

**Stratford Mining Complex - Independent Environmental Audit 2020**  
**Response to Recommendations**

IEA 2020 Recommendations		Management Area	Risk Level of Non-compliance	Auditor Recommendation	Stratford Coal Response	Target Due Date	Completion Status	Comments - Status Update
<b>Development Consent SSD-4966 Non-compliance Recommendations</b>								
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.	Blasting	Administrative	Ensure that the blast hotline information is up to date at all times.	SCPL accepts the recommendation.  SCPL has operated a 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.  SCPL will ensure the blast hotline is updated the day prior to any blast at the SMC.	10-May-21	Completed	Ongoing update of blast hotline.
Sch 3 Cond 27	Unless an EPL authorises otherwise, the Applicant shall comply with Section 120 of the POEO Act	Water	Medium	Ensure that all surface water controls are inspected before, during and after forecast (heavy) rainfall events.	SCPL accepts the recommendation.  <i>Procedures for the inspection of water management infrastructure will be reviewed</i> SCPL have made all endeavours to comply with this condition and to communicate with MidCoast Council. This matter has been raised with MCC 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 demonstrated the commitment to comply with this condition, yet ultimately the invoicing for these payments is not within the control of SCPL.	10-May-21	Completed	All sediment dams, Disturbed Area Dams and water management structures are inspected as required after rainfall events that exceed 25mm. Inspections are completed on the ground and via drone by (Based environmental, the E&C team and the num crew
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.	Road Maintenance	Administrative	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.	SCPL have made all endeavours to comply with this condition and to communicate with MidCoast Council. This matter has been raised with MCC 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 demonstrated the commitment to comply with this condition, yet ultimately the invoicing for these payments is not within the control of SCPL.	30-Jun-21	Completed	MidCoast Council agreed to a meeting with SCPL in February 2021 to discuss matters relating to the Stratford Mining Complex. Invoicing for the Condition 46 and Condition 47 roads contributions have been received in May 2021 and the relevant payments have now been processed.
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 Buckets Way in accordance with the terms in Appendix 4.	Road Maintenance	Administrative	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.	SCPL have made all endeavours to comply with this condition and to communicate with MidCoast Council. This matter has been raised with MCC 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 demonstrated the commitment to comply with this condition, yet ultimately the invoicing for these payments is not within the control of SCPL.	30-Jun-21	Completed	MidCoast Council agreed to a meeting with SCPL in February 2021 to discuss matters relating to the Stratford Mining Complex. Invoicing for the Condition 46 and Condition 47 roads contributions have been received in May 2021 and the relevant payments have now been processed.
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;	Waste	Low	Develop and implement a waste minimisation strategy, covering in particular on-site waste minimisation.	SCPL accepts the recommendation.  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.	1-Dec-21	Open	
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.	Waste	Administrative	In future Annual Reviews report on the implementation and effectiveness of the waste minimization strategy.	SCPL accepts the recommendation. SCPL will include information in the next Annual Review.  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.	1-Dec-21	Open	
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;	Rehabilitation	Administrative	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.	SCPL accepts the recommendation. The SMC MOP/RMP has been updated in February 2021 and lodged with the Resources Regulator for approval.  The SMC Biodiversity Management Plan provides specific detail on the relationship to other management plans including the integration of the site 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 BMP Section 4.8 REHABILITATION - ESTABLISHING NATIVE VEGETATION AND FAUNA HABITAT. A similar level of detail will be added to the MOP/RMP.	31-Mar-21	Completed	
Sch 5 Cond 4 d	Annual Review (d) identify any trends in the monitoring data over the life of the development;	Annual Review	Administrative	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.	SCPL accepts the recommendation. Additional information will be included with the next SMC Annual Review.  The Annual Reviews discuss monitoring results and environmental performance and where necessary include reviews against performance criteria in each sub-section. The Annual Reviews also include statements regarding comparison between monitored results and the predicted results in the EIS.  SMC has demonstrated a long running good environmental performance and has rarely exceeded any monitoring criteria and as such the statements regarding EIS comparisons are generally brief. Additionally, discrepancies between the EIS predictions have been uncommon and the measures to improve environmental performance have not been required in many circumstances. Overall SCPL	1-Dec-21	Next Annual Review	
Sch 5 Cond 4 e	Annual Review (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Annual Review	Administrative	Ensure that future Annual Reviews include (in each subsection of Section 6) a discussion of predicted and actual environmental impacts.	SCPL accepts the recommendation. Additional information will be included with the next SMC Annual Review.	1-Dec-21	Next Annual Review	

Sch 5 Cond 4 f	Annual Review (f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Annual Review	Administrative	The Annual Reviews do not specifically report on measures to be taken in the next year to improve environmental performance. Note: where non-compliance's, monitoring exceedances or incidents have occurred during the relevant reporting period the Annual Review could note that no improvement initiatives are planned.	SCPL accepts the recommendation. Additional information will be included with the next SMC Annual Review.	1-Dec-21	Next Annual Review	
Sch 5 Cond 5a	Within 3 months of: (a) the submission of an annual review under Condition 4 above; the Applicant shall review the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	Management Plans	Administrative	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.	SCPL accepts the recommendation.  Whilst full compliance with this condition has not been met, most of the environmental management plans (EMP) have been revised at least 3 times during the audit period. The intention of this condition is to ensure that the EMPs remain current and relevant. The Stratford EMPs have been reviewed/revised regularly and provide the basis for a highly structure and detailed Environmental Management System.	14-Jul-21	Open	
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 in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary.	Management Plans	Administrative	Establish a register that records the reviews of all management plans (as evidence for future audit).	SCPL accepts the recommendation.  Whilst full compliance with this condition has not been met, most of the environmental management plans (EMP) have been revised at least 3 times during the audit period. The intention of this condition is to ensure that the EMPs remain current and relevant. The Stratford EMPs have been reviewed/revised regularly and provide the basis for a highly structure and detailed Environmental Management System.	14-Jul-21	Open	
<b>Environment Protection Licence EPL 5161 Recommendations</b>								
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Water	Medium	Ensure that all surface water controls are inspected and maintained before, during and after forecast (heavy) rainfall events.	SCPL accepts the recommendation.  Procedures for the inspection of water management infrastructure will be reviewed.	10-May-21	Open	All sediment dams, Disturbed Area Dams and water management structures are inspected as required after rainfall events that exceed 25mm. Inspections are completed on the ground and via drone by CBased environmental, the E&C team and the pump crew. Inspections can be found here: O:\Commercial\11 - ENVIRONMENT\Stratford\Water Management\Diversion Drains Inspections.
O4.3	The PIRMP must be tested at least annually or following a pollution incident.	PIRMP	Administrative	Ensure that the PIRMP is tested within one month of any incident that triggers the implementation of the PIRMP.	SCPL accepts the recommendation.  No adverse effects would be anticipated resulting from the non-compliance. 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.  Testing of the PIRMP has been completed during the reporting period. The PIRMP was implemented successfully following the pollution incidents during the reporting period. No changes to the PIRMP were required as a result of the test. SCPL staff have been reminded of the obligations requiring testing of the PIRMP.	30-Apr-21	Completed	The PIRMP was audited and revised in April 2021.
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;	Monitoring Records	Administrative	Ensure that sampling personnel carefully complete the sampling sheets so that all information required by the EPL is legible.	SCPL accepts the recommendation.	30-Mar-21	Open	
M2.2	Air Monitoring Requirements	Air Quality	Low	No recommendation required as the TEOM was replaced as soon as was possible to do so.	Noted.  The continuous air quality 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. Consider adding a note in the EPL conditions stating the percentage of time monitoring is required to meet the real-time continuous criteria, i.e. 95% or 99%.	30-Mar-21	Completed	No further action required. Ongoing maintenance of TEOMs.
M2.3	Water Monitoring Requirements Testing Methods	Water	Low	Ensure that future sampling reports and records incorporate the EPA sampling point designations.	Overall compliance with this condition was achieved with the exception of one sample missed during the audit period. 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.  The environmental monitoring field sheets and scheduling has been updated. Employees and contractors have been made aware of the environmental monitoring requirements for groundwater sampling.	10-May-21	Completed	
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.	Complaints Line	Administrative	Update the website and entry signage to ensure that it is clear that the community hotline is also the complaints line.	The Community (complaints) Information hotline is shown on the Stratford website on the Community page, Environment page and Contacts page. The Community (complaints) hotline is also advertised in the local phone directory and periodically in the local newspaper. There is no requirement for this to be signposted at the front entrance.  The Stratford website has been updated for clarification. SCPL will continue operation of the complaints line and notify the public via the current avenues.	10-May-21	Completed	No further action required.
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.	Blasting	Administrative	Ensure that drone and video camera are checked prior to all blasts.	SCPL accepts the recommendation.  SCPL has recorded every blast on video over the 3 year audit period and only missed two blasts due to technical failures. SCPL has demonstrated the intentions of meeting this condition consistently. SCPL will continue to ensure all blasts at the SMC are recorded on video.	10-May-21	Completed	The Blast Prefire checklist has a checkbox for checking that video is operational as it is a requirement of critical control active monitoring.
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.	Notification of Environmental Harm	Administrative	Ensure that any future written reports to the EPA are submitted within the timeframes specified in the EPL.	SCPL accepts the recommendation. Incident reports will be provided to the regulators as required in the licence/consent conditions.	30-Jun-21	Completed	No further action required. Ongoing reporting of incidents as required
<b>Mining Lease 1778</b>								
ML4	(b) Non-conformance notifications under condition 4(a) must be provided in the form specified on the Department's website within seven (7) days of the mining lease holder becoming aware of the breach.	Non-compliance Reporting	Administrative	Ensure that notifications to the Department in relation to non-compliances are provided in the specified form (from the Departments Website).	SCPL accepts the recommendation. Incident notifications will be provided to the regulators as required in the licence/consent conditions.	30-Jun-21	Completed	No further action required. Ongoing reporting of incidents as required

MLS	The lease holder must provide environmental incident notifications and reports to the Secretary no later than seven (7) days after these environmental incident notifications and reports are provided to the relevant authorities under the Protection of the Environment Operations Act 1987	Environmental Incident Report	Administrative	Ensure that all reportable environmental incidents are included in the reporting of incidents.	SCPL accepts the recommendation. Incident reports will be provided to the regulators as required in the licence/consent conditions.	30-Jun-21	Completed	No further action required. Ongoing reporting of incidents as required
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