

## Stratford Mining Complex - Independent Environmental Audit 2017

### Response to Recommendations

Audit Recommendations				
Audit Reference	Condition	Management Area	Recommendation	Stratford Coal Response
<b>DA 23-98/99 Non-compliance Recommendations</b>				
1	Sch 3, Con 20	Air Quality	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.	SCPL accepts the recommendation.
2	Sch 3, Con 20	Meteorological	Recommend that meteorological monitoring is not required to include forecasting capabilities as operations have ceased.	SCPL accepts the recommendation. Meteorological forecasting would be implemented when operations recommence.
3	Sch 3, Cond 33	Administrative	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.	SCPL accepts the recommendation. The Rejects Disposal Plan was submitted in accordance with the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 Schedule 3, Part 5, Clause 27 High Risk Activities – Emplacement Areas. The RDP was submitted with documentation for the “High Risk Activities” notification for the Stratford Rejects Emplacement Area to DIRR.
<b>DA 23-98/99 Continual Improvement Recommendations</b>				
4	Sch 3, Con 2	Noise	Recommend consideration be given to revising noise monitoring program for non-operational phase in consultation with DP&E (if Stratford Extension not commenced).	SCPL accepts the recommendation.
5	Sch 3, Con 8	Noise	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.	SCPL accepts the recommendation. Update with next AQGGMP revision.
6	Sch 3, Con 12	Administrative	Recommend that offers to update property inspections are not required going forward as operations have ceased (assuming operations under Stratford Extension does not commence).	SCPL accepts the recommendation. Offers for property inspections would be required only if blasting activities recommence.
7	Sch 3, Con 22	Air Quality	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.	SCPL accepts the recommendation. Update with next AQGGMP revision.
8	Sch 3, Con 26	Flora	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.	SCPL accepts the recommendation. Include with next Annual Review.
9	Sch 3, Con 28	Water	It is recommended that any future updates to the SWMP include additional details on the final void design, closure objectives and specific performance criteria.	SCPL accepts the recommendation. Update with next WMP revision.
10	Sch 5, Con 8	Administrative	Recommended that next audit only required to audit ‘rehabilitation’ related conditions and confirmation from DP&E sought.	SCPL accepts the recommendation. SCPL would seek approval from DP&E. This action is dependent upon the commencement of the Stratford Extension Project.
<b>DA 30-02-01 Non-compliance Recommendations</b>				
11	Sch 3, Con 4i	Fauna	Recommend fauna monitoring is reported in future Annual Reviews.	SCPL accepts the recommendation. Include with next Annual Review.
12	Sch 4, Con 1d	Water	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.	SCPL will seek formal approval from DP&E for only annual review of the site water balance.
13	Sch 7, Con 6	Administrative	It is recommended that the MOP is updated to include management measures for the air strip.	SCPL accepts the recommendation. Update with next AQGGMP revision.
14	Sch 9, Con 2A	Agriculture	Recommend that changes to agricultural land suitability due to mining operations is included in future Annual Reviews.	SCPL accepts the recommendation. Include with next Annual Review.

DA 30-02-01 Continual Improvement Recommendations				
15	Sch 1 Con 2a	Administrative	Recommended that next audit only required to audit 'rehabilitation' related conditions and confirmation from DP&E sought.	SCPL accepts the recommendation. SCPL would seek approval from DP&E. This action is dependent upon the commencement of the Stratford Extension Project.
16	Sch 3, Con 4a	Administrative	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.	SCPL accepts the recommendation.
17	Sch 3, Con 4c	Flora	It is recommended details of revegetation works adjacent to the site (i.e. within wildlife corridor) are included in future Annual Reviews.	SCPL accepts the recommendation. Include with next Annual Review.
18	Sch 6, Con 2A	Air Quality	Suggest review of air quality monitoring program and approval by relevant regulators during non-operational status at Stratford (unless Stratford Extension is progressed).	SCPL accepts the recommendation. Update with next AQGGMP revision.
19	Sch 13, Con 1a	Administrative	When next updated, the BMP 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 is this shown figuratively.	SCPL accepts the recommendation. Update with next BMP revision.
EPL 1561 Recommendations				
20	A1.1	Administrative	Recommend that fee based activity scale is changed to reduce fee.	SCPL accepts the recommendation. An EPL variation was lodged with the EPA in January 2018.
21	A2	Administrative	Recommend a new premise plan is made in next update.	SCPL accepts the recommendation. An EPL variation was lodged with the EPA in January 2018.
22	P1.1	Air Quality	Recommend Ambient dust monitors are considered if they should be removed in next update.	SCPL accepts the recommendation. An EPL variation was lodged with the EPA in January 2018.
23	M2.3	Water	It is recommended that the Sampling Method for Point 2 is changed to probe as opposed to grab sample.	SCPL accepts the recommendation.
24	U1.1, U2.1 and U3.1	Administrative	Recommend these conditions are removed as they are complete.	SCPL accepts the recommendation. An EPL variation was lodged with the EPA in January 2018.
General Recommendations				
25		Administrative	It is recommended that consultation is undertaken for any future revisions to management plans or approval from DP&E sought not to consult.	SCPL accepts the recommendation. SCPL will undertake consultation on all management plans and revisions as required by the Development Consent conditions.
26		Administrative	Recommend management plans are revised for non-operational status if Stratford Extension is not progressed.	SCPL accepts the recommendation. Pending commencement of the Stratford Extension Project.
27		Waste	Recommend that waste grease at the Stratford Fuel Farm is cleaned and the area is maintained (see Plate 2 of Appendix D).	SCPL accepts the recommendation.
28		Rehabilitation	Recommended Table 14 in the MOP (Mine Closure Planning Program) is implemented.	SCPL accepts the recommendation.
29		Training	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.	SCPL accepts the recommendation. Review of the Stratford Coal inductions packages commenced in February 2018.
30		Water	Detailed and updated planning and assessments should be undertaken for the water quantity and quality within the final voids to support long-term management.	SCPL accepts the recommendation. This will be included as a component of the mine closure planning included in Table 14 in the Stratford Coal Mine MOP.