

BARNETT & MAY

Stratford Mining Complex

2020 Independent Environmental Audit

Prepared for
Stratford Coal Pty Ltd.

Client representative
Michael Plain

Date
16 February 2021

Rev 0



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Prepared by — K. Holmes		Date 16 February 2021
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Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
A	Draft for client Review	K. Holmes	T Wilkins	K. Holmes	21/1/2021
0	Final Report	K. Holmes	T Wilkins	K. Holmes	16 /2/2021
1					
2					

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1. Introduction

The Stratford Mining Complex (SMC) is located approximately 10 kilometres southeast of Gloucester in New South Wales and is operated by Stratford Coal Pty Limited (SCPL).

The purpose of the audit, that was undertaken in accordance with the **Barnett and May's** proposal (dated 22 September 2020), was to determine compliance with the obligations contained in the Project Approval (SSD-4966). The audit was undertaken in accordance with SSD-4966 Schedule 5, Conditions 9 and 10, which states:

C9 - "Prior to 31 December 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development.

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

(b) include consultation with the relevant agencies;

(c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL(s) (including any assessment, plan or program required under these approvals);

(d) review the adequacy of strategies, plans or programs required under the abovementioned approval or licences; and

(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or Program required un these consents.

Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.

C10 – Within 3 Months of completion of the audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the Audit Report.

The Audit was commissioned on 10 November 2020 following approval of the audit team by DPIE. The site inspection was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May in December 2020. The audit covered the period from 1 January 2018 to 1 December 2020 (the Audit Period).

1.1 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of Barnett and May's site visit in December 2020, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

1.2 The Stratford Mining Complex.

The Stratford Mining Complex is an open cut coal mine located within the Gloucester Valley, NSW and is a wholly owned subsidiary of Yancoal Australia Limited (Yancoal). The Stratford Mining Complex is owned and operated by SCPL. Mining operations at Stratford are comprised of the Stratford Coal Mine and BRN Open Cut.

The operations at Stratford and BRN were consolidated under a single development consent SSD-4966as part of the Stratford Extension Project (Stratford Extension) approved in May 2015. The Stratford Extension provides for the continuation of mining and processing for an additional 11 years at up to 2.6 Mtpa. The Stratford Extension involves mining in the Roseville West Pit Extension, Avon North Open Cut and the Stratford East Open Cut areas.

2. Definitions

Acronyms	Description
ACHMP	Aboriginal Cultural Heritage Management Plan
AER	Annual Environmental Review
AHIP	Aboriginal Heritage Impact Permit
AEMR	Annual Environmental Management Review
AR	Annual Review
AQGMP	Air Quality and Greenhouse Gas Management Plan
BMP	Biodiversity Management Plan
BOS	Biodiversity Off-set Strategy
BRN	Bowens Road North (Open Cut Pit)
CC	Construction Certificate
CCC	Community Consultative Committee
CHPP	Coal Handling & Processing Plant
DPE	Department of Planning and Environment (former planning department name)
DPI	(former) Department of Primary Industries
DPIE	Department of Planning, Industry and Environment.
ECS	Environment and Community Superintendent
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EP&A Act	NSW Environmental Planning and Assessment Act
EPBC	Environmental Protection and Biodiversity Conservation Act
EPL	Environmental Protection License
GMP	Groundwater Management Plan
IEA	Independent Environmental Audit
MOP	Mining Operations Plan
NOW	DPIE Water (formerly the NSW Office of Water)

Acronyms	Description
NMP	Noise Management Plan
OC	Occupation Certificate
OCE	Open Cut Examiner
OEH	Biodiversity Conservation Division (formerly the NSW Office of Environment and Heritage)
OEMP	Operational Environmental Management Plan
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan
RAP	Registered Aboriginal Group
REF	Review of Environmental Factors
RMP	Rehabilitation Management Plan
SWB	Site Water Balance
SCPL	Stratford Coal Pty Ltd
SWMP	Surface Water Management Plan
SWVR	Surface Water Validation Report
TEOM	Tapered Element Oscillating Microbalance (Samplers)
TMP	Traffic Management Plan
TSF	Tailing Storage Facility
WMP	Water Management Plan
WRE	Waste Rock Emplacement

3. Auditor Certification

Independent Audit Certification Form	
Development Name	Stratford Coal Mine
Application Number	SSD-4966
Description of Development	Coking Coal Mine
Development Address	3364 Buckets Way, Stratford, New South Wales
Proponent	Stratford Coal Pty Ltd
Operator Address	3364 Buckets Way, Stratford, New South Wales
Title of Audit	Stratford Mining Complex 2020 Independent Environmental Audit
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> • <i>The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (June 2018).</i> • <i>The findings of the audit are reported truthfully, accurately and completely;</i> • <i>I have exercised due diligence and professional judgement in conducting the audit;</i> • <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> • <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> • <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i> • <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> • <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	4 Baeckea Place, Frenchs Forest, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	16 February 2021

3.1 Audit Details

Audit Title:	Stratford Mining Complex 2020 Independent Environmental Audit
Site:	Stratford Mining Complex, Stratford New South Wales
Client Contact:	Michael Plain
Position:	Environment & Community Superintendent
Client:	Stratford Coal Pty Limited
Client Address:	3364 Buckets Way, Stratford, New South Wales
Client Phone Number	0400 474 126
Client Email:	michael.plain@yancoal.com.au
Audit Team:	Ken Holmes – Certified Lead Auditor Simon Buchanan, Landloch (rehabilitation specialist) Ms Katrina Wolf, Cumberland Ecology (biodiversity specialist) Mr Adam Bishop, Pitt & Sherry (surface water specialist) Mr Doug Ford, Pitt & Sherry (noise specialist)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Site Visit	1 - 2 December 2020
Site Visit Completion Date	4 December 2020
Audit Scope:	The audit was undertaken as per the brief outlined in the Barnett and May proposal (dated 22 September 2020). As such, the audit provides an assessment of the compliance of the project with the conditions Consent SSD 4966, EPL 5161 and Mining Lease 1778 ¹ . The scope of this Independent Environmental Audit complies with the requirements of the New South Wales Department of Planning, Industry and Environment (DPIE) Independent Audit Post Approval Guidelines May 2020.

Note 1: The Stratford Mine covers nine mining leases:

- ML 1360 granted on 21 December 1994
- ML 1409 granted on 7 January 1997
- ML 1427 granted on 6 April 1998
- ML 1447 granted on 1 April 1999
- ML 1521 granted on 24 September 2002
- ML 1528 granted on 20 January 2003
- ML 1557 granted on 1 March 2006
- ML 1773 granted on 8 April 2016 and
- ML 1778 granted on 5 June 2019.

Previous audits have assessed compliance against ML 1360 to 1773. As the Project Approval and EPL audits substantially cover the issues raised in the Conditions of the mining leases, and the pre-2019 mining leases have been audited previously this IEA will review compliance against newest **Mining Lease ML 1778** only.

4. Audit process

4.1 Audit Guidelines

This audit report has also been prepared in accordance with the 'Independent Audit Guideline, May 2020 (Audit Guidelines) (DP&E, 2020). *Table 1* lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 1 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	<p>Version Control</p> <ol style="list-style-type: none"> 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report. 	<p>Section 3</p> <p>Page iii</p> <p>Page iii</p> <p>Section 3.1</p>
4.2	<p>Contents</p>	
4.2.1	<p>Introduction – a brief overview of the audit including:</p> <ol style="list-style-type: none"> 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit. 	<p>Section 1.2</p> <p>Section 3.1</p> <p>Section 1</p> <p>Section 3.1</p> <p>Section 1</p>
4.2.2	<p>Audit Methodology</p> <ol style="list-style-type: none"> 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document. 	<p>Appendix C</p> <p>Section 5</p> <p>Section 4</p> <p>Section 4.5.3</p> <p>Section 4.5.2</p> <p>Section 5</p> <p>Section 4.6</p>
4.2.3	<p>Audit Findings</p> <ol style="list-style-type: none"> 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements; 3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period; 	<p>Appendix A</p> <p>Section 6.1</p> <p>Section 7.3</p>

Section	Independent Audit Report Requirements	Addressed
	<p>4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;</p> <p>5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.</p> <p>6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;</p> <p>7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;</p> <p>8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;</p> <p>9) a summary of complaints, and the adequacy of the response to, and management of complaints;</p> <p>10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;</p> <p>11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;</p> <p>12) evidence collected through site inspections undertaken during the audit;</p> <p>13) evidence to support compliance assessment provided by the personnel interviewed during the audit;</p> <p>14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and</p> <p>15) key strengths of the development's environmental management and performance identified by the auditor.</p>	<p>Section 6.2</p> <p>Section 7.6</p> <p>Section 7.5</p> <p>Section 7.9</p> <p>Section 5</p> <p>Section 7.2</p> <p>Section 7.1</p> <p>Section 7.8</p> <p>Appendix A</p> <p>Appendix A</p> <p>Section 6.2</p> <p>Section 7.4</p>
4.2.4	Recommendations and opportunities for Improvement	Section 6.2
4.2.5	<p>Appendices</p> <p>1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status</p>	Appendix A

Section	Independent Audit Report Requirements	Addressed
	assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee; 4) completed and signed Independent Audit Declaration Form(s); 5) any reports prepared by the agreed technical specialist(s), as required; and 6) site inspection photographs.	Appendix C Appendix D Section 3 Appendix F Appendix B

Note 1: Compliance against the requirements of the Environment Protection Licence (EPL) has been undertaken in this Audit as the scope of the Independent Environmental Audit in the Conditions of Approval relevant to this development specifically includes the EPL.

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities
- Review of information and preparation of a compliance register (audit protocol / checklist)
- Site inspection and interviews:
 - Opening meeting
 - Site inspection
 - Review of relevant records
 - Review of additional information provided after the site inspection
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation
- Prepare the audit compliance checklist
- Completion of a project specific Risk Assessment
- Review of online information
- Submission of a preliminary document / record request
- Consultation with relevant agencies.

4.3.1 Approval of audit teams

Stratford Coal Pty Ltd (SCPL) sought the Secretary's endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the following team on 23 October 2020 (Appendix C):

- Ken Holmes, Barnett & May (lead auditor)
- Mr Simon Buchanan, Landloch (rehabilitation specialist)
- Katrina Wolf, Cumberland Ecology (biodiversity specialist)
- Adam Bishop, Pitt & Sherry (surface water specialist)
- Doug Ford, Pitt & Sherry (noise specialist)

4.3.2 Consultation with Agencies

The Auditor consulted with the following agencies during the audit planning stage:

- Department of Planning, Industry and Environment (DPIE);
- DPIE Resources Regulator (DRE);
- NSW Environment Protection Authority (EPA);
- MidCoast Council (MC)
- Community Consultative Committee (CCC)

Emails were initially sent (via Email) to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Where required (where no response was provided by the nominated stakeholder organisation, a follow up email was sent to repeat the invitation to provide input into the audit. Details of the responses from each group / organisation is provided in Section 5.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection component of the audit was undertaken from 2 to 4 December 2020.

4.5.1 Opening Meeting

Following site inductions, the opening meeting was held on-site. It was attended by the following personnel:

- Michael Plain (Environmental and Community Superintendent)
- Tom Kirkwood (Environment and Community Coordinator)
- Bruce Robinson (CHPP Superintendent)
- Michael Wells (Health & Safety Coordinator)
- Chris Gardener (Health & Safety Superintendent)
- Nathan Vaughan (Mine Planning Superintendent)
- Todd Hutchins (Coal Planning Superintendent)
- Brett Crouch (Maintenance Superintendent)
- Ken Holmes (Lead Auditor) – Barnett and May.

Introductions were made, and the purpose and scope of the audit was outlined. An explanation of the audit process was communicated. That is, a site inspection, site interviews and detailed review of records in order to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

An initial tour of the site was undertaken by the Auditor. Subsequent detailed inspections of specific areas of the operation were subsequently undertaken. The site inspection included observation of:

- Site Access and security;
- Open cut mining areas;
- Processing plant;
- Rail loop, loading and unloading facilities;
- ROM and product stockpiles and conveyer system;
- Tailings disposal;
- Waste storage areas;
- Fuel and dangerous goods storage areas;

- Equipment maintenance area;
- Rehabilitation and biodiversity off-set areas; and
- Surface water management infrastructure.

The Auditor was provided access to all areas of the site.

4.5.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- John Cullen (Operations Manager)
- Michael Plain (Environmental and Community Superintendent)
- Tom Kirkwood (Environment and Community Coordinator)
- Bruce Robinson (CHPP Superintendent)
- Michael Wells (Health & Safety Coordinator)
- Chris Gardener (Health & Safety Superintendent)
- Nathan Vaughan (Mine Planning Superintendent)
- Todd Hutchins (Coal Planning Superintendent)
- Brett Crouch (Maintenance Superintendent)

4.5.4 Document review

Compliance related documents that were not available prior to, and during site discussions of, the audit, were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix A**. A summary of the non-compliances identified during this audit are provided in Table 5. The audit criteria used to determine compliance for this audit is defined in Table 2.

Table 2 - Compliance Assessment Matrix

Assessment	Criteria
Compliance	<p>Compliance</p> <p>The site complies with the requirements of applicable pre-operational Consent Conditions.</p> <p>A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.</p>
Non-Compliance	<p>Non-Compliance</p> <p>Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit.</p> <p>Site displays little or no evidence of compliance with the requirements of the regulatory documentation.</p> <p>Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.</p>
Not Triggered	<p>Not Applicable / Not Triggered</p> <p>The respective condition / requirement was not activated within the scope of the audit.</p>
Noted	<p>A statement or fact, where no assessment of compliance is required.</p>

Risk levels for each non-compliance identified have been assessed in accordance with Table 2.

Table 3 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

Table 4 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 4 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Response
NSW Department of Planning, Industry and Environment	Jennifer Sage Senior Compliance Officer	<p>Key issues raised during the audit period are:</p> <p>Water management - There were two reported incidents of unplanned discharges from the premises:</p> <ul style="list-style-type: none"> ○ On 9 February 2020 water from the Stratford East Pit Haul Road Construction Area discharged into Avondale Creek ○ On 11 March 2020, water was discharged. The Annual Review for 2017 also noted a 'spill' from sediment dam SD7. As such, the Department considers that the IEA should address the management of water on site including the implementation of the Water Management Plan and compliance with the Water Management Performance Measures prescribed in the consent. <p>Management of noise and blasting impacts Stratford mine has received numerous complaints about noise and blasting impacts. Accordingly, the audit should address the implementation of the Blast Management Plan and Noise Management Plan, compliance with blasting conditions/criteria in the consent and the review of night-time noise levels (Schedule 3 Conditions 4 to 11, and condition 16)</p> <p>Incident notification and reporting - Reporting of all incidents in accordance with approved management</p> 	<p>A review of these issues and the adequacy of the relevant management plans is provided in Sections 7.4.1 and 7.5.</p>

Department	Contact	Stakeholder Comments	Auditor Response
		<p>plans and Schedule 5 Condition 7 of the consent, noting that an 'incident' is defined as actual or potential material harm to the environment, and/or exceedance of limits, performance measures or criteria prescribed in the consent.</p> <p>Please note that on 15 February 2019, the Department issued to Stratford Coal Pty Ltd an official caution for breach of Schedule 2 Condition 1 of the SSD 4966 (as modified) for ground disturbance beyond the approved disturbance boundary in an incident on 16 November 2018.</p>	
MidCoast Council	Ryan Fenning Team Leader – Environmental Health	<p>Recently, complaints in relation to the Stratford operations that have been reported through the community consultative committee meeting have not related to any specific issue, but include blasting, noise, dust and lighting. Complaints in relation to the mining operations have increased as mining has mining operations have recommenced.</p> <p>I assume that the audit will include a review of complaints and environmental compliance in relation to these aspects?</p>	Complaints received during the audit period have been reviewed in Section 7.2.
NSW EPA	Emma Coombes – Regional Operations Officer	The EPA declined to provide input into this IEA.	
DPIE Resources Regulator (DRE)	Jenn Werner – Inspection Environment / Peter Ainsworth – Manager Environmental Operations	DPIE Resources declined to provide into this IEA.	
Community Consultative Committee	Margaret Macdonald-Hill	Just confirming I sent a request for any matters the Stratford and Duralie Committees wished to raise with you in relation to the IEA and advise neither have any requests. On behalf of both committees, thank you for the opportunity to consult and have input into the audit.	Noted

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent and the Environment Protection Licence has been reviewed by assessing compliance against the various documentation related to project approval, as listed in Section 3.1 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 5 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 5 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non- Compliant	Noted	Not Triggered
Project Approval	226	173	11	11	31
Environment Protection Licence	115	88	8	17	2
Mining Leases	20	8	2	5	5

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 6. Recommendations have been made to address all identified Non-Compliances.

Table 6 - Statutory Non-Compliances

No.	Condition	Observation	Recommendation	Risk Level
Project Approval SSD 4966				
Sch 3 Cond 14	The Applicant shall: (d) operate a suitable system to enable the public to get up-to-date information on the proposed blasting Schedule on site, to the satisfaction of the Secretary.	<p>The Blast Management Plan states that a Blasting Information Hotline is operated. The information provided by the hotline on 17 December 2020 was out of date (a blast had been undertaken 11 December 2020).</p> <p>Note that SCPL has operated the blasting hotline during the entire 3-year audit review period and has demonstrated the intention to comply with this condition. The blasting hotline is regularly updated, however at the time this was checked SCPL acknowledges it was not up to date.</p>	Ensure that the blast hot line information is up to date at all times.	Administrative
Sch 3 Cond 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act	<p>Three water discharge incidents were recorded in the Incident Register. Two incidents on 9 February 2020 (overflow of the Rehab sediment dam at Avon North and breach of bund at Stratford East Haul Road) and one on 11 March 2020 (runoff from the BRN emplacement).</p> <p>Two incidents were reported to DPIE and the EPA.</p> <p>The incidents resulted in the discharge of waters with elevated suspended solids content and while the impacts were negligible, the discharges do trigger the definition of "Pollution of Waters" i.e. introducing any matter into waters which changes the physical, chemical or biological condition of the water.</p>	Ensure that all surface water controls are inspected before, during and after forecast (heavy) rainfall events.	Medium
Sch 3 Cond 46	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Buckets Way in accordance with the terms in Appendix 4.	<p>SCPL has endeavored to comply with this Condition, however Council has not invoiced SCPL.</p> <p>Therefore, payments for road maintenance on Buckets Way have not been commenced.</p>	Continue discussions with Council in relation to payments for Road maintenance on Buckets Way or seek agreement with Council and DPIE for removal of this Condition.	Administrative

No.	Condition	Observation	Recommendation	Risk Level
Sch 3 Cond 47	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Bucketts Way in accordance with the terms in Appendix 4.	SCPL has endeavored to comply with this Condition, however Council has not invoiced SCPL. Therefore, payments for road maintenance on Wenham Cox Road have not been commenced.	Continue discussions with Council in relation to payments for Road maintenance on Wenham Cox Road or seek agreement with Council and DPIE for removal of this Condition.	Administrative
Sch 3 Cond 52 a	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste (including coal reject) generated by the development;	No waste minimisation program has been developed for the Stratford Mining Complex.	Develop and implement a waste minimisation strategy, covering in particular on-site waste minimisation.	Low
Sch 3 Cond 52 c	The Applicant shall: (c) monitor and report on the effectiveness of waste minimisation and management measures in the Annual Review.	Section 4.5 of the Annual Reviews describe waste disposal at the mine. No information on waste minimisation or the effectiveness of relevant programs is provided.	In future Annual Reviews report on the implementation and effectiveness of the waste minimization strategy.	Administrative
Sch 3 Cond 55	The Rehabilitation Management Plan must: (d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;	The plan does not clearly describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy. It is noted that the DPE in their email of 12 October 2018 requested that this deficiency be corrected.	Revise the MOP / Rehabilitation Management Plan to include a section describing how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy	Administrative
Sch 5 Cond 4 d	(d) identify any trends in the monitoring data over the life of the development;	The Annual Reviews do not specifically report on trends in monitoring data over the life of the development.	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of trends in monitoring data over the life of the development.	Administrative
Sch 5 Cond 4 e	(e) identify any discrepancies between the predicted and actual impacts of the	The Annual Reviews do not specifically report on discrepancies	Ensure that future Annual Reviews include (in each	Administrative

No.	Condition	Observation	Recommendation	Risk Level
	development, and analyse the potential cause of any significant discrepancies; and	between predicted and actual impacts.	subsection of Section 6) a discussion of predicted and actual environmental impacts.	
Sch 5 Cond 4 f	(f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	<p>The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance.</p> <p>It is noted however that SMC has demonstrated a long running good environmental performance and has rarely exceeded monitoring criteria and as such the statements regarding EIS comparisons are generally brief. Additionally, discrepancies between the EIS predictions have been uncommon and therefore limited opportunities for improvement have been required.</p>	The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance. Note: where no non-compliances, monitoring exceedances or incidents have occurred during the relevant reporting period the Annual Review could note that no improvement initiatives are planned.	Administrative
Sch 5 Cond 5a	<p>Within 3 months of:</p> <p>(a) the submission of an annual review under Condition 4 above; the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.</p>	There was no evidence available that any Management Plans were reviewed following the submission of the annual reviews.	Establish a register that records the reviews of all management plans (as evidence for future audits). Note: the review of each plan does not necessarily result in the revision of every plan. Where no changes to a plan are warranted, the register can note that the review was undertaken and no changes to the plan were required.	Administrative
Sch 5 Cond 5b	(b) the submission of an incident report under Condition 7 below; the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions	There was no evidence available that the Water Management Plan was reviewed following the incidents reported during this Audit Period.	Establish a register that records the reviews of all management plans (as evidence for future	Administrative

No.	Condition	Observation	Recommendation	Risk Level
	in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	NOT VERIFIED	audits).	
ENVIRONMENTAL PROTECTION LICENCE 5161				
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<p>Four water discharge incidents were recorded in the Incident Register. Two incidents on 9 February 2020 (overflow of the Rehab sediment dam at Avon North and breach of bund at Stratford East Haul Road) and one on 11 March 2020 (runoff from the BRN emplacement).</p> <p>Two incidents were reported to DPIE and the EPA.</p> <p>The incidents resulted in the discharge of waters with elevated suspended solids content and while the impacts were negligible, the discharges do trigger the definition of "Pollution of Waters" i.e. introducing any matter into waters which changes the physical, chemical or biological condition of the water.</p>	Ensure that all surface water controls are inspected and maintained before, during and after forecast (heavy) rainfall events.	Medium
O4.3	The PIRMP must be tested at least annually or following a pollution incident.	The SMC PIRMP was not tested within 1 month of the plan being triggered by pollution incidents on 09/02/20 and 11/03/20.	Ensure that the PIRMP is tested within one month of any incident that triggers the implementation of the PIRMP.	Administrative
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	<p>The sampling data spreadsheet (refer M1.1) is accessible and legible.</p> <p>Monthly reports that contain the sampling related data required by Conditions M1.1 to M 1.3 are prepared for SCPL by a consultant. Sampling information (for example identification of sampling personnel) is handwritten on to sampling forms at are appended to each report. A review of three of these reports found that information on these sampling sheets was often illegible</p>	Ensure that sampling personnel carefully complete the sampling Sheets so that all information required by the EPL is legible.	Administrative
M2.2	Air Monitoring Requirements	The continuous dust monitor was operational for more than 99% of the Audit Period. However, it was not operational for two days	No recommendation required as the TEOM was	Low

No.	Condition	Observation	Recommendation	Risk Level
		in March 2019 due to equipment failure.	replaced as soon as was possible to do so.	
M2.3	Water Monitoring Requirements Testing Methods	Less than required pH and Conductivity samples analysed for Groundwater Monitoring Requirements at Point 15 and Point 17. Two samples required during the reporting and only one sample was analysed.	Ensure that future sampling reports and records incorporate the EPA sampling point designations.	Low
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	The Stratford Coal Mine website contacts page contains details of the general phone number and community information hotline but does not provide details of a specific complaints telephone number. The site entry is signposted. The entry sign contains details of the general phone number but does not provide details of a specific complaints telephone number.	Update the website and entry signage to ensure that it is clear that the community hotline is also the complaints line.	Administrative
M7.2	All blast shots must be recorded on video from a position allowing the collars of the shot, and where possible, any face, and/or toe, to be seen on the video. The licensee must retain a copy of this video for at least 12 months after the blast was initiated.	Blast in Roseville Pit on 10/12/2019 was not recorded on video. The drone and video camera were deployed, however the video was not operational at the time of the blast. Note, that SCPL has recorded every blast on video over the 3 year audit period and only missed two blasts due to technical failures.	Ensure that drone and video camera are checked prior to all blasts.	Administrative
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Two incidents of potential environmental harm occurred during the Audit Period relating to water discharges. A written report relating to the 9 February incident was reported to the EPA on 17 February. This written report was one day overdue. A written report relating to the 12 March incident was reported to the EPA on 18 February.	Ensure that any future written reports to the EPA are submitted within the timeframes specified in the EPL.	Administrative
MINING LEASE 1778				
ML4	(b) Non-conformance notifications under condition 4(a) must be provided in the form specified on the Department's website within seven (7) days of the mining lease holder	No written reports were relating to non-compliances were issued to the Division of Resources and Geoscience relating to the 2018 compliance incident	Ensure that notifications to the Department in relation to non-	Administrative

No.	Condition	Observation	Recommendation	Risk Level
	becoming aware of the breach.		compliances are provided in the specified form (from the Departments Website).	
ML5	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.	SCPL did not report incidents to the Resource Regulator.	Ensure that all reportable environmental incidents are included in the reporting of incidents.	Administrative

7. Independent Audit Post Approval Requirements

This audit focused on the pre-operational compliance requirements established by the Conditions of Approval. While the scope of the audit, as specified in the Conditions of Consent do not refer specifically to the DPIE Independent Audit Post Approval Requirements (DPIE, June 2018), for completeness the Audit has, where possible, made an assessment of the environmental performance of the project.

7.1 Summary of Environmental Incidents

The Auditor was provided with a copy of the Incident Register, an MS Excel spreadsheet titled “2.1 Stratford & Duralie – Environmental Incident Register”. The spreadsheet covered both the Duralie and Stratford mines. Twenty-seven incidents were recorded on the spreadsheet. Those incidents are summarised in Table 7.

Table 7 - Summary of Incidents

Date	Category	Details and SCPL Response	DPIE Report ¹
28/05/2018	Chemical Spill	<p>Diesel Spill from Wiggins High Flow Nozzle – Fuel nozzle jammed open and approximately 15L of diesel was spilled onto the ground before the pump was shut down.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Fuel system shut down and tagged out of service. 2) CHPP and Environment and Community Superintendent Notified. 3) Fuel Fix (tank system supplier) advised of incident and requested to commence failure investigation. 	No
4/08/2018	Land / property / access	<p>During routine security inspections a grass fire was identified inside the Mining Lease along Wenham Cox Rd near the BRN cutback.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Security officer reported fire to Environment & Community superintendent. 2) Security officer noticed RFS and local police department. 3) RFS attended site to extinguish fire. 	No
20/08/2018	Land / property / access	<p>During routine security inspections a grass fire was identified inside the Mining Lease along Wenham Cox Rd near the Avon North Open Cut. Security officer reported fire to Land & Property Manager.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Security officer noticed RFS and local police department. 2) RFS attended site to extinguish fire. 3) Stratford Coal staff attended site to provide RFS access to water for fire fighting. 	No
2/11/2018	Environment	<p>No environmental controls for drilling process water or drill cuttings. Drill cuttings deposited to area surrounding drill rig. Drill rig was being packed up when incident was identified.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Contractors were advised no further drilling to be undertaken until further notice. 2) Update exploration management plan. 3) Implemented environmental signoff process for exploration drilling. 	No
16/11/2018	Biodiversity	<p>Ground disturbance beyond outside of mining lease and Approval limit impacting on biodiversity enhancement area.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Activity ceased following identification of incident. 2) Survey undertaken to confirm the extent of ground disturbance. 3) SCPL determined remediation work required to recover material. 4) Remediation work commenced on 16/11/2018. 5) Inspection of remediation work by Environment & Community Superintendent on 19/11/2018. 6) 20/11/2018: Remediation work completed. Dirty water drain reinstated on 20/11/2018. 7) A round of workforce toolbox talks commenced on 21/11/2018. 8) Update refresher training on vegetation clearance and ground disturbance 	Yes

Date	Category	Details and SCPL Response	DPIE Report ¹
		<p>protocols.</p> <p>9) Install additional signage/delineation in areas near disturbance limits or environmentally sensitive areas.</p>	
8/02/2019	Blasting	<p>Blast overpressure exceeded 115dB(L) at Bagnall monitoring location.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) An Internal review was carried out, as is conducted after each blast. 2) No specific actions recorded. 	No
23/03/2019	Blasting	<p>Blast Fume Rating 2B: Avon North, 22/3/2019, 15:26</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) An Internal review was carried out, as is conducted after each blast. 2) drill pattern design change to overburden shots. 	No
29/03/2019	Blasting	<p>Blast Fume Rating 2A: Avon North, 29/3/2019, 12:23</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) An Internal review was carried out, as is conducted after each blast. 2) drill pattern design change to overburden shots. 	No
5/04/2019	Biodiversity	<p>Kangaroo was hit whilst driving on haul road causing minor damage to Light vehicle.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Stopped and checked for damage to make sure vehicle was operational. Kangaroo was deceased and removed from road. 	No
14/05/2019	Biodiversity	<p>While Travelling between Stratford and Duralie sites LV 866 a Kangaroo struck L/H side of LV causing minor damage to passenger side door.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Stopped and inspected for damage and Kangaroo, no sign of Kangaroo. 	No
30/06/2019	Water	<p>pH and EC not analysed for 2 samples collected during June sampling round.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) The environmental monitoring field sheets and scheduling updated. 2) Employees and contractors have been made aware of the environmental monitoring requirements for groundwater sampling. 	No
31/07/2019	Chemical Spill	<p>Hydrocarbon spill at DAD14 Pump.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Removal of contaminated material and remediation of site. 2) Upgrade of pump pad to ensure installation is level. 3) Identify if the filler pipes and breather hoses can be modified to avoid airlocks resulting in a diesel spill. i.e. pressure release on filler cap. 	No
16/08/2019	Blasting	<p>Blast Fume Rating 2A - AN069_02_RL100</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) An Internal review was carried out, as is conducted after each blast. 	No
10/12/2019	Blasting	<p>Roseville Blast overpressure exceeded 115dB(L) at Ex-Judge and Atkins monitoring location.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Environmental Superintendent and Technical Services Superintendent were notified. 2) An Internal review carried out, as is conducted after each blast. 3) Potential stemming ejection from blast hole. Unknown bridged hole - stemming for this blast was increased by 0.5m from last blast, which did not have an issue. 4) Review stemming quality and stemming procedure. 	No
10/12/2019	Blasting	<p>Blast in Roseville Pit on 10/12/2019 was not recorded on video.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Environmental Superintendent and Technical Services Superintendent were notified. 2) Investigation found that the drone and video camera was deployed, however the video was not operational at the time of the blast. 	No

Date	Category	Details and SCPL Response	DPIE Report ¹
		3) Ensure staff and employees are aware of requirements for blast monitoring. 4) Ensure pre-blast checklist includes requirement to video all blasts. Blasts may not be fired if the video camera is not operational.	
28/01/2020	Chemical Spill	Diesel Leak at Contractor HV Workshop. The main fuel delivery hose on the left hand side had a small split near the end of the hose where it joins onto the hose reel. Spill approx. 50L. Action Taken: 1) Leak was stopped and fuel was evacuated into the waste tank on Service Truck 661. 2) Contaminated area and spill was contained with spill kit. absorbent matting was used to soak up diesel. 3) Minor excavation required to remove contaminated soil.	No
7/02/2020	Water	Disturbed Area runoff from topsoil stripping area at Avon North Stage 4. Rainwater runoff ponded against a water management bund. Water management bund then eroded and the contained water from the topsoil stripping area proceeded to flow outside the approved disturbance area/within Mining Lease. 50mm rain recorded at Stratford Met Station in the 12 hours prior. Action Taken: 1) Additional sediment control structures (hay bales and sediment fencing) installed. 2) Ditchfield contractors significantly reduced the catchment area reporting to the water management bund and spread topsoil where access permitted. 3) Inspect area to ensure additional sediment controls, earth works and topsoil spreading are adequate.	No
9/02/2020	Water	Overflow of Rehab Sediment Dam (SD19) at Avon North. Overflow of Rehab Sediment Dam at Avon North following 145.8mm in the 48hrs prior. No off-site discharge Action Taken: 1) Water Quality samples taken.	No
9/02/2020	Water	Runoff from Stratford East Haul road construction breached bund reporting to Avondale Creek. Following receiving 131.6mm rain within 24hours runoff from the Stratford East Haul Road construction area breached the water management bund adjacent to the Disturbed area Dam with the flow reporting into the Avondale Creek. Action Taken: 1) Water quality samples taken at point of discharge, upstream and downstream. 2) Bund Repaired	Yes
20/02/2020	Noise	During Monthly Noise Compliance monitoring a measurement of 41dB was recorded. Recorded measurement reported to environmental staff. Operations staff notified. A re-measure completed as per NMP. Action Taken: 1) Measured noise levels and operational fleet entered into the noise model to predict noise levels at the closest sensitive receivers to the North, North west and West of the monitoring location.	No
21/02/2020	Water	Groundwater – odour in groundwater detected during routine sampling. Action Taken: 1) Sampling completed, reported to Site environmental staff. 2) No material harm. No contamination determined. Odour due to natural coal seam gas in groundwater.	No
11/03/2020	Water	Runoff from BRN waste emplacement reporting off Mining Lease - Uncontrolled discharge. Following a rain even on site (16.8mm from 12pm to 3pm) the BRN waste emplacement was being inspected at which point it was determined runoff from an area being shaped was discharging from the site. Action Taken: 1) Water containment/diversion bund erected immediately, redirecting water into BRN pit. 2) Discharges were confirmed on the 12/03/20 and following consultation the PIRMP was activated. 3) Review Rehabilitation design procedure. 4) Instate bund directing water into BRN Pit	Yes

Date	Category	Details and SCPL Response	DPIE Report ¹
8/04/2020	Chemical Spill	<p>Minor Hydraulic Oil Spill - DBS MMU. 10 litres of hydraulic oil from a split in a hydraulic hose caused by continued rubbing on the machine's chassis.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Loading ceased and Senior Mining Engineer and E&C Superintendent notified immediately. 2) Minor remediation of material of area. 3) Repair of hydraulic hose on DBS MMU and rerouting of hydraulic hose to prevent future reoccurrence 	No
5/05/2020	Noise	<p>Explosion Type Noise generated by Pacific National Train. A very loud explosion type noise was encountered on site at approx. 8am 4/05/2020. Pacific National employee who was onsite at the time advised that the noise was caused by empty Pacific National train starting up and the driver accelerating too quickly causing the carriages to interact and causing an extremely loud bang audible in Craven Village.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Investigation commenced on cause of noise. 2) Train operator to accelerate train in a matter that does not cause the carriages to clash. 	No
11/06/2020	Blasting	<p>Blast in Roseville Pit on 10/12/2019 was not recorded on video. Environmental Superintendent and Technical Services Superintendent were notified. The drone and video camera was deployed, Drone battery malfunctioned and crashed as blast countdown commenced.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) No specific action taken. 	No
29/06/2020	Water	<p>Less than required Conductivity monitoring undertaken as per M2.3 Water Monitoring Requirements at Point 5. Continuous monitoring required and only two sample were analysed during the reporting period.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) The continuous Conductivity probe at Point 5 will be replaced as per environmental monitoring requirements for surface water sampling. 	No
29/06/2020	Administration	<p>The SMC PIRMP was not tested within 1 month of the plan being triggered by pollution incidents on 09/02/20 and 11/03/20. The PIRMP was tested on 28 January 2020 and 9 July 2020, however a test was not conducted within 1 month of the pollution incidents on 09/02/20 and 11/03/20.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) PIRMP test completed. 2) SCPL staff have been reminded of the obligations requiring testing of the PIRMP. 	No
27/08/2020	Water	<p>Damage to GW5 monitoring bore during construction of Stratford East Haul Road. Material from the Stratford East haul road construction migrated beyond the disturbance limit approved in the "Stratford East Haul Road Clearing Plan" onto GW5 monitoring bore. The encroachment of material caused damaged to GW5 monitoring bore.</p> <p>Action Taken:</p> <ol style="list-style-type: none"> 1) Excavator used to remove material covering GW5 monitoring bore. 2) Re-profiling of the outer batter of the haul road. 3) Repair of the groundwater monitoring bore. 	No

Note 1 – Reporting refers to Incident Report in accordance with Schedule 5 Condition 7 of the Planning Approval.

7.2 Summary of Complaints

The Auditor was provided with a copy of the complaints register; an MS Excel spreadsheet titled "2.2 Complaints Register - Community Hotline". The spreadsheet covered both the Duralie and Stratford mines.

Thirty-nine complaints were recorded over the Audit Period. Twenty-two were noise related, ten were blast related, with the remaining seven covering lighting (3), dust (2) and other (2).

The noise complaints were all associated with the mining operations (as opposed, for example traffic). Thirty-two of the

complaints were made by two residents of Stratford. The complaints records retained by SCPL do not consistently record details of investigations undertaken by SCPL, follow up with complainants, response of complaints to the actions / commitment made by SCPL. A recommendation for improvement is detailed in Appendix 1.

Table 8 provides a summary of complaints received by the mine management over the Audit Period.

Table 8 - Summary of Complaints

Date	Category	Details and SCPL Response
25/05/2018 9:30hrs	Noise	<p>Complainant explained the noise had increased during the previous week particularly in the early morning. Mostly dozer track noise.</p> <p>ECS advised work was being undertaken in BRN and CHPP. Weather - Cold nights and strong inversions in previous week. ECS discussed the current operations and shift times, dayshift only during winter. Also advised changes to mobile plant for Stratford including a new stockpile dozer.</p> <p>Ditchfield (Mining Subcontractor) and CHPP Manager notified.</p>
26/07/2018 10:00hrs	Noise	<p>Complaint: "Mine Noise at Stratford has been getting worse. Trucks, dozers and excavators mostly from the direction of BRN " The complainant stated they are getting noise nearly every morning and often during the day. The complainant stated if this is what the noise would be like moving forward then it wasn't acceptable.</p> <p>ECS advised routine noise monitoring had been undertaken at the premises the week prior and the noise levels were <u>above</u> the relevant criteria however an inversion was also present. Temperature inversions at this time of year are very common in the early morning and evenings and SCPL have a requirement to implement additional noise mitigation measures during these times.</p> <p>ECS advised the new real-time noise monitor had been installed near Stratford village and the noise management system was currently being established.</p> <p>Information was provided to Ditchfield OCE and SCPL OCE regarding appropriate mitigation measures for mobile plant during noise enhancing weather conditions.</p> <p>Follow-up noise monitoring. Implementation of the real-time noise management system.</p>
19/09/2018 8:15hrs	Noise	<p>Complaint: "Mine Noise at Stratford during morning from 7:30-8:30. Truck noise and dozer tracks from direction of BRN "</p> <p>ECS advised current operations in BRN and Avon North. ECS advised routine noise monitoring was scheduled next week and mobile plant noise testing was scheduled for the week after.</p> <p>Information was provided to Ditchfield OCE and SCPL OCE regarding noise complaint.</p>
6/11/2018 9:20hrs	Noise	<p>Complaint: "Noise from Stratford Mine louder than normal between 8:00am to 9:00am. Mostly sounds like truck noise and dozer clatter from direction of BRN and Avon North"</p> <p>Production: ECS discussed noise complaint with BRN and Avon North OCEs at 9:30am. BRN haul fleet to RL30 dump. Dozers on pit floor. Avon North haul fleet running to low dump. Elevated works have been avoided during early morning hours.</p> <p>ECS called complainant at 11:00am, no answer. ECS called again at 12pm and left a message with complainant's partner.</p>
8/02/2019 13:00hrs	Blast	<p>Complaint: "Blast overpressure was noticeable at residence and caused windows to shake."</p> <p>The complaint was made directly to the E&C Supt. mobile.</p> <p>ECS advised a blast had been fired at 12:11pm on 08/02/2018. ECS advised the overpressure and ground vibration results at the monitor in closest proximity to the complainant's residence were compliant, however the results were higher than previous blasts.</p> <p>The complainant advised this was the first blast they had noticed and didn't what this to become the norm as had previously been experienced from the Stratford operations.</p> <p>ECS advised SCPL was currently refining designs for blast patterns in the Avon North pit where complex geological structures have been identified to minimise potential impacts from overpressure and ground vibration.</p>
15/02/2019 12:30hrs	Blast	<p>Complaint: "Blast overpressure from Stratford mine caused the windows on the house to shake again"</p> <p>ECS advised a blast had been fired at 12:09pm on 15/02/2018. ECS advised the overpressure and ground vibration results at the monitor in closest proximity to the complainant's residence were well below compliance levels (Stratford Village monitor 0.29mm/s, 86.8dB(L)).</p>

Date	Category	Details and SCPL Response
		<p>ECS and the complainant discussed the blasting operations at the Stratford Mine. ECS discussed the blast criteria and the potential impacts and on residents. The complainant advised the blasting was an inconvenience and if the levels increase it would become unacceptable.</p> <p>ECS advised the measures which are undertaken in blast design to reduce the offsite impacts as much as practicable. ECS stated the feedback from the community is useful to further improve blasting and the information is conveyed with the drill and blast engineer.</p>
14/08/2019 08:45hrs	Noise	<p>Complaint: "Noise from Stratford Mine louder during morning hours. Mostly sounds like truck noise and dozer clatter from direction of BRN and Avon North".</p> <p>Production: ECS discussed noise complaint with BRN and Avon North OCEs at 9:30am. BRN haul fleet to RL30 dump. Dozers on pit floor. Avon North haul fleet running to high dump. Noise possibly from dozer on high dump. Discussed with OCEs to limit elevated dozer use prior to 9am.</p> <p>ECS called complainant at 11:00am, no answer. ECS called again at 12pm and no answer.</p>
10/12/2019 12:50hrs	Blast	<p>Complaint: "Blast overpressure from Stratford mine caused the windows on the house to shake. Blast was larger than others previously."</p> <p>ECS advised a blast had been fired at 12:42pm on 10/12/2019. ECS advised he would follow-up with blast monitoring results and any comments from the blast crew.</p> <p>The overpressure and ground vibration results at the monitor in closest proximity to the complainant's residence were >115dB(L) overpressure. ECS advised an internal review of the blast would be undertaken and it appeared loss of containment of one drill hole had occurred causing a spike in overpressure.</p> <p>ECS and the complainant discussed the blasting operations at the Stratford Mine. The complainant advised they had previously had issues with blasting and it was unacceptable for this to start again. ECS advised Stratford Coal take all efforts in blast design to reduce the overpressure and ground vibration as much is feasible.</p> <p>The complainant advised they would not put up with blasting at these levels. It was causing damage and was not acceptable to expect people to live under these conditions. ECS advised there are processes available under the Development Consent to have either building inspections or investigations undertaken by independent personnel at the request of landowners.</p> <p>ECS advised the measures which are undertaken in blast design to reduce the offsite impacts as much as practicable and information is conveyed to the drill and blast engineer.</p>
10/12/2019 12:50hrs	Blast	<p>Complaint: "Blasting today is unacceptable. Going to report to authorities. Call back Immediately."</p> <p>Complainant stated the mine was breaking the law and was contravening the Act. The complainant stated he was going to report it to the EPA.</p> <p>ECS advised a blast had been fired at 12:42pm on 10/12/2019. The overpressure and ground vibration results at the monitor in closest proximity to the complainant's residence were >115dB(L) overpressure. ECS advised an internal review of the blast would be undertaken and it appeared loss of containment of one drill hole had occurred causing a spike in overpressure. ECS advised the blast remained within compliance criteria.</p> <p>The complainant continued to discuss unacceptable noise and dust from the mine. ECS advised SCPL would continue to minimise its impacts as far as reasonably possible.</p>
10/03/2020 20:51hrs	Noise	<p>Complainant stated that he could hear the mine 'droning noise' 'not the track slap'.</p> <p>SCPL advised the CHPP was operating at the time with the loader on the ROM. No train loading activities were being undertaken. SPCL advised that the SCPL Craven real time noise indicated compliance with the site criteria, no inversion and a gentle wind from the NE was recorded at the time.</p> <p>SPCL advised SCPL are approved to undertake activities within the noise limits with recent noise survey results demonstrating compliance.</p> <p>Complainant stated the consultants always measure on a Wednesday. SPCL advised they would review the timing and ensure these were being undertaken on different days of the week.</p>

Date	Category	Details and SCPL Response
20/03/2020 12:45hrs	Various	Opportunistic complaint to blast sentry point. SCPL returned phone call to complainant who advised she would call back; no call was received. A text message was received with various complaints on the 24, 30/03 & 1, 7/04. No further action taken.
27/03/2020 14:55hrs	blast	<p>Complaint: "Blast was more noticeable at residence around 12:45 and was wondering why that would be?"</p> <p>ECS advised a blast had been fired earlier today 27/03/2020 and advised the overpressure and ground vibration results at the monitors were compliant, with none showing any higher than designed readings warranting any further investigation.</p> <p>ECS provided some detail around how SCPL monitor and investigate blasting at SMC. The complainant asked about SMC timetable of blasting.</p> <p>ECS advised of the Stratford Blasting hotline and the notification distribution list available. Complainant was content to be added to the text message notification list for future blasting.</p>
28/04/2020 20:37hrs	Lighting	<p>Complaint: "I am alarmed & disturbed at what appears to me to be the recent rapid increase in lights from the Southern end of your coal operations. Can you please help me understand the likely ongoing visual impact of lighting & what steps the mine are taking to mitigate it for the adjoining community?"</p> <p>ECS contacted the OCE on site who conducted a lighting audit and boundary check and included in the daily OCE report " 5 lighting plants in the Stratford east area all facing towards working areas and not reflected out into environment. Audit of light direction and boundary check of lighting all satisfactory."</p> <p>ECS returned a phone call to Complainant advising a lighting audit had been undertaken by the Open Cut Examiner on site following receipt of complaint determining satisfactory lighting set up.</p> <p>ECS inspected operational lighting and undertook external inspection including Crowthers Road on 30/04/20 between 6:30-8pm.</p>
1/05/2020	Blast	<p>Complaint "blast shaking the house again".</p> <p>ECS contacted Complainant 1/5/20 to discuss and advised the blast was compliant.</p>
11/05/2020	Mine Noise	<p>After hours call ref EPA109404. HEAVY MACHINERY AND VEHICLES revving constantly, without reprieve but at varying levels of acceleration or idling. Caller is reporting this from their father's property. There is a constant issue. Response to EPA. Direct complaint also received.</p>
14/05/2020	Mine Noise	<p>Complaint "You need to get down there at night-time and listen to these machines 11pm put earmuff on from headaches and been woken to it again at 7 this morning. This is constant. I don't need call-back you need to fix this problem".</p> <p>ECS returned Complainant a text " I have recorded your complaint in our records. If you wish to contact the Stratford Complaints directly the number is 1300658239 Regards"</p> <p>SCPL OCE was closely auditing the Avon North noise and lighting. The digger and truck were not operating from 8:15pm-11pm on the night of the complaint due to a break down.</p>
14/05/2020	Lighting	<p>Complaint "... come down road heading into town around corner bam there the big light in eyes that's a Road hazard. Think you need to come (sic) have a look it across road on to the house across the paddock".</p> <p>ECS contacted the OCE to audit the lighting. Lighting was glow only with no lighting plant positioned shining onto the road.</p>
20/05/2020	Noise	<p>Complaint "it now 11:34 I have 3 very tired and cranky children awake due to noise" "and start back up at 7 and wake them".</p> <p>ECC returned complainants text message with a phone call at 9:02. ECC suggested to the complainant to contact the complaints line so the complaint can be actioned immediately.</p> <p>ECC informed complainant that compliance noise monitoring will be conducted before the end of the month. Complainant stated, 'I went for a drive last night and the noise is drastically different between the our house and other places.' ECC informed complainant of the operations in the Avon N pit at the time of complaint.</p>

Date	Category	Details and SCPL Response
20/05/2020	Noise	<p>Complaint "This noise again tonight is unacceptable".</p> <p>ECC returned complainants text message with a call, no answer. Dozer on upper BRN dump restricted to first gear only to reduce noise. Discussion with OCE to continue to limit elevated dozer use when inversions present.</p>
21/05/2020	Noise	<p>Description of Incident: After hours call EPA109601. "Calling to advise of coal mine site working from 18:30 to 19:00 started working again very loud noise - heavy machinery working continuously".</p> <p>Response provided to EPA. Direct complaint also received.</p>
22/05/2020	Noise	<p>Complaint "keep the noise down".</p> <p>ECC called complainant at 8:18am with no answer, ECC returned complainants call at 11:58am. Complainant stated that "machinery noise, still going" "light is still on the road" "keep the noise down".</p> <p>SCPL to continue implementing noise mitigation measures for mobile plant in accordance with the NMP. Lighting plant have been audited and deemed satisfactory.</p>
26/05/2020	Noise	<p>Complaint "Machinery loud again tonight"</p> <p>Weather conditions: SW wind.</p> <p>ECS contacted OCE on evening shift. Dozer at RL 84 in Avon pit operating in first gear. Dozer at RL 103 in BRN dump well below surface ceasing work at 9:30 pm. Coal was being hauled from Avon pit after 9:30 pm. Stratford East had 2 dig units running 5 trucks and 2 dozers. Only 1 dig unit in operation from 4:30pm till 6:00pm.</p> <p>ECS called complainant at 9:27am with no answer. Called at 11:42am to discuss the operation at the time of the complaint. Complainant stated, "it roars through the house" "something has to be done" "I don't need a call back just log it or whatever you do". ECS advised SCPL were available to discuss the matters further. Complainant stated, "You need to fix it" and hung up the call.</p>
9/06/2020	Noise	<p>Complaint: Complainant advised that the noise 'sounds like blasting shaking the house' 'loud banging' 'started at 1pm seems to of dropped off about 7pm, can just hear engine roaring now' 'can see lights over the hill and flashing blue and red lights'.</p> <p>ECS Contacted OCE on evening shift. Lighting and noise audit undertaken during shift with levels found satisfactory. The Real Time Noise (RTN) monitoring shows compliance with noise criteria at the Craven unit. Minor truck noise and instances of loud banging (likely the first bucket into trucks) audible in audio data. Advice provided to Operations to review excavator bucket height.</p> <p>ECS call back the complainant at 12:55pm no answer, called at 16:50pm. ECS advised RTN monitoring indicated compliance however during review of the audio banging could be heard. SCPL are going to review truck loading and heights of the buckets.</p>
29/06/2020	Noise	<p>Complaint: "the noise is excessive tonight - also lights really broaching his private space - blue lights on a gantry and another shining through his window".</p> <p>ECS contacted the OCE to audit the lighting and noise. OCE went out to Upper Avon Rd reported a faint glow on the Stratford East Dump- adjusted tilt of the lighting plant to remove the glow. Minimal noise observed.</p> <p>contacted CHPP - operating at the time with loader on the ROM. No train. No dozer. ECC reviewed Stratford Noise Monitoring audio files with dozer and truck noise audible. Real time noise and MET monitoring shows SCPL to be within noise criteria.</p> <p>ECS contacted Complainant discussed the current operations and RTN review. Discussed lighting hierarchy, mentioned improvements conducted recently with timers installed on wash down bay.</p>
29/06/2020	Noise	<p>Complaint: "Noise Last Night". (received 30/6/2020, 11:38AM)</p> <p>ECs Returned complainants call as requested. Complainant stated that 'truck noise was more noticeable than usual last night at 10:30PM'. ECS outlined operation and MET conditions to the complainant.</p> <p>ECS reviewed Stratford Noise Monitoring audio files and truck noise was noted on the recording with</p>

Date	Category	Details and SCPL Response
		ambient noise identified as being the dominant source.
6/07/2020	Noise	<p>Complaint "Noise Woke me this morning and they're loud now. I don't need to listen to it into the night. thanks".</p> <p>Dozers in first gear on the exposed areas in the Avon pit BRN dump and also in the Stratford east area.</p>
21/07/2020	Noise	<p>Complaint "Last night the noise was too much. The dust is quite thick. The lights are still on the road which is quite the hazard. And I think it's about time you serviced your dozers. Don't need it again tonight thank you very much."</p> <p>ECS Returned complainant" call.</p>
29/07/2020	Noise	Complaint "has been woken by trucks from 5:00AM onwards, she is a shift worker so doesn't get to sleep until late" Call returned to complainant.
17/08/2020	Blast	<p>Complainant contacted SCPL to discuss general matters including lighting, mining activities and blasting.</p> <p>ECS returned call to Mr Ross on 17/08/20. ECS provided an update on contact methods for community members including direct contact details, updates on exploration lease status and mining activities, updates on previous lighting queries.</p> <p>Complaint advised a neighbour had noticed elevated noise from a blast on 07/08/20 and would like this recorded as a complaint.</p> <p>Blast on 7/8/20 didn't trigger monitoring at Isaac or Ex-judge, in direction of complainant. Advice on complaint provided to D&B Engineer.</p> <p>ECS advised he would follow-up progress on changes to ROM pad lighting and white light on waste emplacement.</p> <p>CHPP Supt. Confirmed adjusts to ROM pad lighting had been completed although the proposed louvre is no longer available. Additionally, CHPP lights are turned off when not required.</p> <p>ECS inspected light emissions from Crowthers Rd at 7pm and observed direct light from lighting plant on Stratford East NAF dump. ECS phoned OCE (Mick Bird) who immediately adjusted the orientation of the plant and reduce glare to the west.</p>
18/08/2020	Lighting	<p>Complaint: "Light Pollution, all she sees is light not darkness"</p> <p>ECS attended Upper Avon Rd at 7pm to observe lighting and noise emissions. No direct line of sight of lighting was possible from the road. The outlook may be different from the location of the dwelling. ECS noted noise emissions were also low the time of observation.</p> <p>ECS returned call to Complainant on 19/08/20 and discussed lighting and noise concerns. The complainant advised the light emissions had noticeable increased and noise has also been bad on several night. ECS provided an update on current mining activities. ECS also advised recent discussions with neighbours regarding lighting and changes which had been made at the CHPP and Stratford East. ECS advised the noise emissions would have increased due to mining in Stratford East, however noise monitoring will continue to be undertaken to identify and adverse impacts.</p> <p>ECS provided feedback to OCEs regarding setup of lighting plants and noise emissions from Stratford East. Information also provided to CHPP Supt. ECS advised he would follow-up with another visit to Upper Avon Rd to inspect lighting emissions from closer to the dwelling.</p> <p>Advice provided to OCE and CHPP regarding lighting and noise impacts and mitigation.</p>
18/08/2020	Noise	<p>Complaint: "Noise complaint - low drone noise and machinery"</p> <p>ECS attended Upper Avon Rd at 7pm to observe lighting and noise emissions. No direct line of sight of lighting was possible from the road. The outlook may be different from the location of the dwelling. ECS noted noise emissions were also low the time of observation.</p> <p>ECS returned call to Complainant on 19/08/20 and discussed lighting and noise concerns. The complainant advised the light emissions had noticeable increased and noise has also been bad on several night. ECS provided an update on current mining activities. ECS also advised recent discussions with neighbours</p>

Date	Category	Details and SCPL Response
		<p>regarding lighting and changes which had been made at the CHPP and Stratford East. ECS advised the noise emissions would have increased due to mining in Stratford East, however noise monitoring will continue to be undertaken to identify and adverse impacts.</p> <p>ECS provided feedback to OCEs regarding setup of lighting plants and noise emissions from Stratford East. Information also provided to CHPP Supt. ECS advised he would follow-up with another visit to Upper Avon Rd to inspect lighting emissions from closer to the dwelling.</p> <p>Advice provided to OCE and CHPP regarding lighting and noise impacts and mitigation.</p>
4/09/2020 12:46hrs	Blast	<p>Complaint: "Blasting dust everywhere that's a no no big time"</p> <p>ECS returned a text message to advise the complaint would be follow-up. No call back required as requested previously.</p> <p>E&C Coordinator reviewed blast video. Dust was observed to stay within ML and blast exclusion zone. Minor levels of dust migrated north of the blast location and dissipated within 4.5 mins.</p>
16/09/2020 18:30hrs	Noise	<p>Complaint: "Noise rattling through house at 11 last night, do not want a repeat again tonight."</p> <p>ECS returned a text message to advise the complaint would be follow-up. No call back required as requested previously.</p> <p>Weather conditions: No inversion present at 11:00PM on the 15/9/2020. Consistent light N wind at the time referenced in complaint.</p> <p>OCE Comments; Dozers in first gear on the expose areas in the Avon pit BRN dump and also in the Stratford east area.</p>
22/09/2020 21:49hrs	Noise	<p>Complaint: "noise like a freight train, and lighting"</p> <p>ECC attempted call back, no answer.</p> <p>Weather conditions: Strong inversion present at 9:49PM on the 22/9/2020. Consistent very light SE wind at the time referenced in complaint.</p>
2/10/2020 12:40 hrs	Blast	<p>Complaint via text: "Not informing when blasting again dust everywhere and that was a bit close to road and you didn't block bit dangerous."</p> <p>No call back required as requested by Complainant previously.</p> <p>Blast notifications for Complainant residence ceased as requested by Complainant.</p> <p>Notes from Senior Mining Engineer:</p> <ul style="list-style-type: none"> • Blast was minimum 700m from Wenham Cox Road – road closure not mandatory • Dust plume very thin, did not leave immediate area of blast • Blast fired at 12:30:18PM against a scheduled blast time of 12:30PM – coincided with Blasting Hotline and community blasting notifications sent by E&C Coordinator • Filmed from 3 locations 1) Drone; 2) Handheld camera at Clarke; 3) DBS in pit camera all footage displays compliance with relevant requirements
7/10/2020 21:45hrs	Lighting	<p>Complaint: "lighting tonight is very extensive"</p> <p>ECS returned call on 08/10/20. Complainant explained he had noticed a beam of light from the Stratford East area shining from south to north. He advised there was no light shining directly towards them although the light seemed to have changed from previous nights.</p> <p>ECS advised he would follow-up with OCE and confirm positioning of lighting plants.</p> <p>OCE advised lighting plant locations had not changed. OCE confirmed lighting plants angled towards east and north and below horizontal. OCE advised beam of light was possibly from PAF Cell light and would inspect on following night. Confirmed lighting plants are angled below horizontal and away from receivers to the west.</p>
14/10/2020 21:30 hrs	Dust	<p>Complaint via text: "the dust is bad fix this problem" No call back required as requested by Complainant previously.</p>

Date	Category	Details and SCPL Response
		<p>Stratford and Craven TEOM Showing low PM10 12.47 and 12.25 respectively.</p> <p>Light ENE wind at time of complaint (4.2km/h), away from complainant</p> <p>Water Cart watering grading floors, ramps and tip heads in the Avon and Stratford circuits.</p> <p>Trucks tipping at Old Main Pit, Stratford East, and Turkeys nest. No dust issues noted at dump locations.</p>
15/10/2020 21:30hrs	Dust	<p>Complaint via text: "it's me again the dust really bad again tonight. you should take a drive down Wenham cox road and have a look for yourself." No call back required as requested by Complainant previously.</p> <p>Stratford and Craven TEOM Showing low PM10 12.47 and 7.26 respectively.</p> <p>Light NNW wind at time of complaint (6.4km/h)</p> <p>Water Cart watering grading floors, ramps and tip heads in the Avon and Stratford circuits. Trucks tipping at Stratford East and Turkeys nest. No dust issues noted at dump locations.</p>
8/10/2020 12:30hrs	Blast	<p>Complaint: "Blast from Stratford mine caused the windows on the house to shake. Blast was larger than others previously from Avon North."</p> <p>The complaint was made directly to the E&C Supt. mobile. Call returned on 19/11/20.</p> <p>ECS advised a blast had been fired at 12:39pm on 08/10/2020. ECS provided blast monitoring results (0.29mm/s, 97.1dB(L)@ Ex-judge). Similar levels to previous blasts. ECS advised the measures which are undertaken in blast design to reduce the offsite impacts as much as practicable and information is conveyed to the drill and blast engineer.</p>

7.3 Summary of Notices

The following is a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period:

- EPA Notice of Licence Variation 19 June 2018
- 15 February 2019, DPIE issued an official caution for breach of Schedule 2 Condition 1 of the SSD 4966 (as modified) for ground disturbance beyond the approved disturbance boundary in an incident on 16 November 2018.

7.4 Project Environmental Management System

The Stratford Mining Complex operates under a formal site Environmental Management System. The Environmental Management Strategy that was prepared as a requirement of the Planning Approval describes the environmental management elements of the Environmental Management System and is generally consistent with the requirements of ISO 14001:2014. While the HSEC System is not certified to ISO 14001, the level of compliance identified in this audit indicates the system is generally being implemented. However, the following elements of the EMS were not fully implemented during the Audit Period.

7.4.1 Incident Management and Reporting

Section 8 of the Environmental Management Strategy outlines the requirements of the incident management system and references the requirements of Schedule 5 Condition 7 of the Planning Approval. Section 7.1 and 7.2 of the PIRMP provides further detail on incident reporting. It is noted that the EMS does not reference the incident reporting information in the PIRMP.

Twenty-seven incidents were recorded for the Audit Period and three of those incidents were considered as “reportable” and were reported to DPIE and the EPA. It is noted that the incident of 9 February 2020 written report was delivered just outside of the 7-day timeframe (from the date of the incident) specified in the Approval. The reporting of the three incidents did not include the Resources Regulator (as is required under the Mining Lease).

Of the remaining twenty-four incidents, five were non-compliances with EPL / Planning Approval conditions. These, while recorded as incidents, for example the water sampling incident of 30/06/2019, were not:

- reported to all relevant Authorities; and/or
- followed up with written incident reports; and/or
- reported in the relevant Annual Review.

7.4.2 Environmental Management System Recommendations

In relation to the Stratford Mining Complex EMS, it is recommended that:

1. The incident management and reporting system be reviewed, the EMS be updated to:
 - a. Reflect the requirements of the PIRMP (or reference the relevant section in the PIRMP)
 - b. Clarify the incident reporting requirements contained in the Approval, EPL and Mining Leases
2. The revised incident reporting requirements be communicated to all relevant personnel and contractors.

7.5 Implementation of the Operational Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the management plans and program listed in Table 9. During the document review phase of the project the contents of each of the plans were reviewed. Table 9 summarises the findings of that review. In general, the Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls.

Table 9 - Management Plan Compliance Summary

Management Plan requirements under Schedule 5 Conditions 3, 5 and 11.	Environmental Management Strategy	Noise Management Plan	Blast Management Plan	Air Quality Management Plan	Water Management Plan	Squirrel Glider Management Plan	Biodiversity Management Plan	Heritage Management Plan	Rehabilitation Management Plan
Schedule 5 Condition 11									
Latest version uploaded to website	√	√	√	√	√	√	√	√	√
Schedule 5 Condition 3									
Detailed baseline data	-	√	√	√	√	√	√	√	√
Statutory requirements	√	√	√	√	√	√	√	√	√
Performance measures / criteria / action trigger levels	-	√	√	√	√	√	√	√	√
Management measures / controls	√	√	√	√	√	√	√	√	√
Monitoring and reporting	√	√	√	√	√	√	√	√	√
Contingency planning	√	√	√	√	√	√	√	√	√
Environmental performance improvement	-	√	√	√	√	√	√	√	√
Incident management	√	√	√	√	√	√	√	√	√
Complaints management	√	√	√	√	√	√	√	√	√
Non-compliance management	√	√	√	√	√	√	√	√	√
Reporting exceedance of impact assessment or performance criteria.	√	√	√	√	√	√	√	√	√
Periodic review and revision	√	√	√	√	√	√	√	√	√
Schedule 5 Condition 5									
Review and revision following Annual Review	NT	NT	NT	NT	NT	NT	NT	NT	NT
Review and revision following Incidents	NT	NT	×	NT	×	NT	×	NT	NT
Review and revision following IEAs	NT	NT	NT	NT	NT	NT	NT	NT	NT
Review and revision following modification to the Approval	NT	NT	NT	NT	NT	NT	NT	NT	NT

Notes to Table 9 - Management Plan Compliance Summary:

√ = Complies

× = Does not comply (for details refer to compliance table in Appendix 1)

- = Not applicable

NT = not triggered during this Audit Period

7.5.1 Water Management Plan / Surface Water Management Plan

The Water Management Plan details the requirements for management of surface water (through the Surface Water Management Plan), groundwater and the site water balance. A number of incidents covering the discharge of water from the site (in breach of the EPL), failure of surface water controls within the boundaries of the site (that did not involve off-site discharges) and failure to analyse water samples as part of the routine compliance monitoring requirements for the site.

Section 7 of the Surface Water Management Plan (SWMP) describes the surface water management measures to be implemented. The controls described in the SWMP are appropriate for the control of surface water flows. A review of the discharge incidents suggests that the intensity of rainfall received at the time of the incidents was likely to be the key factor in the incidents. However, it is noted that it is not possible for the Auditor to comment on the specific design or condition of surface water controls in place at the time of the incidents.

From the review of the incidents and relevant plans it is concluded that implementation of the controls described in the Surface Water Management Plan should provide effective and appropriate controls.

With the increasing intensity of weather-related events, as a result of climate change, the inspection and maintenance of environmental controls, including surface water controls, is critical. Section 8.4 of the Surface Water Management Plan briefly describes the monitoring (inspection) of sediment control structures and states that inspections will be undertaken quarterly or after significant rainfall events.

Recommendation: revise the Water Management / Surface Water Management Plans to include inspections of surface water management structures and controls **prior** to forecast high rainfall events (>50mm) to ensure that all such controls are sufficient to manage the expected rainfall event. These inspections should be timed to provide adequate time to repair / augment existing controls and should be fully documented.

Section 8.2 of the Surface Water Management Plan sets out the water quality monitoring program. The program meets the requirements of the Approval. Following the incident related to failure to complete all required laboratory testing, SCPL revised the field monitoring sheets and advised contractors and relevant staff of the sampling requirements. The Auditor considers the actions taken to be appropriate, however makes the following recommendation related to internal auditing of environmental sampling, especially those activities undertaken by contractors.

Recommendation: initiate an annual monthly in-field audit / surveillance of field sampling activities to ensure that contract sampling personnel are fully trained in the sampling requirements of SCPL, collecting, handling, and recording all environmental sampling in accordance with EPL requirements.

7.5.2 Noise Management Plan

SCPL received twenty-one noise complaints over the audit period. The process following by Stratford following receipt of noise complaints is:

1. Check monitoring results.
2. Check weather conditions.
3. Review mining operations and related activities.
4. Respond to complainant: Discuss issues and request further context regarding the nature of the complaint. Provide information if it is available or advise what further actions and mitigation measures can be taken. Confirm if further follow up is required.
5. Investigate noise or blast emissions with mining supervisions. Obtain comments on any observed emissions at time of complaint. Determine if the complaint is verified. Determine if further mitigation measures are required.
6. Follow up with complainant.
7. Record a full summary of the complaint details and investigation.

Where a noise impact is verified (i.e. where site activities, while complying could result in audible noise

impacts), additional monitoring is undertaken, at the discretion of the Environment and Community Superintendent. Additional monitoring has included real-time monitors and additional monthly attended monitoring.

Stratford endeavour to resolve matters directly with each complainant. If this is not successful and the complainant is still not satisfied with the response, SCPL advise the complainant of their rights to request an independent investigation by DPIE in accordance with the Development Consent conditions.

On the basis that Stratford noise emissions have complied with the requirements of the Approval and EPL, the Auditor has concluded that the requirements of the NMP were implemented and that no additional actions were warranted in relation to the noise complaints.

7.5.3 Blast Management Plan

SCPL received ten blast related complaints over the audit period. There have been no exceedances of blasting criteria during the audit period.

1. Check monitoring results.
2. Check weather conditions.
3. Review mining operations and related activities.
4. Respond to complainant: Discuss issues and request further context regarding the nature of the complaint. Provide information if it is available or advise what further actions and mitigation measures can be taken. Confirm if further follow up is required.
5. Investigate noise or blast emissions with mining supervisions. Obtain comments on any observed emissions at time of complaint. Determine if the complaint is verified. Determine if further mitigation measures are required.
6. Follow up with complainant.
7. Record a full summary of the complaint details and investigation.

The Auditor reviewed the Blast Management Plan and concluded, given that Stratford has complied with the blast overpressure and ground vibration criteria that the plan is adequate and is being implemented.

7.6 Status of Previous IEA Findings

The previous audit was completed in September 2017. **Error! Not a valid bookmark self-reference.** lists the status of implementation of the audit recommendations associated with the Approval, relevant licenses and permits identified during the 2017 Audit.

Table 10 - Status of 2017 Audit Findings

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
DA 23-98/99 - Stratford				
Sch3, Con 20	The Applicant shall:(a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise the off-site odour, fume and dust emissions generated by the development, including any emissions from spontaneous combustion;(b) minimise any visible air pollution generated by the development;(c)regularly assess the real-time air quality monitoring and meteorological forecasting data and relocate, modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Director-General.	Excessive dust seen during site inspection on ROM pad near an operating loader. Recommend that a review of inspections and water cart operation frequency around the CHPP area be undertaken to ensure dust generation minimised during non-operational phase. Recommend that meteorological monitoring is not required to include forecasting capabilities as operations have ceased.	Recommencement of mining at Stratford started during Q2 2018. Site familiarisation and environmental awareness training was undertaken in June 2018. The water cart operations including the ROM pad area now supervised by the Open Cut Examiner. The CHPP routine area inspections have been updated and include the ROM pad area.	Closed
Sch3, Con 20		Air quality monitoring does not have forecasting abilities.	Current Air quality monitoring system includes forecasting capability.	Closed
Sch3, Con 33	The Applicant shall:(a) minimise the waste generated by the development;(b) ensure that the waste generated by the development is appropriately stored, handled and disposed of; and(c) dispose of rejects generated by the processing of coal on site in general accordance with the approved SCM Life of Mine Reject Disposal Plan, to the satisfaction of the Director-General.	The Rejects Disposal Plan was updated in December 2016.The Rejects Disposal Plan was sent to Resource Regulator (and acknowledged on 12/7/17) however, there is no evidence to confirm that the revised Rejects Disposal Plan has implemented to the satisfaction of the Director-General. Recommend that written confirmation is sought from DP&E that the disposal of rejects described in the December 2016 Rejects Disposal Plan is to the satisfaction of DP&E.	The Life of Mine Rejects Disposal Plan (RDP) was submitted with documentation for the "High Risk Activities" notification for the Stratford Rejects Emplacement Area to DIRR. The RDP is also referenced in the approved Surface Water Management Plan.	Closed

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
Sch 5, Con 6	The Applicant shall notify the Director-General and any other relevant agencies of any incident associated with the development as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Director-General and any relevant agencies with a detailed report on the incident	No evidence to show that the train incident discussed in Section 5.11.1 was reported in 7 days	The 2020 IEA has found that all agencies have not been consistently notified of incidents.	Open
Sch 3, Con 2	Except for the land referred to in Table 1, the Applicant shall ensure that the noise generated by the Stratford Mining Complex does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25% of any privately-owned land	Recommend consideration be given to revising noise monitoring program for non-operational phase in consultation with DP&E (if Stratford Extension not commenced)	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. Hence this action is redundant. A new Noise Management Plan has been prepared for the SEP.	Closed
Sch 3, Con 8	The Applicant shall prepare and implement a Noise Management Plan for the Stratford mining complex to the satisfaction of the Director-General. This plan must: (a) be prepared in consultation with DECCW and ARTC, and submitted to the Director-General for approval by the end of May 2011 or prior to the proposed construction of the new rail loop on site, whichever is sooner.	a) Viewed letter from DP&E dated 22/9/17 approving management plan. No evidence that consultation with Council and EPA occurred for the NMP revision. It is recommended that consultation is undertaken for any future revisions or approval from DP&E sought not to consult. A revision to the NMP is recommended to address all relevant DA and EPL conditions, for both Stratford and BRN e.g. EPL5161 Conditions L2.2 and L2.6	2020 IEA found that the required consultation was undertaken on the Noise Management Plan. 2020 IEA determined that the current Noise Management Plan contains the information required by the current Project Approval.	Closed
Sch 3, Con 12	If the Applicant receives a written request for the owner of any privately-owned land within 2 kilometres of the approved open cut mining pit on site for a property inspection to establish the baseline condition of any buildings and/or structures on their land, or to have a previous property inspection report updated, then within 2 months of receiving this request the Applicant shall..... commission the preparation of an updated property inspection report.	Recommend that offers to update property inspections are not required going forward as operations have ceased (assuming operations under Stratford Extension does not commence).	This issue was closed out by the 2017 IEA.	Closed.
Sch 3, Con 22	During the life of the development, the Applicant shall ensure that there is a suitable meteorological station operating in the vicinity of the site that:(a) complies with the requirements in Approved Methods for Sampling of Air Pollutants in New	Table A-1 of the AQGGMP is missing (b) of this condition and there is no mention of this in the text. Recommend the AQGGMP is updated	The 2020 IEA has found that a complying Air Quality Management Plan has been prepared and approved under the current Approval.	Closed

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
	South Wales guideline; and(b) is capable of continuous real-time measurement of temperature lapse rate in accordance with the NSW Industrial Noise Policy.			
Sch 3, Con 26	The Applicant shall improve the riparian habitat along Avondale Creek to the satisfaction of the D-G. These improvements must be made to the section of the creek running from the northern extent of the proposed Woodland Corridor (shown on the figure in Appendix 5) to where it intersects with the south-western boundary of mining lease 1360 (see the figure in Appendix 2)	Recommend the progress of the habitat improvement works along Avondale Creek (i.e. tube stock plantings) are included in future Annual Reviews to confirm success.	Now managed under the Biodiversity off set strategy. An annual biodiversity report is prepared	Closed
Sch 3, Con 28	The Surface Water Management Plan must include: [The full condition has not been reproduced here].	It is recommended that any future updates to the SWMP include additional details on the final void design, closure objectives and specific performance criteria.	The 2020 IEA has determined that the current version of the Surface Water Management Plan meets the requirements of the existing Approval.	Closed.
Sch 5, Con 8	By the end of December 2011, and every 3 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. [The full condition has not been reproduced here].	Recommended that next audit only required to audit 'rehabilitation' related conditions and confirmation from DP&E sought.	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. DPE have advised in the letter dated 30/11/2018 the next Independent Environmental Audit is due prior to 31 December 2020. Hence this action is redundant.	Closed
DA 39-02-01 Bowens Road				
Sch 2, Con 1b	The MOP shall: (i) be prepared in accordance with DMR Guidelines for the Preparation of Mining Operations Plans (Document 08060002.GUI or its most recent equivalent.... [The full condition has not been reproduced here].	The MOP is publicly available on SCPL's website; however, no correspondence was available at the time of the audit to confirm that it was either forwarded to or advised that it is available on the website; to GSC or the Director General.	This condition has been superseded by the current Project Approval.	Closed
Sch3, Con 4h	The regeneration works shall be monitored by an appropriately qualified and experienced ecologist approved by the Director-General. The results of the monitoring and the effectiveness of the reforestation shall be reported annually as part of the Annual Environmental Management Report. [The full condition has not been reproduced here].	Fauna monitoring in accordance with Section 6 of the FFMP has not been reported in the Annual Reviews. Recommend fauna monitoring is reported in future Annual Reviews.	Annual biodiversity assessments are undertaken by a suitably qualified specialist.	Closed
Sch4, Con1d	The mine water balance shall be recalculated on a six-monthly basis and reported in the AEMR. Any discharge must be synchronised to occur within	No evidence that there is a recalculation of the site water balance on a six-monthly basis. Site water balance reviews have been undertaken annually.	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. Hence this	Closed

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
	triggers on river flow.	It is recommended that the site water balance is recalculated at least six monthly using the monthly survey data collected in accordance with the Site Water Balance recommendations or formal approval sought from DP&E for only annual review.	action is redundant. A new Water Management Plan and Site Water balance have been prepared for the SEP and includes a requirement for the review and update on the Site Water Balance.	
Sch7, Con 6	Management measures to ensure adequate air safety and reasonable access for the rural air strip to the east of the Bowns Road North Coal Mine are to be detailed in the MOP.	Management measures for the air strip are not included in the current MOP. It is recommended that the MOP is updated to include management measures for the air strip.	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. A new Mining Operations Plan & Rehabilitation Management Plan has been prepared. This condition is now redundant, as the air strip will be disturbed by the Avon North operations and the Wenham Cox Rd re-alignment.	Closed
Sch9, Con 2a	The Applicant shall, throughout the life of the mine and for a period of at least three years after the completion of mining in the DA area, prepare and submit an Annual Environmental Management Report (AEMR), which may be incorporated into the existing Stratford Coal Mine AEMR, to the satisfaction of the Director-General and DMR... [The full condition has not been reproduced here].	Changes to agricultural land suitability resulting from the mining operations not discussed in the 2016 Annual Review. Recommend that changes to agricultural land suitability due to mining operations is included in future Annual Reviews.	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. DA 39-02-01 has been surrendered, hence this condition is redundant. A section on agricultural management was added to the Stratford Annual Review 2017.	Closed
Sch 1 Con 2a	The Applicant may carry out mining operations on site until the end of 2014	Recommended that next audit only required to audit 'rehabilitation' related conditions and confirmation from DP&E sought.	The mine operations have been restarted; therefore this recommendation is no longer relevant.	Closed
Sch 3 Con 4a	The Applicant shall prior to commencement of Mining Operations prepare and implement a Flora and Fauna Management Plan. ... [The full condition has not been reproduced here].	Recommend FFMP should be updated for closure status (and included in closure planning documentation), unless the Stratford Extension is progressed and a FFMP under that approval is progressed	The 2020 IEA has determined that the current version of the Biodiversity Management Plan which superseded that former Flora and Fauna Management Plan meets the requirements of the existing Approval.	Closed.
Sch 3 Con 4c	Revegetated areas shall be protected from grazing by domestic stock. The revegetation program shall also aim to extend and re-establish existing native vegetation on and, where possible, adjacent to the site	It is recommended details of revegetation works adjacent to the site (i.e. within wildlife corridor) are included in future Annual Reviews.	Flora, fauna and biodiversity management measures have been included in the new Biodiversity Management Plan and reporting is included in the Annual Reviews.	Closed

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
Sch 6 Con 2a	The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the Stratford mining complex do not exceed the criteria listed in Tables 2a, 2b or 2c at any residence on privately-owned land or on more than 25 percent of any privately-owned land.	Suggest review of air quality monitoring program and approval by relevant regulators during non-operational status at Stratford (unless Stratford Extension is progressed).	The 2020 IEA has determined that the current version of the Air Quality Management Plan meets the requirements of the existing Approval.	Closed.
Sch 13 Con 1a	The Applicant shall implement the offset strategy described in Section 3.1 of the environmental assessment titled Bowens Road North Open Cut June 2010 Modification, and depicted generally in the figure in Appendix 6, to the satisfaction of the Director-General.	When next updated, the BDMP could be updated to clarify the differences in areas for the offset strategy (per hectare for each of BRN and Duralie) although it is acknowledged that this shown figuratively.	The 2020 IEA has determined that the current version of the Biodiversity Management Plan meets the requirements of the existing Approval.	Closed.
EPL 5161 - Stratford				
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises	Air quality monitoring does not have forecasting abilities	Current Air quality monitoring system includes forecasting capability.	Closed
M2.1 – 2.2	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns	One instance where not enough samples were taken (e.g 11 Samples taken at MP9 where 12 samples are required. As one dust gauge was broken in January 2015).	The 2020 IEA found that while the majority of sampling and analysis undertaken was complete, two instances occurred where the full suite of analyses were not undertaken.	Open
R4.2	A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring.	Noise compliance reports submitted late due to transition to new noise consultant.	The 2020 IEA found that all quarterly noise reports had been submitted within the specified timeframes.	Closed
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation	Recommend that fee-based activity scale is changed to reduce fee.	In January 2018, an application was submitted to the EPA for a variation of EPL 5161 and to surrender EPL 11745. The fee-based activity scale has been amended.	Closed
A2	Premises or plant to which this licence applies	Recommend a new premise plan is made in next update		

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.	Recommend Ambient dust monitors are considered if they should be removed in next update.	In January 2018, an application was submitted to the EPA for a variation of EPL 5161 and to surrender EPL 11745. A new premises plan was included.	Closed
M2.3	Refer to table in EPL	It is recommended that the Sampling Method for Point 2 is changed to probe as opposed to grab sample.	The 2018 EPL variation changed monitoring points and requirements. This recommendation is no longer relevant.	Closed
U1.1, 2.1 and 3.1	Refer to original EPL (Current version has been amended to remove these conditions.	Recommend these conditions are removed as they are complete.	The PRP conditions was removed in the last EPL variation.	Closed
General Recommendations				
-	-	It is recommended that consultation is undertaken for any future revisions to management plans or approval from DP&E sought not to consult	The 2020 IEA found that consultation with all required stakeholders was consistently undertaken.	Closed
-	-	Recommend management plans are revised for non-operational status if Stratford Extension is not progressed	Mine operations were commenced in 2018. Recommendation no longer relevant.	Closed
-	-	Recommend that waste grease at the Stratford Fuel Farm is cleaned and the area is maintained (see Plate 2 of Appendix D).	All wastes areas observed during the 2020 IEA were appropriately organised and maintained.	Closed
-	-	Recommended Table 14 in the MOP (Mine Closure Planning Program) is implemented	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. A new Mining Operations Plan & Rehabilitation Management Plan was prepared for the SEP. The new MOP includes the "Mine Closure Planning Schedule" and states that the completion dates will be included in a future MOP revision at a suitable time prior to closure.	Closed
-	-	Recommend inductions (and log on) are updated to include more environmental detail such as the general management processes used for dust, noise, water, odour and heritage on site as well as identifying any of the sensitive areas in relation to these.	The Auditor (2020 IEA) undertook the site induction. Appropriate environmental content has been included in the induction.	Closed

Condition	Detail	2017 Audit Assessment / Recommendation	2020 Audit Assessment	Status
-	-	Detailed and updated planning and assessments should be undertaken for the water quantity and quality within the final voids to support long-term management.	The Stratford Extension Project Development Consent SSD-4966 was triggered on 4 April 2018. Final void water management was assessed in the SEP Environmental Impact Statement Surface Water Assessment. The new MOP includes the "Mine Closure Planning Schedule" and includes a review of the final void water quality and quantity in the long-term.	Closed

7.7 Specialist Auditor Reports

No specialist auditor reports were prepared as part of this audit.

7.8 Operational Environmental Impacts

The assessment of actual impacts against those predicted in the EIS is provided in Table 11.

Table 11 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Groundwater	Negligible impact on groundwater levels or groundwater yield for groundwater users with privately owned bores in the fractured rock groundwater system	No significant impacts to groundwater were detected during the audit period. No complaints were received relating to groundwater impacts on other groundwater users.
	Negligible change in groundwater quality as a result of mining in the short-term	The mining operational impacts on groundwater were consistent with the predictions if the EA during the audit period.
Surface Water	The Project is not expected to result in a measurable change to downstream flows in Avondale Creek, Dog Trap Creek or the Avon River.	Flows in the creek system associated with the mine were impacted by the prevailing weather conditions (low rainfall) during the audit period. No impacts due to mining were reported. No significant difference between upstream and downstream water quality was detected during the audit period.
	The risks of elevated dissolved solids and other contaminants impacting downstream waters is considered to be low.	The mining operational impacts on surface water were consistent with the predictions if the EA during the audit period.
Noise	No receiver would exceed the construction noise criteria.	No construction related noise complaints have been received. The noise monitoring reports reviewed indicated that no noise exceedances were measured at privately owned residents during the audit period.
	No noise exceedances were predicted at privately owned residences that were not subject to a noise agreement.	The noise monitoring reports reviewed indicated that no noise exceedances were measured at privately owned residents during the audit period. Note that regular noise complaints have been received from residential neighbours during the Audit Period, including sleep disturbance episodes.
	The relative increase in traffic flow on The Bucketts Way would result in barely perceivable traffic noise increases.	No road traffic related noise complaints have been received. The noise monitoring reports reviewed indicated that no noise exceedances were measured at privately owned residents during the audit period.

Category	Predicted Impact	Actual Impacts to Date
	The average Project-related rail noise level increase is 0.2 dBA, and the peak Project-related rail noise level increase is 0.6 dBA. This noise level increase would not be perceptible to most people.	One rail related noise complaint was received during the audit period. The noise monitoring reports reviewed indicated that no noise exceedances were measured at privately owned residents during the audit period.
Blasting	No exceedance of the structural damage criteria is predicted for the Project	No exceedances of structural damage criteria were measured during the audit period.
	No blast overpressure or ground vibration exceedances were predicted.	No exceedances of blast overpressure or ground vibration criteria were measured during the audit period.
Air Quality	No exceedances of the average criteria for PM10 and TSP concentrations or dust deposition criteria were predicted.	A review of the dust monitoring data for the audit period indicated that no exceedances were detected that were attributed to the mine operations.
Greenhouse Gas Emissions	The total indirect emissions (i.e. Scopes 2 and 3) over the life of the Project are estimated to be approximately 39 Mt CO ₂ -e, which is an average of approximately 3.5 Mt CO ₂ -e per annum.	The Auditor was unable to determine the impact of Scope 1 Emissions. Scope 2 and 3 Emissions for Yancoal as a whole were reported in 2019 to be 1834921 tCO ₂ -e with an emissions intensity of 0.044 tCO ₂ /ROMt. At that intensity scope 2 and 3 emissions for Stratford for 2019/20 financial year are estimated to be in the order of 55,440 tCO ₂ .
Flora	A total of 103.7 ha of native vegetation would be cleared for the extension project.	The extent of clearing associated with the extension project is (at the time of this IEA) under the total approved area for clearance.
	No adverse impacts on existing native vegetation would occur from irrigation.	No negative impacts from irrigation were identified during this IEA.
	The proposed vegetation disturbance associated with the Project has the potential to act as a catalyst for weed incursion.	During the IEA site inspection weed infestations were observed. This IEA has found that current weed management activities may not be sufficient to prevent the on-going invasion of noxious weeds.
	The European Rabbit and other introduced animals can result in erosion problems as well as reduce recruitment and survival of native plants.	A pest management program has been implemented. No observable impacts to native or rehabilitated vegetation from pest species was observed during this IEA.
	Any effects of dust on vegetation are likely to be minor at the Project.	No dust level exceedances were recorded during the audit period. No dust impacted vegetation was observed during the IEA.
	The risk of high frequency fire as a result of the Project is considered to be relatively low.	No significant fires resulting from site operations occurred during the audit period.
	The Project would not significantly impact any threatened flora species.	Flora surveys undertaken during the audit period did not identify any negative impacts on threatened flora species.
Fauna	The Project has the potential to cause mortality of some animals as a result of direct encounters with construction works/ vehicles or through removal of habitat during clearing.	Two incidents involving project motor vehicles and kangaroos were recorded during the audit period.
	The EA concluded that the extension project would be unlikely to significantly impact any threatened fauna	Fauna surveys undertaken during the audit period did not identify any negative impacts on

Category	Predicted Impact	Actual Impacts to Date
	species.	threatened fauna species.
	Predation by the feral cat, Competition and grazing by the feral European rabbit and Predation by the European red fox	A pest management program has been implemented. No observable impacts to native or rehabilitated habitat areas from pest species was observed during this IEA.
Aboriginal Heritage	The Project would result in the disturbance of 10 known Aboriginal Heritage sites.	No unauthorized disturbance of heritage sites has occurred during the Audit Period. No unexpected heritage finds were reported over the audit period.
Non-Aboriginal Heritage	The Project would not materially contribute to local or regional cumulative impacts on non-Aboriginal heritage.	No impacts on non-Aboriginal heritage have been identified during this IEA.
Road Transport	The Project is not expected to generate any additional traffic on Wenham Cox Road or Bowens Road. There is expected to be no capacity concerns regarding the future operation of intersections and the Project would not impact significantly on the efficiency of the road system.	No road transport issues or complaints were recorded during the audit period.
Visual Character	The major aspects of the Project considered to have the potential to impact on the visual landscape include: <ul style="list-style-type: none"> •additional clearance or disturbance of vegetation within the Project area; •modification of topographic features including expanded placement of waste rock in the Stratford Waste Emplacement (including backfilling of the Stratford Main Pit) and Northern Waste Emplacement; •an extension of the existing Roseville West Pit and development of the new Avon North and Stratford East Open Cuts; •progressive rehabilitation of completed landforms; and •lighting associated with night-time mining operations. 	Visual amenity impacts from the development are consistent with the predictions in the EA.

Compliance Table

Appendix A

PLANNING APPROVAL SSD-4966

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
SCHEDULE 2 ADMINISTRATIVE CONDITIONS								
Sch 1 Cond 1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.			During the site inspections undertaken on 1 and 2 December the Auditor did not identify any circumstances where reasonable and feasible environmental controls were not being implemented.	All reasonable and feasible measures were being implemented to minimise the potential for environmental harm.	Complies	
Sch 2 Cond 2		The Applicant shall carry out the development generally in accordance with the: (a) EIS; (b) statement of commitments; and (c) conditions of this consent.					Noted	
Sch 2 Cond 3		If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.					Noted	
Sch 2 Cond 4		TERMS OF CONSENT	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these documents.	<p>Letter from DPE (L Cook) to SCPL (M Plain) titled "Stratford Mining Complex 2017 Annual Review" dated 19/6/2018. The letter requested changes be made to the 2017 Annual Review.</p> <p>Letter from DPE (L Cook) to SCPL (M Plain) titled "Stratford Mining Complex 2017 Annual Review" dated 17/7/2018. The letter approved the changes be made to the 2017 Annual Review in response to the DPE letter of 19 June.</p> <p>Letter from DPE (L Cook) to SCPL (M Plain) titled "Stratford Extension Project 2018 Annual Review" dated 20/6/2019. The letter requested changes be made to the 2018 Annual Review. The letter approved the changes be made to the 2017 Annual Review in response to the DPE letter of 19 June.</p> <p>Letter from DPE (L Cook) to SCPL (M Plain) titled "Stratford Extension Project 2018 Annual Review" dated 2/7/2019. The letter approved the changes be made to the 2018 Annual Review in response to the DPE letter of 19 June.</p> <p>Letter from DPE (L Sims) to SCPL (M Plain) titled "Stratford Extension Project (SSD 4966) – Official Caution" dated 15/2/2019. The letter directed SCPL to signpost the sensitive area (that was encroached upon) and/or identify that encroachment of that</p>			<p>DPIE requested changes be made to each of the 2017 and 2018 Annual Review. SCPL made the requested changes within the time frames specified by DPIE.</p> <p>In response to the Official Caution issued in Feb 2019 SCPL implemented five corrective and preventative actions including the installation of signage and improvements in internal communications , update of training.</p>	Complies

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			area is a risk in future haul road maintenance risk assessments. Master Incident No.20281 (Internal Incident Data Base) details the findings of the incident investigation relating to the Official Caution, and the remedial actions taken by SCPL.					
Sch 2 Cond 5	Mining Operations	The Applicant may carry out mining operations on the site until 31 December 2025.					Noted	
Sch 2 Cond 6	Coal Extraction	The Applicant shall not extract more than 2.6 million tonnes of ROM coal from the site in any calendar year.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years. Mining Superintendent – Mining recommenced at Stratford in 2018 and about 1 million tonnes have been mined each year over the past three years.	Photograph 1 shows the current (at the time of the audit) mining activities in the Bowens road north Pit.	Quantity mined over the Audit Period was: 2017/8 – 61,007 Tonnes 2018/9 – 568,649 Tonnes 2019/20 – 1,278,330 Tonnes	Complies	
Sch 2 Cond 7	Coal Processing	The Applicant shall not process on site more than 5.6 million tonnes of ROM coal in any calendar year.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – The Coal Processing Plant processes coal from both the Duralie and Stratford mines. Over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years.		In 2017/18, 776,080 tonnes of ROM coal was processed, producing 631,768 tonnes of coal. In 2018/9, 1,259,995 tonnes of ROM coal was processed, producing 415,690 tonnes of coal. In 2019/20, 1,278,330 tonnes of ROM coal was processed, producing 763,749 tonnes of coal.	Complies	
Sch 2 Cond 8	Coal Transport	The Applicant shall ensure that: (a) all product coal is transported from the site by rail;		Environment and Community Superintendent – all coal product has been transported from the site by rail.		No evidence that coal products were shipped from the site by road were found during the audit.	Complies	
		(b) no more than an average of 2.5 laden trains leave the site each day over any calendar year;	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Coal Plant Superintendent - Since the recommencement of mining at Stratford, maximum annual production (mining) has been about 1.2 million tonnes. Generally, no more than one train departs the site daily.		In 2018, 87 trains were loaded during that calendar year, with an average of 1.04 trains loaded per day (this average was calculated over only those days that loading occurred). In 2019, 119 trains were loaded during that calendar year, with an average of 1.12 trains loaded per day (this average was calculated over only those days that loading occurred).	Complies	

PLANNING APPROVAL SSD-4966

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						In 2020 (July to Oct inclusive) an average of 8 trains per month were loaded,		
		(c) no more than 6 laden trains leave the site in any 24-hour period; and.			During the audit period no trains were observed loading.	A review of the train records showed that generally trains were loaded and left the site during the daytime. Where night loading occurred no more than one load per night left the mine.	Complies	
		(d) no more than 2 laden trains leave the site during any night					Complies	
Sch 2 Cond 9	SURRENDER OF EXISTING CONSENTS	Prior to the end of December 2015, or as otherwise agreed by the Secretary, the Applicant shall surrender all existing development consents for the site in accordance with section 104A of the EP&A Act.	Letter to J Cullen (Operations Manager SCPL) from H Reed (Director Resource Assessments, DPE), titled "Stratford Extension Project (SSD 4699) Voluntary Surrender of Development Consents DA 39-02-01 and DA 23-98/99", dated 11.4.17 – approving surrender of the approvals effective 11.4.17. [Note that this letter appears to have been incorrectly dated as it refers to Mr. Cullen's 2018 correspondence].			DPE (Director of Resource Assessments) approved the surrender of previous approvals on (assumed date) 11 April 2018.	Complies	
Sch 2 Cond 10		Prior to the surrender of existing development consents, the conditions of this consent shall prevail to the extent of any inconsistency with the conditions of these consents.					Noted	
Sch 2 Cond 11	STRUCTURAL ADEQUACY	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Construction Certificates (NC180027, dated 11 May 2018) for alterations and additions to Stratford Workshop – certified by BCA Certifiers.	Infrastructure and Project Supervisor – During the audit period, other than the relocation of some demountable buildings from Duralie, the only construction undertaken was in relation to the Workshops.		The construction works undertaken in relation to the upgraded workshops at Stratford were certified (by registered construction certifier as meeting the relevant BCA requirements.	Complies	
Sch 2 Cond 12	DEMOLITION	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Supply of Services Agreement SDM-CM-PROC-PC-1337 for the demolition of the bathhouse at Stratford. The Agreement specifies (Schedule 2 Description of Services) that all demolition works are to comply with AS2601-2001.	Infrastructure and Project Supervisor – During the audit period the former bathhouse was demolished (undertaken by Nonvacation Demolition Serve Pty Ltd).		The bathhouse was demolished during the audit period. The contract issued to the demolition contractor required compliance with the specified Australian Standard.	Complies	
Sch 2 Cond 13	Protection of Public Infrastructure	Unless the Applicant and the applicable authority agree otherwise, the Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Letter from MidCoast Council to SCPL, dated 7 August 2020 granting approval for the relocation of Wenham Cox Road, Stratford.	Environment and Community Superintendent – no requests or claims related to damage to public infrastructure were received during the audit period.		SCPL sought and Council granted approval for SCPL to realign Wenham Cox Road. SCPL undertook the works.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 2 Cond 14	Operation of Plant and Equipment	The Applicant shall ensure that all plant and equipment used at the site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Maintenance records (sampled) located on the SAP system.	Maintenance Superintendent – Maintenance at both mines (Duralie and Stratford) is undertaken by the same team. A comprehensive maintenance management system is in use.	The Maintenance Superintendent demonstrated the SAP maintenance scheduling and management system. Maintenance areas (both Stratford operated, and contractor operated. All plant and equipment (including environmental monitoring equipment sighted by the Auditor appeared to be operable and appropriately maintained. Photographs 2 and 3 show the two key maintenance workshops.	Stratford operates an appropriate maintenance management, tracking and scheduling system.	Complies	
Sch 2 Cond 15	STAGED SUBMISSION OF STRATEGIES, PLANS OR PROGRAMS	With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.	Letter from SCPL (M Jacobs) to DPE (H Reed) titled "STRATFORD EXTENSION PROJECT (SSD 4966) – STAGED SUBMISSION OF MANAGEMENT PLANS & TIMING OF TRIENNIAL AUDIT", dated 21 November 2017. The letter request DPE approval for the delayed staged submission of plans and revised timing of the first IEA under SSD-4966). Letter from DPE (H Reed) to SCPL (M Jacobs) titled "Stratford Extension Project (SSD-4966) Staged Submission of Management Plans", dated 30 November 2017. The letter documented DPE approval of the staged submission of management plans. Letter from SCPL (M Jacobs) to DPE (H Reed) titled "STRATFORD EXTENSION PROJECT (SSD 4966) – BIODIVERSITY MANAGEMENT PLAN TIMING", dated 21 November 2017. The letter request DPE approval for the delayed, staged submission of plans and revised timing of the first IEA under SSD-4966). Letter from DPE (H Reed) to SCPL (M Jacobs) titled "Stratford Extension Project (SSD-4966) Biodiversity Management Plan", dated 30 November 2017. The letter documented DPE approval of the staged submission of Biodiversity Management Plan to 30 November 2018.	Environment and Community Superintendent – Prior to the commencement of SSD-4966 in April 2018, consultation was undertaken with DPIE regarding the timing of submission for the EMPs. Approval for staged submission was given.		The revised timing and staged submission of management plans was approved by DPIE.	Complies	
Sch 2 Cond 16		Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall implement the existing strategies, plans or programs for the site that have been approved under existing development consents.					Noted	
Sch 2 Cond 17	COMMUNITY ENHANCEMENT	From 31 March 2015 until mining operations under this consent cease on the	MidCoast Council Tax Invoice No. 16291 Gloucester Component Community			Not that Mid Coast Council was formed in 2016	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		site, unless the Secretary agrees otherwise, the Applicant shall pay to GSC a total of \$550 a year for each full-time equivalent employee/contractor on the site. This payment is for the provision of infrastructure and services generated by the development. It is also to be indexed in accordance with the CPI for the December quarter of the previous year (except for the initial payment).	Enhancement 20191031 – Duralie and Gloucester Contributions MidCoast Council Tax Invoice No. 151331 Section 94 Contribution 20200210			merging Great Lakes, Greater Taree and Gloucester Shire Councils. Stratford Coal has met its council contribution obligations throughout the Audit Period.		
Sch 2 Cond 18		The Applicant's obligations to make payments to GSC under condition 15 of Schedule 2 of DA 23-98/99 shall cease on 31 March 2015, unless the Secretary agrees otherwise.					Noted	
Sch 2 Cond 19		The Applicant shall use its best endeavours to co-operate with the proponent of the Gloucester Gas Project.	Letter from SCPL (M Jacobs) to DPE (H Reed) titled "STRATFORD EXTENSION PROJECT (SSD 4966) – Statement of Commitments", dated 21 November 2017. AGL abandoned the Gloucester Gas Project. The letter requested DPE confirmation that this condition has been satisfied with no ongoing obligations. Letter from DPE (H Reed) to SCPL (M Jacobs) titled "Stratford Extension Project (SSD-4966) Statement of Commitments", dated 30 November 2017. The letter confirmed DPE is satisfied there are no ongoing obligations under these conditions.			The Gloucester Gas Project has not proceeded.	Not Triggered	
SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS								
Sch 3 Cond 1	ACQUISITION ON REQUEST	Upon receiving a written request for acquisition from an owner of the land listed in Table 1, the Applicant shall acquire the land in accordance with the procedures in conditions 5-6 of Schedule 4.		Environment and Community Superintendent – Two properties listed in Table 4 of the Approval were acquired in the last audit period: 1. 40/51/Cr1 – L. Blanch 2. 42 – D. Blanch Property 15(3) – Falla 31(1) – Isaac was purchased during this audit period.		One property was acquired during this audit period in accordance with this Condition.	Complies	
Sch 3 Cond 2	ADDITIONAL MITIGATION ON REQUEST	Upon receiving a written request from the owner of any residence on the land listed in Tables 1 and 2, the Applicant shall implement additional noise mitigation measures (such as double glazing, insulation, and/or air conditioning) at the residence in consultation with the owner. These measures must be reasonable and feasible and directed towards reducing the noise impacts of the development on the residence.		Environment and Community Superintendent – No requests for additional mitigation measures were received during the Audit Period, however compensation agreements have been entered into between SCPL and all landholders listed in Sch 3, Condition 1.			Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 3	NOISE Hours of Operation	The Applicant shall comply with the operating hours in Table 3.	Complaints Register Incident Register	Environment and Community Superintendent – Day works commenced in April 2018. Evening shift commenced in October 2018. BRN and Roseville are operated on day shift only (7am-5:30pm). Other areas operate between 6:30am-1:00am. Generally no Sunday work. Coal Plant Superintendent - Since the recommencement of mining at Stratford, maximum annual production (mining) has been less than 1.2 million tonnes. The operation is running below capacity.		No complaints have been received relating to out of hours operation during the audit period. No out of hours incidents have been recorded during the audit period.	Complies	
Sch 3 Cond 4	Noise Criteria	The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 4 at any residence on privately-owned land.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Stratford Mining Complex Monthly Compliance Noise Monitoring August 2020 Stratford Mining Complex Monthly Compliance Noise Monitoring September 2020 Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020	Environment and Community Superintendent – In response to complaints received noise monitoring has been undertaken on three of the complainants’ property boundaries. Monitoring also undertaken at other locations. Refer to monthly noise reports. Additional real-time noise monitoring has also been undertaken on two properties. The EPA has undertaken an investigation regarding the one series of noise complaints as these makeup over 50% of the complaints received. The EPA has not requested any further action. Real-time noise monitoring is undertaken at Stratford village and Craven village. Real-time monitoring was also previously at two complainants’ properties. Real-time noise levels are reviewed following complaints. Attended noise monitoring is undertaken monthly.		All noise monitoring undertaken during the audit period found that the noise emissions from the mine met the relevant noise criteria with the following exceptions: 1. Daytime noise level exceeded criteria by 1dbA at the Atkins Property (owned by SCPL) in March 2019. 2. Daytime noise level exceeded criteria at the Clarke Property (owned by SCPL) in July, August, September, October, November and December 2018. The noise monitoring reports reviewed indicated that noise emissions met the requirements of this Condition at all private properties (other than two SCPL owned properties).	Complies	
Sch 3 Cond 5	Noise Operating Conditions	The Applicant shall: (a) implement best management practice to minimise the construction, operational, road and rail noise of the development;	Complaints Register Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.	Environment and Community Superintendent – as a result of complaints received the following best practice actions have been implemented: 1. Noise mitigation measures are listed in the noise Management Plan. 2. XQ mobile plant, restricted operating hours in certain areas, no elevated dozer works during night hours, dozers limited to first gear in elevated areas.		Stratford has prepared and implemented a Noise Management Plan that describes the noise management strategies. While there have been noise related complaints during the audit period, the noise monitoring undertaken by independent consultants indicates that the mine is complying with the noise criteria specified in the Approval.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
				3. During winter trucks were restricted to only tipping in-pit prior to 8am. No tipping on elevated waste dumps at night-time at BRN.				
		(b) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this consent;	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019: <ul style="list-style-type: none"> Section 7.3 Real Time Noise Monitoring Section 7.5 Meteorological Monitoring and Forecasting Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018		The Auditor was provided with a demonstration of the Sentinex system that provides: Integrated Monitoring Stations <ul style="list-style-type: none"> 2 x real-time noise monitors 1 x weather station 2 x inversion towers System Settings <ul style="list-style-type: none"> Real-time logging of noise and meteorological data Alarm functionality for the real-time noise trigger limits in the NMP Section 7.3.3 (examples attached) Alarm functionality for exempt meteorological conditions as per SSD-4966 Appendix 6 (examples attached) Daily forecasting reports for weather, noise and dust. (examples attached) Realtime Noise Response Protocol (as per NMP section 7.3.4) <ul style="list-style-type: none"> Alarms sent by email and SMS Response recorded in daily shift reports (examples provided) All information recorded in the Real-time noise response register and adverse weather conditions register (available on website) Predictive forecasting System <ul style="list-style-type: none"> Daily forecasting reports for weather, noise and dust are emailed prior to each shift (examples sighted) Proactive management measures are record in daily shift reports. 	The Noise Management Plan describes the noise monitoring and meteorological monitoring and forecasting undertaken. Records of noise and meteorological monitoring and forecasting have been sighted by the auditor.	Complies	
		(c) minimise the noise impacts of the development during meteorological conditions under which the noise limits in this consent do not apply (see Appendix 6);	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019. Sentinex Noise prediction chart from 30 Nov 2020. Email from novecom.net (Sentinex System) to Environment Team warning of inversion conditions, dated 8/12/2020. Email from novecom.net (Sentinex System) to Environment Team warning of high winds, dated 9/12/2020. OCE Reports dated 4 Nov 2020, 27 Nov 2020, 30 Nov 2020 - each report noise and dust control activities implemented on those days.				Complies	
		(d) only use locomotives and rolling stock that are approved to operate on the NSW rail network in accordance with the noise limits in ARTC's EPL (No. 3142);	2014 Independent Environmental Audit.	Environment and Community Superintendent – The current locomotives are class 92 and 93 which are included in the EPA's register. The accountability for rolling stock and locomotives no longer sits with the rail infrastructure operator (ARTC). ARTC's EPL has been updated and the onus now sits with the rolling stock operator (Pacific National). As of August 2020, PN now have their own EPL.		This condition was verified in the 2014 Audit. The current locomotives are class 92 and 93 which are included in the EPA's register.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(e) co-ordinate noise management on site with the noise management of the Gloucester Gas Project to minimise cumulative noise impacts; and	Letter from DPIE to SCPL dated 30/11/17			DPE wrote to SCPL in 2017 confirming that as AGL were not proceeding with the Gloucester Gas Project that this Condition and the relevant condition in the SOC were no longer triggered.	Not Triggered	
		(f) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Stratford Mining Complex Monthly Compliance Noise Monitoring August 2020 Stratford Mining Complex Monthly Compliance Noise Monitoring September 2020 Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020			Regular noise monitoring is undertaken in accordance with the Project Approval, the EPL and the Noise Management Plan.	Complies	
Sch 3 Cond 6	Noise Management Plan	The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary;	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019. Letter from the EPA to SCPL in response to the request for comments on the December 2017 revision of the NMP. Letter from DPE approving Revision 6 of the Noise Management Plan (dated 17.6.19)			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15). The required plan was prepared and approved by DPE. The latest revision issued in December 2017. The EPA was consulted during the preparation of the plan and DPE approved the plan.	Complies	
		(b) describe the measures that would be implemented to ensure: - compliance with the noise criteria and operating conditions of this consent; and - the noise impacts of the project are minimised during meteorological conditions when the noise limits of this consent do not apply	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019: <ul style="list-style-type: none"> • Section 6 Noise Management Measures • Section 7.5 Meteorological Monitoring and Forecasting 			The Noise Management Plan describes the noise mitigation measures (controls) to be implemented and describes the approach to managing noise levels during adverse meteorological conditions.	Complies	
		(c) describe the proposed noise management system in detail;	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.			The Noise Management Plan provides an appropriate explanation of the noise management system that has been implemented at the Stratford Mine.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>(d) include a monitoring program that: + includes monitoring of inversion strength at an appropriate sampling rate to determine compliance with noise limits; + provides for the biennial validation of the noise model for the project. + evaluates and reports on: - the effectiveness of the on-site noise management system; - compliance against the noise criteria in this consent; and - compliance with the noise operating conditions; + includes a program to calibrate and validate real-time noise monitoring results with attended monitoring results over time (so the real-time noise monitoring program can be used as a better indicator of compliance with the noise criteria and as a trigger for further attended monitoring); and + defines what constitutes a noise incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any noise incidents; and</p>	<p>Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019, Section 7 Noise Monitoring Program.</p>			<p>Section 7 of the Noise Management Plan provides the noise monitoring program that satisfies the requirements of this Condition.</p>	<p>Complies</p>	
		<p>(e) include provisions for a review of the site's real-time noise monitoring and management system within 12 months of the commencement of mining operations under this consent to ascertain if, and how, the system could be designed and used to determine compliance with noise limits.</p>	<p>Notice of Modification SSD 4966, dated 14 January 2021.</p>	<p>Environment and Community Superintendent – Please refer to SSD-4966 MOD 2 Schedule 3, Condition 6(e). This condition is not mentioned in the Notice of Modification for SSD-4966 MOD 2 nor is it included in the original consent conditions. It is our (SCPL's) understanding that this condition would not be enforceable as the Notice of Modification has legal precedent.</p> <p>This condition should not be included in the audit protocol. We will have the matter addressed with DPIE.</p>		<p>It is SCPL's opinion that this condition was not meant to be included in the last modification to the approval, and the notice of modification issued by DPIE does not include this new condition.</p> <p>DPIE confirmed this condition was not intentionally included and modified the Approval on 14 January 2021.</p>	<p>Complies</p>	
Sch 3 Cond 7	Night-time Noise	<p>Within 2 years of the commencement of night-time mining operations, and every 2 years thereafter, the Applicant shall engage an independent acoustic expert to undertake a review of compliance with the relevant conditions of consent for night-time operations, to the satisfaction of the Secretary.</p> <p>Should any review report show that night-time mining operations have been/are non-compliant, the Applicant must modify its operations and conduct another independent review with 30 days. If this second review demonstrates compliance, the Applicant may continue its modified night-time mining operations. If not, the Applicant must immediately cease night-time mining operations.</p>	<p>Stratford Mining Complex Night-time Noise Review – 2018 – 2019, SSD 4966 Schedule 3 Condition 7 -Draft Report dated 4 December 2020.</p>			<p>A draft report has been prepared by SLR and was being reviewed by the proponent at the time of the audit.</p>	<p>Complies</p>	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Night-time mining operations may only restart if the Secretary is satisfied that the proposed operations would be compliant with the relevant conditions of consent.						
Sch 3 Cond 8	Record of Noise Limit Exemptions	The Applicant shall record and make available on its website: (a) when the real-time monitoring and management system detects any potential exceedance of the noise limits; (b) when exemptions from noise limits due to meteorological conditions apply; (c) the specific reasonable and feasible measures that were taken when either (a) or (b) apply; and (d) facilitate the regular review of this information by the CCC, to the satisfaction of the Secretary.	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ http://www.stratfordcoal.com.au/content/Document/community/CCC/Stratford%20CC%20Agenda%20-%20November%202020.pdf			The Stratford Coal Mine Website contain links to: <ul style="list-style-type: none">Record of Noise Triggers and ResponseRecord of Adverse Weather Conditions and Responses This information is available to the CCC for review. The agenda for each meeting includes a review of environmental monitoring.	Complies	
Sch 3 Cond 9	BLASTING	The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 5.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – Production (and blasting) recommenced at Stratford in September 2018.		In 2018 no blasting occurred before 14 September. Nineteen blasts were undertaken between 14 Sept and 30 December 2018. One vibration exceedance (117 db(Lin Peak) was detected on 14 September. That exceedance represents 5% of the total number of blasts and therefore is not a non-compliance. During 2019 eighty-three blasts were undertaken. Two blasts (8 Feb and 10 Dec) recorded exceedances of the 115db limit (<5% of total blasts). During 2020 (to 25 November) ninety-four blasts were undertaken. No vibration exceedances were recorded.	Complies	
Sch 3 Cond 10	Blasting Hours	The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.			Blast records indicate that all blasting was undertaken within the approved hours.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 11	Blasting Frequency	The Applicant may carry out a maximum of: (a) 1 blast per day on site; and (b) 3 blasts per week, averaged over a calendar year. This condition does not apply to blasts required to ensure the safety of the mine or its workers.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.			Blast records indicate that blasting frequency did not exceed the approved level during the audit period.	Complies	
Sch 3 Cond 12	Property Inspections	If the Applicant receives a written request from the owner of any privately-owned land within 2 kilometres of any approved open cut pit on site for a property inspection to establish the baseline condition of any buildings and/or structures on his/her land, or to have a previous property inspection report updated, then within 2 months of receiving this request the Applicant shall: (a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to: <ul style="list-style-type: none"> • establish the baseline condition of any buildings and/or structures on the land, or update the previous property inspection report; and • identify any measures that should be implemented to minimise the potential blasting impacts of the development on these buildings and/or structures; and 	Base Condition Dilapidation Residence at 33 Avon Street, Stratford, Report prepared by Bill Jordan and Associates Pty Ltd, dated 30 January 2020.	Environment and Community Superintendent – At Stratford, notifications in accordance with Schedule 4 Condition 1 were provided in two stages in 2018 and 2019. Following this we received four requests for inspections in 2018 and 4 requests in 2019. No requests for investigations of damage have been received.		The baseline dilapidation inspections were undertaken by Bill Jordan and Associates Pty Ltd. The consultant commissioned has the appropriate skills, experience, and independence. The baseline dilapidation reports sighted meet the requirements of this Condition.	Complies	
		(b) give the landowner a copy of the new or updated property inspection report. If there is a dispute over the selection of the suitably qualified, experienced, and independent person, or the Applicant or landowner disagrees with the findings of the independent property investigation, either party may refer the matter to the Secretary for resolution.	Complaints Register Incident Register	Environment and Community Superintendent – all reports were delivered by hand to each landowner. We have received no objections to the report findings.		All property inspection reports have been provided to the relevant landowners.	Complies	
Sch 3 Cond 13	Property Investigations	If any owner of privately-owned land claims that the buildings and/or structures on his/her land have been damaged as a result of blasting on site, then within 2 months of receiving this claim in writing from the landowner, the Applicant shall: (a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to investigate the claim; and		Environment and Community Superintendent – No requests for investigations of damage have been received.			Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(b) give the landowner a copy of the property investigation report. If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Applicant shall repair the damages to the satisfaction of the Secretary. If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or landowner disagrees with the findings of the independent property investigation, either party may refer the matter to the Secretary for resolution.					Not Triggered	
Sch 3 Cond 14	Blasting Operating Conditions	The Applicant shall: (a) implement best management practice to: <ul style="list-style-type: none"> protect the safety of people and livestock in the surrounding area; protect public infrastructure and private property in the surrounding area from any damage; and minimise the dust and fume emissions of any blasting. 	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019. Incident Register – blast overpressure exceeded 115 db on 8/2/19 and 10/12/19. Blast Flume visible 22/3/19, 29 /3/ 19, and 18/8/19. Blast not filmed 10/12/19. Complaints Register – blast related complaints were received on 8/02/19, 15/02/19, 10/12/19 (two complaints), 17/8/20, 4/9/20, 2/10/20, 8/10/20.			Six incidents relating to blasting and eight blasting complaints were received during the audit period. No exceedances of blast criteria were measured. No instances of residence or infrastructure damage were recorded during the audit period. Three instances of visible flume were recorded as incidents, and one complaint referenced blasting dust. The video recording of the blast showed no dust / flume left the mine lease. All complaints and incidents were investigated.	Complies	
		(b) ensure that blasting on the site does not damage Aboriginal cultural heritage site CTS-1;	Spreadsheet titled "4.5 Stratford Extension Project Blast Results". The spreadsheet records all blast monitoring undertaken for the SCPL operation over the audit period.			Results of vibration monitoring at CTS-1 were available on the website.	Complies	
		(c) minimise the frequency and duration of any required road closures; and	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.	Environment and Community Superintendent – Road closure duration is recorded by the traffic management contractor and has been reduced to the minimum required for the blast clearance.			Noted	
		(d) operate a suitable system to enable the public to get up-to-date information on the proposed blasting Schedule on site, to the satisfaction of the Secretary.	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.	Environment and Community Superintendent – Our last blast was in Stratford East on 11/12/2020.	The Auditor rang the Blast Hotline on 17 December 2020. A recorded message referred to the blast scheduled for 10 December 2020 and related road closures.	The Blast Management Plan states that a Blasting Information Hotline is operated. The information provided by the hotline on 17 December 2020 was out of date (a blast had been undertaken 11 December 2020). Note that SCPL has operated the blasting hotline during the entire 3-year audit review period	Non-Compliance	Ensure that the blast hot line information is up to date at all times.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						and has demonstrated the intention to comply with this condition. The blasting hotline is regularly updated, however at the time this was checked SCPL acknowledges it was not up to date.		
Sch 3 Cond 15		The Applicant shall not undertake blasting within 500 metres of: (a) any public road; or	<p>Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.</p> <p>Stratford Mining Complex Blasting Road Closure Management Plan Version 2 dated 30/11/19.</p> <p>Email from Midcoast Council (S Nicholson) to SCPL (M Plain) titled "Stratford Coal – Blasting Road Closures", dated 14 October 2018. The email provides approval for the closure of Wenham Cox Road during blasting.</p>	<p>Environment and Community Superintendent – Blasting for the Stratford Extension Project commenced in Sep 2018. The following road closures are undertaken:</p> <ul style="list-style-type: none"> • Wenham Cox Rd for blasting in Avon North • Wheatleys Lane/Bowens Rd for blasting in Roseville West • Glen Rd for blasting in Stratford East when within 500m (not yet commenced) <p>In accordance with the SMC Blast Management Plan SCPL have prepared a Blasting Road Closure Management Plan in consultation with MidCoast Council.</p>		<p>Wenham Cox Rd and Wheatleys Lane/Bowens Rd are within 500 metres of blasting.</p> <p>Approval has been obtained from Council for road closures during blasting.</p>	Complies	
		(b) any land outside of the site not owned by the Applicant, unless the Applicant has: <ul style="list-style-type: none"> • demonstrated to the satisfaction of the Secretary that the blasting can be carried out closer to the road or land without compromising the safety of people or livestock, or damaging buildings and/or structures; and • updated the Blast Management Plan to include the specific measures that would be implemented while blasting is being carried out within 500 metres of the land or road; or • a written agreement with the landowner or GSC (in the case of any public road) to allow blasting to be carried out closer to the land or road, and the Applicant has advised the Department in writing of the terms of this agreement. 	<p>Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.</p> <p>Stratford Mining Complex Blasting Road Closure Management Plan Version 2, dated 30/11/19.</p>	<p>Environment and Community Superintendent – No private land within 500m of Roseville West Pit, all land is owned by SCPL.</p> <p>A private agreement is held with the Wenham property.</p> <p>The Falla property was acquired in 2019.</p>		<p>There is no privately-owned land within 500 m of the Avon North Open Cut, the Stratford East Open Cut and BRN.</p> <p>Privately owned property is located within 500 metres of the Roseville West pit. An agreement is in place with the property owner.</p>	Complies	
Sch 3 Cond 16	Blast Management Plan	The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA and submitted to the Secretary for approval at least 3 months prior to the commencement of mining operations in the new mining areas, unless otherwise agreed by the Secretary	<p>Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.</p> <p>Email for SCPL (M Plain) to the NSW EPA (E Coombs) titled "Stratford Extension Project – Environmental Management Plans", dated 18 January 2018 providing copies of the Noise Management Plan, Blast Management Plan and Air Quality Management Plan for review.</p>			<p>The Blast Management Plan has been prepared and substantially implemented. The EPA was consulted during preparation of the plan and DPE approved the revised plan.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			Letter from DPE (M Dawson) to SCPL (M Plain) titled "Stratford Extension Project (SSD-4966) Revised Management Plans staged for Stratford East Open Cut", dated 17 October 2018. The letter documented DPE approval of the revised plans.					
		(b) describe the measures that would be implemented to ensure compliance with the blasting criteria and operating conditions of this consent;	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.			Section 5 of the Blast Management Plan describes the blast management measures to be implemented.	Complies	
		(c) propose and justify any alternative ground vibration limits for public infrastructure in the vicinity of the site (if relevant);	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.			No alternative ground vibration levels have been specified in the Blast Management Plan.	Not Triggered	
		(d) include a monitoring program for evaluating and reporting on compliance with the blasting criteria and operating conditions; and	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.			Section 6 of the Blast Management Plan describes the blast monitoring program.	Complies	
		(e) include a specific blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated.	Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.			Sections 5.5 and 7.1.1 describe fume management and contingency plans.	Complies	
Sch 3 Cond 17	AIR QUALITY Odour	The Applicant shall ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	Complaints Register Incident Register			No offensive odours were detected during the IEA site inspections.	A review of the complaints register and incident register indicated that no instances of offensive odour emission have occurred during the Audit Period.	Complies
Sch 3 Cond 18	Air Quality Criteria	The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 6 at any residence on privately-owned land.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		Dust mitigation measures (water carts) were observed during the IEA site inspections. Photograph 4 shows a water cart in operation during the IEA site inspection.	Two dust related complaints were received (29 June and 27 August 2020). A review of the TEOM (real time monitoring) by SCPL at the time of the complaints found no dust level exceedances. A review of the dust monitoring data for the audit period indicated that no exceedances were detected that were attributed to the mine operations.	Complies
Sch 3 Cond 19	Mitigation Measures	If the development causes an exceedance of the air quality criteria in Table 6, the Applicant shall, upon receiving a written request for air quality mitigation measures from the landowner, undertake air quality mitigation measures directed towards reducing the potential human health and amenity impacts of the development at a residence. These measures may include (for example):		Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. No requests for mitigation measures were received during the audit period.			No dust level exceedances related to mine operations were detected during the audit period. No requests for dust mitigation were received during the audit period.	Not Triggered

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(a) air conditioning, including heating; (b) insulation; (c) first flush water systems; (d) installation and regular replacement of water filters; (e) cleaning of rainwater tanks; (f) clothes dryers; and (g) regular cleaning or any residence and its related amenities, such as barbeque areas and swimming pools. If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.						
Sch 3 Cond 20	Mine Owned Land	The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 6 at any occupied residence on mine-owned land unless: (a) the tenant and landowner (if the residence is owned by another mining or petroleum company) has been notified of any health risks associated with such exceedances in accordance with the notification requirements under Schedule 4 of this consent;	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		No dust exceedances were due to mining operations were reported during the audit period.	Complies	
		b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;		Environment and Community Superintendent – No tenants of Mine Owned land have terminated their leases on the grounds of dust exceedances.		No tenants of Mine Owned land have terminated their leases on the grounds of dust exceedances.	Not Triggered	
		(c) air mitigation measures such as those listed in condition 20 are installed at the residence, if requested by the tenant or landowner (if the residence is owned by another mining or petroleum company);		Environment and Community Superintendent – No tenants of Mine Owned land have requested air mitigation measures on the grounds of dust exceedances.		No tenants of Mine Owned land have requested air mitigation measures on the grounds of dust exceedances.	Not Triggered	
		(d) air quality monitoring is regularly undertaken to inform the tenant or landowner (where owned by another mining or petroleum company) of the actual particulate emissions at the residence; and	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		No dust exceedances were due to mining operations were reported during the audit period.	Not Triggered	
		(e) data from this monitoring is presented to the tenant or landowner in an appropriate format for a medical practitioner to assist the tenant and/or landowner (where owned by another mining or petroleum company) in making informed decisions on health risks associated with occupying the property, to the satisfaction of the Secretary.	Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		No dust exceedances were due to mining operations were reported during the audit period.	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
Sch 3 Cond 21	Air Quality Acquisition Criteria	If particulate matter emissions generated by the development exceed the criteria, or contribute to an exceedance of the cumulative criteria, in Table 7 at any residence on privately-owned land, or on more than 25% of any privately owned land where there is an existing dwelling or where a dwelling could be built under existing planning controls, then upon receiving a written request for acquisition from the landowner the Applicant shall acquire the land in accordance with the procedures in conditions 5-6 of Schedule 4.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		No dust exceedances were due to mining operations were reported during the audit period.	Not Triggered	
Sch 3 Cond 22	Air Quality Operating Conditions	The Applicant shall: (a) implement best practice management to minimise the off-site odour, fume and dust emissions of the development;	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.		Water sprays and water trucks were observed in operation during each of the IEA site inspections. Small localised dust was observed in the immediate vicinity of operational plant. No visible dust emissions were observed on the ROM pad, coal stockpiles, coal conveyers or the coal processing plant.	The requirements of the air quality management plan were being implemented during the IEA inspections. Dust monitoring results indicate that no exceedances of dust criteria due to the mining operations were reported over the audit period. Plant and equipment on site is appropriately serviced and maintained.	Complies	
		(b) implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site;	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019.		None of the plant operating at the time of the IEA site inspection was observed to generate significant visible air emission. Progressive rehabilitation of the completed mining area was observed.	Plant and equipment used at the mine is appropriately serviced and maintained. Progressive rehabilitation of the site is being undertaken.	Complies	
		(c) minimise the surface disturbance of the site;	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019.		During the IEA inspections, progressive rehabilitation or completed areas was sighted. No areas outside of the active mining or mine waste disposal areas where unnecessary clearing had occurred was observed during the audit. Photograph 5 shows rehabilitated (suitable for grazing) waste rock dump.	No areas outside of the active mining or mine waste disposal areas where unnecessary clearing had occurred was observed during the audit.	Complies	
		(d) minimise any visible off-site air pollution generated by the development;	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019.		No off-site dust movement was observed during the IEA site inspections.	The requirements of the air quality management plan were being implemented during the IEA inspections. Dust monitoring results indicate that no exceedances of dust criteria due to the mining	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						operations were reported over the audit period.		
		(e) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting, predictive and real-time air dispersion modelling and real-time air quality monitoring data to guide the day-to-day planning of mining operations and implementation of both proactive and reactive air quality mitigation measures (such as relocate, modify and/or suspend) to ensure compliance with the relevant conditions of this consent; and	<p>Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Section 7 of the plan describes the air quality management program implemented at SCPL.</p> <p>Sentinex Dust Prediction Reports (issued automatically to the environment team) 30 /11/2020, 1/12/2020 and 2/12/2020.</p> <p>Spreadsheet titled "Dust Forecast Data". The Spreadsheet provided details of the weather predictions for 1/12/2020 hourly from 6 am to 5pm along with predicted dust risk levels.</p>	<p>Environment and Community Superintendent – The air quality monitoring program consists of networks of dust deposition gauges, HVASs and TEOMs (real time air quality monitoring located in Stratford and near Craven.</p> <p>Meteorological stations are operating, and the mine operates a predictive weather program.</p> <p>If adverse weather conditions are predicted, the mine operations teams are notified and given directions (including the modification of mining activities).</p>	<p>The Auditor was provided with a demonstration of the air quality monitoring (data assessment and reporting) system. When high wind events (for example) are predicted.</p> <p>Photograph 6 shows one of the Stratford Weather Stations.</p>	An appropriate air quality monitoring and predictive dust modelling system has been implemented at SCPL.	Complies	
		(f) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note d to Tables 6 and 7 above), to the satisfaction of the Secretary.	<p>Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Section 7 of the plan describes the air quality management program implemented at SCPL.</p> <p>Sentinex Dust Prediction Reports (issued automatically to the environment team) 30 /11/2020, 1/12/2020 and 2/12/2020.</p> <p>Spreadsheet titled "Dust Forecast Data". The Spreadsheet provided details of the weather predictions for 1/12/2020 hourly from 6 am to 5pm along with predicted dust risk levels.</p>	<p>Environment and Community Superintendent – The air quality monitoring program consists of networks of dust deposition gauges, HVASs and TEOMs (real time air quality monitoring located in Stratford and near Craven.</p> <p>Meteorological stations are operating, and the mine operates a predictive weather program.</p> <p>If adverse weather conditions are predicted, the mine operations teams are notified and given directions (including the modification of mining activities).</p>	<p>Meteorological monitoring stations were sighted during the IEA site inspections.</p> <p>The Auditor was provided with a demonstration of the air quality monitoring (data assessment and reporting) system. When hi wind events (for example) are predicted.</p>	An appropriate air quality monitoring and predictive meteorological forecast system has been implemented at SCPL.	Complies	
Sch 3 Cond 23	Air Quality Management Plan	The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary;	<p>Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019.</p> <p>Email for SCPL (M Plain) to the NSW EPA (E Coombs) titled "Stratford Extension Project – Environmental Management Plans", dated 18 January 2018 providing copies of the Noise Management Plan, Blast Management Plan and Air Quality Management Plan for review.</p> <p>Letter from EPA (E Coombs) to SCPL (M Plain) titled "Stratford Coal Pty. Ltd – Environment Protection Licence 5161 Management Plans", dated 8 March 2018. In this letter the EPA declined to provide comments of the December 2017 version of the Air Quality Management Plan.</p> <p>Letter from DPE (M Dawson) to SCPL (M Plain) titled "Stratford Extension Project (SSD-4966) Revised Management Plans staged for Stratford East Open Cut", dated 17 October 2018. The letter documented</p>			<p>DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15).</p> <p>The required plan was prepared and approved by DPE.</p> <p>The subsequent revision (2019) was minor and as the EPA had previously declined to comment of the Air Quality (and other) Management Plan, SCPL elected not to consult the EPA.</p> <p>In is noted however, that in accordance with the condition, that consultation was undertaken with the EPA for the original AQMP.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			DPE approval of the revised plans.					
		(b) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this consent;	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Section 6 of the plan describes the air quality management and mitigation measures that are implemented at the Stratford Mine.			Section 6 of the plan describes the air quality management and mitigation measures.	Complies	
		(c) describe the proposed air quality management system; and	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Sections 6 through 10 of the plan describes the air quality management system that is implemented at the Stratford Mine.			Sections 6 through 10 of the plan describes the air quality management system that is implemented at the Stratford Mine.	Complies	
		(d) include an air quality monitoring program that: <ul style="list-style-type: none"> uses a combination of real-time monitors and supplementary monitors to evaluate the performance of the development against the air quality criteria in this consent; adequately supports the proactive and reactive air quality management system; evaluates and reports on: <ul style="list-style-type: none"> the effectiveness of the air quality management system; and compliance with the air quality operating conditions; and defines what constitutes an air quality incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents. 	Stratford Mining Complex (Stratford Extension Project) Air Quality Management Plan, Revision 3, dated 17 June 2019. Sections 7 of the plan describes the air quality monitoring system that is implemented at the Stratford Mine.			Sections 7 of the plan describes the air quality monitoring system that is implemented at the Stratford Mine.	Complies	
Sch 3 Cond 24	Meteorological Monitoring.	For the life of the development, the Applicant shall ensure that there is a meteorological station in the vicinity of the site that: (a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline and the NSW Industrial Noise Policy; and (b) is capable of continuous real-time measurement of temperature lapse rate data that are able to be transformed accurately and repeatably, and no more favourably, to those that would be obtained by the use of a 60 m tower, to the satisfaction of the EPA.	Spreadsheet titled "W3 Stratford – 15_Min_Data". The spreadsheet provided the weather station monitoring records for the audit period. 2017 Independent Environmental Audit		The meteorological station (Photograph 6) and inversion towers were sighted during the audit.	The specifications of the weather station installed meets the requirements of this Condition.	Complies	
			Spreadsheet Titled "W3 – Stratford – 15 min data" Spreadsheet Titled "W3 – Stratford – Daily Summary"			The meteorological data collected and reported satisfies the requirements of this Condition.	Complies	
Sch 3 Cond 25	SOIL AND WATER Water Supply	The Applicant shall ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations on site to match its available water supply. Note: Under the Water Act 1912 and/or	2019 Annual Review Water Balance Water Licenses: WAL 41534, WAL 41535, WAL 41536, WAL 41537, WAL 4153		At the time of the audit, water storages at the mine contained significant water. Photographs 7 and 8 show the Main Pit (water storage) and Stratford East Dam.	The Stratford Coal Complex operates with a water surplus.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		the Water Management Act 2000, the Applicant is required to obtain the necessary water licenses for the development.						
Sch 3 Cond 26	Compensatory Water Supply	<p>The Applicant shall provide a compensatory water supply to the owner of any privately-owned land whose water supply is adversely and directly impacted (other than a negligible impact) as a result of the development, in consultation with NOW, and to the satisfaction of the Secretary. The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent to the loss attributed to the development. Equivalent water supply should be provided (at least on an interim basis) within 24 hours of the loss being identified.</p> <p>If the Applicant and the landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>If the Applicant is unable to provide an alternative long-term supply of water, then the Applicant shall provide alternative compensation to the satisfaction of the Secretary.</p>		Environment and Community Superintendent – no claims for compensatory water supply have been received during the audit period.		No claims for compensatory water supply have been received during the audit period.	Not Triggered	
Sch 3 Cond 27	Water Pollution	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act.	<p>Incident Register</p> <p>EPA Annual Return 2017 - 18 EPA Annual Return 2018 - 19 EPA Annual Return 2019 – 20</p> <p>Letter from SCPL (J Cullen) to the DPIE (The Secretary) titled “RE: Stratford Coal Pty Ltd – Incident Report”, dated 17 February 2020. The letter provides information requested by DPIE in response to the water discharge incident that occurred on 9 February 2020.</p> <p>Letter from SCPL (J Cullen) to the DPIE (The Secretary) titled “RE: Stratford Coal Pty Ltd – Incident Report 11-03-20”, dated 18 March 2020. The letter provides information requested by DPIE in response to the water discharge incident that occurred on 11 March 2020.</p> <p>Letter from SCPL (J Cullen) to the NSW EPA (E Coombs) titled “RE: Stratford Coal Pty Ltd – Discharge Incident 10-03-20”, dated 26 March 2020. The letter provides information requested by the EPA in</p>			<p>Three water discharge incidents were recorded in the Incident Register. Two incidents on 9 February 2020 (overflow of the Rehab sediment dam at Avon North and breach of bund at Stratford East Haul Road) and one on 11 March 2020 (runoff from the BRN emplacement).</p> <p>Two incidents were reported to DPIE and the EPA.</p> <p>The incidents resulted in the discharge of waters with elevated suspended solids content and while the impacts were negligible, the discharges do trigger the definition of “Pollution of Waters” i.e. introducing any matter into waters which changes the physical, chemical or</p>	Non-Compliance	Ensure that all surface water controls are inspected before, during and after forecast (heavy) rainfall events.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			<p>response to the water discharge incident that occurred on 12 March 2020</p> <p>Letter from SCPL (J Cullen) to the DPIE (The Secretary) titled ""RE: Notice to Provide Information and / or Records", dated 10 June 2020. The letter provides information requested by DPIE in response to the water discharge incident that occurred on 11 March 2020.</p>			biological condition of the water.		
Sch 3 Cond 28	Irrigation	The Applicant shall only carry out irrigation on parts of the site that drain directly to mine water storages, and in accordance with the relevant requirements of an approved Water Management Plan.	<p>Incident Register</p> <p>Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.</p>		At the time of the IEA site inspection no irrigation works were being undertaken within the mine lease area.	No irrigation has been undertaken at Stratford during the audit period.	Not Triggered	
Sch 3 Cond 29		The Applicant shall not carry out any mining operations within 40 metres of Avondale or Dog Trap Creeks, with the exception of the construction and/or use of the proposed and existing haul road crossings of Avondale Creek shown in the figure(s) in Appendix 3.	<p>Aerial Photograph from the Extension Project EIS</p> <p>Google Earth</p>	Environment and Community Superintendent – During the audit period there was no ground disturbance for Roseville West Pit or BRN pit in the vicinity of Avondale Creek. Construction of Roseville West and BRN was undertaken under previous Development Consents during previous audit terms. Mining activities are in accordance with the approved disturbance areas in SSD-4966 Appendix 3. The Stratford Annual Review Figure 3 shows the current extent of mining activities.		<p>Dog Trap Creek is at least 150 metres from the nearest mining operations (Bowens Road North)</p> <p>Avondale Creek runs through the centre of the mine lease and comes within 50 metres of the Roseville West pit.</p> <p>No works were undertaken in this area during the audit period.</p>	Not Triggered	
Sch 3 Cond 30	Avondale and Dog Trap Creeks	The Applicant shall improve the riparian habitat along Avondale Creek to the satisfaction of the Secretary. These improvements must be made within the area of the proposed Biodiversity Enhancement Area (see Appendix 8) and include the re-establishment of flora species characteristic of the Cabbage Gum open forest vegetation community.	<p>Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.</p> <p>2019 Annual Review</p> <p>2018 Annual Review</p> <p>2019 Annual Biodiversity Report</p> <p>2020 Autumn Stratford & Duralie Biodiversity Offsets Planting Program (Kleinfelder Report NCA20R115355)</p>	Environment and Community Superintendent – Condition 30 is applicable to Avondale Creek within the Biodiversity Enhancement Area. The improvement of riparian habitat is included in the SMC Biodiversity Management Plan. Tube stock plantings in the Avondale Creek corridor between Roseville Extension pit and BRN pit were undertaken in previous audit periods and reported in the Annual Reviews	During the IEA site inspection areas of rehab work were sighted within Avondale Creek.	<p>Details of the rehabilitation works in this area are provided in the Biodiversity Management Plan.</p> <p>On-going rehabilitation (plantings) in this area were sighted during the IEA site inspection.</p> <p>2018 Annual Biodiversity Report includes details of revegetation works between Parkers Road and Wenham Cox Rd (Squirrel Glider corridor (Management Zone A1) and Cabbage Gum Floodplain (Management Zone A3)</p> <p>Other riparian enhancement works included livestock exclusion and weeds and pest control.</p> <p>2019 Annual Biodiversity Report – Section 5 and Appendix D Biodiversity</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation						
						Offsets Flora Monitoring Report includes details of further revegetation works.								
Sch 3 Cond 30A	Offsite Water Transfer	The Applicant may allow a public authority to collect and transport water offsite by road: a) where this water is intended for use for a public purpose; and b) up to a maximum rate of 25 road registered water trucks per day.		Environment and Community Superintendent: Water transfer in accordance with SSD-4966 Condition 30A has not commenced. Licensing required under the POEO Act has not been finalised to allow this.		Water transfer has not commenced.	Not Triggered							
Sch 3 Cond 31	Water Management Performance Measures	The Applicant shall comply with the performance measures in Table 8 (below) to the satisfaction of the Secretary.												
		<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"> Minimise the use of clean water on site Maximise as far as reasonable and feasible the separation of clean and dirty water within the site </td> </tr> <tr> <td>Construction and operation of linear infrastructure</td> <td> <ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls generally in accordance with the series Managing Urban Stormwater: Soils and Construction including Volume 1, Volume 2A – Installation of Services and Volume 2C – Unsealed Roads Design, install and maintain Infrastructure within 40 m of watercourses generally in accordance with the Guidelines for Controlled Activities on Waterfront Land (July 2012), or its latest version Design, install and maintain creek crossings generally in accordance with the Policy and Guidelines </td> </tr> </tbody> </table>	Feature	Performance Measure	Water Management General	<ul style="list-style-type: none"> Minimise the use of clean water on site Maximise as far as reasonable and feasible the separation of clean and dirty water within the site 	Construction and operation of linear infrastructure	<ul style="list-style-type: none"> Design, install and maintain erosion and sediment controls generally in accordance with the series Managing Urban Stormwater: Soils and Construction including Volume 1, Volume 2A – Installation of Services and Volume 2C – Unsealed Roads Design, install and maintain Infrastructure within 40 m of watercourses generally in accordance with the Guidelines for Controlled Activities on Waterfront Land (July 2012), or its latest version Design, install and maintain creek crossings generally in accordance with the Policy and Guidelines 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.		During the IEA site inspection, the site drainage controls, including the segregation of clean and dirty water were in general accordance with the Surface Water Management Plan. The SMC reuses dirty water preferentially for all high-water use activities such as irrigation and dust management.	Section 5 of the Surface Water Management Plan describes the management of clean and dirty water on-site.	Complies	
		Feature	Performance Measure											
Water Management General	<ul style="list-style-type: none"> Minimise the use of clean water on site Maximise as far as reasonable and feasible the separation of clean and dirty water within the site 													
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	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.	Environment and Community Superintendent – there have been no creek crossings or other linear infrastructure constructed within 40 metres of any water sources during the audit period.	The erosion and sediment controls observed during the IEA site inspections across the mine were berms, earthen (unlined) drains and progressive rehabilitation. No visual evidence of uncontrolled erosion was apparent. Note that the site was inspected during a period of heavy rainfall.	Appropriate erosion and sediment controls were observed on site installed on-site. There have been no creek crossings or other linear infrastructure constructed within 40 metres of any water sources during the audit period.	Complies									

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		for Fish Friendly Waterway Crossings (NSW Fisheries 2003) and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries 2003), or their latest versions						
	Mine Sediment Dams	<ul style="list-style-type: none"> Design, install and maintain the dams generally in accordance with the series Managing Urban Stormwater: Soils and Construction – Volume 1 and Volume 2E – Mines and Quarries 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.		The main water storage on-site is in former mining pits. No major dams were observed during the site inspection. Some small, temporary sediment control dams were sighted. Those sediment control devices were stable with no evidence of erosion or instability observed during the IEA site inspection.		Complies	
	Clean Water Diversion and Storage Infrastructure	<ul style="list-style-type: none"> Maximise as far as reasonable and feasible the diversion of clean water around disturbed areas on site Design, install and maintain the clean water system to capture and convey the 1 in 100-year ARI flood 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Avondale Creek Flood Model Review - Final Report J0208-35.11c Lemon Tree Creek (Tributary of Avondale) cross sections Avon North Sediment Basin Design - Oct 2018 Avon North Clean Water Diversion Drain Design Mar 2018 Stratford East Clean Water Drain Design Stratford East CWD design check - specifications		Dirty water diversions berms and channels have been installed to segregate clean and dirty water on-site.	The Surface Water Management plan refers in Table 8 to diversion drain design capacity to meet 1:20 AEP Peak Flow. Design reports and specification confirm that: Temporary Diversion drains have been designed to reduce runoff from undisturbed areas onto disturbed areas for 1:20 AEP peak flow. Permanent Diversion drains have been designed to reduce runoff from undisturbed areas onto disturbed areas for 1:100 AEP peak flow.	Complies	
	Stream diversion of tributary of Avondale Creek	<ul style="list-style-type: none"> Design, install and maintain the tributary diversion to convey the modelled peak water flows for its altered catchment Establish and maintain geomorphic stability of the diversion channel using appropriate revegetation and stabilization techniques 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Stratford East Clean Water Drain Design Stratford East CWD design check – specifications Avon North Clean Water Diversion Drain Design Mar 2018	Environment and Community Superintendent – <ul style="list-style-type: none"> The Stratford East CWD drain diverts runoff from the upper catchment of Lemon Tree Creek around the Stratford east mining area. This drain connects to an existing diversion drain to the north of the Stratford East Dam and reports to Lemon Tree Creek. The Avon North CWD also diverts runoff to Lemon tree creek. No modification to the existing Lemon Tree Creek between Avon North pit and the BRN Haul Road have been required. 		The design of the surface water management system that impacts on Lemon Tree Creek meets the requirements of this condition.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> Demonstrate that the channel is appropriately vegetated and stabilised prior to the release of flows into the diversion channel Control water flows entering the diversion channel by the construction of a stormwater detention basin 		<ul style="list-style-type: none"> Flood bunds either side of Lemon Tree Creek for the Avon North Pit and Stratford Main pit have been designed and constructed. Two stormwater detention basin are included in the design the Stratford East CWD. 				
		<p>Mine Water Storages and out-of-pit emplacement of potentially acid-forming materials</p> <ul style="list-style-type: none"> No discharges to surface waters adequate freeboard to minimise the risk of discharge to surface waters 	<p>Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan.</p> <p>PAF Management Procedure slides (internal training resources)</p> <p>Annual Water Balance Reviews</p>	<p>Environment and Community Superintendent –</p> <ul style="list-style-type: none"> PAF management is described in the SWMP Section 7.2 The Stratford Extension Project EIS Geochemistry Assessment 2012 provides a description of waste rock materials. PAF material is only associated with the Stratford East Open Cut. All other mining areas are mostly NAF. A PAF model has been prepared for the Stratford East Open Cut PAF waste rock material is segregated and selectively handled and then placed in either in-pit (below the predicted final water table recovery level) or out-of-pit waste rock emplacements (PAF waste cells). Initial PAF from Stratford East will be placed in an out-of-pit PAF Cell in the Eastern Emplacement Area. PAF Cell design prepared by Xenith and ATC Williams. PAF Cell construction commenced in 2020 followed by placement of PAF material. (Design report in separate email.) In-pit backfilling of PAF in the Stratford East Open Cut will commence this year (2021). PAF horizon for Stratford East Open Cut is attached. 		<p>Section 7.2 of the Surface Water Management Plan describes the PAF management approach. PAF storage areas appropriately designed.</p> <p>Training provided to plant operators in PAF management.</p>	Complies	
		<p>In-pit emplacement of CHPP rejects and potentially acid forming materials</p> <ul style="list-style-type: none"> Emplacement, and/or encapsulation and/or capping to prevent or minimise the migration of pollutants beyond the pit shell or seepage from out-of-pit emplacement areas 	<p>Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.</p> <p>Life of Mine Rejects Disposal Plan, Version D, dated September 2018.</p>	<p>Environment and Community Superintendent – CHPP rejects are disposed on into the Stratford Main Pit.</p> <p>The former co-disposal area (Western Co-Disposal Area) is being excavated and reprocessed.</p>	<p>CHPP rejects were being pumped into the Stratford Main Pit (in the co-disposal area) below water. The Stratford Main Pit has sufficient freeboard to contain the wastes disposed of there.</p>	<p>No CHPP rejects are disposed of outside of the Stratford Main Pit. Wastes in the former Western Co-disposal pit are currently being excavated and reprocessed.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
		<ul style="list-style-type: none"> • Emplacement of CHPP rejects below the predicted post-mining groundwater level. • Adequate freeboard within the pit to minimise the risk of discharge to surface waters. 							
		Chemical and petroleum storage	<ul style="list-style-type: none"> • Chemical and hydrocarbon products to be stored in bunded areas in accordance with relevant Australian Standards 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.		Appropriate bunded storage areas are in place for the storage of all fuels and chemicals. Photographs 9, 10 and 11 show fuel and oil storage facilities at Stratford.	Appropriate bunded storage areas are in place for the storage of all fuels and chemicals.	Complies	
		Aquatic and riparian ecosystem, in the Avon River and its tributaries, particularly Avondale and Dog Trap Creeks	<ul style="list-style-type: none"> • Develop site-specific in-stream water quality objectives in accordance with ANZECC 2000 and Using the ANZECC Guidelines and Water Quality Objectives in NSW (DECC 2006), or their latest versions 	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan.			Section 5.1.3 of the Surface Water Management Plan describes the in-stream water quality objectives set for the Avon River, Avondale Creek and Dog Trap Creek.	Complies	
Sch 3 Cond 32	Water Management Plan	The Applicant shall prepare and implement a Water Management Plan for the development to the satisfaction of the Secretary.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.		During the IEA site inspection, the water management features described in the Water Management Plan were observed and were operational.	A water management plan has been prepared and implemented.	Complies		
		This plan must: (a) be prepared in consultation with the EPA and DPIE Water, by suitably qualified and experienced person/s whose appointment has been approved by the Secretary;	<p>Letter from DPE (H Reed) to DCPL (M Jacobs) titled "Stratford extensions Project (SSD-4966) Appointment of Suitably Qualified and Experienced Persons", dated 10 October 2017.</p> <p>Letter from DPI Water (I Zinger) to SCPL (M Plain) titled "Stratford Coal – Review of Water Management Plan, Mining Operations Plan and Rehabilitation Management Plan", dated 7 March 2018.</p> <p>Letter from EPA (E Coombs) to SCPL (M Plain) titled "Stratford Coal Pty Ltd. – Environment Protection Licence 5161 Water Management Plan", dated 8 March 2018.</p>			The appointment of the water specialist responsible for the preparation of the Water Management Plan was approved on 10 October 2017.	The EPA and DPIE Water were consulted during the preparation of the plan.	Complies	
		(b) be submitted to the Secretary for approval prior to 31 December 2015, unless otherwise agreed by the Secretary; and	Letter from DPIE (H Reed) to SCPL (M Plain) titled "Stratford Extension Project (SSD 4966) Approval of Revised Management Plans" dated 2 July 2019. The letter documents DPIE approval for the Water Management Plan and the Environmental Management System.			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15).	The required plan was prepared and approved by DPE.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>(c) in addition to the standard requirements for management plans (see condition 3 of Schedule 5), include a:</p> <p>(i) Site Water Balance, that:</p> <ul style="list-style-type: none"> • includes details of: <ul style="list-style-type: none"> ○ sources and security of water supply, including details of Water Access Licenses held, and contingency supply for future reporting periods; ○ water use and management on site; ○ any off-site water discharges; and ○ reporting procedures, including the preparation of a site water balance for each calendar year; and ○ investigates and implements all reasonable and feasible measures to minimise water use on site; 	<p>Stratford Mining Complex (Stratford Extension Project) Rev Site Water Balance, Revision 3A, dated 2 July 2019 (Appendix 1 of the Water Management Plan – Revision 3).</p>			<p>The Site Water Balance (prepared by Hydro Engineering & Consulting Pty Ltd) is provided in Appendix 1 to the Water Management Plan. The SWB includes the details required by this Condition, including:</p> <ul style="list-style-type: none"> • details of sources and security of water supply, Water Access Licenses held, and contingency supply for future reporting periods; • water use and management on site; • any off-site water discharges; and • reporting procedures, including the preparation of a site water balance for each calendar year; and • all reasonable and feasible measures to minimise water use on site. 	<p>Complies</p>	
		<p>(ii) Surface Water Management Plan, that includes:</p> <ul style="list-style-type: none"> • detailed baseline data on water flows and quality in the watercourses that could potentially be affected by the development; • a detailed description of the water management system, including the: <ul style="list-style-type: none"> ○ clean water diversion systems; ○ erosion and sediment controls (mine water system); and ○ mine water management systems, including irrigation areas; • detailed plans, including design objectives and performance criteria for: <ul style="list-style-type: none"> ○ design and management of final voids; ○ design and management for the emplacement of coal reject materials and potential acid-forming or sulfate-generating materials; ○ management of sodic and dispersible soils; ○ diversion of the key tributary of Avondale Creek; 	<p>Stratford Mining Complex (Stratford Extension Project) Surface Water Management Plan, Revision 3A, dated 2 July 2019. (Appendix 2 of the Water Management Plan – Revision 3).</p>			<p>The Surface Water Management Plan is provided at Appendix 2 of the Water Management Plan.</p> <p>Section 4 describes the baseline data on water flows and quality in the potentially impacted watercourses.</p> <p>Section 6 describes the water management system.</p> <p>Section 7 (Water Management Measures) describes the design objectives and performance criteria related to the final voids; reject materials and potential acid-forming materials; sodic and dispersible soils; diversion of the key tributary of Avondale Creek; and control of any potential water pollution from the rehabilitated areas of the site.</p>	<p>Complies</p>	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> ○ reinstatement of drainage lines on the rehabilitated areas of the site; and ○ control of any potential water pollution from the rehabilitated areas of the site; ● performance criteria for the following, including trigger levels for investigating any associated potentially adverse impacts: <ul style="list-style-type: none"> ○ mine water management system; ○ downstream surface water quality; ○ downstream flooding impacts, and ○ stream and riparian vegetation health for the Avon River and its tributaries, including ○ Avondale and Dog Trap Creeks; ● a program to monitor and report on: <ul style="list-style-type: none"> ○ effectiveness of the mine water management system; ○ effectiveness of the stream diversion for the key tributary of Avondale Creek; ○ surface water flows (with a focus on base flow and low flows) and quality in the watercourses potentially affected by the development; and ○ downstream flooding impacts; ● reporting procedures for the results of the monitoring program; and ● a plan to respond to any exceedances of the performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development; 				<p>Section 5 describes performance criteria, including trigger levels for investigating any associated potentially adverse impacts.</p> <p>Section 8 Describes the surface water monitoring program.</p> <p>Sections 9 (Assessment of Performance) and 12 (Reporting Protocols) describes the reporting procedures for the results of the monitoring program; and a plan to respond to any exceedances of the performance criteria.</p>		
		<p>(iii) Groundwater Management Plan that includes:</p> <ul style="list-style-type: none"> ● detailed baseline data of groundwater levels, yield and quality in the region that could be affected by the development, including licensed privately-owned groundwater bores and a detailed survey/Schedule of groundwater dependent ecosystems; ● groundwater assessment criteria including trigger levels for investigating any potentially adverse groundwater impacts; <ul style="list-style-type: none"> ○ a program to monitor and report on: ○ groundwater inflows to the open cut pits; ○ the seepage/leachate from water storages, emplacements and final voids; 	<p>Stratford Mining Complex (Stratford Extension Project) Surface Water Management Plan, Revision 3A, dated 2 July 2019. (Appendix 3 of the Water Management Plan – Revision 3).</p>			<p>The Groundwater Management Plan is provided at Appendix 3 of the Water Management Plan.</p> <p>Section 2 (Hydrological Setting) and Section 3 (Baseline Data) provide groundwater system baseline data.</p> <p>Section 3 Describes the groundwater assessment criteria including trigger levels for investigating any potentially adverse groundwater impacts.</p> <p>Section 6.2 describes the program to validate the groundwater model</p>	<p>Complies</p>	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> o background changes in groundwater yield/quality against mine-induced changes; and o impacts of the development on: <ul style="list-style-type: none"> ▪ regional and local (including alluvial) aquifers; ▪ groundwater supply of potentially affected landowners; and ▪ groundwater dependent ecosystems and riparian vegetation; ▪ a program to validate the groundwater model for the development, including an independent review of the model every 3 years, and comparison of monitoring results with modelled predictions; and ▪ a plan to respond to any exceedances of the performance criteria; and 				<p>Section 8 Describes the Groundwater monitoring program.</p> <p>Section 9 describes the contingency plan to respond to any exceedances of the performance criteria.</p>		
		<p>(iv) protocol that has been prepared in consultation with the owners of nearby resource developments, including the Gloucester Gas Project, to:</p> <ul style="list-style-type: none"> • minimise and manage the cumulative water quality and quantity impacts of these developments; • review opportunities for water sharing/water transfers between these developments; • co-ordinate water quality monitoring programs as far as practicable; • undertake joint investigations/studies in relation to complaints/exceedances of trigger levels where cumulative impacts are considered likely; and • co-ordinate modelling programs for validation, re-calibration and re-running of the groundwater and surface water models using approved mine and gas production operation plans. 	<p>Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019.</p> <p>Letter from DPIE to SCPL dated 30/11/17</p>			<p>Section 6 of the Water Management Plan describes the protocol for cumulative assessment and management.</p> <p>Note: DPE wrote to SCPL in 2017 confirming that as AGL were not proceeding with the Gloucester Gas Project that this Condition and the relevant condition in the SOC were no longer triggered.</p>	Complies	
Sch 3 Cond 33	BIODIVERSITY Biodiversity Offset Strategy	The Applicant shall implement the biodiversity offset strategy described in the EIS, summarised in Table 9 (below) and shown conceptually in Figure 1 in Appendix 8, to the satisfaction of the Secretary.	<p>Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.</p> <p>Stratford Mining Complex Annual Biodiversity Report, for the year ending 31 December 2019.</p> <p>Stratford Mining Complex Annual Biodiversity Report, for the year ending 31 December 2018.</p>			<p>Section 5.2 of the 2019 (Kleinfelder) Annual Biodiversity Report details the vegetation planting / enhancement progress (to Dec 19). All Performance Criteria for 2018 and 2019 were achieved except for the commencement of Allocaurina spp. planting in Management Zone A2.</p>	Complies	
		Biodiversity Offset Area, including Offset Areas 1, 2, 3 and 4	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19	<p>Environment and Community Superintendent –</p> <ul style="list-style-type: none"> • Biodiversity Offset Area – 935ha 		Section 3.2.1 of the Biodiversity Management Plan describes the	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>Offset Type: Existing vegetation to be enhanced and additional vegetation to be established.</p> <p>Minimum Size: 935 Includes 490 ha of existing native vegetation.</p>	<p>October 2018.</p> <p>Stratford Coal Complex Annual Plan 2018</p> <p>Stratford Coal Complex Annual Plan 2019</p>	<ul style="list-style-type: none"> Biodiversity Enhancement Area – 247ha Rehabilitation Completed – 229ha (from SMC 2019 Annual Review) 		<p>Biodiversity Offset Areas (including Offset Areas 1, 2, 3 and 4)</p> <p>The biodiversity offset area total approximately 935 ha (including 490 ha of existing vegetation)</p> <p>Vegetation surveys have identified the existing vegetation.</p>		
		<p>Biodiversity Enhancement Area</p> <p>Offset Type: Existing vegetation to be enhanced and additional vegetation to be established, including Cabbage Gum open forest within the Avondale Creek riparian area.</p> <p>Minimum Size: 240 ha.</p>	<p>Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.</p> <p>Stratford Coal Complex Annual Plan 2018</p> <p>Stratford Coal Complex Annual Plan 2019</p>	<p>Environment and Community Superintendent –</p> <ul style="list-style-type: none"> Biodiversity Offset Area – 935ha Biodiversity Enhancement Area – 247ha Rehabilitation Completed – 229ha (from SMC 2019 Annual Review) 		<p>The Biodiversity Enhancement Area covers 247ha</p> <p>Implementation of the BMP is reported in the SMC Annual Biodiversity Reports (these have been provided previously for 2018 and 2019) and summarised in the SMC Annual Reviews.</p>	Complies	
		<p>Rehabilitation Areas</p> <p>Offset Type: Native woodland vegetation communities to be re-established.</p> <p>Minimum Size: 350 ha.</p>	<p>Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.</p> <p>Stratford Coal Complex Annual Plan 2018</p> <p>Stratford Coal Complex Annual Plan 2019</p>	<p>Environment and Community Superintendent –</p> <ul style="list-style-type: none"> Biodiversity Offset Area – 935ha Biodiversity Enhancement Area – 247ha Rehabilitation Completed – 229ha (from SMC 2019 Annual Review) 	<p>Photograph 12 shows native woodland revegetation on the Stratford site.</p>	<p>Rehabilitation completed to date covers 229ha (from SMC 2019 Annual Review).</p>	Complies	
Sch 3 Cond 34	Enhancement of Biodiversity Offset Strategy	<p>At least 3 months prior to the commencement of mining operations in the new mining areas, the Applicant shall notify the owner of Property 44 (Cross / Jane) that they may request the Applicant to acquire their property.</p> <p>Upon receiving a written request from the owner to acquire their property, the Applicant shall acquire this property in accordance with conditions 5 and 6 of Schedule 4.</p> <p>Should the Applicant acquire Property 44, then the property, exclusive of the residence and its immediate surrounds, shall be added to the Biodiversity Offset Strategy for the development described in condition 34 above, and managed in accordance with the requirements applicable to this Strategy.</p> <p>Should the Applicant not acquire Property 44 in accordance with this condition, then the Applicant shall use its best endeavours to enter into an agreement with the owner</p>	<p>Letter from SCPL (J Cullen) to owner of Property 44 titled "Notification of Stratford Extension Project Consent SSD-4966", dated 26 June 2015.</p> <p>Email from Opteon Solutions (Property Consultant – A Aylward) to SCPL (A Andrews) dated 24 July 2017. The email documents communications with the landowner relating to potential property acquisition.</p>	<p>Environment and Community Superintendent – the landowner has not taken up the offer to purchase their property.</p>		<p>SCPL has written to the relevant land owner and opened discussions related to the option for acquisition of their property.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		that conserves, enhances and provides long-term security for the native vegetation on the property. This agreement must require that the vegetation on this property is managed in accordance with the Biodiversity Management Plan in condition 40.						
Sch 3 Cond 35	Cabbage Gum Open Forest	The Applicant shall ensure the establishment of vegetation in the Biodiversity Offset Area and Biodiversity Enhancement Area includes the establishment of flora species characteristic of the Cabbage Gum Open Forest community as described in the note below Table 9.	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018. 2020 Planting / Rehab progress.			Section 5.2 Table 4 in the Biodiversity Management Plan specifies that Cabbage Gum Open Forest Community plantings will commence in 2020.	Complies	
Sch 3 Cond 36	Long Term Security of Offset	Prior to 30 June 2016, unless the Secretary agrees otherwise, the Applicant shall make suitable arrangements to protect the Biodiversity Offset Area in perpetuity to the satisfaction of the Secretary. <i>Note: For the purposes of this consent suitable arrangements may include a biobanking agreement or the use of Public Positive Covenants in combination with Restrictions In Use of Land on the land titles of the Offset lands. Other arrangements such as dedication of land under the National Parks and Wildlife Act 1974, Trust Agreements under the Nature Conservation Trust Act 2001 or a Property Vegetation Plan registered on title under the Native Vegetation Act 2003 would be considered for their suitability by the Secretary.</i>	Email from Minter Ellison (A Jacks) to SCPL (M Plain) titled "Stratford Biodiversity Instruments (ME-ME.FID4993385)" dated 31 October 2019. The email lists the biodiversity instruments established for Stratford. Land and Register Services notice of registration dated 25 October 2019. Land and Register Services notice of registration dated 15 October 2019. Positive Covenant covering Biodiversity Areas 1, 2, 3, and 4.			The required Public Positive Covenants in combination with Restrictions In Use of Land on the land titles of the Offset lands have been established.	Complies	
Sch 3 Cond 37	Habitat for Threatened Fauna Species	The Applicant shall ensure that the Biodiversity Offset Area and Biodiversity Enhancement Area provides suitable habitat for all the threatened fauna species recorded in the surface development area, namely the: <ul style="list-style-type: none"> • Glossy-black Cockatoo; • Speckled Warbler; • Grey-crowned Babbler (eastern subspecies); • Varied Sittella; • Brush-tailed Phascogale; • Squirrel Glider; • Long-nosed Potoroo; and • New Holland Mouse. 	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018. Stratford Coal Mine: Fauna Surveys of Off-set and Biodiversity Enhancement Areas, Spring 2019 (AMBS Report), dated April 2020.			Section 3.2.4 of the Biodiversity Management Plan lists the threatened fauna species associated with the site. Annual (Spring) Fauna surveys of the Biodiversity Off-set and Enhancement Areas by AMBS. The 2019 survey (the 2020 survey report had not been finalized at the time of this IEA) concluded that biodiversity Off-set and Enhancement Areas were providing suitable habitat for the identified threatened species.	Complies	
Sch 3 Cond 38	Squirrel Glider Management Plan	The Applicant shall prepare and implement a Squirrel Glider Management Plan to the satisfaction of the Secretary. This Plan must be prepared in consultation with BCD (Biodiversity Conservation Division, within the Department) and approved by the Secretary prior to any clearing within 500 metres of a Squirrel Glider colony and shall include:	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018. Email from SCPL (M Plain) to OEH (S Cox) titled "Stratford Extension Project – Squirrel Management Plan", dated 10 September 2018. The email is a request to			The Squirrel Management Plan has been prepared. OEH was consulted during the preparation of the plan and DPIE approved the plan on 19 October 2018.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			<p>OEH to review and comment on the Squirrel Management Plan.</p> <p>Letter from DPE (M Dawson) to SCPL (M Plain) titled "Stratford Extension Project (SS-4966) Revised Management Plans staged for Stratford East Open Cut", dated 19 October 2018. The letter approved the Noise Management Plan, Biodiversity Management Plan and the Squirrel Management Plan.</p>					
		[The Plan shall] include: (a) measures to establish the home range of each colony;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 4.2 of the Squirrel Management Plan describes the measures to identify the home range of each squirrel colony.	Complies	
		(b) a census of suitable tree hollows in home ranges and offset areas suitable for Squirrel Gliders;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 7.1 of the Squirrel Management Plan describes	Complies	
		(c) establishing the food resources utilised by each colony;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 6.1 of the Squirrel Management Plan describes survey of suitable tree hollows in the off-set areas.	Complies	
		(d) measures to enhance food resources utilised by Squirrel Gliders, particularly for Offset Area 1;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 6.2 of the Squirrel Management Plan describes measures to enhance food resources utilised by Squirrel Gliders.	Complies	
		(e) a vegetation clearing protocol to protect individual Squirrel Gliders;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 5 of the Squirrel Management Plan describes the vegetation clearing protocol.	Complies	
		(f) relocation of trees containing suitable tree hollows;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 5 of the Squirrel Management Plan describes relocation of trees containing suitable tree hollows.	Complies	
		(g) installation of suitable nest boxes at a ratio of least 3:1 for each suitable hollow destroyed by the development and their long-term management	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 7.2 of the Squirrel Management Plan describes the installation of suitable nest boxes.	Complies	
		(h) measures to assess the rate of tree hollow development within the Offset Areas;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 7.3 of the Squirrel Management Plan describes measures to assess the rate of tree hollow development.	Complies	
		(i) implementation of Yancoal's proposed Glider crossings of haul roads with the establishment of suitable vegetation adjacent to each crossing;	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 8.2 of the Squirrel Management Plan describes proposed Glider crossings of haul roads.	Complies	
		(j) implementation of Yancoal's proposals to enhance vegetation, particularly in Offset Area 3, to create recruitment and dispersal pathways for Squirrel Gliders; and	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 8.1 of the Squirrel Management Plan describes the vegetation enhancement strategy.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(k) installation of Gliders crossings of The Bucketts Way and Main Northern Railway, should Yancoal acquire Property 44, unless their installation is prevented by the relevant transport authority.	Stratford Mining Complex (Stratford Extension Project) Squirrel Glider Management Plan, Revision 1A, dated 19 October 2018.			Section 8.2 of the Squirrel Management Plan describes installation of Gliders crossings of The Bucketts Way and Main Northern Railway.	Complies	
Sch 3 Cond 39	Biodiversity Management Plan	The Applicant shall prepare and implement a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with BCD, and be submitted to the Secretary for approval prior to 31 December 2015;	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018. Email from OEH (S Cox) to SCPL (M Plain) titled "Stratford Extension Project – Environmental Management Plans" dated 18 January 2018. The email advises SCPL that OEH would not be able to review the Biodiversity Management Plan or the Heritage Management Plan. Letter from DPE (M Dawson) to SCPL (M Plain) titled "Stratford Extension Project (SS-4966) Revised Management Plans staged for Stratford East Open Cut", dated 19 October 2018. The letter approved the Noise Management Plan, Biodiversity Management Plan, and the Squirrel Management Plan.			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15). The Biodiversity Management Plan has been prepared. OEH was consulted during the preparation of the plan and DPE approved the plan on 19 October 2018.	Complies	
		(b) describe the short, medium, and long-term measures that would be implemented to: <ul style="list-style-type: none">manage the remnant vegetation and habitat on the site; andimplement the biodiversity offset strategy;	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Sections 4 and 5 of the Biodiversity Management Plan describes biodiversity management measures to be implemented.	Complies	
		(c) include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and triggering remedial action (if necessary);	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Section 6 of the Biodiversity Management Plan describes the performance and completion criteria for evaluating the performance of the biodiversity offset strategy, and action trigger levels.	Complies	
		(d) include a detailed description of the measures that would be implemented over the next 3 years for: <ul style="list-style-type: none">enhancing the quality of existing vegetation and fauna habitat;establishing native vegetation and fauna habitat in the Biodiversity Offset Area, Biodiversity Enhancement Area and Rehabilitation Area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of naturally scarce fauna habitat features (where necessary);enhancing the landscaping of the site and along public roads to minimise	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			The Biodiversity Management Plan covers the following areas as follows: Sections 4.8 and 5.3 – strategy for enhancing the existing habitat. Section 4.10 revegetation / enhancement of the off-set areas. Section 4.1.1 Enhancing site landscape and public roads. Section 4.1.4 Vegetation	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>visual and lighting impacts, particularly along Glen Road;</p> <ul style="list-style-type: none"> protecting vegetation and soil outside approved disturbance area; maximising the salvage of resources within the approved disturbance area – including vegetative and soil – for beneficial reuse in the biodiversity offset strategy; collecting and propagating seed; minimising the impacts to fauna on site, including undertaking pre-clearance surveys; managing any potential conflicts between the proposed restoration works in the Biodiversity Offset Area and any Aboriginal heritage values (both cultural and archaeological); managing salinity; controlling weeds and feral pests; controlling erosion; managing grazing and agriculture; controlling access; and managing bushfire risk; 				<p>and topsoil salvage.</p> <p>Section 4.1.5 Seed collection and propagation.</p> <p>Sections 4.1.2 and 4.1.3 Clearance surveys.</p> <p>Section 5.5 Managing biodiversity offset areas and indigenous heritage sites.</p> <p>Section 4.9 Salinity management.</p> <p>Sections 4.4, 4.5, 5.6 and 5.7 weed and pest management.</p> <p>Sections 4.6 and 5.8 Erosion and sediment control.</p> <p>Section 4.2 and 5.1 Managing grazing and cropping.</p> <p>Sections 4.3 and 5.1 managing site access.</p> <p>Sections 4.7 and 5.9 Bushfire management.</p>		
		(e) include a program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria;	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Sections 6 and 7 of the Biodiversity Management Plan describes the monitoring and reporting program.	Complies	
		(f) identify the potential risks to the successful implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate against these risks; and	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Section 7.2 of the Biodiversity Management Plan describes biodiversity risks.	Complies	
		(g) include details of who would be responsible for monitoring, reviewing, and implementing the plan. <i>Note: The Biodiversity Management Plan and Rehabilitation Management Plan need to be substantially integrated for achieving biodiversity objectives for the rehabilitated mine-site.</i>	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Section 8.5 of the Biodiversity Management Plan describes monitoring and reporting responsibilities.	Complies	
Sch 3 Cond 40	Conservation Bond	By the end of June 2016, unless the Secretary agrees otherwise, the Applicant shall lodge a Conservation Bond with the Department to ensure that the Biodiversity Offset Strategy is implemented in accordance with the performance and	Letter from DPIE (H Reed) to SCPL (M Plain) titled "Stratford Extension Project (SSD 4966) Conservation Bond Calculation" dated 16 January 2019. The letter approves the conservation bond calculation and requires the bond to be lodged prior to 1 March 2019.			The required bond has been calculated in accordance with the Approval and lodged with DPIE.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>completion criteria of the Biodiversity Management Plan.</p> <p>The sum of the bond shall be determined by: (a) calculating the full cost of implementing the Biodiversity Offset Strategy (other than land acquisition costs); and (b) employing a suitably qualified quantity surveyor to verify the calculated costs. If the Offset Strategy is completed generally in accordance with the completion criteria in the Biodiversity Management Plan to the satisfaction of the Secretary, the Secretary will release the bond.</p> <p>If the offset strategy is not completed generally in accordance with the completion criteria in the Biodiversity Management Plan, the Secretary will call in all, or part of, the conservation bond, and arrange for the satisfactory completion of the relevant works.</p>	Bank Guarantee (Commonwealth Bank) for \$10,806,730, dated 8 February 2019.					
Sch 3 Cond 41	Bowens Road North Open Cut Offset Strategy	The Applicant shall implement the Bowens Road North Offset Strategy, as described in the modification application Bowens Road North Mod 4 and accompanying Environmental Assessment titled Bowens Road North Open Cut June 2010 Modification, in conjunction with the biodiversity offset strategy for the Duralie Extension Project and comply with the relevant requirements for the implementation of this strategy in the Duralie Extension project approval (see MP 08_0203).	<p>Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.</p> <p>Refer to 2020 Duralie Coal Mine IEA.</p> <p>Duralie Coal Mine Biodiversity Management Plan, Version I, dated 27 November 2018.</p>			<p>Section 3.3 of the Biodiversity Management Plan states that the Bowens Road North Off-set will be managed in conjunction with the Duralie off-set strategy.</p> <p>The Bowens Road North Off-set area is included in the Duralie Mine Biodiversity Management Plan.</p>	Complies	
Sch 3 Cond 42	HERITAGE Protection of Aboriginal Sites	The Applicant shall ensure that the development does not cause any direct or indirect impact on identified Aboriginal sites located outside the approved disturbance area of the development on the site.	<p>In Stratford Mining Complex (Stratford Extension Project) Heritage Management Plan, Revision 2A, dated 17 October 2018.</p> <p>Incident Register</p>	Environment and Community Superintendent - No unauthorized disturbance of heritage sites has occurred during the Audit Period.	Aboriginal Heritage sites have been secured.	No unauthorized disturbance of heritage sites has occurred during the Audit Period.	Complies	
Sch 3 Cond 43	Heritage Management Plan	The Applicant shall prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;	<p>Stratford Mining Complex (Stratford Extension Project) Heritage Management Plan, Revision 2A, dated 17 October 2018.</p> <p>NSW Department of Planning and Environment [DP&E] [letter dated 10 October 2017] as a "suitably qualified and experienced person", to satisfy the requirements under Development Consent SSD-4966.</p>	Environment and Community Superintendent - The HMP has been prepared by Mr. Jamie Reeves of Niche Environment and Heritage Pty Ltd (Niche).		The Heritage Management Plan has been prepared by an approved expert and implemented.	Complies	
		be prepared in consultation with OEH and local Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	Email from OEH (S Cox) to SCPL (M Plain) titled "Stratford Extension Project – Environmental Management Plans" dated 18 January 2018. The email advises SCPL that OEH would not be able to review the Biodiversity Management Plan or the			OEH and the relevant RAPS were consulted during preparation of the HMP.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			Heritage Management Plan. Stratford Mining Complex (Stratford Extension Project) Heritage Management Plan, Revision 2A, dated 17 October 2018. Appendix A describes the consultation undertaken with the RAPs.					
		be submitted to the Secretary for approval prior to 31 December 2015, unless the Secretary agrees otherwise;	Letter from DPE (M Dawson) to SCPL (M Plain) titled "Stratford Extension Project (SSD-4966) Revised Management Plans staged for Stratford East Open Cut", dated 17 October 2018. The letter documented DPE approval of the revised plans.			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15). The required plan was prepared and approved by DPE. DPE approved the Heritage Management Plan on 17 January 2018.	Complies	
		include the following: <ul style="list-style-type: none"> a detailed archaeological salvage program for Aboriginal sites/objects within the approved disturbance area, including methodology and procedures/protocols for: <ul style="list-style-type: none"> staged salvage, based on anticipated mine planning (sites OS-3, OS-4, OS-5, IF-1, IF-2, IF-3, IF-4 shown on the figure in Appendix 7); salvage of scarred trees (sites ST-2; ST-4 shown on the figure in Appendix 7); monitoring of topsoil stripping during construction associated with the Wenham Cox / Bowens Road realignment in the vicinity of Dog Trap Creek; site assessment and reporting; protection, storage, management and long-term protection of salvaged Aboriginal objects; and addressing relevant statutory requirements under the National Parks and Wildlife Act 1974; and 	Stratford Mining Complex (Stratford Extension Project) Heritage Management Plan, Revision 2A, dated 17 October 2018.			Section 4.3 of the Heritage Management Plan describes the salvage of the nominated sites. Section 4.4 and Appendix 4 describe scar tree salvage. Section 5.2 of the Heritage Management Plan describes monitoring of top soil. Section 4.3 of the Heritage Management Plan describes site assessment and reporting. Sections 4.8 and 4.9 of the Heritage Management Plan describe the storage, protection and management of salvage artifacts.	Complies	
		<ul style="list-style-type: none"> a description of the measures that would be implemented for: <ul style="list-style-type: none"> protecting, monitoring and managing Aboriginal sites outside the approved disturbance area (including sites OS-1, OS-2, ST-1, ST-3, IF-5, PAD-1, PAD-2, CTS-1 shown on the figure in Appendix 7); maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage 				Section 4 of the Heritage Management Plan describes the management, protection and monitoring of sites outside of the disturbed area. Section 4.1.5 of the Heritage Management Plan describes access management. Sections 4.6 and 4.7 of the	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>items on site and in the Biodiversity Offset Area;</p> <ul style="list-style-type: none"> managing the discovery of any human remains or previously unidentified Aboriginal objects on site, including (in the case of human remains) stop work provisions and notification protocols; ongoing consultation with local Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage both on-site and in the Biodiversity Offset Area; and ensuring any workers on site receive suitable heritage inductions prior to carrying out any activities which may disturb Aboriginal sites, and that suitable records are kept of these inductions. 				<p>Heritage Management Plan describes the unexpected find protocol.</p> <p>Section 4.1.3 of the Heritage Management Plan describes on-going consultation with relevant aboriginal parties.</p> <p>Section 4.6 of the Heritage Management Plan describes heritage inductions and training.</p>		
Sch 3 Cond 44	TRANSPORT Road Alignments	<p>The Applicant shall construct the proposed realignment of:</p> <p>(a) Bowens Road to Wenham Cox Road to the east of the Avon North pit; and</p> <p>b) Wheatleys Lane and Bowens Road to the west of the Roseville West pit extension, to the satisfaction of GSC.</p>	<p>Public Engineering Works Permit – Wenham Cox Road, dated 3 July 2018. The permit grants SCPL approval for the realignment works.</p> <p>Letter from Council (M Wilkinson) to Lidbury, Summers & Whiteman (SCPL’s engineering consultants) dated 16 October 2018. The letter approves (practical completion) the works on Wenham Cox Road.</p> <p>Letter from Council (S Nicholson) to SCPL (S Cox) titled “Request for consent to carry out S138 Roads Activity Property – Wenham Cox Road, Stratford” dated 7 August 2020. The letter provides approval for further works on Wenham Cox Road.</p>	<p>Environment and Community Superintendent – No works have been undertaken at Wheatleys Road at this stage.</p> <p>Wenham Cox Road realignment has been completed..</p>		<p>Council approved the road works undertaken by SCPL.</p>	Complies	
Sch 3 Cond 45	Intersection Upgrades	<p>Prior to 31 December 2015, unless the Secretary agrees otherwise, the Applicant shall:</p> <p>(a) improve the warning signage, re-paint line markings and install raised reflective markers at the intersection of the Stratford Mine Access Road and The Bucketts Way; and</p> <p>(b) upgrade/repair road drainage on the southwestern corner of the intersection of Wenham Cox Road and Wheatleys Lane to ensure it does not pose an unacceptable safety risk to traffic, to the satisfaction of GSC.</p>		<p>Environment and Community Superintendent – The following works were completed to satisfy Condition 45 A (intersection of Bucketts way and the mine access road): Works during 2019 – Pothole repairs, new road signage and re-painting of line markings.</p> <p>Environment and Community Superintendent – No works have been undertaken at Wheatleys Road at this stage.</p>	<p>Road upgrades sighted by Auditor</p>	<p>The required upgrades were completed in 2019.</p>	Complies	
Sch 3 Cond 46	Road Maintenance Bucketts Way	<p>From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC and GLC annual contributions for the maintenance and resealing of The Bucketts</p>	<p>Email to MidCoast Council from SCPL (M Plain) titled “Summary of Stratford Coal & Duralie Coal Contributions to MidCoast Council”, dated 27 November 2018.</p>	<p>Environment and Community Superintendent – SCPL has made all endeavours to comply with this condition and to communicate with MidCoast Council. This matter has been raised on several occasions over the past few years</p>		<p>SCPL has endeavored to comply with this Condition, however Council has not invoiced SCPL.</p> <p>Therefore, payments for</p>	Non-Compliance	<p>Continue discussions with Council in relation to payments for Road maintenance on Buckets Way or seek agreement with Council and DPIE for</p>

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Way in accordance with the terms in Appendix 4.		and SCPL are still to receive any invoicing from MidCoast Council regarding this condition. SCPL have provided reminders to MidCoast Council and have also requested a meeting to resolve the matter. SCPL has received a reply from MidCoast Council in December 2020, thanking SCPL for their patience and honesty in relation to the matter however the accounting has still not been finalised.		road maintenance on Buckets Way have not been commenced.		removal of this Condition.
Sch 3 Cond 47	Road Maintenance Whenham Cox Road	From the commencement of mining operations in the new mining areas until their cessation, unless otherwise agreed by the Secretary, the Applicant shall pay GSC annual contributions for the maintenance of Wenham Cox Road. The contribution shall be based on the proportion of all heavy vehicles using this road due to the Applicant's mining operations and exploration activities, or a figure of \$5000 per annum (2014 dollars, subject to annual indexation in accordance with the CPI), as the Applicant decides. Any dispute about this condition shall be referred to the Secretary for resolution.	Email to MidCoast Council from SCPL (M Plain) titled "Summary of Stratford Coal & Duralie Coal Contributions to MidCoast Council", dated 27 November 2018.	Environment and Community Superintendent – SCPL have made all endeavours to comply with this condition and to communicate with MidCoast Council. This matter has been raised on several occasions over the past few years and SCPL are still to receive any invoicing from MidCoast Council regarding this condition. SCPL have provided reminders to MidCoast Council and have also requested a meeting to resolve the matter. SCPL has received a reply from MidCoast Council in December 2020, thanking SCPL for their patience and honesty in relation to the matter however the accounting has still not been finalised.		SCPL has endeavored to comply with this Condition, however Council has not invoiced SCPL. Therefore, payments for road maintenance on Wenham Cox Road have not been commenced.	Non-Compliance	Continue discussions with Council in relation to payments for Road maintenance on Whenham Cox Road or seek agreement with Council and DPIE for removal of this Condition.
Sch 3 Cond 48		The Applicant shall monitor and report on: (a) the amount of coal transported from the site; and	http://www.stratfordcoal.com.au/page/environment/export-train-coal-transported/			Monthly coal transport quantities are reported on the Stratford Coal Mine website.	Complies	
		(b) the date and time of each train movement to and from the site, to the satisfaction of the Secretary.	http://www.stratfordcoal.com.au/page/environment/export-train-summary/			Train movement to and from the site are reported on the Stratford Coal Mine website.	Complies	
Sch 3 Cond 49	Transport Monitoring	Prior to 31 December 2015, the Applicant shall submit a detailed Transport Monitoring Program for the development, which has been prepared in consultation with GSC and GLC, to the Secretary for approval. This Program shall monitor heavy vehicle movements to and from the mine and on The Buckets Way to the north and south of the mine and require these data to be reported directly to the Applicant, GSC and GLC.	Memorandum from GTA Consultants (P Dalton to SCPL (M Plain) titled "Stratford Coal Complex Traffic Monitoring", dated 16 February 2018.			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15). A transport monitoring program was prepared by GTA Consultants (16 Feb 2018) who consulted with Council. A copy of the program is located on the Stratford Coal Mine website. It is noted that the program does not include timing of the survey.	Complies	
Sch 3 Cond 50	VISUAL Operating Conditions	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development;	Stratford Coal Training and Assessment Manual - Brite Lorce LED star 3.2K-HL Mobile Lighting Tower. Jang Engineering – report on changes to Stratford Lighting (in response to complaints) dated 2 July 2018 (author			SCPL have received complaints regarding mobile lighting. A lighting audit and visual lighting assessments were undertaken, and the recommendations made	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			Graeme Brown). Email from G Brown (electrical Engineer SCPL) to G May (SCPL) regarding review of lighting and inspections, dated 12 May 2020.			have been implemented. Mine operations personnel are provided with training is the set up and use of mobile lighting.		
		(b) ensure no fixed outdoor lights shine above the horizontal;	Stratford Coal AS 4282.2019 Compliance Report. Report prepared by Julian Freed Consulting, dated April 2019.		No fixed lighting is visible from off-site.	The Lighting audit did not identify any issues with fixed lighting.	Complies	
		(c) ensure no in-pit mobile lighting rigs shine above the pit wall and other mobile lighting rigs do not shine above the horizontal;	Stratford Coal Training and Assessment Manual - Brite Lorce LED star 3.2K-HL Mobile Lighting Tower. Jang Engineering – report on changes to Stratford Lighting (in response to complaints) dated 2 July 2018 (author Graeme Brown). Email from G Brown (electrical Engineer SCPL) to G May (SCPL) regarding review of lighting and inspections, dated 12 May 2020.		In pit mobile lighting is not visible from outside of the pits.	SCPL have received complaints regarding mobile lighting. A lighting audit and visual lighting assessments were undertaken, and the recommendations made have been implemented. Mine operations personnel are provided with training is the set up and use of mobile lighting.	Complies	
		(d) ensure that all external lighting associated with the development complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting or its latest version;	Stratford Coal Training and Assessment Manual - Brite Lorce LED star 3.2K-HL Mobile Lighting Tower.			A lighting audit and visual lighting assessments were undertaken, and the recommendations made have been implemented.	Complies	
		(e) provide for the establishment and monitoring of trees and shrubs: <ul style="list-style-type: none"> • along the Glen Road; and • at other areas identified as necessary for the maintenance of satisfactory visual amenity; and 		Environment and Community Superintendent - Bucketts Way visual screen planned in 1995. Glen Road visual screen planted in 2018. Wenham Cox Road visual bunds constructed in 2018. Wenham Cox Rd visual screen proposed to be planted in 2021. Further details in the Annual Biodiversity Reports.	Screen plantings and bunds were sighted.	Planting and bunds required by this Condition have been completed.	Complies	
		(f) ensure that the visual appearance of all buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape, to the satisfaction of the Secretary.			The buildings and structures (including elevated conveyers) at the Stratford Mine are fitted with green cladding and generally blend into the environment.	A visual inspection during this IEA found that the visual appearance of buildings and structures satisfies the requirements of the Condition.	Complies	
Sch 3 Cond 51	BUSHFIRE MANAGEMENT	51. The Applicant shall: (a) ensure that the development is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as possible if there is a fire in the surrounding area.	Stratford Mining Complex (Stratford Extension Project) Biodiversity Management Plan, Revision 2, dated 19 October 2018.			Bushfire management is described in Section 4.7 and 5.9 of the Biodiversity Management Plan	Complies	
							Noted	
Sch 3 Cond 52	WASTE	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste (including coal reject) generated by the development;		Environment and Community Superintendent - Whilst SCPL does not have a specific waste minimisation program, SCPL have developed a whole of site waste management contract. This includes regular inspections and recommendations for improvements in waste handling. This also includes regular	Photograph 13 shows waste battery storage. Photograph 14 shows waste bins (segregation)	No waste minimisation program has been developed for the Stratford Mining Complex.	Non-Compliance	Develop and implement a waste minimisation strategy, covering in particular on-site waste minimisation.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
				reporting of waste disposal volumes including the percentage of recycling achieved.				
		(b) ensure that the waste generated by the development is appropriately stored, handled, and disposed of; and		Environment and Community Manager: JR Richards is contracted to manage all wastes at Duralie.	JR Richards waste bins were sighted.	All wastes generated are managed by JR Richards and disposed of in accordance with EPA requirements.	Complies	
		(c) monitor and report on the effectiveness of waste minimisation and management measures in the Annual Review.	Stratford Mining Complex Annual Review 1 January 2018 to 31 December 2019.	Environment and Community Superintendent - Whilst SCPL does not have a specific waste minimisation program, SCPL have developed a whole of site waste management contract. This includes regular inspections and recommendations for improvements in waste handling. This also includes regular reporting of waste disposal volumes including the percentage of recycling achieved.		Section 4.5 of the Annual Reviews describe waste disposal at the mine. No information on waste minimisation or the effectiveness of relevant programs is provided.	Non-Compliance	In future Annual Reviews report on the implementation and effectiveness of the waste minimization strategy.
Sch 3 Cond 53	REHABILITATION Rehabilitation Objectives	The Applicant shall rehabilitate the site to the satisfaction of the Resources Regulator. This rehabilitation must be generally consistent with the proposed Rehabilitation Strategy described in the EIS and comply with the objectives in Table 10 (below).	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 5.2 of the MOP / Rehabilitation Plan describes the rehabilitation objectives for the project. Specific objectives are summarised below.	Noted	
		Mine Site as a whole (no pun intended)	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			<p>Section 5.2.1 Infrastructure Areas – Surface infrastructure will be removed, areas decontaminated and revegetated (safety / stability/ visual impact).</p> <p>Section 5.2.2 Water Areas – dewatered, reprofiled and revegetated (safety / stability /natural landforms / visual impact / drainage).</p> <p>Section 5.2.3 Permanent Water Management Area – drainage established (drainage / stability / future water resource).</p> <p>Section 5.2.4 Waste Emplacement – reshaping, revegetation (safety / stability /natural landforms / visual impact / drainage)</p> <p>Section 5.2.5 Rejects Management Area - reshaping, revegetation (safety / stability /natural landforms / visual impact / drainage)</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						Section 5.2.6 Open Cut Pit - reshaping, revegetation (safety / stability / natural landforms / visual impact / drainage)		
		<p>Final Voids</p> <p>Minimise the size and depth of final voids so far as is reasonable and feasible</p> <p>Minimise the drainage catchment of final voids so far as is reasonable and feasible.</p> <p>Minimise high wall instability risk so far as is reasonable and feasible.</p> <p>The size and depth of final voids must be designed having regard to their function as long-term groundwater sinks, to maximize groundwater flows across back-filled pits to the void and to not be a source of saline groundwater for aquifers and streams.</p> <p>Designed and constructed to ensure adequate freeboard to ensure no spillage under any foreseeable conditions.</p> <p>Minimise risk of flood interaction for all flood events up to and including the Probable Maximum Flood .</p>	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			<p>Section 5.2.3 Permanent Water Management Area - reshaping, revegetation (minimise size and volume / drainage / risk management and flooding)</p> <p>Section 5.2.5 Rejects Management Area - reshaping, revegetation (minimise size and volume / drainage / risk management and flooding)</p> <p>Section 5.2.6 Open Cut Pit - reshaping, revegetation (minimise size and volume / drainage / risk management and flooding)</p>	Complies	
		Surface Infrastructure	To be decommissioned and removed, unless the Deputy Secretary, Resources and Energy agrees otherwise	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.		Section 5.2.1 Infrastructure Areas – Surface infrastructure will be removed, areas decontaminated and revegetated (decommissioning and removal).	Complies	
		Agricultural Land	Establish a minimum of 300 hectares of land with Class 4 agricultural suitability	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.	Photograph 8 shows an area (near the Stratford East Dam) rehabilitated for agricultural use.	<p>Section 5.2.2 Water Areas - some areas will be rehabilitated for agricultural use.</p> <p>Section 5.2.3 Permanent Water Management Area – Stratford East Sam and Eastern Emplacement Area to be reestablished for</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						agricultural use. Section 5.2.4 Waste Emplacement – some areas will be rehabilitated for agricultural use. Section 5.2.5 Rejects Management Area – rehabilitated for agricultural use.		
		Other Land Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprising: - a wildlife corridor (shown as Biodiversity Enhancement Area in the figure in Appendix 8); - local native plant species; and - a landform consistent with the surrounding environment	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Sections 5.2.1 to 5.1.6 – the objectives established for all areas generally meet these requirements.	Complies	
		Stratford and Glen heritage railway corridors Road and transmission alignments to avoid heritage railway corridors Rehabilitation activities to avoid or minimise impacts	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 5.2.1 Infrastructure Areas – rail infrastructure	Complies	
		Community Ensure public safety, with an emphasis on final voids Minimise the adverse socio-economic effects associated with mine closure	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 5.2.1 Infrastructure Areas – removal of infrastructure (safety) Section 5.2.2 Water Areas – filling, reprofiling and revegetation (safety). Section 5.2.6 Open Cut Pit - filling, reprofiling and revegetation (safety).	Complies	
Sch 3 Cond 54	Progressive Rehabilitation	The Applicant shall progressively rehabilitate the site, including the Western Co-disposal Area, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies must be employed where areas prone to dust generation are not subject to active mining operations but cannot yet be permanently rehabilitated.	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019. Stratford Mining Complex Annual Reviews including rehabilitation reporting.		During the IEA site inspection all rehabilitation areas were inspected. Extensive progressive rehabilitation has been undertaken.	Progressive rehabilitation works have been undertaken.	Complies	
Sch 3 Cond 55	Rehabilitation Management Plan	The Applicant shall prepare and implement a Rehabilitation Management Plan to the satisfaction of the Resources Regulator.	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version		During the IEA site inspection all rehabilitation areas were inspected. Extensive progressive	The Rehabilitation Management Plan has been prepared and is being	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			3, dated 16 July 2019.		rehabilitation has been undertaken.	implemented.		
		This plan must: (a) be prepared in consultation with the Department, DPIE Water, BCD, and GSC;	<p>Email from DPI Water (R Shepherd) to CPL (M Plain) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 13 February 2018.</p> <p>Email from SCPL (M Plain) to OEH (S Cox) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. The Email sought review and comments on the Plan.</p> <p>Email from SCPL (M Plain) to Council (R Flenning) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. The Email sought review and comments on the Plan.</p> <p>Email from SCPL (M Plain) to EPA (E Coombs) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. The Email sought review and comments on the Plan.</p> <p>Email from SCPL (M Plain) to DPE (S Phillips) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. The Email sought review and comments on the Plan.</p> <p>Email from SCPL (M Plain) to the CCC titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. The Email sought review and comments on the Plan.</p>			SCPL consulted with all required parties during the preparation of the Rehabilitation Management Plan (as part of the MOP).	Complies	
		(b) be submitted to the Resources Regulator for approval at least 3 months prior to the commencement of mining operations in the new mining areas; unless the Resources Regulator agrees otherwise;	Letter from the Resources Regulator (M Meyer) to SCPL (J Cullen) titled "Mining Lease (ML) 1360, ML 1409, ML 1521, ML1528, ML 1577, ML 1733, ML 1787 (1992) Stratford Mining Complex Mining Operations Plan and Rehabilitation Management Plan 2018 – 2021", dated 16 July 2019.			The Resources Regulator approved the latest revision of the plan on 16 July 2019.	Complies	
		(c) be prepared in accordance with any relevant DRG guideline;	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			The MOP / Rehabilitation Management Plan was prepared in general accordance with the DRG Guideline.	Complies	
		(d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.	Environment and Community Superintendent - The SMC Biodiversity Management Plan provides specific detail on the relationship to other management plans including the integration of the site		The plan does not clearly describe how the rehabilitation of the site would be integrated with the implementation of the	Non-Compliance	Revise the MOP / Rehabilitation Management Plan to include a section describing how the

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
			Email from SCPL (M Plain) to DPE (C Phillips) titled "Stratford Mining Operations and Rehabilitation Management Plan", dated 5 October 2018. BMP Section 4.8 REHABILITATION - ESTABLISHING NATIVE VEGETATION AND FAUNA HABITAT	rehabilitation and the biodiversity offset strategy; refer to BMP Section 1.4 RELATIONSHIP OF THE BMP TO OTHER MANAGEMENT PLANS, 1.4.2 Mining Operations Plan/ Rehabilitation Management Plan.		biodiversity offset strategy. It is noted that the DPE in their email of 12 October 2018 requested that this deficiency be corrected.		rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy
		(e) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary);	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 6 of the Mining Operations and Rehabilitation Management Plan presents the rehabilitation performance and completion criteria.	Complies	
		(f) describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent, and address all aspects of rehabilitation including mine closure, final landform and final land use;	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 7 and 9 describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent>. Mine closure planning is described in Section 10.	Complies	
		(g) include interim rehabilitation where necessary to minimise the area exposed for dust generation;	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 2.3.10 of the MOP - Progressive Rehabilitation and Completion Section 2.3.11 Topsoil Management "progressive stripping of approved disturbance areas to minimise the incremental disturbance;" Section 3.3.6 Progressive Rehabilitation - Rehabilitation will be undertaken progressively across the site, in line with objectives of Development Consent (SSD-4966) and will also account for interim rehabilitation strategies as specified in Condition 54, Schedule 3 of Development Consent (SSD-4966). The MOP stage plan shows the incremental and progressive rehabilitation targets for the SMC.	Complies	
		(h) include a program to monitor, independently audit and report on the effectiveness of the rehabilitation measures and progress against the detailed performance and completion criteria; and	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Section 8 of the Mining Operations and Rehabilitation Management Plan describes the rehabilitation monitoring and research will be undertaken.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(i) build to the maximum extent practicable on the other management plans required under this consent.	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.				Noted	
SCHEDULE 4 ADDITIONAL PROCEDURES								
Sch 4 Cond 1	NOTIFICATION OF LANDOWNERS	<p>Within 1 month of the date of this consent, unless the Secretary agrees otherwise, the Applicant shall:</p> <p>(a) notify in writing the owners of:</p> <ul style="list-style-type: none"> the land listed in Table 1 of Schedule 3 that they have the right to require the Applicant to acquire their land at any stage during the development; any residence listed in condition 2 of Schedule 3, including those on the land listed in Table 1 of Schedule 3, that they have the right to request the Applicant for additional noise mitigation measures to be installed at their residence at any stage during the development; and any privately-owned land within 2 kilometres of the approved open cut mining pit/s that they are entitled to ask for an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated; 	<p>Spreadsheet titled "SEP Notification spreadsheet – 2018 update pre-commencement." The spreadsheet records the notifications made to landholders prior to recommencement of mining in 2018.</p> <p>Letter from SCPL (M Plain) to Landowner (Barnes) titled "RE: Stratford Extension Project SSD-4966 Development Consent Approval – Notification to Landowners", dated 23 May 2018. The letter is an example of the notification letters sent to landowners offering baseline building inspections.</p> <p>Letter from SCPL (M Plain) to Landowner (Barnes) titled "RE: Notification of Stratford Extension Project 4966 Development Consent Approval SSD", dated 21 October 2019. The letter is an example of the notification letters sent to landowners notifying them that nighttime operations were recommencing and that they were entitled to request acquisition of their properties..</p>	<p>Environment and Community Superintendent - At Stratford, notifications in accordance with Schedule 4 Condition 1 were provided in two stages in 2018 and 2019. Following this we received four requests for inspections in 2018 and 4 requests in 2019. No requests for investigations of damage have been received.</p>		<p>The required notifications were issued to landowners at the commencement of mining operations.</p>	Complies	
		(b) notify the tenants of any mine-owned land of their rights under this consent; and	<p>Email (with attachments) from SCPL (M Plain) to Webbs Realestate (H Sanders) titled "Stratford Extension Project - Pre-commencement Consultation Strategy" dated 27 April 2018). The email advises Webbs of the requirements for notification of tenants.</p>	<p>Environment and Community Superintendent - Residential tenancy of Stratford Coal owned properties is managed by Webbs Real Estate. Please see attached correspondence to Webbs with advice for new tenancy agreements.</p>		<p>Webbs Realestate manage the leased properties on behalf of SCPL. SCPL have provided Webbs with the information required to be communicated to all leases.</p>	Complies	
		(c) send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the owners and/or existing tenants of any land (including mine-owned land) where the predictions in the EIS identify that dust emissions generated by the development are likely to be greater than the relevant air quality criteria in Schedule 3 at any time during the life of the development.				<p>Refer to Sch 3 Condition 18 above. No exceedances of air quality criteria were reported.</p>	Not Triggered	
Sch 4 Cond 2		Prior to entering into any tenancy agreement for any land owned by the Applicant that is predicted to experience exceedances of the recommended dust and/or noise criteria, or for any of the land listed in Table 1 that is subsequently purchased by the Applicant	<p>Email (with attachments) from SCPL (M Plain) to Webbs Realestate (H Sanders) titled "Stratford Extension Project - Pre-commencement Consultation Strategy", dated 27 April 2018). The email advises Webbs of the requirements for notification of tenants.</p>	<p>Environment and Community Superintendent: Residential tenancy of Stratford Coal owned properties is managed by Webbs Real-estate. No new tenancies were established during the Audit Period.</p>		<p>Environment and Community Superintendent: No new tenancies were established during the Audit Period.</p>	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		shall: (a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time); and						
		(b) advise the prospective tenants of the rights they would have under this consent, to the satisfaction of the Secretary.	Email (with attachments) from SCPL (M Plain) to Webbs Realestate (H Sanders) titled "Stratford Extension Project - Pre-commencement Consultation Strategy", dated 27 April 2018). The email advises Webbs of the requirements for notification of tenants.	Environment and Community Superintendent: No new tenancies were established during the Audit Period.		Environment and Community Superintendent: No new tenancies were established during the Audit Period.	Not Triggered	
Sch 4 Cond 3		As soon as practicable after obtaining monitoring results showing: (a) an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, and provide regular monitoring results to each affected landowner until the development is again complying with the relevant criteria; and				Refer to Sch 3 Condition 18 above. No exceedances of environmental criteria were reported.	Not Triggered	
		(b) an exceedance of the relevant air quality criteria in Schedule 3, the Applicant shall send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and/or existing tenants of the land (including the tenants of any mine-owned.				Refer to Sch 3 Condition 18 above. No exceedances of air quality criteria were reported.	Not Triggered	
Sch 4 Cond 4	INDEPENDENT REVIEW	<p>If an owner of privately-owned land considers the development to be exceeding the criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.</p> <p>If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision, the Applicant shall:</p> <p>(a) commission a suitably qualified, experienced and independent expert, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"> • consult with the landowner to determine his/her concerns; • conduct monitoring to determine whether the development is complying with the relevant impact • assessment criteria in Schedule 3; and • if the development is not complying with these criteria then: <ul style="list-style-type: none"> ○ determine if more than one mine or development is responsible for 		Environment and Community Superintendent: No Independent Reviews were requested during the Audit Period.		No Independent Reviews were requested during the Audit Period.	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
		<ul style="list-style-type: none"> o the exceedance, and if so o the relative share of each mine or development regarding the impact on the land; and o identify the measures that could be implemented to ensure compliance with the relevant criteria; and 							
		(b) give the Secretary and landowner a copy of the independent review.		Environment and Community Superintendent: No Independent Reviews were requested during the Audit Period.		No Independent Reviews were requested during the Audit Period.	Not Triggered		
Sch 4 Cond 5	LAND ACQUISITION	<p>Within 3 months of receiving a written request from a landowner with acquisition rights, the Proponent shall make a binding written offer to the landowner based on:</p> <p>(a) the current market value of the landowner's interest in the land at the date of this written request, as if the land was unaffected by the project, having regard to the:</p> <ul style="list-style-type: none"> • existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and • presence of improvements on the land and/or any approved building or structure which has been physically commenced on the land at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the implementation of any additional noise mitigation measures under Condition 4 of Schedule 3; 		<p>Environment and Community Superintendent: The following acquisition have been completed:</p> <ol style="list-style-type: none"> 1. 40/51/Cr1 – L. Blanch 42 – D. Blanch purchased in previous audit period 2. 15(3) – Falla 31(1) – Isaac purchase during audit period 3. Boorer (CR2) existing Deed of Release with SCPL <p>No acquisitions have been made under SSD-4966 Schedule 4, Condition 5 – Land Acquisition. Both the Falla & Isaac purchases were made under private Compensation Deeds executed by the parties in 2012.</p>		No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered		
		(b) the reasonable costs associated with: <ul style="list-style-type: none"> • relocating within the Great Lakes or Gloucester local government areas, or to any other local government area determined by the Secretary; and • obtaining legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and 				No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered		
		(c) reasonable compensation for any disturbance caused by the land acquisition process.					No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered	
		However, if at the end of this period, the Proponent and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution.					No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered	
		Upon receiving such a request, the Secretary will request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to:					No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<ul style="list-style-type: none"> consider submissions from both parties; determine a fair and reasonable acquisition price for the land and/or the terms upon which the land is to be acquired, having regard to the matters referred to in paragraphs (a)-(c) above; prepare a detailed report setting out the reasons for any determination; and provide a copy of the report to both parties. Within 14 days of receiving the independent valuer's report, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination. 						
		<p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, they may refer the matter to the Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Secretary will determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in paragraphs (a)-(c) above, the independent valuer's report, the detailed report disputing the independent valuer's determination, and any other relevant submissions. Within 14 days of this determination, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the Secretary's determination. If the landowner refuses to accept the Proponent's binding written offer under this condition within 6 months of the offer being made, then the Proponent's obligations to acquire the land shall cease, unless the Secretary determines otherwise.</p>				No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered	
Sch 4 Cond 6		The Proponent shall pay all reasonable costs associated with the land acquisition process described in Condition 5 above, including the costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of this plan at the Office of the Registrar-General.				No acquisitions have been made under SSD-4966 Schedule 4, Condition 5	Not Triggered	
SCHEDULE 5 ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING								
Sch 5 Cond 1	ENVIRONMENTAL MANAGEMENT Environmental Management	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for	Stratford Mining Complex Environment Management Strategy, Version 3A, dated 2 July 2019. Letter from DPE (H Reed) to SCPL (M Plain)			DPE approved a revised management plan submission timing (refer Schedule 2 Condition 15).	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
	Strategy	approval within 3 months of the date of this approval, unless otherwise agreed by the Secretary;	titled "Stratford Extension Project (SSD-4966) Approval of Revised Management Plans", dated 2 November 2019. The letter documented DPE approval of the most recent revision of the EMS.			The required plan was prepared and approved by DPE.		
		(b) provide the strategic framework for the environmental management of the project;				Section 3.3 of the Environmental Management Strategy describes the Duralie Coal Mine Environmental Management Framework.	Complies	
		(c) identify the statutory approvals that apply to the project;				Section 2 of the Environmental Management Strategy details the statutory approvals that apply to the project.	Complies	
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;				Table 2 (Section 4) of the Environmental Management Strategy details site environmental roles and responsibilities.	Complies	
		(e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • respond to emergencies; and 				Section 57 describes the procedures for information dissemination. Section 6 describes the procedures for complaints management. Section 6 describes the dispute resolution process. Section 7 describes the procedures to be followed if non-compliance is recorded. Section 9 describes the emergency response procedures.	Complies	
		(f) include: <ul style="list-style-type: none"> • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring required to be carried out under the conditions of this approval. 				Copies of all Plans required under the Planning Approval are located on the Stratford Coal Complex website. Figure 3 (Section 3I in the EMS illustrates the location of the environmental monitoring points.	Complies	
Sch 5 Cond 2	Adaptive Management	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.	Incident Register. 2019 Stratford Mining Complex Annual Review. 2018 Stratford Mining Complex Annual Review.			Over the audit period blast overpressure exceedances were recorded. These were not blast non-compliances, as they related to blasts between 115-120dB(L) and represented less than the 5% allowance. SCPL records these events to allow for	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
		Where any exceedance of these criteria and/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;				continuous improvement, however this should not be reported as an exceedance. These exceedances did not result in damage to either mine owned or private property.			
		(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		Environment and Community Superintendent: There have been no directions incidents that have resulted in material environmental harm that have required remediation during the Audit Period.		There have been no directions incidents that have required remediation during the Audit Period.	Not Triggered		
		(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.		Environment and Community Superintendent: There have been no directions from DPE regarding site remediation.		There have been no directions from DPE regarding site remediation.	Not Triggered		
Sch 5 Cond 3	Management Plan Requirements	The Applicant shall ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data;				Refer to Section 7.4 of this report.	Complies		
		(b) a description of: <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures/criteria; 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 				Refer to Section 7.4 of this report.	Complies		
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;					Refer to Section 7.4 of this report.	Complies	
		(d) a program to monitor and report on the: <ul style="list-style-type: none"> impacts and environmental performance of the development; effectiveness of any management measures (see c above); 					Refer to Section 7.4 of this report.	Complies	
		(e) a contingency plan to manage any unpredicted impacts and their consequences;					Refer to Section 7.4 of this report.	Complies	
		(f) a program to investigate and implement ways to improve the environmental performance of the development over time;					Refer to Section 7.4 of this report.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		g) a protocol for managing and reporting any: <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and 				Refer to Section 7.4 of this report.	Complies	
		(h) a protocol for periodic review of the plan.				Refer to Section 7.4 of this report.	Complies	
Sch 5 Cond 4	Annual Review	By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must: <p>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p>	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			All Annual Reviews required for this Audit Period have been prepared and published on the Stratford Coal Mine website. Section 4 of the Annual Reviews describe the development. Section 12 of the Annual Reviews describe the activities proposed for the next audit period.	Complies	
		(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the EIS; 	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			Section 3 of the Annual Reviews describe the relevant regulatory requirements. Section 6 of the Annual Reviews present (and assess) the environmental monitoring undertaken during the reporting period. Assessments of the monitoring results against the general predictions in the EA are also provided in Section 6.	Complies	
		(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			Sections 1 and 11 of the Annual Reviews reports on incident and non-compliances.	Complies	
		(d) identify any trends in the monitoring data over the life of the development;	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			The Annual Reviews do not specifically report on trends in monitoring data over the life of the development.	Non-Compliance	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of trends in monitoring data over the life of the development.
		(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			The Annual Reviews do not specifically report on discrepancies between predicted and actual impacts.	Non-Compliance	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of predicted and actual environmental impacts.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Stratford Mining Complex Annual Review - 2019 Stratford Mining Complex Annual Review - 2018			The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance. It is noted however that SMC has demonstrated a long running good environmental performance and has rarely exceeded monitoring criteria and as such the statements regarding EIS comparisons are generally brief. Additionally, discrepancies between the EIS predictions have been uncommon and therefore limited opportunities for improvement have been required.	Non-Compliance	The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance. Note: where no non-compliances, monitoring exceedances or incidents have occurred during the relevant reporting period the Annual Review could note that no improvement initiatives are planned.
Sch 5 Cond 5	Revision of Strategies, Plans and Programs	Within 3 months of: (a) the submission of an annual review under Condition 4 above;	Stratford Mining Complex Environment Management Strategy, Version 3A, dated 2 July 2019.			There was no evidence available that any Management Plans were reviewed following the submission of the annual reviews.	Non-Compliance	Establish a register that records the reviews of all management plans (as evidence for future audits). Note: the review of each plan does not necessarily result in the revision of every plan. Where no changes to a plan are warranted, the register can note that the review was undertaken and no changes to the plan were required.
		(b) the submission of an incident report under Condition 7 below;				There was no evidence available that the Water Management Plan was reviewed following the incidents reported during this Audit Period. NOT VERIFIED	Non-Compliance	Establish a register that records the reviews of all management plans (as evidence for future audits).
		(c) the submission of an audit report under Condition 9 below; or	Stratford Mining Complex Environment Management Strategy, Version 3A, dated 2 July 2019.			The PRIMP was reviewed and revised every year following the annual PRIMP Audit (internal)	Complies	
		(d) any modification to the conditions of this consent, (unless the conditions require otherwise),				All Plans were reviewed and revised as a result of the commencement of mining works in new area (as a result of the most recent Approval Modification.	Complies	

PLANNING APPROVAL SSD-4966

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	Stratford Mining Complex Environment Management Strategy, Version 3A, dated 2 July 2019.			All Plans were reviewed and revised as a result of the commencement of mining works in new area (as a result of the most recent Approval Modification. Letters from DPIE approving the most recent versions of the Management Plans were sighted.	Complies	
Sch 5 Cond 6	Community Consultative Committee	The Applicant shall operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version).	http://www.stratfordcoal.com.au/page/community/	The CCC Chairperson was consulted as part of this IEA.		The CCC has been established. CCC meeting records are available on the Duralie Mine Website.	Complies	
Sch 5 Cond 7	REPORTING Incident Reporting	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Letter from SCPL (M Plain) to the EPA (E Coombs) titled "Report Ref: EPA 106955 – Stratford Coal Pty Ltd – Incident Reports", dated 11 February 2020. Letter from SCPL (M Plain) to the DPIE (J Curran) titled "Stratford Coal Pty Ltd – Incident Reports", dated 11 February 2020. Letter from SCPL (M Plain) to the EPA (E Coombs) titled "Report Ref: EPA C03889 - 2020 – Stratford Coal Pty Ltd – Incident Reports", dated 18 March 2020. Letter from SCPL (M Plain) to the DPIE (J Curran) titled "Stratford Coal Pty Ltd – Incident Report 11-03-20", dated 18 March 2020. Letter from DPE (L Sims) to SCPL (M Plain) titled "Stratford Extension Project (SSD 4966) – Official Caution" dated 15/2/2019. The letter directed SCPL to signpost the sensitive area (that was encroached upon) and/or identify that encroachment of that area is a risk in future haul road maintenance risk assessments. Master Incident No.20281 (Internal Incident Data Base) details the findings of the incident investigation relating to the Official Caution, and the remedial actions taken by SCPL.			Three incidents occurred during the reporting period. These were reported to DPIE in accordance with this Condition.	Complies	
Sch 5 Cond 8	Regular Reporting	The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs	2020_08 Stratford Report (C-Based Environmental Monthly Monitoring Report).		Ensure that sampling personnel complete all sampling information on the sampling sheets legibly.	Environmental monitoring results are published on the Stratford Coal Website and regularly updated. C-Based Environmental undertake	Complies	Refer to EPL Compliance Assessment.

PLANNING APPROVAL SSD-4966

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		approved under the conditions of this consent.			Ensure that future sampling reports and records incorporate the EPA sampling point designations.	<p>sampling and send samples to lab.</p> <p>SCPL use a consultant (C-Based Environmental) to undertake sampling and prepare a monthly report. The reports do not tally with the monitoring result spread sheet on the website. C-Based appear to using a different sampling point designation to that specified in the EPL.</p>		
Sch 5 Cond 9	INDEPENDENT ENVIRONMENTAL AUDIT	Prior to 31 December 2015, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	2017 Independent Environmental Audit. Letter from DPE (L Cook) to DCPL (M Plain) titled "Duralie Coal and Stratford Coal Independent Environmental Audit Team dated 13 November 2017. The letter approves the appointment of the audit team, including the nominated technical experts.			<p>The 2017 IEA was commissioned and completed within the timeframes required by this Condition.</p> <p>DPE endorsed the audit team on 13 November 2017.</p> <p>DPIE also provided a letter confirming the date for the IEA changed to 31 December 2020 from 2015 stated in the consent.</p>	Complies	
		(b) include consultation with the relevant agencies;	2017 Independent Environmental Audit.			The 2017 IEA included consultation with relevant agencies.	Complies	
		(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL/s and/or Mining Lease/s (including any assessment, plan or program required under these approvals);	2017 Independent Environmental Audit.			The 2017 IEA included the assessment of performance and compliance against the relevant NSW Statutory requirements.	Complies	
		(d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and	2017 Independent Environmental Audit.			The 2017 IEA included the review of all approved plans, strategies, and programs.	Complies	
		(e) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.	2017 Independent Environmental Audit.			The 2017 IEA included relevant recommendations for improvement.	Complies	
		<i>Note: This audit team must be led by a suitably qualified auditor, and include experts in noise, blasting, air quality, ecology, and any other fields specified by the Secretary.</i>	2017 Independent Environmental Audit.			DPE endorsed the audit team on 13 November 2017. The specific experts required by this Condition were included in the audit team.	Complies	
Sch 5 Cond 10		Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit	2017 Independent Environmental Audit.			The audit (on-site aspects) was completed on 14 December 2017. The report was issued by the Auditor in February 2018.	Complies	

PLANNING APPROVAL SSD-4966

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		report.						
Sch 5 Cond 10	ACCESS TO INFORMATION	<p>The Applicant shall:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • all current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, which is to be updated on a monthly basis; • minutes of CCC meetings; • the last five annual reviews; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; • any other matter required by the Secretary; and 	http://www.stratfordcoal.com.au/page/environment/			<p>All of the documents required by this Condition were available on the website at the time of this IEA. Specifically:</p> <ul style="list-style-type: none"> • the EIS and relevant statutory approvals; • all approved strategies, plans, programs and studies; • the monitoring results of the project; • complaints register; • CCC agenda papers and minutes; • the annual reviews; • IEAs, and • the Proponent's response to the recommendations in any audit report. 	Complies	
		<p>(b) keep this information up to date, to the satisfaction of the Secretary.</p>	http://www.stratfordcoal.com.au/page/environment/			<p>The documentation required by the Approval were up to date at the time of this IEA.</p>	Complies	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
A1.1	Administrative Conditions	Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. Coal Works 0 - 2,000,000 T annual handling capacity.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – The Coal Processing Plant processes coal from both the Duralie and Stratford mines. Over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years.		In 2017/8, 776,080 tonnes of ROM coal was processed, producing 631,768 tonnes of coal. In 2018/9, 1,259,995 tonnes of ROM coal was processed, producing 415,690 tonnes of coal. In 2019/20, 1,278,330 tonnes of ROM coal was processed, producing 763,749 tonnes of coal.	Complies	
		Mining of Coal > 5,000,000 - 20,000,000 T annual production capacity.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years. Mining Superintendent – Mining recommenced at Stratford in 2018 and about 1 million tonnes have been mined each year over the past three years.		Quantity mined over the Audit Period was: 2017/8 – 61,007 Tonnes 2018/9 – 568,649 Tonnes 2019/20 – 1,278,330 Tonnes	Complies	
A 1.2	What the licence authorises and regulates	The development consent for the premises notes that the licensee must not extract more than 2.6 million tonnes of Run of Mine (ROM) coal at the premises and must not process on site more than 5.6 million tonnes of ROM coal in any calendar year. For the purposes of this licence, the licensee must not: 1. Handle more than 2,000,000 tonnes of coal within any 12 month period.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – The Coal Processing Plant processes coal from both the Duralie and Stratford mines. Over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years.		In 2017/8, 776,080 tonnes of ROM coal was processed, producing 631,768 tonnes of coal. In 2018/9, 1,259,995 tonnes of ROM coal was processed, producing 415,690 tonnes of coal. In 2019/20, 1,278,330 tonnes of ROM coal was processed, producing 763,749 tonnes of coal.	Complies	
		2. Produce more than 2,000,000 tonnes of coal within any 12-month period.	Spreadsheet titled "8.1 Production Volumes 2021". The spreadsheet detailed monthly production (mining and processing) quantities at both the Duralie and Stratford mines from 2014 to October 2020. Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018	Interview – Superintendent Coal Plant – over recent years the mining and processing at both sites have been well below the allowable levels. Neither the Stratford nor Duralie mines have been in full production at any time over the past three years. Mining Superintendent – Mining recommenced at Stratford in 2018 and about 1 million tonnes have been mined each year over the past three years.		Quantity mined over the Audit Period was: 2017/8 – 61,007 Tonnes 2018/9 – 568,649 Tonnes 2019/20 – 1,278,330 Tonnes	Complies	
A2.1	Premises or plant to which this licence applies	The licence applies to the following premises: Stratford Coal Buckets Way Stratford NSW 2422					Noted	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
A3.1	Other Activities	This licence applies to all other activities carried on at the premises, including: Chemical Storage.					Noted	
A4.1	Information supplied to the EPA	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.					Noted	
P1.1	Discharges to Air and Water and Applications to Land Location of monitoring / discharge points	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. Air: EPA 13 PM10 Monitoring EPA 14 PM10 Monitoring EOA 27 PM10 Monitoring EPA 28 PM10 Monitoring EPA 29 PM10 Monitoring					Noted	
P1.2		The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.					Noted	
P1.3		The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. Water and Land: EPA 1 Surface Water Quality EPA 2 Surface Water Quality EPA 3 Surface Water Quality EPA 4 Surface Water Quality EPA 5 Surface Water Quality EPA 6 Surface Water Quality EPA 15 Groundwater Monitoring Bore EPA 17 Groundwater Monitoring Bore EPA 18 Groundwater Monitoring Bore EPA19 Groundwater Monitoring Bore EPA 20 Groundwater Monitoring Bore EPA 21 Groundwater Monitoring Bore EPA 22 Groundwater Monitoring Bore EPA 23 Groundwater Monitoring Bore EPA 24 Groundwater Monitoring Bore					Noted	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		EPA 25 Groundwater Monitoring Bore EPA 26 Groundwater Monitoring Bore EPA 33 Discharge Quality Monitoring EPA 34 Discharge Quality Monitoring EPA 35 Discharge Quality Monitoring EPA 36 Discharge Quality Monitoring EPA 37 Discharge Quality Monitoring EPA 38 Discharge Quality Monitoring EPA 39 Discharge Quality Monitoring EPA 40 Surface Water Quality EPA 41 Surface Water Quality						
P1.4		The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises. Noise / Weather: EPA 30 Meteorological Station EPA 31 Meteorological Station EPA 32 Meteorological Station					Noted	
L1.1	Limit Conditions Pollution of Waters	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Incident Register EPA Annual Return 2017 - 18 EPA Annual Return 2018 - 19 EPA Annual Return 2019 – 20 Letter from SCPL (J Cullen) to the NSW EPA (E Coombs) titled "RE: Stratford Coal Pty Ltd – Discharge Incident 10-03-20", dated 26 March 2020. The letter provides information requested by the EPA in response to the water discharge incident that occurred on 12 March 2020	Environment and Community Superintendent - Water discharges at Stratford are recorded in the incident register. Discharge related events are listed below. <ul style="list-style-type: none"> 7/2/2020 - Disturbed Area runoff from topsoil stripping area at Avon North Stage 4 9/2/2020 - Overflow of Rehab Sediment Dam (SD19) at Avon North. 9/2/2020 - Runoff from Stratford East Haul road construction breached bund reporting to Avondale Creek 11/3/2020 - Runoff from BRN waste emplacement reporting off Mining Lease - Uncontrolled discharge 		Four water discharge incidents were recorded in the Incident Register. Two incidents on 9 February 2020 (overflow of the Rehab sediment dam at Avon North and breach of bund at Stratford East Haul Road) and one on 11 March 2020 (runoff from the BRN emplacement). Two incidents were reported to DPIE and the EPA. The incidents resulted in the discharge of waters with elevated suspended solids content and while the impacts were negligible, the discharges do trigger the definition of "Pollution of Waters" i.e. introducing any matter into waters which changes the physical, chemical or biological condition of the water.	Non-Compliance	
L1.2		Adequate freeboard must be maintained at all times to all mine water storage dams, including the Stratford Main Pit and Stratford East Dam, to minimise the risk of discharge to surface waters.	Spreadsheet titled "Stratford Main Pit and Storage Dam Levels".	Environment and Community Superintendent - Water levels at Stratford are recorded monthly by the surveyor. Additionally, the Return Water Level is monitoring via Citect by the CHPP.	No water discharges occurred during this IEA.	SCPL survey water levels in the storage dams to ensure that adequate free board is maintained.	Complies	
L1.3		There must be no discharges to surface waters from mine water storage dams including the Stratford Main Pit and Stratford East Dam.	Incident Register	Environment and Community Superintendent – no discharges have occurred from the mine storage dams. The water discharge incidents resulted from rainfall events and surface run-off only.		No discharges have occurred from the mine water storage dams during the Audit Period.	Complies	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation																																			
L1.4		Following the cessation of mining activities there must be no discharge of mine water from the premises.				The mine was operating at the time of this IEA.	Not Triggered																																				
L2.1	Noise Limits	<p>Noise from the premises must not exceed:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day LAeq (15min)</th> <th>Evening LAeq (15min)</th> <th>Night LAeq (15min)</th> <th>Night LA1 (1min)</th> </tr> </thead> <tbody> <tr> <td>CR 7</td> <td>43</td> <td>43</td> <td>43</td> <td>49</td> </tr> <tr> <td>R 60</td> <td>39</td> <td>39</td> <td>39</td> <td>45</td> </tr> <tr> <td>R 44</td> <td>39</td> <td>39</td> <td>39</td> <td>47</td> </tr> <tr> <td>R23</td> <td>37</td> <td>37</td> <td>37</td> <td>45</td> </tr> <tr> <td>Stratford</td> <td>37</td> <td>36</td> <td>35</td> <td>45</td> </tr> <tr> <td>All Other</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table>	Location	Day LAeq (15min)	Evening LAeq (15min)	Night LAeq (15min)	Night LA1 (1min)	CR 7	43	43	43	49	R 60	39	39	39	45	R 44	39	39	39	47	R23	37	37	37	45	Stratford	37	36	35	45	All Other	35	35	35	45	<p>Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019</p> <p>Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring August 2020</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring September 2020</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020</p>	<p>Environment and Community Superintendent – In response to complaints received noise monitoring has been undertaken on three of the complainants’ property boundaries. Monitoring also undertaken at other locations.</p> <p>Refer to monthly noise reports. Additional real-time noise monitoring has also been undertaken on two properties. The EPA has undertaken an investigation regarding the one series of noise complaints as these makeup over 50% of the complaints received. The EPA has not requested any further action.</p> <p>Real-time noise monitoring is undertaken at Stratford village and Craven village. Real-time monitoring was also previously at two complainants’ properties.</p> <p>Real-time noise levels are reviewed following complaints. Attended noise monitoring is undertaken monthly.</p>		<p>All noise monitoring undertaken during the audit period found that the noise emissions from the mine met the relevant noise criteria with the following exceptions:</p> <ol style="list-style-type: none"> Daytime noise level exceeded criteria by 1dbA at the Atkins Property (owned by SCPL) in March 2019. Daytime noise level exceeded criteria at the Clarke Property (owned by SCPL) in July, August, September, October, November and December 2018. <p>The noise monitoring reports reviewed indicated that noise emissions met the requirements of this Condition at all private properties (other than two SCPL owned properties).</p>	Complies	
Location	Day LAeq (15min)	Evening LAeq (15min)	Night LAeq (15min)	Night LA1 (1min)																																							
CR 7	43	43	43	49																																							
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R 44	39	39	39	47																																							
R23	37	37	37	45																																							
Stratford	37	36	35	45																																							
All Other	35	35	35	45																																							
L2.2		<p>Noise from the premises is to be measured or computed at the most noise-affected point at the property boundary of the receptors listed in L2.1, or a distance within 30 metres of the residence where the boundary is more than 30 metres from the residence of the most affected receiver to determine compliance with this condition.</p> <p>For the purpose of noise measures required for this condition, the LAeq noise level must be measured or computed for the required period (ie, 15 minutes or full day, evening or night) using "FAST" response on the sound level meter.</p> <p>For the purpose of the noise limits for this condition, 5 dB (A) must be added to the measured level if the noise is substantially tonal, impulsive, intermittent or low frequency in nature. Where two or more of these characteristics are present the maximum addition to the measured noise level is limited to 10dB(A).</p>	<p>Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.</p>			<p>SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website.</p> <p>Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR.</p> <p>The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.</p>	Complies																																				

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L2.3	Noise Limits	The noise limits set out in the Noise Limits table apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Temperature inversion conditions up to 3°C/100m and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Greater than 3°C/100m temperature inversion conditions.	Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.			SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website. Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR. The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.	Complies	
L2.4		For the purposes of the previous condition: a) The meteorological data to be used for determining meteorological conditions is the data recorded by the meteorological weather stations established for this premises for the purposes of this EPL. b) Temperature inversion conditions on this premises are measured using the meteorological stations depicted as "Inversion Tower - Lower" and "Inversion Tower - Upper" on plan titled "Stratford Mining Complex EPL 5161 - Environmental Monitoring Locations" dated 8 June 2018. EPA reference DOC18/13944-06. c) Degrees C/100m temperature inversion conditions are to be determined by direct measurement of temperature lapse rate as referred to in Part E2 of Appendix E to the Industrial Noise Policy. d) Temperature lapse rate must be measured over a minimum of 50 metre interval.	Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.			SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website. Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR. The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.	Complies	
L2.5		For the purposes of determining the noise generated at the premises Class 1 or Class 2 noise monitoring equipment, as defined by AS IEC61672.1-2004 and AS IEC61672.2-2004, or other noise monitoring equipment accepted by the EPA, must be used.	Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.			SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website. Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR. The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.	Complies	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
L2.6		<p>To determine compliance:</p> <p>a) with the Leq(15 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located:</p> <p>i) approximately on the boundary where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or</p> <p>ii) within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable</p> <p>iii) within approximately 50 metres of the boundary of a National Park or a Nature Reserve.</p> <p>b) with the LA1(1 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located within 1 metre of a dwelling façade.</p> <p>c) the noise measurement equipment must be located in a position that is:</p> <p>i) at the most affected point at a location where there is no dwelling at the location; or</p> <p>ii) at the most affected point within an area at a location prescribed by part (a) or part (b) of this condition.</p>	<p>Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.</p>			<p>SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website.</p> <p>Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR.</p> <p>The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.</p>	Complies	
L2.7		<p>An exceedance of a noise limit prescribed in this licence will still occur where noise generated from the premises in excess of the appropriate limit specified in the Noise Limits Table is detected:</p> <p>a) in an area at a location other than an area prescribed by the condition above and/or;</p> <p>b) at a point other than the most affected point at a location.</p>	<p>Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.</p>			<p>SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website.</p> <p>Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR.</p> <p>The noise monitoring and assessment methodology is consistent with the requirements of Licence Conditions of L2.2 to L2.8.</p>	Complies	
L2.8		<p>For the purposes of determining the noise generated at the premises the modification factors in Noise Policy for Industry (2017) Fact Sheet C must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.</p>	<p>Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants.</p> <p>Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.</p>			<p>SLR Consultants undertook the noise monitoring at Stratford required during the Audit Period. The Monthly noise monitoring reports have been uploaded to the Stratford Coal Mine Website.</p> <p>Section 3 of the Monthly Noise Monitoring Reports present the Noise Monitoring Methodology used by SLR.</p> <p>The noise monitoring and assessment methodology is</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						consistent with the requirements of Licence Conditions of L2.2 to L2.8.		
L3.1	Blasting	The overpressure level from blasting operations carried out in or on the premises must not exceed 115 dB(L) for more than 5% of the total number of blasts carried out on the premises within the 12 months annual reporting period	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – Production (and blasting) recommenced at Stratford in September 2018.		In 2018 no blasting occurred before 14 September. Nineteen blasts were undertaken between 14 Sept and 30 December 2018. One vibration exceedance (117 db(Lin Peak) was detected on 14 September. That exceedance represents 5% of the total number of blasts and therefore is not a non-compliance. During 2019 eighty-three blasts were undertaken. Two blasts (8 Feb and 10 Dec) recorded exceedances of the 115db limit (<5% of total blasts). During 2020 (to 25 November) ninety-four blasts were undertaken. No vibration exceedances were recorded.	Complies	
L3.2		The airblast overpressure level from blasting operations in or on the premises must not exceed 120 dB(L) at any time at any residence or noise sensitive location (such as a school or hospital) that is not owned by the licensee or subject of a private agreement between the owner of the residence or noise sensitive location and the licensee as to an alternative overpressure level.					Complies	
L3.3		The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed 5mm/second for more than 5% of the total number of blasts carried out on the premises within the 12 months annual reporting period.					Complies	
L3.4		The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed 10mm/second at any time at any residence or noise sensitive location (such as a school or hospital) that is not owned by the licensee or subject of a private agreement between the owner of the residence or noise sensitive location and the licensee as to an alternative ground vibration level.					Complies	
L3.5		The Licensee must not carry out more than: a) 1 blast on each day unless an additional blast is required due to a misfire; and b) 3 blasts a week, averaged over a calendar year.					Complies	
L3.6		Blasting operations at the premises may only take place between 9am and 5pm Monday to Saturday inclusive. No blasting is to be undertaken on Sundays or Public Holidays. Where compelling reasons exist the EPA may approve in writing a blast to occur outside the abovementioned hours.					Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation												
L3.7		<p>Offensive blast fume must not be emitted from the premises.</p> <p><i>Definition:</i> <i>Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances:</i></p> <p><i>1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted,</i> <i>or</i> <i>2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.</i></p>	<p>Stratford Mining Complex Blast Management Plan, Revision 3, dated 17 June 2019.</p> <p>Incident Register – Blast Flume visible 22/3/19, 29 /3/ 19, and 18/8/19.</p> <p>Complaints Register – blast related complaints were received on 8/02/19, 15/02/19, 10/12/19 (two complaints), 17/8/20, 4/9/20, 2/10/20, 8/10/20.</p>			<p>Six incidents relating to blasting and eight blasting complaints were received during the audit period. No exceedances of blast criteria were measured.</p> <p>No instances of residence or infrastructure damage were recorded during the audit period.</p> <p>Three instances of visible flume were recorded as incidents, and one complaint referenced blasting dust. The video recording of the blast showed no dust / flume left the mine lease.</p> <p>All complaints and incidents were investigated.</p>	Complies													
L4.1	Hours of Operation	<p>The Licensee shall comply with the operating hours identified below:</p> <table border="1"> <tr> <td>Open cut mining operations in the Bowens Road North and Roseville West Extension pits.</td> <td>07:00 to 18:00, 7 days per week</td> </tr> <tr> <td>Recovery and transport of CHPP rejects for reprocessing.</td> <td>07:00 to 18:00, 7 days per week</td> </tr> <tr> <td>Construction of the noise mitigation bunds on the western side of the Avon North, Roseville West Extension and Stratford East pits.</td> <td>07:00 to 18:00, 7 days per week</td> </tr> <tr> <td>Open cut mining operations in the Avon North and Stratford East pits.</td> <td>24 hours a day, 7 days per week</td> </tr> <tr> <td>Coal processing, loading and dispatch of product coal trains.</td> <td>24 hours a day, 7 days per week</td> </tr> <tr> <td>Maintenance activities.</td> <td>24 hours a day, 7 days per week</td> </tr> </table>	Open cut mining operations in the Bowens Road North and Roseville West Extension pits.	07:00 to 18:00, 7 days per week	Recovery and transport of CHPP rejects for reprocessing.	07:00 to 18:00, 7 days per week	Construction of the noise mitigation bunds on the western side of the Avon North, Roseville West Extension and Stratford East pits.	07:00 to 18:00, 7 days per week	Open cut mining operations in the Avon North and Stratford East pits.	24 hours a day, 7 days per week	Coal processing, loading and dispatch of product coal trains.	24 hours a day, 7 days per week	Maintenance activities.	24 hours a day, 7 days per week	<p>Complaints Register</p> <p>Incident Register</p>	<p>Environment and Community Superintendent – Day works commenced in April 2018. Evening shift commenced in October 2018. BRN and Roseville are operated on day shift only (7am-5:30pm). Other areas operate between 6:30am-1:00am. Generally no Sunday work.</p> <p>Coal Plant Superintendent - Since the recommencement of mining at Stratford, maximum annual production (mining) has been less than 1.2 million tonnes. The operation is running below capacity.</p>		<p>No complaints were received relating to out of hours operation during the audit period.</p> <p>No out of hours incidents were recorded during the audit period.</p>	Complies	
Open cut mining operations in the Bowens Road North and Roseville West Extension pits.	07:00 to 18:00, 7 days per week																			
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Coal processing, loading and dispatch of product coal trains.	24 hours a day, 7 days per week																			
Maintenance activities.	24 hours a day, 7 days per week																			
L5.1	Potentially Offensive Odour	<p>The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.</p>	<p>Complaints Register</p> <p>Incident Register</p>		<p>No offensive odours were detected during the IEA site inspections.</p>	<p>A review of the complaints register and incident register indicated that no instances of offensive odour emission have occurred during the Audit Period.</p>	Complies													
L5.2		<p>No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.</p>					Noted													

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
O1.1	Operating Conditions	Licensed activities must be carried out in a competent manner. This includes:	Complaints Register		During the site inspections undertaken on 1 and 2 December the Auditor did not identify any circumstances where reasonable and feasible environmental controls were not being implemented.	All reasonable and feasible measures were being implemented to minimise the potential for environmental harm.	Complies	
	Activities must be carried out in a competent manner	a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	Incident Register	Environment and Community Manager: JR Richards is contracted to manage all wastes at Duralie.	JR Richards waste bins were sighted. All waste handling areas were tidy and well maintained.	All wastes generated are managed by JR Richards and disposed of in accordance with EPA requirements.	Complies	
O2.1	Maintenance of plant and equipment	All plant and equipment installed at the premises or used in connection with the licensed activity:	Maintenance records (sampled) located on the SAP system.	Maintenance Superintendent – Maintenance at both mines (Duralie and Stratford) is undertaken by the same team. A comprehensive maintenance management system is in use.	The Maintenance Superintendent demonstrated the SAP maintenance scheduling and management system. Maintenance areas (both Stratford operated, and contractor operated. All plant and equipment (including environmental monitoring equipment sighted by the Auditor appeared to be operable and appropriately maintained.	Stratford operates an appropriate maintenance management, tracking and scheduling system.	Complies	
		b) must be operated in a proper and efficient manner.	Incident Register		All activities observed during the audit were being undertaken in a reasonable and appropriate manner.	No incidents recorded indicated that plant and equipment was not being operated in a proper and efficient manner.	Complies	
O3.1	Dust	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019 Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018 Spreadsheet titled "EPL 5161 (Stratford Mining Complex) Monitoring Data - Stratford Extension Project (31).exe". The spreadsheet recorded environmental monitoring results (air, noise, blasting, water) for the audit period.	Environment and Community Superintendent – No exceedances of dust levels were detected during the audit period. However elevated levels were detected (above the approval criteria) in 2019 during the bushfires. No exceedances due to mining operations have been detected.		No dust exceedances were due to mining operations were reported during the audit period. Note that between 29 October and 16 December 2019 PM10 levels measured exceeded the 50mg/m ³ criteria. The elevated levels were caused by the widespread bushfires, not the mining operations.	Complies	
O3.2		All trafficable areas, coal storage areas and vehicle manoeuvring areas in or on the premises must be maintained, at all times, in a condition that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.			During the IEA site inspections trafficable areas, including workshop forecourts, storage areas, internal roads, active mining and waste emplacement areas were being serviced by water carts. No uncontrolled dust emissions were observed.	During the IEA site inspections are reasonable and feasible dust mitigation measures were being implemented.	Complies	
O3.3		The licensee must ensure that it has sufficient water for all stages of the operations, and if necessary, adjust the scale of the operations on site to match its available water supply.	2019 Annual Review Water Balance Water Licenses: WAL 41534, WAL 41535, WAL 41536, WAL 41537, WAL 4153			At the time of the audit, water storages at the mine contained significant water.	The Stratford Coal Complex operates with a water surplus.	Complies

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation	
O4.1	Emergency Response	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.	Stratford Mining Complex Pollution Incident Response Management Plan, Revision 7, dated November 2018.			The PIRMP has been prepared and implemented.	Complies		
O4.2		The licensee must always keep the incident response plan on the premises. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.				The PIRMP is available at all times on the Stratford Coal Mine website. The PIRMP document systems and procedures to deal with all types of incidents that could occur, and which are likely to cause harm to the environment	Complies		
O4.3		The PIRMP must be tested at least annually or following a pollution incident.	Incident Register				The SMC PIRMP was not tested within 1 month of the plan being triggered by pollution incidents on 09/02/20 and 11/03/20.	Non-Compliance	Ensure that the PIRMP is tested within one month of any incident that triggers the implementation of the PIRMP.
O5.1	Stormwater Management	The licensee must maximise the diversion of clean water around disturbed areas of the site.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan.			The surface water management infrastructure was inspected during the IEA. The system diverts clean water around disturbed areas.	Complies		
		The licensee must design, install and maintain the clean water system to capture and convey the 1 in 100 year ARI flood.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Avondale Creek Flood Model Review - Final Report J0208-35.11c Lemon Tree Creek (Tributary of Avondale) cross sections Avon North Sediment Basin Design - Oct 2018 Avon North Clean Water Diversion Drain Design Mar 2018 Stratford East Clean Water Drain Design Stratford East CWD design check - specifications			Dirty water diversions berms and channels have been installed to segregate clean and dirty water on-site.	The Surface Water Management plan refers in Table 8 to diversion drain design capacity to meet 1:20 AEP Peak Flow. Design reports and specification confirm that: Temporary Diversion drains have been designed to reduce runoff from undisturbed areas onto disturbed areas for 1:20 AEP peak flow. Permanent Diversion drains have been designed to reduce runoff from undisturbed areas onto disturbed areas for 1:100 AEP peak flow.	Complies	
		The drainage from all areas at the premises which will liberate suspended solids when stormwater runs over these areas must be diverted into adequately sized sedimentation basins.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan.			The surface water management infrastructure was inspected during the IEA. The system diverts clean water around disturbed areas and into temporary sedimentation basins.	Section 6 of the Surface Water Management Plan describes the water management system and sedimentation basin design.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		The sedimentation basins must be maintained to ensure that their design capacity is available for the storage of all runoff from cleared areas; all runoff from coal stockpiles and other contaminated areas.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan. Site inspection records.		The surface water management infrastructure was inspected during the IEA. Sedimentation basins sightings.	Section 6 of the Surface Water Management Plan describes the water management system and includes the clean water diversion system and sediment basin management. The environment team and the OCE inspect and report on operation and maintenance of the surface water management system weekly.	Complies	
O5.5	Waste Management	The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored at the premises is assessed and classified in accordance with the NSW EPA Waste Classification Guidelines as in force from time to time.	Total Waste Management Report Stratford Coal	Environment and Community Superintendent - All waste streams from Stratford and Duralie are managed under a group contract with JR Richards.		JR Richards manage all aspects of waste collection, classification and disposal and provide SCPL with a detailed monthly report.	Complies	
O5.6		The licensee must ensure that waste identified for recycling is stored separately from other waste.			Waste storage bins (JJ Richards) were observed. JJ Richards supply sufficient bins for the segregation of recyclable materials from the waste stream. The waste storage areas inspected were tidy and well maintained. Recyclable materials were being segregated at the time of the IEA site inspections.	Recyclable materials were segregated and stored appropriately.	Complies	
O6.1	Other Operation Conditions Mine Waters Irrigation	The irrigation system must be installed, maintained and operated to ensure that any runoff as a result of rainfall reports to the mine-water dam known as Stratford East Dam.	Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan.		Irrigation areas were inspected. The location of the area is in accordance with the Surface Water Management Plan.	Section 7.10 of the Surface Water Management Plan describes the location of the irrigation areas and drainage. Irrigation area drainage reports to the Stratford East Dam	Complies	
O6.2		Application of wastewaters must only be applied at a rate that can be assimilated by the irrigation area and its evapotranspiration capacity.	Incident Register	Environment and Community Superintendent - There has been no irrigation at Stratford since Sep 2018. Previous irrigation occurred only on the Stratford Waste emplacement. All runoff reports to Stratford East Dam.	No irrigation was being undertaken at the time of this IEA site inspection. No evidence of erosion from over irrigation was observed.	No evidence of over irrigation was found during this IEA.	Complies	
O6.3		There must be no ponding or runoff from the irrigation area as a result of the application of mine wastewaters.	Incident Register		No irrigation was being undertaken at the time of this IEA site inspection. No evidence of erosion from over irrigation was observed.	No evidence of over irrigation was found during this IEA.	Complies	
O6.4		Each irrigation pump must be fitted with a flow meter capable of indicating both total and event mine wastewater volumes applied to the irrigation area.					Complies	
O6.5		The licensee must record the amount of wastewater applied by each irrigation event. The application rate, the start and stop dates and times, and weather conditions, including rainfall, temperature and humidity, must be recorded.					Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
O6.6	Bunding	All above-ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.			All hazardous liquids, including fuels and oils, were storage in appropriately bunded areas that are compliant with AS1940.	All hazardous liquids were storage in appropriately bunded areas.	Complies	
O6.7		Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.			All hazardous liquids, including fuels and oils, were storage in appropriately bunded areas that are compliant with AS1940. Bulk Diesel is stored in self bunded (purpose built) storage tanks.	All hazardous liquids were storage in appropriately bunded areas or self-bunded containers.	Complies	
O6.8	Noise	The licensee must: (a) implement best management practice to minimise the construction, operational, road and rail noise of the development;	Complaints Register Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.	Environment and Community Superintendent – as a result of complaints received the following best practice actions have been implemented: 1. Noise mitigation measures are listed in the noise Management Plan. 2. XQ mobile plant, restricted operating hours in certain areas, no elevated dozer works during night hours, dozers limited to first gear in elevated areas. 3. During winter trucks were restricted to only tipping in-pit prior to 8am. No tipping on elevated waste dumps at night-time at BRN.		Stratford has prepared and implemented a Noise Management Plan that describes the noise management strategies. While there have been noise related complaints during the audit period, the noise monitoring undertaken by independent consultants indicates that the mine is complying with the noise criteria specified in the Approval.	Complies	
		(b) in accordance with documentation produced for the Stratford Extension Project (SSD-4966), dozers operating in specific areas must be restricted to certain gears at night.	Complaints Register Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.	Environment and Community Superintendent – XQ mobile plant, restricted operating hours in certain areas, no elevated dozer works during night hours, dozers limited to first gear in elevated areas.		Dozers are restricted to first gear during nighttime operations.	Complies	
		(c) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this licence; and	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019: <ul style="list-style-type: none">Section 7.3 Real Time Noise MonitoringSection 7.5 Meteorological Monitoring and Forecasting Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2019		The Auditor was provided with a demonstration of the Sentinex system that provides: Integrated Monitoring Stations <ul style="list-style-type: none">2 x real-time noise monitors1 x weather station2 x inversion towers	The Noise Management Plan describes the noise monitoring and meteorological monitoring and forecasting undertaken. Records of noise and meteorological monitoring and	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		<p>(d) minimise the noise impacts of the development during meteorological conditions under which the noise limits in the licence do not apply.</p> <p><i>NOTE: In addition to the real-time monitoring installed at Stratford and Craven villages the licensee must install real-time noise monitors to measure noise impacts in the vicinity of Receiver 23-Bagnall and Receiver 60-Healy/Greenwood during periods when noise impacts from waste rock dumping is predicted to approach noise limits.</i></p>	Stratford Mining Complex Annual Review 1 Jan 2019 to 31 December 2018		<p>System Settings</p> <ul style="list-style-type: none"> Real-time logging of noise and meteorological data Alarm functionality for the real-time noise trigger limits in the NMP Section 7.3.3 (examples attached) Alarm functionality for exempt meteorological conditions as per SSD-4966 Appendix 6 (examples attached) Daily forecasting reports for weather, noise and dust. (examples attached) <p>Realtime Noise Response Protocol (as per NMP section 7.3.4)</p> <ul style="list-style-type: none"> Alarms sent by email and SMS Response recorded in daily shift reports (examples provided) All information recorded in the Real-time noise response register and adverse weather conditions register (available on website) <p>Predictive forecasting System</p> <ul style="list-style-type: none"> Daily forecasting reports for weather, noise and dust are emailed prior to each shift (examples sighted) Proactive management measures are record in daily shift reports. 	forecasting have been sighted by the auditor.	Complies	
O6.9	Record of Actions to Reduce Noise	<p>The licensee must record and make available on its website:</p> <p>(a) when the real-time monitoring and management system detects any potential exceedance of the noise limits;</p> <p>(b) when exemptions from noise limits due to meteorological conditions apply; and</p> <p>(c) the specific reasonable and feasible measures that were taken when either (a) or (b) apply.</p>	<p>http://www.stratfordcoal.com.au/page/environment/monitoring-results/</p>			Records of actions taken to reduce noise (in accordance with this licence condition) are available of the Stratford Coal Mine website.	Complies	
O6.10		All necessary noise amelioration measures detailed in the Stratford Extension Project SSD-4966 documentation, for example construction of noise bunds in specific	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.	<p>Environment and Community Superintendent -</p> <ul style="list-style-type: none"> Introduction of XQ mobile fleet 		Noise Bunds have been installed.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		locations, must be implemented prior to activities being undertaken in these areas.		including trucks and dozers completed				
O6.11		<p>To reduce noise from mobile fleet and conveyors, prior to the Stratford Extension Project commencing the fleet and conveyors must be upgraded as detailed in Table 27 of Stratford Extension Project Environmental Impact Statement – Appendix C – Noise and Blasting Assessment (SLR Consulting 2012).</p> <p><i>Note: The abovementioned measures were identified by the proponent as feasible and reasonable measures to reduce noise levels to meet criteria.</i></p>	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019.	<ul style="list-style-type: none"> Operational hour restrictions have been complied with Implemented real-time noise system Implemented predictive forecasting reports Acoustic bunds have been constructed on hauls including the new Stratford East Haul Rd and Main Haul road. Avon North haul road shielded by waste emplacement. XQ conveyer drives and idlers installed. 		Introduction of XQ mobile fleet including trucks and dozers completed.	Complies	
O6.12		<p>The licensee must:</p> <p>a. conduct an annual testing program of the mobile equipment on site to ensure that noise attenuation measures remain effective; b. restore the effectiveness of any noise attenuation if it is found to be defective; and c. report on the results of any testing and/or attenuation work within the fourth quarter noise report submitted to the EPA (required by Condition R4.1).</p> <p><i>Note: The abovementioned measures were identified by the proponent as feasible and reasonable measures to reduce noise levels to meet criteria.</i></p>	<p>Caterpillar D10T2 Stratford Coal Unit 215 Sound Power by sound pressure level and operator noise exposure assessment. Report by Global Acoustics Pty, dated 4 February 2019.</p> <p>Hitachi EWX2600 Stratford Coal Unit 6 Sound Power by sound pressure level and operator noise exposure assessment. Report by Global Acoustics Pty, dated 18 February 2019.</p> <p>Stratford Mining Complex Plant and Equipment Sound Power Level Testing -2020. Report by SLR dated 10 December 2020.</p>			Plant and equipment testing is undertaken annually in accordance with this Condition.	Complies	
O6.13	Potential Acid Forming (PAF) Waste Rock	Waste rock must be assessed to determine if it is Potential Acid Forming (PAF). PAF waste rock must be segregated, handled and disposed so as to mitigate against acid formation and pollution of waters.	<ul style="list-style-type: none"> Stratford Mining Complex (Stratford Extension Project) Water Management Plan, Revision 3, dated 2 July 2019. Appendix 2 Surface Water Management Plan. <p>PAF Management Procedure slides (internal training resources)</p>	<p>Environment and Community Superintendent –</p> <ul style="list-style-type: none"> PAF management is described in the SWMP Section 7.2 The Stratford Extension Project EIS Geochemistry Assessment 2012 provides a description of waste rock materials. PAF material is only associated with the Stratford East Open Cut. All other mining areas are mostly NAF. A PAF model has been prepared for the Stratford East Open Cut PAF waste rock material is segregated and selectively handled and then placed in either in-pit (below the predicted final water table recovery level) or out-of-pit waste rock emplacements (PAF waste cells). Initial PAF from Stratford East will be placed in an out-of-pit PAF Cell in the Eastern Emplacement Area. 		<p>Section 7.2 of the Surface Water Management Plan describes the PASS management approach. PASS storage areas appropriately designed.</p> <p>Training provided to plant operators in PASS management.</p>	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
				<ul style="list-style-type: none"> PAF Cell design prepared by Xenith and ATC Williams. PAF Cell construction commenced in 2020 followed by placement of PAF material. (Design report in separate email.) In-pit backfilling of PAF in the Stratford East Open Cut will commence this year (2021). PAF horizon for Stratford East Open Cut is attached.				
O6.14		PAF material must not be disposed above groundwater level without EPA specifically approving in writing the location and design of the out-of-pit PAF waste cells.	Letter from SCPL (M Plain) to EPA (C Hjek) titled "Stratford Mining Complex – EPL 5161 – Application for out-of-pit PAF waste cell – Request for additional information", dated 6 October 2020.	Environment and Community Superintendent – Whilst all information has been provided to the EPA, the EPA is yet to formally approve the PAF Cell. The PAF Cell design was originally submitted in Jan 2020.		SCPL has sought EPA Approval for the out-of-pit PAF storage cell.	Complies	
M1.1		The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	http://www.stratfordcoal.com.au/page/environment/monitoring-results/			Sampling and testing results required by the EPL are provided in a spreadsheet titled EPL 5161 (Stratford Mining Complex) Monitoring Data (31)-1, that is located on the Stratford Coal Mine Website.	Noted	
M1.2	Monitoring and Reporting Conditions Monitoring Records	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form;	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ 2020_08 Stratford Report (C-Based monthly monitoring report). 2020_09 Stratford Report (C-Based monthly monitoring report). 2020_010 Stratford Report (C-Based monthly monitoring report).			The sampling data spreadsheet (refer M1.1) is accessible and legible. Monthly reports that contain the sampling related data required by Conditions M1.1 to M 1.3 are prepared for SCPL by a consultant. Sampling information (for example identification of sampling personnel) is handwritten on to sampling forms at are appended to each report. A review of three of these reports found that information on these sampling sheets was often illegible.	Non-Compliance	Ensure that sampling personnel carefully complete the sampling Sheets so that all information required by the EPL is legible.
		b) kept for at least 4 years after the monitoring or event to which they relate took place; and	http://www.stratfordcoal.com.au/page/environment/monitoring-results/			The sampling data spreadsheet (refer M1.1) contains monitoring data from 2014.	Complies	
		c) produced in a legible form to any authorised officer of the EPA who asks to see them.	http://www.stratfordcoal.com.au/page/environment/monitoring-results/			The sampling data spreadsheet (refer M1.1) is accessible to any member of the public.	Complies	
M1.3		The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken;	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ 2020_08 Stratford Report (C-Based monthly monitoring report).			The sampling data spreadsheet (refer M1.1) provides the date on which each sample was taken.	Complies	
		b) the time(s) at which the sample was collected;	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ 2020_08 Stratford Report (C-Based monthly			C-Based Environmental's monitoring reports identify the day and time that samples were collected.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation																								
			monitoring report).																													
		c) the point at which the sample was taken; and	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ 2020_08 Stratford Report (C-Based monthly monitoring report).			The sampling data spreadsheet (refer M1.1) identifies the specific sampling points.	Complies																									
		d) the name of the person who collected the sample.	http://www.stratfordcoal.com.au/page/environment/monitoring-results/ 2020_08 Stratford Report (C-Based monthly monitoring report).			C-Based Environmental's monitoring reports identify the name of sampling personnel (handwritten on the sampling sheets that are appended to each report.	Complies																									
M2.1	Monitoring Requirements	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns: <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit</th> <th>Frequency</th> <th>Method</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Pollutant	Unit	Frequency	Method								Noted																		
Pollutant	Unit	Frequency	Method																													
M2.2	Air Monitoring Requirements	EPA Points 13, 14, 28, 29 <table border="1"> <thead> <tr> <th>PM10</th> <th>mg/m³</th> <th>every 6 days</th> <th>AM-18</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PM10	mg/m ³	every 6 days	AM-18					Spreadsheet (downloaded from Stratford Coal Mine website) titled "EPL 5161 (Stratford Mining Complex) Monitoring Data – Stratford Extension Project(31)". Stratford Mining Complex 2018 Annual Review. Stratford Mining Complex 2019 Annual Review.	Stratford TEOM, Point 27 was out for a period in March 2019. The TEOM outage was due to an air conditioner fault, which prevented the TEOM from running consistently during the warmer part of the day. The air conditioner was replaced as soon as possible.	Samples were collected and analysed every six days as required by this Condition.	Complies																		
		PM10	mg/m ³	every 6 days	AM-18																											
EPA Point 27 <table border="1"> <thead> <tr> <th>PM10</th> <th>mg/m³</th> <th>continuous</th> <th>AM-22</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PM10	mg/m ³	continuous	AM-22					The continuous dust monitor was operational for more than 99% of the Audit Period. However, it was not operational for two days in March 2019 due to equipment failure.	Non-Compliance	No recommendation required as the TEOM was replaced as soon as was possible to do so.																					
PM10	mg/m ³	continuous	AM-22																													
M2.3	Water Monitoring Requirements Testing Methods	EPA Points 1, 2, 3, 4, 5, 6, 40, 41 <table border="1"> <thead> <tr> <th>pH</th> <th>pH</th> <th>monthly</th> <th>Grab</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <th>TSS</th> <th>mg/l</th> <th>monthly</th> <th>Grab</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <th>Turbidity</th> <th>NTU</th> <th>monthly</th> <th>Grab</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	pH	pH	monthly	Grab					TSS	mg/l	monthly	Grab					Turbidity	NTU	monthly	Grab					Spreadsheet (downloaded from Stratford Coal Mine website) titled "EPL 5161 (Stratford Mining Complex) Monitoring Data – Stratford Extension Project(31)". Stratford Mining Complex 2018 Annual Review. Stratford Mining Complex 2019 Annual Review.			Monthly samples were collected when water was flowing at these surface water sampling points (the sampling points were dry for the majority of the Audit Period). All samples were tested in accordance with this Condition.	Complies	
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EPA Points 2, 5 <table border="1"> <thead> <tr> <th>Conductivity</th> <th>uS/cm³</th> <th>Continuous</th> <th>Grab</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Conductivity	uS/cm ³	Continuous	Grab					Monthly samples were collected when water was flowing at these surface water sampling points (the sampling points were dry for the majority of the Audit Period). All samples were tested in accordance with this Condition.	Complies																						
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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation								
		<p>EPA Points 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26</p> <table border="1"> <tr> <td>Conductivity</td> <td>uS/cm³</td> <td>6 Monthly</td> <td>Grab</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>6 Monthly</td> <td>Grab</td> </tr> </table>	Conductivity	uS/cm ³	6 Monthly	Grab	pH	pH	6 Monthly	Grab	<p>Spreadsheet (downloaded from Stratford Coal Mine website) titled "EPL 5161 (Stratford Mining Complex) Monitoring Data – Stratford Extension Project(31)".</p> <p>2020_08 Stratford Report (C-Based monthly monitoring report).</p>			<p>Less than required pH and Conductivity samples analysed for Groundwater Monitoring Requirements at Point 15 and Point 17. Two samples required during the reporting and only one sample was analysed.</p>	Non-Compliance	<p>Ensure that future sampling reports and records incorporate the EPA sampling point designations.</p>
Conductivity	uS/cm ³	6 Monthly	Grab													
pH	pH	6 Monthly	Grab													
M2.4		<p>In the event that rainfall on the premises exceeds 25 millimeters in any 24 hour period, the Licensee must as soon as is practicable after the rainfall event is recorded:</p> <p>a) monitor the surface water quality at monitoring points 1, 2, 3, 4, 5, 6, 40 and 41 for each of the parameters referred to in condition M2.3.</p> <p>For the purposes of this condition, a maximum of one rainfall event sample, at each of the above sites, is required in any 21 day period.</p>	<p>Spreadsheet (downloaded from Stratford Coal Mine website) titled "EPL 5161 (Stratford Mining Complex) Monitoring Data – Stratford Extension Project(31)".</p> <p>2020_08 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_09 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_10 Stratford Report (C-Based monthly monitoring report).</p>			<p>A review of the surface water monitoring records showed that "Event" sampling was undertaken at Sampling Points 1, 2, 3, 4, 5, 6, 40 and 41.</p>	Complies									
M3.1	Testing Methods – concentration limits	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p>	<p>2020_08 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_09 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_10 Stratford Report (C-Based monthly monitoring report).</p>			<p>Monthly sampling reports (C-Based Environmental) record air quality sampling undertaken. The reports state that all Sampling and analysis is conducted to Australian Standards "AS3580.9.6 "Methods for Sampling and Analysis of Ambient Air. Determination of Suspended Particulates—PM10 High Volume Air sampler with size selective inlet - Gravimetric method" (equivalent to EPA AM-18).</p>	Complies									
M3.2		<p>Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.</p>	<p>2020_08 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_09 Stratford Report (C-Based monthly monitoring report).</p> <p>2020_10 Stratford Report (C-Based monthly monitoring report).</p>			<p>Monthly sampling reports (C-Based Environmental) record all surface and groundwater sampling and testing. Laboratory reports are appended to each report. ALS was contracted during the Audit Period to conduct the relevant laboratory testing> ALS is a NATA register testing laboratory.</p>	Complies									
M4.1	Weather Monitoring	<p>The licensee must maintain and operate equipment on the premises for the purpose of monitoring each weather parameter specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p>														

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Cond.	Short Title	Condition				Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		Parameter	Units	Freq	Method						
		Air temp	°C	Continuous	AM-4	Spreadsheet titled :W3 -Stratford – Daily Summary.			Weather records (from on-site meteorological stations) have been maintained and cover the Audit Period. The data required by this Condition has been recorded.	Complies	
		Wind Direction	Deg	Continuous	AM-2&4						
		Temp Lapse 50m	°C	Continuous	E2						
		Wind Speed	m/s	Continuous	AM-2&4						
		Sigma Theta	Deg	Continuous	AM-2&4						
		Rel Humidity	%	Continuous	AM-4						
M5.1	Recording of Pollution Complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.				Complaints Register (internal document) http://www.stratfordcoal.com.au/page/community/complaints-register/			Two complaints registers are maintained, an internal document that provides details of the complaint, complainant, time of complaint and actions taken. The second register is maintained on the web site and does not contain details of the complainants (for privacy reasons).	Complies	
M5.2		The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.				Complaints Register (internal document)			The master complaints register contains the information required by this licence condition.	Complies	
M5.3		The record of a complaint must be kept for at least 4 years after the complaint was made.				Complaints Register (internal document)			The master complaints register contains details of the complaints received since 2013.	Complies	
M5.4		The record must be produced to any authorised officer of the EPA who asks to see them.								Noted	
M6.1		Telephone Complaints Line	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.							The Stratford Coal Mine website contacts page contains details of the general phone number and community information hotline but does not provide details of a specific complaints telephone number.	Complies

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						The site entry is signposted. The entry sign contains details of the general phone number but does not provide details of a specific complaints telephone number.		
M6.2		The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	http://www.stratfordcoal.com.au/contact			The Stratford Coal Mine website contacts page contains details of the general phone number and community information hotline but does not provide details of a specific complaints telephone number. The site entry is signposted. The entry sign contains details of the general phone number but does not provide details of a specific complaints telephone number.	Non-Compliance	Update the website and entry signage to ensure that it is clear that the community hotline is also the complaints line.
M6.3		The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.					Noted	
M7.1		The licensee must monitor all blasts carried out in or on the premises at or near the nearest residence or noise sensitive location (such as a school or hospital) that is likely to be most affected by the blast and that is not owned by the licensee or subject of a private agreement between the owner of the residence or	Spreadsheet (downloaded from Stratford Coal Mine website) titled "EPL 5161 (Stratford Mining Complex) Monitoring Data – Stratford Extension Project(31)".			Monitoring records reviewed confirm that all blasts undertaken at Stratford were monitored in accordance with this Condition.	Complies	
M7.2	Blasting	All blast shots must be recorded on video from a position allowing the collars of the shot, and where possible, any face, and/or toe, to be seen on the video. The licensee must retain a copy of this video for at least 12 months after the blast was initiated.	Incident Register			Blast in Roseville Pit on 10/12/2019 was not recorded on video. The drone and video camera were deployed, however the video was not operational at the time of the blast. Note, that SCPL has recorded every blast on video over the 3 year audit period and only missed two blasts due to technical failures.	Non-Compliance	Ensure that drone and video camera are checked prior to all blasts.
M8.1	Noise Monitoring	To determine compliance with the Noise Limits shown in this licence, attended noise monitoring must be undertaken in accordance with all relevant conditions of this licence: a) at the nearest and/or most affected locations listed in the Noise Limits Table; and	Stratford Mining Complex Noise Management Plan Revision 3, 17 June 2019. Stratford Mining Complex Monthly Compliance Noise Monitoring October 2020, prepared by SLR Consultants. Stratford Mining Complex Monthly Compliance Noise Monitoring June 2020, prepared by SLR Consultants.			Section 2.4 of the quarterly noise monitoring reports confirm that noise monitoring is undertaken at the required residences.	Complies	
		b) occur quarterly beginning 1 January each year.	Stratford Mining Complex Monthly Compliance Noise Monitoring January 2020, prepared by SLR Consultants.			Quarterly noise monitoring is conducted in accordance with this licence condition.	Complies	

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R1.1	Reporting Conditions Annual Returns	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	EPA Public Register			All Annual returns required for this Audit Period have been submitted to the EPA. The Annual Returns are provided in the EPA supplied format.	Complies	
R1.2		An Annual Return must be prepared in respect of each reporting period, except as provided below.				All Annual returns required for this Audit Period have been submitted to the EPA.	Complies	
R1.3		Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.					Noted	
R1.4		Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.					Noted	
R1.5		The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	EPA Public Register (Licence 5161)				All annual returns were submitted within the required 60-day period.	Complies

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R1.6		The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Stratford Mining Complex Annual Return 2020 Stratford Mining Complex Annual Return 2019 Stratford Mining Complex Annual Return 2018			Copies of all Annual returns required by this Licence Condition were provided to the Auditor.	Complies	
R1.7		Within the Annual Return, the Statements of Compliance must be certified, and the Monitoring and Complaints Summary must be signed by: a) the licensee holder; or b) by a person approved in writing by the EPA to sign on behalf of the licensee holder.	Stratford Mining Complex Annual Return 2020 Stratford Mining Complex Annual Return 2019 Stratford Mining Complex Annual Return 2018			All annual returns were certified in accordance with this Condition.	Complies	
R1.8		The licensee must supply with the Annual Return a report, which provides: a) an analysis and interpretation of monitoring results; and b) actions to correct identified adverse trends.	Stratford Mining Complex Annual Return 2020 Stratford Mining Complex Annual Return 2019 Stratford Mining Complex Annual Return 2018			Annual reviews are provided to the EPA to meeting the requirements of Licence Conditions R1.8 and R1.8. The Annual Reviews include: a) an analysis and interpretation of monitoring results; and b) actions to correct identified adverse trends.	Complies	
R1.9		The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: a) the date and time of the blast; b) the location of the blast on the premises; c) the blast monitoring results at each blast monitoring station; and d) an explanation for any missing blast monitoring results.	Stratford Mining Complex Annual Return 2020 Stratford Mining Complex Annual Return 2019 Stratford Mining Complex Annual Return 2018			Annual reviews are provided to the EPA to meeting the requirements of Licence Conditions R1.8 and R1.8. The Annual Reviews contain all of the information required by this Condition.	Complies	
R2.1		Notifications must be made by telephoning the Environment Line service on 131 555.		Environment and Community Superintendent – two reportable incidents occurred in 2020. Both of these were initially reported to the EPA via the Pollution Line.		These were reported to the EPA via the Pollution Line on in accordance with this Condition	Complies	
R2.2	Notification of Environmental Harm	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Letter from SCPL (M Plain) to the EPA (E Coombs) titled "Report Ref: EPA 106955 – Stratford Coal Pty Ltd – Incident Reports", dated 17 February 2020. Letter from SCPL (M Plain) to the EPA (E Coombs) titled "Report Ref: EPA C03889 - 2020 – Stratford Coal Pty Ltd – Incident Reports", dated 18 March 2020. Master Incident No.20281 (Internal Incident Data Base) details the findings of the incident investigation relating to the Official Caution, and the remedial actions taken by SCPL.			Two incidents of potential environmental harm occurred during the Audit Period relating to water discharges. A written report relating to the 9 February incident was reported to the EPA on 17 February. This written report was one day overdue. A written report relating to the 12 March incident was reported to the EPA on 18 February.	Non-Compliance	Ensure that any future written reports to the EPA are submitted within the timeframes specified in the EPL.

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Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R3.1	Written Report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Master Incident No.20281 (Internal Incident Data Base) details the findings of the incident investigation relating to the Official Caution, and the remedial actions taken by SCPL.			EPA issued a notice to SCPL to provide further information in a letter dated 6/5/2020. SCPL responded with the requested information on 10/6/20.	Complies	
R3.2		The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Master Incident No.20281 (Internal Incident Data Base) details the findings of the incident investigation relating to the Official Caution, and the remedial actions taken by SCPL.			A review of the incident reports compiled by SCPL, all reasonable inquiries in relation to the incidents were made.	Complies	
R3.3		The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.					Noted	
R3.4		The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.					Noted	
R4.1	Other Reporting conditions Blast Reporting	The licensee must report any exceedence of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedence becomes known to the licensee or to one of the licensee's employees or agents.	Stratford Mining Complex Annual Return 2020 Stratford Mining Complex Annual Return 2019 Stratford Mining Complex Annual Return 2018			No blasting non-compliances were recorded during the Audit Period.	Not Triggered	

ENVIRONMENT PROTECTION LICENCE 5161

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
R4.2	Noise Monitoring Report	A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant which: a) assesses compliance with the noise limits in the Noise Limits Table; and b) outlines any management actions taken within the monitoring period to address any exceedances of the limits contained in the Noise Limits Table.	Email from SCPI (M Plain) to the EPA (E Coombs) titled Stratford Mining Complex Noise Monitoring Report Q3 2020.			The quarterly noise monitoring reports are provided to the EPA.	Complies	
G1.1	General Conditions Copy of Licence	A copy of this licence must be kept at the premises to which the licence applies.				An electronic version of the EPL is available on the Stratford Coal Mine website.	Complies	
G1.2		The licence must be produced to any authorised officer of the EPA who asks to see it.					Noted	
G1.3		The licence must be available for inspection by any employee or agent of the licensee working at the premises.					Noted	

MINING LEASE 1787

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
1	Notice to Landholders	(a) Within a period of three months from the date of grant/renewal of this mining lease, the lease holder must serve on each landholder a notice in writing indicating that this mining lease has been granted/renewed and whether the lease includes the surface. A plan identifying each landholder and individual land parcel subject to the lease area, and a description of the lease area must accompany the notice.	Letter from SCPL (J Cullen) to DPIE titled "Mining Lease Application NO. 552 (1992)", dated 18 December 2017. The letter contains a Statutory Declaration confirming that all relevant landholders had been notified. Letter from SCPL (J Cullen) to Transgrid titled "Mining Lease Application NO. 552 (1992)", dated 18 December 2017. The letter advised Transgrid of the grant of the mining lease.			The mining lease was granted on 6 June 2019. All relevant landholders were notified in writing.	Complies	
		(b) If there are ten or more landholders, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this mining lease has been granted/renewed; state whether the lease includes the surface and must contain a plan and description of the lease area. If a notice is made under condition 1(b), compliance with condition 1(a) is not required.		Environment and Community Superintendent – the impacted landholders were Transgrid, Gloucester Coal and CIM Stratford Pty Ltd only. Letter were sent to these organisations.		Less than ten landholders were impacted by the grant of the Mining Lease.	Not Triggered	
2	Rehabilitation	Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.				Annual rehabilitation completed and progressive rehabilitation targets are reported in the Annual Reviews	Noted	
3	Mining Operations Plan and Annual Rehabilitation Report	(a) The lease holder must comply with an approved Mining Operations Plan (MOP) in carrying out any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The lease holder must apply to the Minister for approval of a MOP. An approved MOP must be in place prior to commencing any significant surface disturbing activities, including mining operations, mining purposes and prospecting.	Letter from the Resource Regulator (M Meyer) to SCPL (J Cullen) titled Mining Lease (ML) 1360, ML 1409, ML 1521, ML1528, ML 1577, ML 1733, ML 1787 (1992) Stratford Mining Complex Mining Operations Plan and Rehabilitation Management Plan 2018 – 2021, dated 16 July 2019. The letter approves the 2019 revision of the MOP.			The MOP has been approved in accordance with this Condition.	Complies	
		(b) The MOP must identify the post mining land use and set out a detailed rehabilitation strategy which: (i) identifies areas that will be disturbed; (ii) details the staging of specific mining operations, mining purposes and prospecting; (iii) identifies how the mine will be managed and rehabilitated to achieve the post mining land use; (iv) identifies how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment; and (v) reflects the conditions of approval under: • the Environmental Planning and Assessment Act 1979; • the Protection of the Environment Operations Act 1997; and • any other approvals relevant to the development including the conditions of this mining lease.	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Refer to Sch 3 Cond 55 above.	Complies	
		(c) The MOP must be prepared in accordance with the ESG3: Mining Operations Plan (MOP) Guidelines September 2013 published on the Department's website .	Stratford Mining Complex (Stratford Extension Project) Mining Operations and Rehabilitation Management Plan, Version 3, dated 16 July 2019.			Refer to Sch 3 Cond 55 above. The MOP satisfies the general requirements of the ESG3: Mining Operations	Complies	

MINING LEASE 1787

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
						Plan (MOP) Guidelines September 2013.		
		(d) The lease holder may apply to the Minister to amend an approved MOP at any time.					Noted	
		(e) It is not a breach of this condition if: (i) the operations which, but for this condition 3(e) would be a breach of condition 3(a), were necessary to comply with a lawful order or direction given under the Environmental Planning and Assessment Act 1979, the Protection of the Environment Operations Act 1997, the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 or the Work Health and Safety Act 2011; and Work Health and Safety Regulation 2011 (ii) the Minister had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out.					Noted	
		(f) The lease holder must prepare a Rehabilitation Report to the satisfaction of the Minister. The report must: (i) provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP; (ii) be submitted annually on the grant anniversary date (or at such other times as agreed by the Minister); and (iii) be prepared in accordance with any relevant annual reporting guidelines published on the Department's website at www.resourcesandenergy.nsw.gov.au/miners-andexplorers/rules-and-forms/pgf/environmental-guidelines	Stratford Mining Complex Annual Review 2018 Stratford Mining Complex Annual Review 2019 Stratford Mining Complex Annual Review 2020			Section 8 of the Annual Reviews reports on rehabilitation for each year.	Complies	
4	Non-Compliance Reporting	(a) The lease holder must notify the Department upon becoming aware of any breaches of the conditions of this mining lease or breaches of the Mining Act or Regulations;	Incident Register File Note titled "Draft Environmental Incident – File Note Ground Disturbance beyond limit in accordance with SSD-4966 and EPL 5161", dated 16 November 2018.	Environment and Community Superintendent -. An example of the notification to the Resources Regulator for the incident on 16 Nov 2018 is attached.		Telephone and email notification of the non-compliance related to the ground disturbance incident was reported to the Division of Resources and Geoscience.	Complies	
		(b) Notifications under condition 4(a) must be provided in the form specified on the Department's website within seven (7) days of the mining lease holder becoming aware of the breach.	Email from SCPL (M Plain) to Division of Resources and Geoscience (M Meyer) titled "Stratford Coal Mine Incident" dated 16 November 2018.			No written reports were relating to non-compliances were issued to the Division of Resources and Geoscience relating to the 2018 compliance incident.	Non-Compliance	Ensure that notifications to the Department in relation to non-compliances are provided in the specified form (from the Departments Website).
5	Environmental Incident Report	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after those environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1997.		Environment and Community Superintendent - we do not have record of separate correspondence to the Resources Regulator. However, the incidents were also reported in the Annual Reviews.		SCPL did not report incidents to the Resource Regulator.	Non-Compliance	Ensure that all reportable environmental incidents are included in the reporting of incidents.
6	Extraction Plan	Definitions of Approved Extraction Plan					Noted	
		(b) The lease holder must not undertake any underground mining operations that may cause subsidence except in accordance with an approved Extraction Plan.				No underground mining has been undertaken at Stratford.	Not Triggered	

MINING LEASE 1787

Cond.	Short Title	Condition	Documents Reviewed	Interviews / Conversations	Inspections / Observations	Assessment	Compliance Finding	Recommendation
		(c) The lease holder must ensure that the approved Extraction Plan provides for the effective management of risks associated with any subsidence resulting from mining operations carried out under this lease.				No underground mining has been undertaken at Stratford.	Not Triggered	
		(d) The lease holder must notify the Secretary within 48 hours of any: (i) incident caused by subsidence which has a potential to expose any person to health and safety risks; (ii) significant deviation from the predicted nature, magnitude, distribution, timing and duration of subsidence effects, and of the potential impacts and consequences of those deviations on built features and the health and safety of any person; or (iii) significant failure or malfunction of a monitoring device or risk control measure set out in the approved Extraction Plan addressing: A. built features; B. public safety; or C. subsidence monitoring.				No underground mining has been undertaken at Stratford.	Not Triggered	
7	Resource Recovery	The lease holder must optimise recovery of the minerals that are the subject of this mining lease to the extent economically feasible.					Noted	
8	Group Security	The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all or any kind under the mining lease, including obligations of all or any kind under the mining lease that may arise in the future. The amount of the security deposit to be provided as a group security has been assessed by the Minister at \$12,367,000. This group security is extended to apply to this lease.	Letter from the Resources Regulator (K Eller) to SCPL (J Cullen) titled "NOTICE OF VARIATION TO SECURITY CONDITION - ML1360, ML1409, ML1447, ML1521, ML1528, ML1538, ML1577 and ML1733 (1992)", dated 27 February 2019. The letter notifies SCPL of the increase in security deposit required. Bank Guarantee for additional guarantee (Citibank) dated 3 April 2019.			The required group security has been provided in the form a registered bank guarantee.	Complies	
9	Cooperation Agreement	The lease holder must make every reasonable attempt, and be able to demonstrate its attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as: • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts; and • rehabilitation issues.		Environment and Community Superintendent – there are no overlapping titles associated with the Stratford Mine.		There are no overlapping titles associated with the Stratford Mine.	Not Triggered	
-	Exploration Reporting	The lease holder must lodge reports to the satisfaction of the Minister in accordance with section 163C of the Mining Act 1992 and in accordance with clause 59 of the Mining Regulation 2016. Reports must be prepared in accordance with Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.	Annual Exploration Report (21/12/2018 to 20/12/2019).			The required exploration reports have been prepared.	Complies	

Audit Photos

Appendix B



Photograph 1 Bowens Road North Open Cut



Photograph 2 Heavy Plant Maintenance Workshop



Photograph 3 - Ditchfield Maintenance Workshop



Photograph 4 - Water Cart Operating in BRN Pit



Photograph 5 - Rehabilitated (waste dump) Area



Photograph 6 - Weather Station



Photograph 7 - Stratford Main Pit (co-disposal area)



Photograph 8 - Stratford East Water Storage Dam



Photograph 9 - Bulk Fuel Storage



Photograph 10 - Oil Storage (bunded)



Photograph 11 - Chemical Storage



Photograph 12 - Native Woodland Revegetation



Photograph 14 - Waste Storage Area

DPIE Auditor Approval

Appendix C



Michael Plain
Environment and Community Superintendent
Stratford Coal Ltd
PO Box 168
GLOUCESTER NSW 2422

By Email ONLY: Michael.Plain@yancoal.com.au

23/10/2020

Dear Mr Plain

**Stratford Mining Complex (SSD-4966) and Duralie Coal Mine (PA08_0203)
2020 Independent Environmental Audit**

I refer to your request (SSD-4966-PA-3) for the Secretary of the Department of Planning, Industry and Environment (the Department) to endorse a team of suitably qualified, experienced and independent persons to undertake the 2020 Independent Environmental Audits (IEA) for Stratford and Duralie mines and the Rail Haulage Audit for Duralie mine.

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. In accordance with Schedule 5 condition 9 of SSD-4966, Schedule 5 condition 8 of MP08_0203 (the consent/s) and the Department's *Post-approval requirements for State Significant Developments Independent Audit Guideline, October 2015* (IEA Guideline), the Secretary has endorsed the appointment of the following audit team:

- Mr Ken Holmes, Barnett & May (lead auditor)
- Mr Simon Buchanan, Landloch (rehabilitation specialist)
- Ms Katrina Wolf, Cumberland Ecology (biodiversity specialist)
- Mr Adam Bishop, Pitt & Sherry (surface water specialist)
- Mr Doug Ford, Pitt & Sherry (noise specialist)

The Independent Audit Report must be prepared, undertaken and finalised in accordance with the approval and the IEA Guideline. Failure to meet these requirements will require revision and resubmission.

As per Schedule 5 condition 10 of SSD-4966, within three months of commencing the IEA (i.e. from the date of the first day of the site inspection), or as otherwise agreed with the Secretary, the Independent Audit Report for Stratford and the response to audit recommendations (RAR) are to be submitted to the Department via the Major Project website.

To enable the Duralie IEA and Rail Haulage Audit to be conducted simultaneously with the Stratford IEA, the Secretary agrees to the submission of the audit reports within three months of commencing the audit, in accordance with Schedule 5 condition 9B of MP08_0203.

Please ensure this correspondence is appended to the Independent Audit Report.

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

Yours sincerely

A handwritten signature in black ink that reads "H Watters". The signature is written in a cursive style with a large, stylized initial 'H'.

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

Stakeholder Consultation

Appendix D

From: [Jennifer Sage](#)
To: [Ken Holmes](#)
Cc: [Heidi Watters](#)
Subject: RE: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request
Date: Friday, 13 November 2020 4:02:17 PM

Hello Ken

Thank you for your email seeking DPIE's input to the next IEA for Duralie and Stratford Coal Mines. Key issues for consideration in the next audits are listed below, for your consideration.

Duralie Coal Mine

I note that current activities at Duralie include biodiversity offset management and rehabilitation.

Key issues raised during the audit period are –

- Air quality
Duralie Mine has been the subject of odour complaints during the audit period, which have been attributed to spontaneous combustion in the pits and waste emplacement areas. In 2017, Duralie Mine reported exceedances of dust and PM10 criteria. As such, the audit should address the implementation of the Air Quality & Greenhouse Gas Management Plan to prevent and minimise offsite emissions including dust and odours, and compliance with relevant Operating Conditions in the consent (i.e. Schedule 3 condition 22).
- Water quality
The 2019 annual review noted exceedances of some of the surface water performance indicators in adjacent surface waters including Coal Shaft Creek and Mammy Johnsons River. The IEA should focus on the management of surface water and mine water, in accordance with the approved Surface Water Management Plan and Irrigation Management Plan.
- Rehabilitation
Mining operations are approved until 31 December 2021. Rehabilitation activities are required to be carried out progressively, and will continue after 2021. As such, this audit should address the rehabilitation of the mine including the management and maintenance of the rehabilitated areas, through the implementation of the approved Rehabilitation Management Plan and Biodiversity Management Plan.

Please note that the Department has not undertaken any enforcement action for Duralie Coal Mine during the audit period.

Stratford Mine

Key issues for consideration in the IEA audit are –

- Water management
There were two reported incidents of unplanned discharges from the premises –
 - On 9 February 2020 water from the Stratford East Pit Haul Road Construction Area discharged into Avondale Creek
 - On 11 March 2020, water was dischargedThe Annual Review for 2017 also noted a 'spill' from sediment dam SD7. As such, the Department considers that the IEA should address the management of water on site including the implementation of the Water Management Plan and compliance with the Water Management Performance Measures prescribed in the consent.
- Management of noise and blasting impacts
Stratford mine has received numerous complaints about noise and blasting impacts. Accordingly, the audit should address the implementation of the Blast Management Plan and Noise Management Plan, compliance with blasting conditions/criteria in the consent and the review of night time noise levels (Schedule 3 Conditions 4 to 11, and condition 16)
- Incident notification and reporting
Reporting of all incidents in accordance with approved management plans and Schedule 5

Condition 7 of the consent, noting that an 'incident' is defined as actual or potential material harm to the environment, and/or exceedance of limits, performance measures or criteria prescribed in the consent.

Please note that on 15 February 2019, the Department issued to Stratford Coal Pty Ltd an official caution for breach of Schedule 2 Condition 1 of the SSD 4966 (as modified) for ground disturbance beyond the approved disturbance boundary in an incident on 16 November 2018.

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

Regards
Jen
Jennifer Sage
Compliance Officer

Planning and Assessment | Department of Planning, Industry and Environment
T 02 6575 3420 M 0400 245 170 | E jennifer.sage@dpie.nsw.gov.au
PO Box 3145, Singleton NSW 2330
www.dpie.nsw.gov.au



Our Vision: Together, we create thriving environments, communities and economies.
The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Tuesday, 10 November 2020 4:04 PM
To: Jennifer Sage <jennifer.sage@dpie.nsw.gov.au>
Cc: heidi.watters@dpie.nsw.gov.au
Subject: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Good Afternoon Jennifer,

I have been commissioned by Yancoal to undertake the 2020 Independent Environmental Audits (IEA) of the Stratford and Duralie Mines, located in the upper Hunter Region. The Duralie Mine IEA will be undertaken accordance with Project Approval 08_0203, that requires:

Prior to 31 December 2015, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

The Stratford Mine IEA will be undertaken in accordance with Project Approval SSD-4966 that requires:

By the end of December 2011, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

And

By the end of December 2013, and with every Independent Environmental Audit thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of a Rail Haulage Audit of the project. This audit must:

- (a) be conducted by a suitably qualified, experienced and independent experts whose appointment has been endorsed by the Secretary;*
- (b) review the existing rail haulage operations and determine whether all reasonable and feasible measures are being implemented to minimise the:*
 - noise and dust impacts of these operations;*
 - use of the shuttle train during the approved night-time hours;*
 - dispatch of trains from the site between 9.25pm and 1am the following day; and*
- (c) recommend appropriate measures or actions to improve the efficiency of these rail haulage operations and minimise their associated impacts; and*
- (d) evaluate the use of the exceptional circumstances provision in condition 8 of schedule 2, and the associated reporting on any use of this provision on the Proponent's website (see condition 8A in schedule 2).*

The Project Approval Conditions for both mines require that the auditor consults with relevant agencies.

I would therefore appreciate if you could provide me with any information, comments or concerns DPIE may have regarding compliance, the environmental performance of the operation (over the past three years – the audit period) and details of any specific issues your Agency suggests that the Auditor addresses during the audit.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Lead Auditor

Principal Environmental Consultant
Director

Barnett & May

P +61 [0]438 046 261

E ken@baeckea.com.au

A **PO Box 365 Belrose NSW 2085**

From: [Ryan Fenning](#)
To: [Ken Holmes](#)
Cc: [Michelle Jobson](#)
Subject: RE: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request
Date: Friday, 4 December 2020 3:25:04 PM

Good Afternoon Ken,

I do not have any specific issues in relation to the Stratford and Duralie Coal Mines. I note that Duralie is in the process of closure whereas Stratford operations have increased over recent time.

Recently, complaints in relation to the Stratford operations that have been reported through the community consultative committee meeting have not related to any specific issue, but include blasting, noise, dust and lighting. Complaints in relation to the mining operations have increased as mining has mining operations have recommenced.

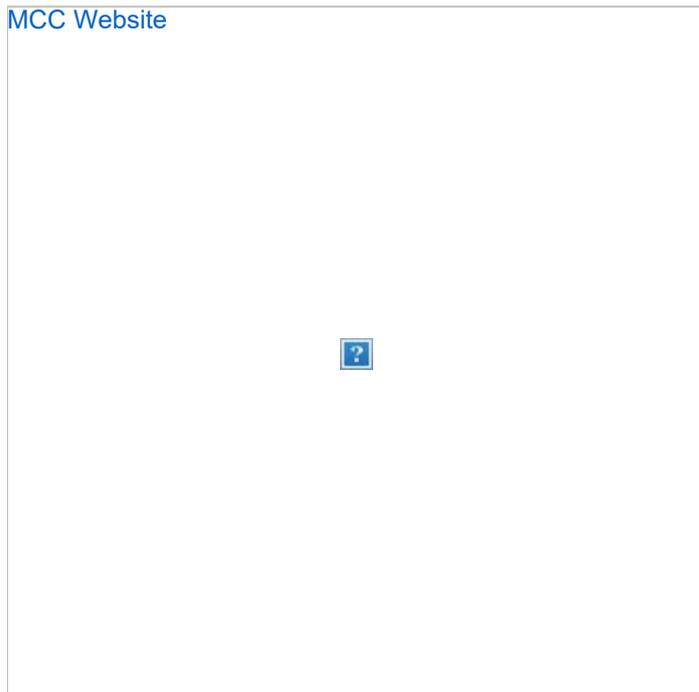
I assume that the audit will include a review of complaints and environmental compliance in relation to these aspects?

Thanks
Ryan

Ryan Fenning

Team Leader - Environmental Health - Food and General Duties

[MCC Website](#)



[Direct](#)

Ryan.Fenning@MidCoast.nsw.gov.au

www.midcoast.nsw.gov.au or follow us





*We acknowledge the traditional custodians of the land on which we work and live, the Gathang-speaking people and pay our respects to all Aboriginal and Torres Strait Islander people who now reside in the MidCoast Council area.
We extend our respect to elders past and present, and to all future cultural-knowledge holders.*

From: Ken Holmes [mailto:Ken@baeckea.com.au]
Sent: Tuesday, 1 December 2020 11:45 AM
To: Ryan Fenning <Ryan.Fenning@MidCoast.nsw.gov.au>
Cc: Michelle Jobson <Michelle.Jobson@MidCoast.nsw.gov.au>
Subject: RE: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Ryan,

I am following up on my email from 11 November providing Council the opportunity to provide input into the Independent Environmental Audit on the Stratford and Duralie mines (please see below). Please respond by return email if Council has any concerns or comments regarding the environmental performance or compliance relating to these operations.

Please note that the audit commenced on 1 December and will be completed over the next week, therefore I would appreciate any inputs you have within the next week.

Regards,

Ken Holmes
Principal Environmental Consultant
Director

Barnett & May

P +61 (0)438 046 261
E ken@baeckea.com.au
A PO Box 365 Belrose NSW 2085

From: Ken Holmes
Sent: Tuesday, 10 November 2020 4:19 PM
To: ryan.fenning@midcoast.nsw.gov.au
Cc: michelle.jobson@midcoast.nsw.gov.au
Subject: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Good Afternoon Ryan,

I have been commissioned by Yancoal to undertake the 2020 Independent Environmental Audits (IEA) of the Stratford and Duralie Mines, located in the upper Hunter Region. The Duralie Mine IEA will be undertaken accordance with Project Approval 08_0203, that requires:

Prior to 31 December 2015, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

The Stratford Mine IEA will be undertaken in accordance with Project Approval SSD-4966 that requires:

By the end of December 2011, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

And

By the end of December 2013, and with every Independent Environmental Audit thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of a Rail Haulage Audit of the project. This audit must:

- (a) be conducted by a suitably qualified, experienced and independent experts whose appointment has been endorsed by the Secretary;*
- (b) review the existing rail haulage operations and determine whether all reasonable and feasible measures are being implemented to minimise the:*
 - noise and dust impacts of these operations;*
 - use of the shuttle train during the approved night-time hours;*
 - dispatch of trains from the site between 9.25pm and 1am the following day; and*
- (c) recommend appropriate measures or actions to improve the efficiency of these rail haulage operations and minimise their associated impacts; and*
- (d) evaluate the use of the exceptional circumstances provision in condition 8 of schedule 2, and the associated reporting on any use of this provision on the Proponent's website (see condition 8A in schedule 2).*

The Project Approval Conditions for both mines require that the auditor consults with relevant agencies.

I would therefore appreciate if you could provide me with any information, comments or concerns Council may have regarding compliance, the environmental performance of the operation (over the past three years – the audit period) and details of any specific issues Council suggests that the

Auditor addresses during the audit.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Lead Auditor

Principal Environmental Consultant
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085

From: mmacdonald-hill@bigpond.com
To: [Ken Holmes](#)
Subject: RE: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request
Date: Wednesday, 25 November 2020 8:08:12 AM

Hi Ken,

Just confirming I sent a request for any matters the Stratford and Duralie Committees wished to raise with you in relation to the IEA and advise neither have any requests. On behalf of both committees, thank you for the opportunity to consult and have input into the audit.

*Margaret MacDONald-Hill
Independent Chair
0448 414 888*

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Wednesday, 11 November 2020 5:21 PM
To: mmacdonald-hill@bigpond.com
Subject: Re: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Hi Margaret,

Three weeks for input into the audit.

Many thanks,

Ken

Ken Holmes
Barnett and May
+61438046261

From: mmacdonald-hill@bigpond.com <mmacdonald-hill@bigpond.com>
Sent: Wednesday, November 11, 2020 9:19:31 AM
To: Ken Holmes <Ken@baeckea.com.au>
Subject: RE: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Hi Ken,

Thanks for your email. I am not aware of any major concerns either CCC has within the scope of the audit. However, I will advise them of the IEA and ask for any concerns they may have to be forwarded to me. What is your timeline with this information so I can request any information by a set date?

Margaret MacDonald-Hill
0448 414 888

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Tuesday, 10 November 2020 4:22 PM
To: mmacdonald-hill@bigpond.com
Subject: Stratford / Duralie Mines - 2020 Independent Environmental Audit - Consultation Request

Good Afternoon Margaret,

I have been commissioned by Yancoal to undertake the 2020 Independent Environmental Audits (IEA) of the Stratford and Duralie Mines, located in the upper Hunter Region. The Duralie Mine IEA will be undertaken accordance with Project Approval 08_0203, that requires:

Prior to 31 December 2015, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

The Stratford Mine IEA will be undertaken in accordance with Project Approval SSD-4966 that requires:

By the end of December 2011, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) include consultation with the relevant agencies;*
- c) assess the environmental performance of the project and assess whether it is complying with the relevant requirements in this approval and any relevant EPL (including any assessment, plan or program required under these approvals);*
- d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and*
- f) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

And

By the end of December 2013, and with every Independent Environmental Audit thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of a Rail Haulage Audit of the project. This audit must:

- (a) be conducted by a suitably qualified, experienced and independent experts whose appointment has been endorsed by the Secretary;*
- (b) review the existing rail haulage operations and determine whether all reasonable and*

feasible measures are being implemented to minimise the:

- noise and dust impacts of these operations;*
- use of the shuttle train during the approved night-time hours;*
- dispatch of trains from the site between 9.25pm and 1am the following day; and*

(c) recommend appropriate measures or actions to improve the efficiency of these rail haulage operations and minimise their associated impacts; and

(d) evaluate the use of the exceptional circumstances provision in condition 8 of schedule 2, and the associated reporting on any use of this provision on the Proponent's website (see condition 8A in schedule 2).

The Project Approval Conditions for both mines require that the auditor consults with relevant agencies.

I would therefore appreciate if you, as chair of the Community Consultative Committee could provide me with any information, comments or concerns the CCC may have regarding the environmental performance of the operation (over the past three years – the audit period) and details of any specific issues the CCC suggests that the Auditor addresses during the audit.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Lead Auditor

Principal Environmental Consultant
Director

Barnett & May

P +61 (0)438 046 261

E ken@baeckea.com.au

A PO Box 365 Belrose NSW 2085