes that AGLM's Community Complaints and Feedback Policy outlines AGLM's commitment to the effective management of complaints and resolution of disputes for all existing and planned projects.</p> <p>Section 4.3 of the EMS also notes that AGLM aim to come to an early resolution on all feedback for complaints. Personnel and contractors are to direct all community complaints to the Environment Manager, and a response is to be provided to the complainant as soon as practicable and recorded in the Community Complaints Register AGL-HSE-REG-008.09.2.</p> <p>KS (pers comms) confirmed that no Project-related complaints have been received during the audit period.</p>
	(iv) respond to any non-compliance and any incident;	C	<p>Section 8 of the EMS describes non-compliance notification procedures.</p> <p>KS (pers comms) confirmed that there has been no non-compliances during the audit period.</p>
	(v) respond to emergencies; and	C	<p>Section 3.5 of the EMS describes incident and emergency management.</p> <p>Section 3.5.3 of the EMS notes that AGLM maintains a Pollution Incident Response Management Plan (AGL-HSE-PLN-010.02) (PIRMP).</p> <p>Sighted copy of AGLM PIRMP dated 30</p>

Cond	Project Approval DA 86/51	Status	Evidence
			June 2023.
	(f) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and	C	Section 5 of the EMS describes the related management plans and procedures including the Void 5 rehabilitation plan, RMP, WMP and Rehabilitation Strategy. Sighted a copy of the Ravensworth South Final Void Rehabilitation Plan dated 1 May 2012 developed by Aurecon.
	(ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.	C	Section 7 of the EMS includes a clear plan depicting all the monitoring to be carried out under the conditions of the consent.
Adaptive Management			
C2.	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;	NT	KS (pers comms) confirmed that the Readynow system is in place for AGLM risk management. Sighted copy of Bayswater Legal Reqs Obs register that records the legal obligations for the project. KS (pers comms) confirmed that no exceedances of Project performance criteria have occurred during the audit period.
	(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and	NT	See Schedule 2, Condition C2(a) above.
	(c) implement reasonable remediation measures as directed by the Planning Secretary.	NT	See Schedule 2, Condition C2(a) above.
Management Plan Requirements			
C3.	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) summary of relevant background or baseline data;	C	The approved Project EMS, WMP and Rehabilitation Strategy include reference to the relevant guidelines referred to in this consent, statutory requirements,

Cond	Project Approval DA 86/51	Status	Evidence
			<p>environmental performance measures, incidents and complaints response procedures and Project approval documentation.</p> <p>The RMP notes analogue sites were established in 2017 for baseline monitoring, but no background monitoring data provided in the Rehabilitation Strategy. It is recommended that a summary of baseline data is added to the Rehabilitation Strategy in a future revision of the document, as an appendix.</p>
	<p>(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p>	C	<p>See Schedule 2, Condition C3(a) above. A complete list of approvals/leases/licences is included in the RMP, but not specific conditions.</p> <p>It is recommended that the RMP include a table in Section 1, following Section 1.2, which includes the specific DA 86/51 conditions relevant to rehabilitation, and where they are addressed in the document.</p>
	<p>(ii) any relevant limits or performance measures and criteria; and</p>	C	<p>See Schedule 2, Condition C3(a) above. Rehabilitation completion objectives are provided in table 7, and completion criteria are listed in Table 8 of the RMP.</p>
	<p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p>	C	<p>See Schedule 2, Condition C3(a) above. Performance indicators are listed in table 8 of the RMP.</p>
	<p>(c) any relevant commitments or recommendations identified in the document/s listed in condition A2(c);</p>	NC	<p>The Project WMP and Rehabilitation Strategy do not include reference to relevant commitments made in the EIS or</p>

Cond	Project Approval DA 86/51	Status	Evidence
			<p>MOD1 Modification Report. It is recommended that these commitments are included in the respective management plans at the next revision of each document.</p> <p>Condition A2(c) refers to the EIS and the Modification Report (Mod 1). Commitments from these documents have not been included in the RMP.</p> <p>It is also recommended that any relevant commitments or recommendations identified in the EIS and Modification Report (Mod 1) are included within the RMP.</p>
	(d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	C	See Schedule 2, Condition C3(a) above. Measures to be implemented to comply with the relevant statutory requirements, limits or performance measures and criteria are not specifically described in the RMP, however these are provided in the Rehabilitation Strategy.
	(e) a program to monitor and report on the: (i) impacts and environmental performance of the development; and	C	See Schedule 2, Condition C3(a) above. Section 8.2 of the RMP includes the monitoring schedule.
	(ii) effectiveness of the management measures set out pursuant to condition C2(c);	NT	See Schedule 2, Condition C3(a) above. KS (pers comms) confirmed that there have been no relevant directions from regulators during the audit period.
	(f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	C	See Schedule 2, Condition C3(a) above. A Trigger Action Response Plan is included in Section 10 of the RMP, aimed at identifying and mitigating unexpected variations to the planned rehabilitation

Cond	Project Approval DA 86/51	Status	Evidence
			outcomes.
	(g) a program to investigate and implement ways to improve the environmental performance of the development over time;	NC	<p>See Schedule 2, Condition C3(a) above.</p> <p>No program to investigate and implement ways to improve environmental performance of the Project is included in the Rehabilitation Strategy.</p> <p>It is recommended that the Rehabilitation Strategy is revised and updated to include a program to investigate and implement ways to improve the environmental performance of the development over time.</p>
	(h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion or performance criterion;	C	See Schedule 2, Condition C3(a) above. AGLM management plans for the project include procedures for responses to incidents and non-compliances.
	(ii) complaint; or	C	See Schedule 2, Condition C3(a) above. Management plans for the project include reference to the AGLM Community Complaints Framework.
	(iii) failure to comply with other statutory requirements;	C	See Schedule 2, Condition C3(a) above. AGLM management plans for the project include procedures for responses to incidents and non-compliances.
	(i) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	C	See Schedule 2, Condition C3(a) above. Section 9 of the RMP provides details on rehabilitation research, modelling, and trials. Further monitoring results are available publicly in the Annual Reviews for the project.

Cond	Project Approval DA 86/51	Status	Evidence
	(j) a protocol for periodic review of the plan.	C	See Schedule 2, Condition C3(a) above. Section 11 of the RMP lists the review triggers, and allows that an additional review will be undertaken at a minimum every 3 years.
C4.	The Applicant must ensure that management plans prepared for the development are consistent with the conditions of this consent and any EPL issued for the site.	C	The EMS, WMP and Rehabilitation Strategy refer to the relevant conditions of this consent and the EPL held for the Project.
REVISION OF STRATEGIES, PLANS AND PROGRAMS			
C5.	Within three months of: (a) the submission of an incident report under condition C7 or C8;	NT	KS (pers comms) confirmed that this has not been triggered as there have been no incidents during the audit period.
	(b) the submission of an Independent Environmental Audit under condition C9; or	NT	KS (pers comms) confirmed that this has not been triggered as this is the first IEA for the Project.
	(c) the approval of any modification of the conditions of this consent (unless the conditions require otherwise); the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	NT	KS (pers comms) confirmed that there has been no modifications during the audit period.
C6.	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. <i>Note:</i> <i>This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	NT	KS (pers comms) confirmed that a revision has not yet been triggered.
REPORTING AND AUDITING			
Incident Notification			
C7.	The Applicant must immediately notify the Department and any other relevant agencies immediately	NT	KS (pers comms) confirmed that there has

Cond	Project Approval DA 86/51	Status	Evidence
	after it becomes aware of an incident. The notification must be in writing via the Department’s Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.		been no incidents during the audit period in relation to the Project.
Non-Compliance Notification			
C8.	<p>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing via the Department’s Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p><i>Note:</i> A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	NT	KS (pers comms) confirmed that there has been no non-compliances during the audit period in relation to the Project.
Independent Environmental Audit			
C9.	<p>Within one year of approval of Mod 1, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:</p> <p>(a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;</p>	C	This IEA.
	(b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary;	C	<p>Sighted a copy of the AGLM letter addressed to DPHI dated 29 April 2024 which notes AGLM propose to engage the following auditors from James Bailey & Associates (JBA) and that JBA have nominated the experts below to meet the request of the DPHI:</p> <ul style="list-style-type: none"> • Biodiversity – Cumberland Ecology • Rehabilitation – Minesoils • • Water Management – Alluvium. <p>Sighted copy of DPHI letter ref: DA86-51-PA-14 which refers to the request for the Planning Secretary’s endorsement of</p>

Cond	Project Approval DA 86/51	Status	Evidence
			suitably qualified, experienced and independent persons to conduct an IEA of the Ravensworth South/ No. 2 Mine submitted on the 29 April 2024. The letter notes the endorsement of the proposed audit team.
	(c) be carried out in consultation with the relevant agencies;	C	Consultation was conducted by JBA via email with MSC, DPHI and EPA.
	(d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals);	C	This IEA.
	(e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent;	C	This IEA.
	(f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and	C	Recommendations have been against the relevant conditions of consent and are included in Section 4 of this IEA report.
	(g) be conducted and reported to the satisfaction of the Planning Secretary.	NT	Responsibility of AGLM.
C10.	Within three months of commencing an Independent Environmental Audit the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.	NT	Responsibility of AGLM.
Monitoring and Environmental Audits			
C11.	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit.	Note only	Noted.
C12.	For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the	Note only	Noted.

Cond	Project Approval DA 86/51	Status	Evidence
	development to provide information on compliance with the consent or the environmental management or impact of the development.		
ACCESS TO INFORMATION			
C13.	Within 3 months of the approval of Mod 1, until the completion of all rehabilitation required under this consent, the Applicant must: (a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website: (i) the documents listed in condition A2(c) of this consent;	C	The AGLM website includes a link to the Ravensworth South Mine Modification Report (MOD1) dated 20 May 2022.
	(ii) all current statutory approvals for the development;	C	See Schedule 2, Condition C13(a) above.
	(iii) all approved strategies, plans and programs required under the conditions of this consent;	C	Copies of the EMS, WMP and Rehabilitation Strategy are available on the AGLM website.
	(iv) a summary of the current phase and progress of the development;	C	The AGLM website provides a project overview and purpose.
	(v) contact details to enquire about the development or to make a complaint;	C	Sighted complaints phone number and email address advertised on the AGLM website.
	(vi) a complaints register, updated monthly following the receipt of any complaints;	C	KS (pers comms) confirmed that a central complaints register is maintained for AGLM, updated monthly.
	(vii) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report;	NT	KS (pers comms) confirmed that there has not been a previous IEA for the Project.
	(viii) any other matter required by the Planning Secretary; and	NT	KS (pers comms) confirmed that there are no other requirements made by DPHI.
	(b) keep such information up to date, to the satisfaction of the Planning Secretary.	NT	No instructions have been received from DPHI.

Cond	Project Approval DA 86/51	Status	Evidence				
APPENDIX 1: SCHEDULE OF LAND							
	<table border="1"> <thead> <tr> <th>Lot</th> <th>DP</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1204457</td> </tr> </tbody> </table>	Lot	DP	1	1204457		
Lot	DP						
1	1204457						
APPENDIX 2: DEVELOPMENT LAYOUT PLAN							
	Figure 1: Development Layout	C	The site inspection confirmed that the development layout is generally consistent with Figure 1 of Appendix 2				
APPENDIX 3: CONCEPTUAL FINAL LANDFORM DESIGN							
	Figure 2: Conceptual Final Landform Design						
APPENDIX 4: BIODIVERSITY OFFSET STAGES							
	Figure 3: Biodiversity Offset Stages						

Table C2 DA 86/51 Project Commitments

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
ENVIRONMENTAL MANAGEMENT MEASURES			
Detailed Design			
1.	<p>The detailed design process would consider and incorporate outcomes of the following:</p> <ul style="list-style-type: none"> The potential for major changes to the declared dam and where necessary, the dams Operations and Maintenance Plan and the Dams Safety Management Plan updated to ensure the landform would be long term stable and be shown to have no credible mode of failure; 	NT	<p>Sighted a copy of the ATC Williams Intermediate Surveillance Report for Ravensworth Void 5 Ash Dam dated August 2023.</p> <p>Section 3.8 of the ATC Williams report describes the surveillance program including routine visual inspections and monitoring.</p>
	<ul style="list-style-type: none"> The design of the cap will account for the intended final land use of pasture/grazing including consideration of continued monitoring to assess performance against the agreed criteria and Trigger Action Response Plan to address any issues that are identified during the monitoring; 	C	<p>Table 6 of the Rehabilitation Strategy describes conceptual completion criteria including the objective for agricultural revegetation. Table 6 notes the completion criteria of Routine soil testing indicates no key deficiencies that could prevent or affect pasture vegetation establishment, health and production.</p>
	<ul style="list-style-type: none"> Risks associated with tree growth and potential to lead to exposure of ash and identification of any management measures as required; 	C	<p>Section 7.2 of the Rehabilitation Strategy notes that The final land use for RSCM is grazing and native woodland to create a safe, stable and non-polluting landscape.</p> <p>Native and exotic pasture grasses will be used as a vegetation cover on the capped areas of Void 5 as trees and shrubs are not a suitable vegetation cover, as they have the potential to penetrate and damage the capping and make it ineffective.</p>
	<ul style="list-style-type: none"> The potential for differential settlement to occur within Void 5 and identification of design measures that accommodate for this risk to ensure that the landform remains free draining in the long term; 	NT	<p>MP (pers comms) confirmed this commitment was not relevant to this stage of the Project</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
	<ul style="list-style-type: none"> Relevant stability assessments to ensure the landform is safe, stable and non-polluting; and 	C	Table 6 of the Rehabilitation Strategy describes conceptual completion criteria and the objective of landform
	<ul style="list-style-type: none"> Should any low walls remain in the final landform, provision of adequately fencing, and signage to address safety risks. 	NT	The Project final landform has not been developed at the time of audit.
GW1			
2.	<p>To manage groundwater impacts, the following will be implemented:</p> <ul style="list-style-type: none"> On-going monitoring of the RSCM monitoring bores to assess potential trends in water level and quality; and 	NC	<p>KS (pers comms) confirmed that the EMP report contains 2023 water monitoring.</p> <p>Lab results and chain of custody documentation was not available at the time of the audit. It is recommended that lab results and chain of custody records are retained.</p>
	<ul style="list-style-type: none"> Adoption of the recommendations provided in the Void 5 Water Loss Investigation – Seepage Investigation Report (Jacobs, 2018) for the installation of additional monitoring bores. 	C	<p>MP (pers comms) noted that AGLM are installing an additional groundwater bore for the Project in response to the recommendations of Jacobs (2018). It is recommended that this bore and any associated performance criteria are referenced in the Project WMP once it has been installed.</p>
SW1			
3.	<p>To prevent pollution from sedimentation and oil spills:</p> <ul style="list-style-type: none"> Limit fuels and chemicals stored onsite to a minimum; 	C	<p>KS (pers comms) confirmed that minimal chemicals are stored on site</p> <p>Minimal amounts of chemicals were identified during the site inspection.</p>
	<ul style="list-style-type: none"> All required chemicals and fuels must be located within a bunded enclosure located away from drainage lines and stormwater drains; 	C	See Schedule 2, Condition B19 in Table C1 above.
	<ul style="list-style-type: none"> Plant and equipment must be regularly inspected to check for oil leaks; and 	C	Sighted examples of regular maintenance of Project plant and equipment. See Schedule 2, Condition B1 in Table C1

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			above.
	<ul style="list-style-type: none"> Refuelling of vehicles or machinery is to occur within a containment or hardstand area designed to prevent the escape of spilled substances to the surrounding environment. 	C	Viewed the refuelling area for Project equipment during the site inspection. Any runoff from the refuel area would be captured within the Project site water management system.
SW2			
4.	<p>New stockpiling/spoil excavation activities will be undertaken with appropriate erosion and sediment control measures to prevent pollution of waters. This may include:</p> <ul style="list-style-type: none"> Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed; 	NT	KS (pers comms) confirmed there is no new stockpiles were developed during the audit period.
	<ul style="list-style-type: none"> Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion; and 		
	<ul style="list-style-type: none"> Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required. 		
SW3			
5.	Erosion and sediment control measures will be implemented and maintained at all work sites generally in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 and Volume 2D (commonly referred to as the “Blue Book”) where appropriate. Additionally, any water collected from worksites will be treated and discharged (where possible) to avoid any potential contamination or local stormwater impacts. Measures will be designed in accordance with the relevant guidelines where appropriate.	NC	See Schedule 2, Conditions B7 and B8 in Table C1 above.
SW4			
6.	Water use during construction will be minimised where possible and measures to reduce water use will be applied.	NT	KS (pers comms) confirmed no construction activities were undertaken during the audit period.
SW5			
7.	<p>To prevent ponding of water, scouring and erosion which could impact on downstream water quality the following management measure will be implemented for the borrow pits (if required):</p> <ul style="list-style-type: none"> Earth bunds will be constructed around the perimeter of borrow-pits to avoid soil and erosion run-off to adjacent areas from the boundary of the borrow pit and the haul road; 	NT	KS (pers comms) confirmed that the borrow pits have not been developed at the time of audit.

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
	<ul style="list-style-type: none"> Any water that is collected in the borrow pits would be managed appropriately in accordance with the Blue Book and/or reused for operational purposes; and 		
	<ul style="list-style-type: none"> Once borrow pits are stabilised, the final landform would be designed to be free draining so that they do not form permanent water bodies. 		Borrow pits have not started during the audit period
AQ1			
8.	During loading and unloading of materials, the following actions will be undertaken: <ul style="list-style-type: none"> Minimising drop heights; and 	C	MJ (pers comms) confirmed that drop heights are minimised. Table 11 of the EMS notes that during loading and unloading of materials, the following actions will be undertaken: <ul style="list-style-type: none"> Minimising drop heights; and Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions Sighted copy of Pework Brief & Toolbox Sign In / Out Sheet dated 4 March 2024 which notes the site was closed due to high winds and airborne dust.
	<ul style="list-style-type: none"> Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions. 	C	See Condition AQ1 above.
AQ2			
9.	To manage wind erosion from Void 5 cap, borrow pit areas and haulage roads the following will be carried out: <ul style="list-style-type: none"> Watering stockpiles and exposed surfaces; and 	C	KS (pers comms) confirmed that water carts are used on site on any exposed surfaces. Table 11 of the EMS notes that to manage wind erosion from Void 5 cap, borrow pit areas and haulage roads the following will be carried out:

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			<ul style="list-style-type: none"> Watering stockpiles and exposed surfaces <p>A water cart was sighted operating during the IEA site inspection, see Plate 1.</p> <p>Exposed surfaces within available areas of Void 5 have been treated with a dust suppressant product to minimise dust emissions (see Plate 2).</p>
	<ul style="list-style-type: none"> Progressive rehabilitation of exposed surfaces (as feasible). 	NT	<p>KS (pers comms) confirmed that no new disturbance has been required during the audit period. All existing exposed areas are required for access and coal ash emplacement.</p>
AQ3			
10.	<p>While hauling materials, the following will be undertaken:</p> <ul style="list-style-type: none"> Regular watering of unsealed haulage routes; and 	C	<p>Table 11 of the EMS notes that while hauling materials, the following will be undertaken:</p> <ul style="list-style-type: none"> Regular watering of unsealed haulage routes. <p>A water cart was sighted operating during the IEA site inspection, see Plate 1.</p>
	<ul style="list-style-type: none"> Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network. 	NC	<p>Table 11 of the EMS notes that while hauling materials, the following will be undertaken:</p> <ul style="list-style-type: none"> Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network <p>No evidence was available at the time of the IEA to confirm that regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			<p>network has occurred during the audit period.</p> <p>It is recommended that regular inspection and removal of debris from plant and equipment is undertaken to avoid the tracking of materials onto the adjacent road network and records are retained.</p>
AQ4			
11.	<p>The following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> Inspecting all plant and equipment before it is used on-site; 	C	<p>Table 11 of the EMS notes that the following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> Inspecting all plant and equipment before it is used on-site <p>Sighted a copy of KCE Pework Brief and Toolbox Sign in / Out Sheet dated 23 April 2024 which notes the completion of pre-start checks for mobile plant, however no pre-start documentation was available at the time of the IEA. It is recommended that pre starts are completed for all plant and equipment before use and that copies are retained by AGLM contractors.</p> <p>KS (pers comms) confirmed that pre starts for plant and equipment are completed before use and are held in vehicles during operation or when parked up.</p>
	<ul style="list-style-type: none"> Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner; 	NC	<p>Table 11 of the EMS notes that the following will be undertaken to manage exhaust emissions from plant and equipment:</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			<ul style="list-style-type: none"> Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner <p>There was no evidence available at the time of the IEA to confirm that vehicles, plant and equipment are operated in a proper and efficient manner. It is recommended that training records / operator competencies are retained to confirm that all vehicle, plant and equipment are operated in a proper and efficient manner.</p>
	<ul style="list-style-type: none"> Switching off all vehicles, plant and equipment when not in use for extended periods; and 	C	<p>MJ (pers comms) confirmed that all vehicle, plant and equipment when not in use for extended periods are switched off.</p> <p>Table 11 of the EMS notes that the following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> Switching off all vehicles, plant and equipment when not in use for extended periods <p>The site inspection did not identify any idling equipment at the time of the audit.</p>
	<ul style="list-style-type: none"> Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. 	C	<p>Table 11 of the EMS notes that the following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. <p>MJ (pers comms) confirmed that there is one generator that runs crib room and</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			toilet as electricity connection is not feasible, see Plate 4 .
NV1			
12.	The MOP will be updated to address the management of noise associated with the modified activities.	C	The executive summary of the EMP notes that as required by the Mining Amendment (Standard Conditions of Mining Leases-Rehabilitation) Regulation 2021, a RMP was developed for the site and as of 1 August 2022 replaced the MOP.
NV2			
13.	Earthmoving activities will be confined to daylight hours.	C	<p>KS (pers comms) confirmed that all Project activities are undertaken during daylight hours.</p> <p>MJ (pers comms) confirmed that there is a sign in/ out register in the crib room, see Plate 14.</p> <p>Sighted copy of the sign in/ sign out register at the time of the IEA site inspection to confirm day-only construction hours were being followed.</p>
NV3			
14.	<ul style="list-style-type: none"> Implement training to induct staff on noise sensitivities, as well as regular toolbox talks; 	NC	<p>Table 11 of the EMS includes the environmental management measure of Implement training to induct staff on noise sensitivities, as well as regular toolbox talks.</p> <p>Sighted a copy of the Environmental Compliance Training Presentation dated 2024, however this document does not include a specific section on noise mitigation. It is recommended that the Environmental Compliance Training</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			<p>Presentation is reviewed and updated to include a specific section on noise mitigation considerations.</p>
	<ul style="list-style-type: none"> Review and modify operations as required; 	C	<p>Table 11 of the EMS includes the environmental management measure of review and modify operations as required MJ (pers comms) when it is necessary activities are suspended or modified during dry and windy weather conditions, which is recorded in sign in / sign out sheets.</p> <p>Sighted copy of Pework Brief & Toolbox Sign In / Out Sheet dated 4 March 2024 which notes the site was closed due to high winds and airborne dust.</p>
	<ul style="list-style-type: none"> Select low-noise plant and equipment. Ensure equipment mufflers operate in a proper and efficient manner; and 	NC	<p>Table 11 of the EMS includes the environmental management measure of 'Select low-noise plant and equipment. Ensure equipment mufflers operate in a proper and efficient manner'.</p> <p>No evidence was available at the time of the IEA to confirm that low noise plant and equipment have been selected during the audit period.</p> <p>It is recommended that evidence is retained to confirm the selection of low noise plant and equipment.</p> <p>KS (pers comms) confirmed that contractors are using standard construction equipment as opposed to large mining equipment which tends to have higher noise levels due to higher output engines.</p> <p>No excessive noise from plant or equipment was identified during the IEA</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			site inspection.
	<ul style="list-style-type: none"> Co-operate with surrounding operations to minimise cumulative noise levels at surrounding sensitive receivers. 	C	<p>Table 11 of the EMS includes the environmental management measure of co-operation with surrounding operations to minimise cumulative noise levels at surrounding sensitive receivers</p> <p>KS (pers comms) confirmed that AGLM cooperates by operating minimal equipment and not operating during evening or night periods. KS (pers comms) confirmed that any noise generated during daylight hours would be inaudible compared to road traffic and neighbouring sites. The major works under the modified consent have not yet started. There are no additional actions that can be taken by AGLM to minimise noise in the area.</p>
B1			
15.	<p>To reduce the direct impacts of the clearing of native vegetation, the following measures will be implemented:</p> <ul style="list-style-type: none"> Avoid and minimise clearing impacts to native vegetation where possible; 	C	<p>KS (pers comms) confirmed that there has been no disturbance during the audit period.</p> <p>All proposed disturbance would be required to go through the AGLM Ground and Vegetation Approval application process before commencement.</p>
	<ul style="list-style-type: none"> Clearly delineate the boundaries of the project footprint to prevent any unnecessary clearing beyond its extent; 	C	<p>During the site inspection it was observed that boundaries of the project footprint were clearly delineated to prevent any unnecessary clearing beyond its extent</p>
	<ul style="list-style-type: none"> Ensure vehicle and equipment parking areas and stockpile areas are identified and positioned to avoid areas containing ecological value; 		
	<ul style="list-style-type: none"> Appropriate signage such as 'no go zone' or 'environmental protection area' should be installed; and 		

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
	<ul style="list-style-type: none"> Identify and communicate the location of any 'no go zones' in site inductions. 		
B2			
16.	<p>Measures to mitigate impacts from the removal of hollow-bearing trees/habitat trees include:</p> <ul style="list-style-type: none"> limit removal of trees to that required within the project footprint where possible; 	NT	<p>KS (pers comms) confirmed that there has been no disturbance during the audit period.</p> <p>Section 6 of the EMS notes that AGLM will develop these procedures prior to any clearing of native vegetation.</p>
	<ul style="list-style-type: none"> A pre-clearing protocol will be implemented during clearing works which will include: <ul style="list-style-type: none"> Pre-clearance surveys to determine if any inhabiting fauna are present, and The presence of a suitably qualified and trained fauna handler during habitat tree clearing (including trees containing nests) to rescue and relocate displaced fauna; 		
	<ul style="list-style-type: none"> Appropriate exclusion fencing around any trees and woodland that are to be retained within the Proposed Modification will be erected, considering allowance for Tree Protection Zones in accordance with AS4970 (Standards Australia, 2009). 		
B3			
17.	<p>Measures to prevent impacts to surface and groundwater quality due to sediment run-off and/or contaminant runoff include:</p> <ul style="list-style-type: none"> Source controls such as sediment fences, mulching and jute matting will be utilised where appropriate; 	C	<p>Sections 6 and 7 of the WMP includes an ESCP for the Project and discuss pollution control monitoring and response measures.</p>
	<ul style="list-style-type: none"> Site-based vehicles will carry spill kits; 		
	<ul style="list-style-type: none"> Erosion and sediment control will be required for the development in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004) prior to the commencement of construction; and 		
	<ul style="list-style-type: none"> Limiting the use of pesticides in the project footprint where possible to avoid contamination of nearby watercourses/wetland areas. 		
B4			
18.	<p>To prevent vehicle collision with fauna, speed limits within the development site will be limited to 40 km/hr. This limit will be clearly signed at all entry points to the site.</p>	C	<p>The site induction packages notes Project speed limits.</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			40 km speed limit signage was sighted on the project site at the time of the site inspection.
B5			
19.	<ul style="list-style-type: none"> To prevent the transfer of weeds and pathogens to and from site, vehicles must be cleaned appropriately before arrival on site to help prevent the spread of the fungal pathogens <i>Phytophthora cinnamomi</i> and Myrtle Rust (<i>Puccinia psidii</i>); and 	NC	Evidence that vehicles were cleaned prior to mobilisation to site was not available at the time of audit. It is recommended that AGLM complete and document the cleaning of all heavy vehicles prior to arrival on site.
	<ul style="list-style-type: none"> As most of the site contains exotic species (including some high-threat weeds), excavated topsoil must be managed appropriately to limit the risk of transferring invasive species into surrounding vegetation. 	NT	KS (pers comms) confirmed that there has been no disturbance during the audit period.
B7			
20.	<p>Measures to mitigate impacts on flora and fauna from noise, vibration, waste, light and air pollution will include the following:</p> <ul style="list-style-type: none"> Enforce 'carry-in, carry-out' policy regarding rubbish and waste materials generated on-site during construction to avoid waste materials entering adjacent vegetation; 	C	See Schedule 2, Condition B17 in Table C1 above. No waste management issues were noted during the site inspection.
	<ul style="list-style-type: none"> Restriction of public access and associated impacts from domestic pets, waste dumping and damage to adjoining vegetation must be enforced pre, during and post construction; 	C	Access to the Project site is restricted by gates and fencing.
	<ul style="list-style-type: none"> Fence sensitive areas to delineate 'no go' zones; 	C	Access to the Project site is restricted by gates and fencing.
	<ul style="list-style-type: none"> Levels of lighting that will accompany the access road will be reduced to a minimal level to reduce any adverse effects upon the essential behavioural patterns of light-sensitive fauna; 	NT	KS (pers comms) confirmed that there has been no fixed or mobile lighting during the audit period.
	<ul style="list-style-type: none"> Lighting should comply with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting; 	NT	KS (pers comms) confirmed that there has been no fixed or mobile lighting during the audit period.
	<ul style="list-style-type: none"> Noise minimisation practices in accordance with mitigation measures outlined above; and 	C	Noise minimisation measures are outlined in the Project EMS.

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
	<ul style="list-style-type: none"> Dust control measures in accordance with the mitigation measures outlined above 	C	Air quality impact minimisation measures are outlined in the Project EMS.
V1			
21.	AGLM will seek to minimise disturbance associated with the Proposed Modification by, for example, retaining existing mature vegetation and limiting areas of disturbance (where possible) in order to limit the visual impacts.	C	<p>KS (pers comms) confirmed that there has been no disturbance during the audit period.</p> <p>Addressed in Section 6.3 of the Rehabilitation Strategy. Potential disturbance of vegetation to install 2 haul roads linking 2 potential borrow areas for material to be used as capping material over Void 5. The Rehabilitation Strategy commits to undertaking this disturbance in line with DA 86/51.</p> <p>Table 11 of the EMS includes the environmental management measure of AGLM will seek to minimise disturbance associated with the MOD1 by, for example, retaining existing mature vegetation and limiting areas of disturbance (where possible) in order to limit the visual impacts</p>
V2			
22.	<ul style="list-style-type: none"> Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality; 	C	<p>Table 11 of the EMS includes the environmental management measure of stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality</p> <p>During the site inspection it was noted that there were no stockpiles currently present on site, however it was noted that all non-active areas (except burnt and spontaneous combustion affected areas) were stabilised</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			with vegetation to prevent dust.
	<ul style="list-style-type: none"> On completion of the work disturbed areas will be stabilised and rehabilitated, and 	NT	<p>KS (pers comms) confirmed that there has been no disturbance during the audit period</p> <p>Table 11 of the EMS includes the environmental management measure of on completion of the work disturbed areas will be stabilised and rehabilitated</p> <p>KS (pers comms) confirmed that this is ongoing</p>
	<ul style="list-style-type: none"> The final landform design would consider visual implications. 	C	<p>Table 11 of the EMS includes the environmental management measure of the final landform design would consider visual implications.</p> <p>Section 4 of the Rehabilitation Strategy that notes the objective of minimising visual impacts, where practicable.</p> <p>Visual amenity listed in Section 5 of the Rehabilitation Strategy as a key component of the final land use strategy, and is planned to be consistent with the surrounding agricultural landscape.</p>
V3			
23.	AGLM would continue to maintain screening plantings within their landholding in accordance with the requirements of the MOP/Rehabilitation Management Plan.	NC	<p>Screen plantings were inspected on site during the site inspection and are being maintained effectively.</p> <p>Tree screens were sighted during the IEA site inspection, see Plate 11.</p> <p>Table 11 of the EMS includes the environmental management measure of AGLM would continue to maintain screening plantings within their landholding in accordance with the</p>

SoC	DA 86/51 MOD1 Commitments	Status	Evidence
			<p>requirements of the RMP</p> <p>There were no records available at the time of the audit to confirm that AGLM are continuing to maintain screen plantings within their landholding. It is recommended that AGLM retain evidence to confirm that inspections and any required maintenance works for tree screening areas are undertaken.</p>

Table C3 Mining Lease 1485

Cond	Project Approval ML 1485	Status	Evidence						
CONDITION 1									
1.	<p>Notice to Landholders</p> <p>(a) Within 90 days from the date of grant or renewal of this mining lease, the lease holder must give each landholder notice in writing:</p> <p>(i) that this mining lease has been granted or renewed; and</p>	NT	ML 1485 was not renewed during the audit period.						
	<p>(ii) whether the lease includes the surface. The notice must include a plan identifying the lease area and each landholder and individual land parcel within the lease area.</p>	NT	See Condition 1 (a) above.						
	<p>(b) If there are ten or more landholders to which notice must be given, the lease holder will be taken to have complied with condition 1(a) if a notice complying with condition 1(a) is published in a newspaper circulating in the region where the lease area is situated.</p>	NT	See Condition 1 (a) above.						
2.	<p>Group Security</p> <p>The security deposit to be provided and maintained for this mining lease is part of a group security deposit.</p> <p>The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining leases covered by the group security deposit, including obligations under each mining lease that may arise in the future.</p> <p>The amount of the security deposit to be provided as a group security deposit has been assessed at \$17,557,300.</p> <p>The leases covered by the group security include this ML 1485 (1992) and:</p> <table border="1" data-bbox="324 1029 907 1109"> <thead> <tr> <th>Lease type</th> <th>Lease Number</th> <th>Act Year</th> </tr> </thead> <tbody> <tr> <td>ML</td> <td>1484</td> <td>1992</td> </tr> </tbody> </table>	Lease type	Lease Number	Act Year	ML	1484	1992	C	<p>KS (pers comms) confirmed that a group security is held by the Department of Regional NSW.</p> <p>Sighted copy of RR letter dated 24 May 2023 which confirms the current rehabilitation liability attributed to AGLM and the respective security held by the Department of Regional NSW.</p>
Lease type	Lease Number	Act Year							
ML	1484	1992							
3.	<p>Cooperation Agreement</p> <p>The lease holder must make every reasonable attempt, and be able to demonstrate its attempts to the satisfaction of the Secretary, to enter into a cooperation agreement with the holder(s) of any overlapping authorisations issued under the Mining Act 1992 and petroleum titles issued under the Petroleum (Onshore) Act 1991. The cooperation agreement should address but not be limited to:</p> <ul style="list-style-type: none"> access arrangements operational interaction procedures 	NC	<p>Evidence of co-operation agreements with overlapping title holders was not available at the time of audit.</p> <p>It is recommended that AGLM make attempts to enter into agreements with other relevant parties who hold mining authorities that overlap ML 1485.</p>						

Cond	Project Approval ML 1485	Status	Evidence
	<ul style="list-style-type: none"> dispute resolution information exchange well location timing of drilling potential resource extraction conflicts; and rehabilitation issues. 		
4.	<p>Assessable Prospecting Operations</p> <p>(a) The lease holder must not carry out any assessable prospecting operation on land over which this lease has been granted unless:</p> <p>(i) it is carried out in accordance with any necessary development consent; or</p>	NT	KS (pers comms) confirmed no mining or prospecting has been completed during the audit period
	<p>(ii) if development consent is not required, the prior written approval of the Minister has been obtained.</p>	NT	See Condition 4(a) above.
	<p>(b)The Minister may require the lease holder to provide such information as required to assist the Minister to consider an application for approval.</p>	NT	See Condition 4(a) above.
	<p>(d) An approval granted by the Minister under this condition may be granted subject to terms.</p>	NT	See Condition 4(a) above.
	<p>(e) The lease holder must comply with the approval granted to the holder under this condition.</p>	NT	See Condition 4(a) above.
5.	<p>Dams Safety – Mining Leases</p> <p>(a) The lease holder must not mine within any part of the lease area which is within the notification area of the Ravensworth Void 5 Tailings Dam or Ravensworth South Tailings Dam or the notification areas of Ravensworth East, Ravensworth West or Ravensworth South without the prior written approval of the Minister and subject to any conditions the Minister may stipulate.</p>	NT	KS (pers comms) confirmed no mining activities have occurred during the audit period.
	<p>(b) Where the lease holder desires to mine within the notification area, the lease holder must:</p> <p>(i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A plan of the mining system to be implemented must accompany the notice; and</p>	NT	See Condition 5(a) above.
	<p>(ii) provide such information as the Minister may direct.</p>	NT	See Condition 5(a) above.
	<p>(c) The Minister must not, except in the circumstances set out in sub-paragraph (ii), grant approval unless sub-paragraph (i) of this paragraph has been complied with.</p> <p>(i) This sub-paragraph is complied with if:</p> <p>(a) Dams Safety NSW as constituted by section 6 of the Dams Safety Act 2015 and the owner of the dam</p>	NT	See Condition 5(a) above.

Cond	Project Approval ML 1485	Status	Evidence
	have been notified in writing of the desire to mine referred to in paragraph (b). (b) the notifications referred to in clause (a) are accompanied by a description or plan of the area to be mined.		
	(c) the Secretary has complied with any reasonable request made by Dams Safety NSW or the owner of the dam for further information in connection with the mining proposal.	NT	See Condition 5(a) above.
	(d) Dams Safety NSW has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and	NT	See Condition 5(a) above.
	(e) where Dams Safety NSW has made recommendations the approval is in terms that are: - in accordance with those recommendations; or - where the Minister does not accept those recommendations or any of them - in accordance with a determination under sub-paragraph (ii) of this paragraph.	NT	See Condition 5(a) above.
	(ii) Where the Minister does not accept the recommendations of Dams Safety NSW or where Dams Safety NSW has failed to make any recommendations and has not informed the Minister in writing that it does not propose to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam: - as determined by agreement between the Minister and the Minister administering the Dams Safety Act 2015; or - in the event of failure to reach such agreement - as determined by the Premier.	NT	See Condition 5(a) above.
	(d) The Minister, on notice from Dams Safety NSW, may at any time or times: (i) cancel any approval given where a notice pursuant to section 19 of the Dams Safety Act 2015 is given.	NT	See Condition 5(a) above.
	(ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed.	NT	See Condition 5(a) above.
	Exploration Reporting Note: Exploration Reports (Geological and Geophysical) The lease holder must lodge reports in accordance with the requirements in section 163C of the Mining Act 1992 and clauses 59, 60 and 61 of the Mining Regulation 2016 as well as any further requirements issued by the Secretary under clause 62 of the Mining Regulation. Guidelines for the structure, content and data format requirements for reports are set out in the Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.	NC	KS (pers comms) confirmed that MLs are jointly held by Glencore (Ravensworth Operations) and this reporting is completed by Glencore, however copies of this reporting was not available at the time of the audit. It is recommended that AGLM retain copies of relevant Exploration Reporting.

APPENDIX D
STAKEHOLDER ENGAGEMENT
CORRESPONDENCE

From: [Jennifer Sage](#)
To: [Tegan Anne Brown](#)
Subject: RE: Ravensworth South Coal Mine Independent Environmental Audit Consultation
Date: Thursday, 23 May 2024 12:24:51 PM
Attachments: [image001.png](#)
[image002.png](#)

[WARNING] This email originated from outside of the organisation.

Hello Tegan

I apologise for responding to your email late.

To date, there have been no audits of the Ravensworth South Coal Mine. We consider that the audit should focus on mine rehabilitation, water management and biodiversity, reflecting the technical expertise included in the audit team.

Please note that NSW Planning has not taken any formal enforcement action on the development within the audit period.

Regards
Jen

Jennifer Sage
Senior Compliance Officer
Development Assessment and Sustainability | Planning Compliance
Department of Planning, Housing and Infrastructure



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

APPENDIX E
IEA SITE VISIT AGENDA

AGL Macquarie
Department of Planning, Housing and Infrastructure
Independent Environmental Audit
Ravensworth South Coal Mine (DA 86/51)

Itinerary for Site Visit scheduled
21 May 2024

INVITEES:

Matthew Parkinson (MP)	AGL	Environment & Approvals Manager
Keith Simkin (KS)	AGL	Advisor Environment (Contractor)
Dorian Walsh (DW)	James Bailey & Associates	Auditor
Tegan Brown (TB)	James Bailey & Associates	Auditor

Table 1
Audit Agenda Items

Time	Description	Location	Attendees
8:00 – 9:00am	Opening Meeting <ul style="list-style-type: none"> • Inductions / housekeeping (KS) • IEA scope and purpose (DW) • Confidentiality arrangements (DW) • IEA process and timing (DW) • Brief overview of site during the audit period (KS) 	Meeting Room	KS, MP, DW, TB
9:00am – 12:00pm	Compliance Review <ul style="list-style-type: none"> • DA 86/51 conditions and statement of commitments • Management plan commitments • Site Procedures 	Meeting Room	KS, DW, TB
12:00 – 12:30pm	Lunch		All
12:30 - 2:00pm	Site Inspection <ul style="list-style-type: none"> • Review of site and environmental controls, including: <ul style="list-style-type: none"> ○ Waste Emplacement Activities 	Field	KS, DW, TB

Time	Description	Location	Attendees
	<ul style="list-style-type: none"> ○ Amenity Management ○ Water management system and structures ○ Project infrastructure ○ Biodiversity Offset Areas 		
2:00 – 2:30	<p>Compliance Review (continued)</p> <ul style="list-style-type: none"> • Licencing review • Mining authority review • JBA prepare preliminary findings 	Meeting Room	KS, DW, TB
2:30 – 3:00 (TBC)	<p>Close Out Meeting</p> <ul style="list-style-type: none"> • Overview of preliminary findings • Outstanding information requirements • Confirmation of process for audit completion 	Meeting Room	KS, DW, TB

APPENDIX F
SITE INSPECTION PLATES



Plate 1 Water cart used on site for dust suppression



Plate 2 Polymer Dust Suppression used on Void 5



Plate 3 Polymer dust suppression used on Void 5



Plate 4 Generator being used on site at the time of the IEA

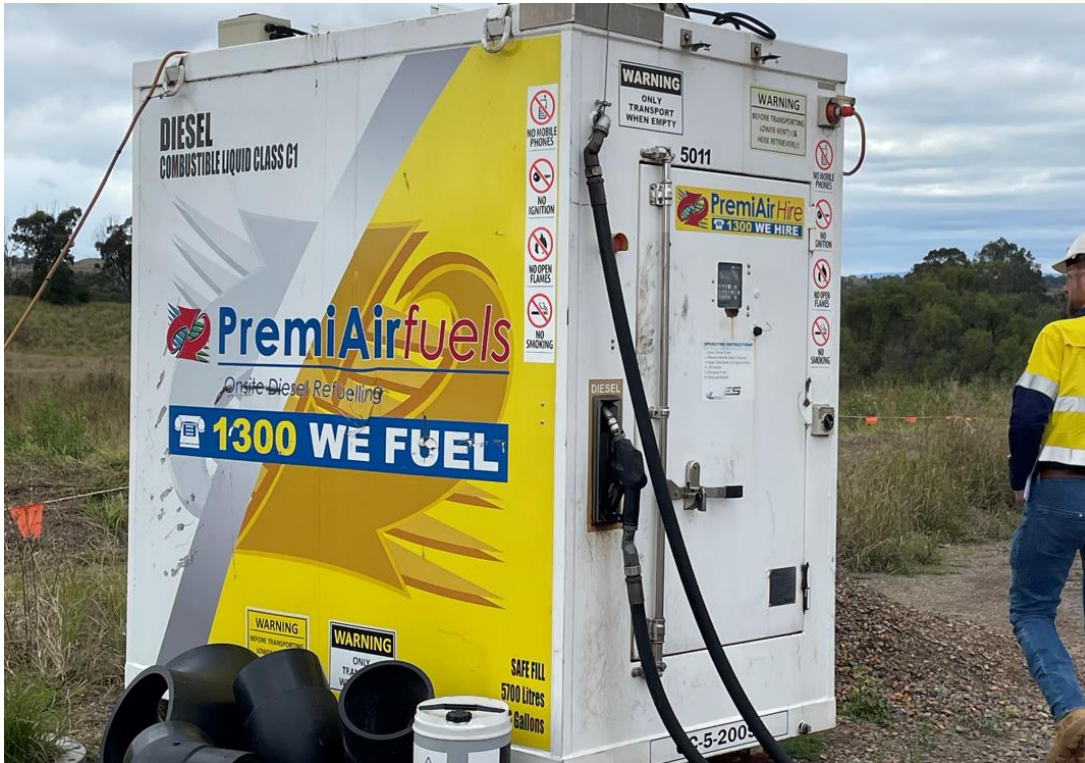


Plate 5 5,700 L Diesel secondary containment tank available on site



Plate 6 5,700 L Diesel secondary containment tank specifications



Plate 7 5000 L Diesel secondary containment tank available on site

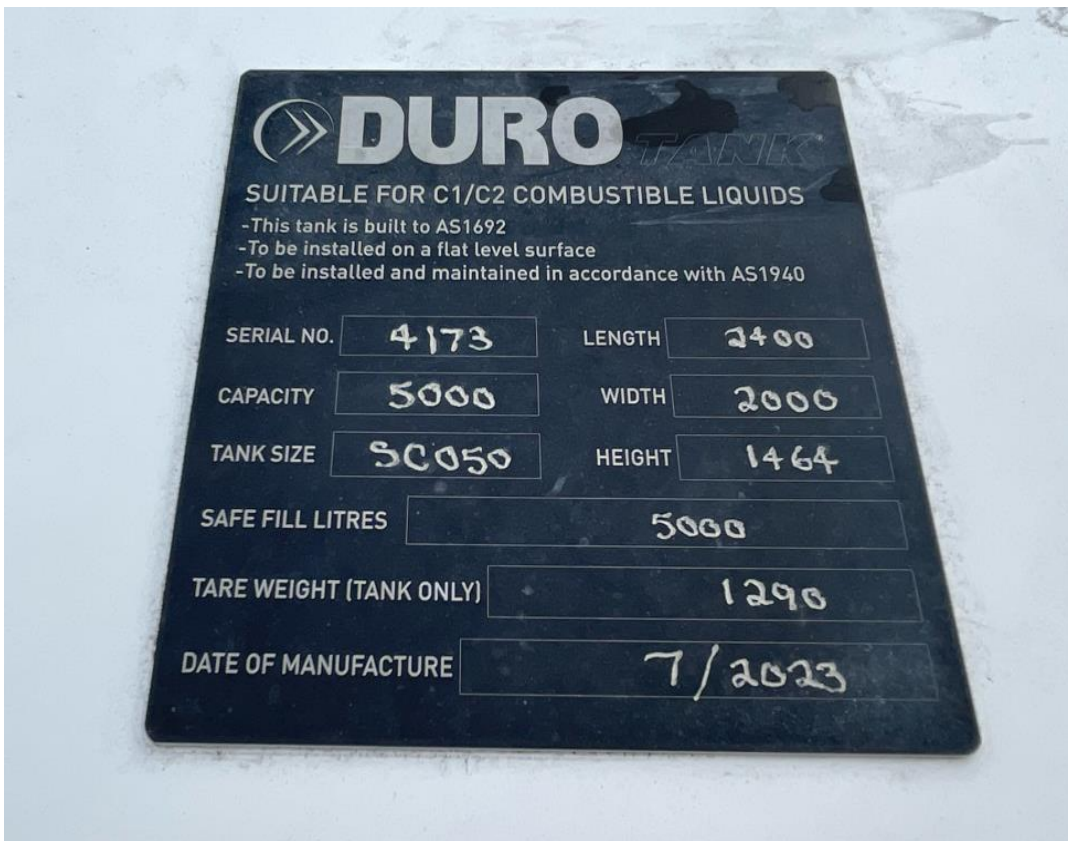


Plate 8 5000 L Diesel secondary containment tank specifications



Plate 9 40 km Speed limit signage available on site



Plate 10 40 km Speed limit signage available on site

Note: areas previously affected by late 2023 bushfire event in background



Plate 11 Tree screening in place as visual mitigation



Plate 12 General waste skip bin available on site



Plate 13 **Water Management**



Plate 14 **Water Management**

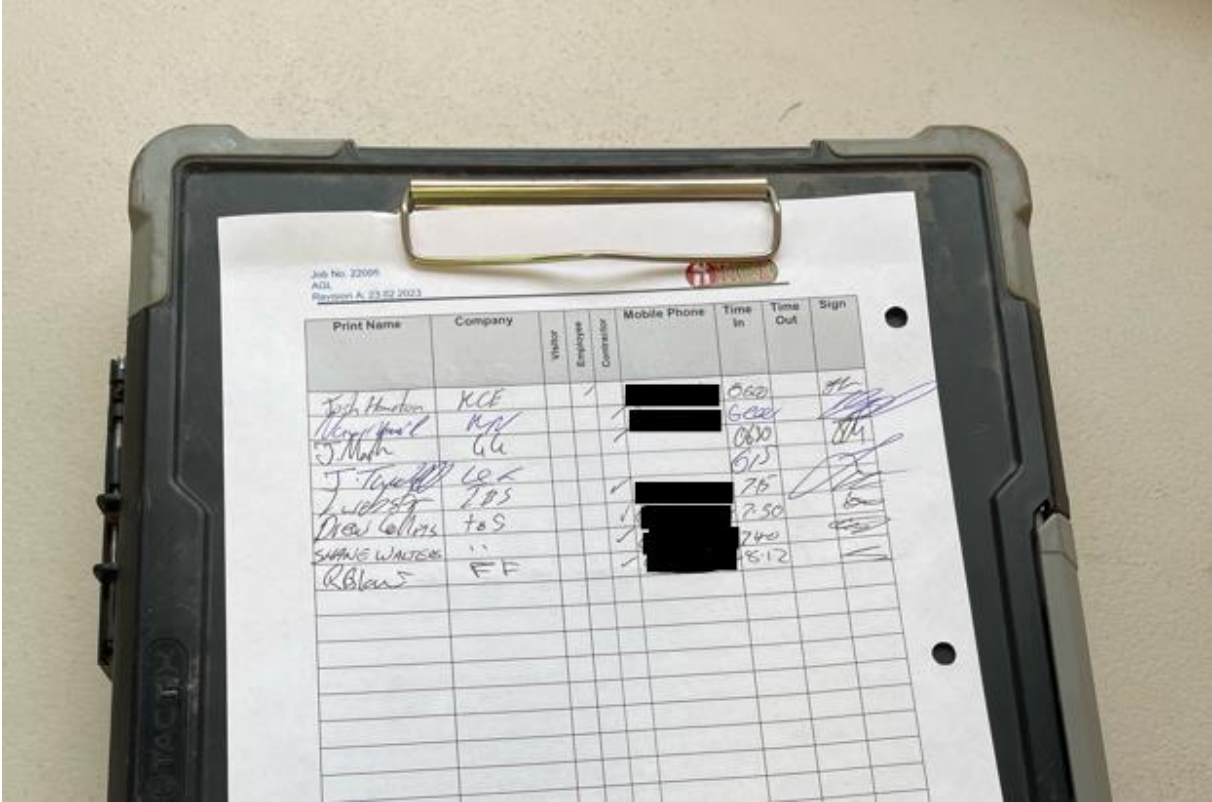


Plate 15 Sign in / sign out register available to record employee and contractor hours

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
DA 86/51 Mod 1 Non-Compliance Recommendations				
Schedule 2, Condition A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	Non-compliances (NC) with DA 86/51 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.	Refer to actions throughout this table	Refer to actions throughout this table
Schedule 2, Condition B4	The Applicant must: (c) make all reasonable efforts to co-ordinate air quality management on the site with the air quality management at nearby mines to minimise cumulative air quality impacts.	It is recommended that AGLM consult with nearby mines over the co-ordination of air quality impact management. Records of this consultation should be retained.	AGLM propose to make all reasonable endeavours to consult with Ravensworth Operations and Ashton Coal to establish agreements regarding air quality management.	20 December 2024

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B8	<p>The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(f) include a:</p> <p>(i) Erosion and Sediment Control Plan that:</p> <p>is consistent with the requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) and Volume 2E: Mines and Quarries (DECC, 2008);</p> <p>identifies activities that could cause soil erosion, generate sediment or affect flooding;</p> <p>describes measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, and manage flood risk;</p> <p>describes the location, function, and capacity of erosion and sediment control structures and flood management structures; and</p> <p>describes what measures would be implemented to maintain (and if necessary decommission) the structures over time;</p>	<p>(i) The Erosion and Sediment Control Plan (ESCP) is included in Section 6 of the WMP.</p> <p>It is recommended that the Project WMP is reviewed and updated if required, to include further detail on existing erosion and sediment minimisation measures and the need for any flood management structures.</p>	<p>The Water Management Plan will be reviewed to include:</p> <ul style="list-style-type: none"> • current erosion and sediment control measures • reference to flood management. 	<p>Timing of Water Management Plan update will be as required by Schedule 2, Conditions C5 and C6 of DA 86/51 Mod 1.</p>

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C3	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(c) any relevant commitments or recommendations identified in the document/s listed in condition A2(c);</p>	<p>The Project WMP and Rehabilitation Strategy do not include reference to relevant commitments made in the EIS or MOD1 Modification Report. It is recommended that these commitments are included in the respective management plans at the next revision of each document.</p> <p>It is also recommended that any relevant commitments or recommendations identified in the EIS and Modification Report (Mod 1) are included within the RMP.</p>	<p>AGLM will review and if necessary revise management plans and strategies associated with DA 86/51 Mod 1 as required by Schedule 2, Conditions C5 and C6.</p>	<p>Timing of Water Management Plan update will be as required by Schedule 2, Conditions C5 and C6 of DA 86/51 Mod 1.</p>
Schedule 2, Condition C3	<p>(g) a program to investigate and implement ways to improve the environmental performance of the development over time;</p>	<p>It is recommended that the Rehabilitation Strategy is revised and updated to include a program to investigate and implement ways to improve the environmental performance of the development over time.</p>	<p>AGLM will review and if necessary revise management plans and strategies associated with DA 86/51 Mod 1 as required by Schedule 2, Conditions C5 and C6.</p>	<p>Timing of Water Management Plan update will be as required by Schedule 2, Conditions C5 and C6 of DA 86/51 Mod 1.</p>

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
DA 86/51 Mod 1 Commitment SW3	Erosion and sediment control measures will be implemented and maintained at all work sites generally in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 and Volume 2D (commonly referred to as the “Blue Book”) where appropriate. Additionally, any water collected from worksites will be treated and discharged (where possible) to avoid any potential contamination or local stormwater impacts. Measures will be designed in accordance with the relevant guidelines where appropriate.	See Schedule 2, Conditions B7 and B8 in Table C1 above.	See Schedule 2, Conditions B7 and B8 in Table C1 above.	See Schedule 2, Conditions B7 and B8 in Table C1 above.
DA 86/51 Mod 1 Commitment AQ3	While hauling materials, the following will be undertaken: Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network.	It is recommended that regular inspection and removal of debris from plant and equipment is undertaken to avoid the tracking of materials onto the adjacent road network and records are retained.	This inspection has previously been undertaken informally. AGLM will improve documentation of this inspection process.	28 November 2024

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
DA 86/51 Mod 1 Commitment NV3	Implement training to induct staff on noise sensitivities, as well as regular toolbox talks;	Sighted a copy of the Environmental Compliance Training Presentation dated 2024, however this document does not include a specific section on noise mitigation. It is recommended that the Environmental Compliance Training Presentation is reviewed and updated to include a specific section on noise mitigation considerations.	The training will be reviewed to include this information. A toolbox talk will also be prepared with this information and delivered to relevant personnel.	28 November 2024
DA 86/51 Mod 1 Commitment NV3	Select low-noise plant and equipment. Ensure equipment mufflers operate in a proper and efficient manner.	No evidence was available at the time of the IEA to confirm that low noise plant and equipment have been selected during the audit period. It is recommended that evidence is retained to confirm the selection of low noise plant and equipment.	<p>Contractors are using standard construction equipment as opposed to large mining equipment which tends to be much noisier as its larger with higher output engines. Evidence provided to auditor of maintenance to OEM requirements.</p> <p>Small equipment was selected instead of needing to attenuate larger equipment. This will be continued for works under this consent.</p> <p>A validation noise monitoring event will be conducted to verify controls.</p>	<p>Ongoing</p> <p>31 December 2024</p>

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
DA 86/51 Mod 1 Commitment B5	To prevent the transfer of weeds and pathogens to and from site, vehicles must be cleaned appropriately before arrival on site to help prevent the spread of the fungal pathogens <i>Phytophthora cinnamomi</i> and Myrtle Rust (<i>Puccinia psidii</i>)	Evidence that vehicles were cleaned prior to mobilisation to site was not available at the time of audit. It is recommended that AGLM complete and document the cleaning of all heavy prior to arrival on site.	AGLM will review and if necessary revise management plans and strategies associated with DA 86/51 Mod 1 as required by Schedule 2, Conditions C5 and C6 to address this requirement.	Timing will be as required by Schedule 2, Conditions C5 and C6 of DA 86/51 Mod 1.

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Mining Lease 1485 Condition 3	<p>Cooperation Agreement</p> <p>The lease holder must make every reasonable attempt, and be able to demonstrate its attempts to the satisfaction of the Secretary, to enter into a cooperation agreement with the holder(s) of any overlapping authorisations issued under the Mining Act 1992 and petroleum titles issued under the Petroleum (Onshore) Act 1991. The cooperation agreement should address but not be limited to:</p> <ul style="list-style-type: none"> • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts; and <p>rehabilitation issues.</p>	<p>Evidence of co-operation agreements with overlapping title holders was not available at the time of audit.</p> <p>It is recommended that AGLM make attempts to enter into agreements with other relevant parties who hold mining authorities that overlap MP 1485.</p>	<p>AGLM propose to make all reasonable endeavours to consult with Ravensworth Operations and Ashton Coal to establish agreements regarding air quality management.</p>	20 December 2024

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Mining Lease 1485	<p>Exploration Reporting Note: Exploration Reports (Geological and Geophysical) The lease holder must lodge reports in accordance with the requirements in section 163C of the Mining Act 1992 and clauses 59, 60 and 61 of the Mining Regulation 2016 as well as any further requirements issued by the Secretary under clause 62 of the Mining Regulation.</p> <p>Guidelines for the structure, content and data format requirements for reports are set out in the Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.</p>	<p>KS (pers comms) confirmed that MLs are jointly held by Glencore (Ravensworth Operations) and this reporting is completed by Glencore, however copies of this reporting was not available at the time of the audit. It is recommended that AGL retain copies of the Exploration Reporting.</p>	<p>AGLM will request exploration reports from Ravensworth Operations for past reporting periods, and request future reports to be provided as they are submitted.</p>	28 November 2024
DA 86/51 Mod 1 Non-Compliance Recommendations				

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B6	The Applicant must ensure that all surface discharges from the site comply with: (b) relevant provisions of the POEO Act and Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	See description of related non-compliance and recommendations in Schedule 2, Condition B6(a) above. i.e. It is recommended that AGLM: Include a map with runoff direction and sediment dam locations in the WMP; and Implement a procedure for treating and discharging water if the Project sediment dams are full, to comply with Section 7 in the WMP, which notes that “all water collected from worksites will be treated and discharged (where possible)”.	The Water Management Plan will be updated with a map including runoff direction and sediment dam locations. A procedure for treating and discharging water from Project sediment dams will be prepared and in place prior to the commencement of Borrow Pit excavation under the consent.	Timing of Water Management Plan update will be as required by Schedule 2, Conditions C5 and C6 of DA 86/51 Mod 1. Prior to commencement of Borrow Pit excavation.

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B7	The Applicant must ensure that the development complies with the performance measures in Table 1.	<p>It is recommended that AGLM:</p> <ul style="list-style-type: none"> • Complete and document regular inspections of erosion and sediment control works on site and any corrective actions required; and • Design, construct and maintain new dams and erosion and sediment controls required for the project generally in compliance with Blue Book requirements. <p>It is recommended that AGLM review the status of site sediment dams and complete maintenance works for these storages, if required. It is also recommended that AGLM retain records to show that maintenance and inspection of erosion and sediment control structures and sediment dams are being completed.</p>	<p>AGLM will improve documentation of erosion and sediment control inspections onsite, and any maintenance activities completed for the works.</p> <p>Any dams constructed for the Borrow Pit works will be completed in accordance with the NSW Blue Book.</p> <p>AGLM will complete a review of the status of sediment dams and implement maintenance works if required.</p>	<p>28 November 2024</p> <p>When triggered by Borrow Pit works.</p> <p>Review of sediment dam status – 31 December 2024 Implementation of maintenance works will be dependent on the nature of the works and the relevant risk.</p>

Response letter for AGL Macquarie DA 86/51 Mod 1 Independent Environment Audit Recommendations and Proposed Actions

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
DA 86/51 Mod 1 Commitment GW1	<p>To manage groundwater impacts, the following will be implemented: On-going monitoring of the RSCM monitoring bores to assess potential trends in water level and quality.</p>	<p>Lab and chain of custody documentation was not available at the time of the audit. It is recommended that lab records and chain of custody records are retained.</p>	<p>This documentation is held by the monitoring contractor and is readily available. Monitoring is completed as required.</p> <p>AGLM will obtain past documentation and put a process in place to retain this information in the future.</p>	28 November 2024
DA 86/51 Mod 1 Commitment AQ4	<p>The following will be undertaken to manage exhaust emissions from plant and equipment:</p> <p>Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner.</p>	<p>It is recommended that training records / operator competencies are retained to confirm that all vehicle, plant and equipment are operated in a proper and efficient manner.</p>	<p>Training records will be requested from operators.</p>	28 November 2024