



Independent Environmental Audit 2025

Narrabri Coal Operations

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Independent Environmental Audit 2025

Narrabri Coal Operations

0792454



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EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Environmental Audit (IEA) of the Narrabri Coal Operations ('NCO') underground mine on behalf of Whitehaven Coal Limited ('WCL'). The mine is located approximately 17 km south east of Narrabri, New South Wales (NSW). The primary purpose of the audit was to satisfy the Department of Planning, Industry & Environment (DPIE)¹ Minister's Conditions of Approval (CoA) PA 08_0144, which requires completion of an independent audit every three years from the date of the approval. The audit period assessed in this IEA is 9 December 2022 through 5 November 2025 (the date the site visit was completed as part of the audit).

The audit included a review of:

- DPIE Minister's Conditions of Approval PA 08_0144 (Modification 7) including Statements of Commitments;
- Standard Conditions (Mining Lease 1609, 1839);
- Environment Protection Licence (EPL) 12789; and
- Implementation of Management Plans developed as part of the Ministers Conditions of Approval.

WCL has established the control systems generally required for the operational phase of the mine. All staff interviewed demonstrated an understanding of requirements and a commitment to the application of the requisite management systems and plans.

A qualitative risk assessment was also completed on the findings consistent with AS/NZS ISO31000:2018. The number of non-conformances with the statutory conditions and implementation of the management plans is summarised in the Table below. It is noted that all non-compliances have been reported to the appropriate regulator where required during the audit period. An action table addressing all findings of the audit has been developed by WCL and will be issued separately to this report.

SUMMARY OF AUDIT FINDINGS

Review	Non-compliances (NC)
Statutory Instruments	-
Implementation of Plans	1 ² (Low risk)

¹ The Department of Planning, Industry & Environment is noted within the Conditions of Approval. The current name of this Department is Department of Planning, Housing and Infrastructure (DPHI). Throughout this Report, the terms Department of Planning & Environment (DPE), Department of Planning, Industry & Environment (DPIE), and Department of Planning, Housing and Infrastructure (DPHI) are used interchangeably, reflecting the terminology used in relevant approvals, correspondence, and source documentation.

² HVAS Failure in 2023 (Non-compliance with Air Quality Management Plan)

1. INTRODUCTION

1.1 BACKGROUND

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Environmental Audit (IEA) of the Narrabri Coal Operations Pty Ltd ('NCO') underground mine on behalf of Whitehaven Coal Limited ('WCL'). The mine is operated by Narrabri Coal Operations Pty Ltd on behalf of the Narrabri Mine Joint Venture (Narrabri Coal Pty Ltd, Narrabri Coal Australia Pty Ltd, Posco International Australia Holdings Pty Ltd, J-Power Australia Pty Ltd, Kores Narrabri Pty Ltd and Upper Horn Investments (Australia) Pty Ltd). The Narrabri Mine is located approximately 17 km south east of Narrabri, New South Wales (NSW).

Narrabri Mine Stage 2 Operations was granted approval (PA 08_0144) on 26 July 2010 for mining coal until 26 July 2032. To facilitate further development, the Narrabri Mine Stage 3 Extension Project was granted State Significant Development approval (SSD-10269) on 1 April 2022. While Stage 3 SSD-10269 has become effective on 1 August 2025, Stage 2 PA 08_144 has not yet been surrendered.

The purpose of the audit was to assess compliance with the requirements of the following approvals:

- DPIE Minister's Conditions of Approval (CoA) PA 08_0144 (Modification 7);
- Standard Conditions (Mining Lease 1609, 1839);
- Environment Protection Licence (EPL) 12789; and
- Implementation of Management Plans developed as part of the Ministers Conditions of Approval.

Under Schedule 6, Condition 7 and of PA 08_0144:

Prior to 13 September 2010, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project (Stages 1 and 2). 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 of this approval and any relevant mining lease or EPL (including any strategy, plan or program required under these approvals);

(d) review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate,

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

Note: This audit team must be led by a suitably qualified auditor and include experts in the fields of subsidence, water and noise management (other than for the 2010 audit which is not required to include a subsidence expert in the audit team).

The above condition does not refer to any new conditions such as those of Stage 3 SSD-10269. Therefore, the present IEA will address the Stage 2 PA 08_0144 conditions only, but will refer to Stage 3 SSD-10269 values (limits) from 1 August 2025 if these are different from Stage 2 values for the same type of measurement.

The audit period assessed in this IEA is 9 December 2022 through 5 November 2025 (the date the site visit was completed as part of the audit).

1.2 AUDIT TEAM AND TIMING

Dr. Toivo Zoete (lead auditor) and Dr Gareth Swarbrick (subsidence specialist) undertook the site visit and were approved by the DPHI to conduct the audit (refer to correspondence from the DPHI at Appendix A). Qualifications and experience of these personnel are as follows:

Toivo Zoete – Lead Auditor

- Qualifications: BSc (Hons), MAppSc (Hons), PhD, EMS 14001 Lead Auditor (2015); and Experience: Toivo is a Principal Consultant within ERM’s Sustainable Mining Team. He is an environmental professional with 30 years’ experience in a range of environmental studies, including mine closure, environmental audits, environmental impact studies, ecological assessments, among others in Australia and elsewhere. Relevant projects have included numerous audits for mining and upstream CSG developments (legal compliance, HSE, and ISO 140001 certification).

Gareth Swarbrick – Subsidence Specialist

- Qualifications: BE (Hons), PhD

Experience: Gareth is a geotechnical engineer and Principal of PSM. His major projects relate to mining, tunnelling and other civil infrastructure. Other areas of expertise include landfill design and operation, settlement and consolidated slurried mineral wastes, estimating ground movements due to shrink-swell phenomena and multi-phase modelling of water, gas and heat through the ground.

1.3 AUDIT OBJECTIVES

The objectives of ERM’s audit were to:

- Assess the environmental performance of the project and assess whether it is complying with the requirements in the CoA, EPL, and Standard Conditions/Mining Lease (including any assessment, plan or program required under these approvals);
- Review the adequacy of any approved strategy, plan, or program required under the abovementioned consents/approvals;
- Recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the abovementioned approvals; and
- Consult with the relevant agencies including DPHI, NSW Environment Protection Agency (EPA), NSW Resources Regulator, NSW Department of Climate Change, Energy, the Environment and Water, Narrabri Shire Council (NSC), and the Community Consultative Committee (CCC).

1.4 AUDIT SCOPE

The scope of works in order to complete the Audit includes the following:

- The audit is to be carried out in accordance with DPIE's Independent Audits Post Approval Requirements, 2020;
- The audit will also be carried out in accordance with AS/NZS ISO 19011:2018: Guidelines for quality and/or environmental management systems auditing;
- Review of compliance against the documentation identified in the CoA (as it relates to the current activities of Sunnyside) which will include:
 - document review of compliance against the CoA, statement of commitments, and any other relevant consents/approvals;
 - site inspection to assess compliance against field implementation of active CoA; and
 - review of supporting plans developed as part of the CoA and assessment of their adequacy towards effective environmental performance.
- Review of monitoring results and trends with comparison of monitoring results against regulatory limits (where applicable);
- Confirmation if any additional monitoring required for identified trends;
- Community complaints with review completed for any trends and identifying the source of an established trend;
- Review of any regulatory actions including any letters, penalty notices and prosecutions (if any);
- Review of previous Independent Environment Report audit report to verify close-out of actions;
- Consultation with the relevant agencies;
- Draft report with results of compliance assessment to be issued for comment to NCO; and
- Final report issued for submission to the DPHI.

The audit covers the period 9 December 2022 to 5 November 2025 and is limited to assessing the activities completed during the audit period.

1.5 LIMITATIONS OF THIS REPORT

This disclaimer, together with any limitations specified in the report, applies to this report and its use.

This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on:

1. client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM do not accept responsibility for omissions or inaccuracies in the client/third party information; and
2. information taken at or under the particular times and conditions specified, and ERM do not accept responsibility for any subsequent changes.

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2. AUDIT METHODOLOGY

2.1 SELECTION AND ENDORSEMENT OF THE AUDIT TEAM

Prior to the commencement of the audit, approval of nominated audit personnel was sought from the DPHI. These were approved as per letter from the DPHI to NCO, dated 24 July 2025 and 9 September 2025 (attached in Appendix A). Declarations of Independence are included in Appendix B.

2.2 SCOPE DEVELOPMENT

2.2.1 TERMS OF REFERENCE

Scope development for the audit included delineation of a Terms of Reference in collaboration with site personnel. The Terms of Reference included:

- Audit scope and objectives;
- Date and location of audit;
- Members of audit team;
- Compliance Evaluation Ratings (see below); and
- Audit Criteria.

2.2.2 AGENCY AND COMMUNITY CONSULTATION

The Terms of Reference were submitted to the agencies and stakeholders on 25 September 2025 to obtain feedback and draw attention to any key issues, within the agreed scope of the audit.

Agencies and stakeholders consulted include the DPHI, Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW), Resources Regulator, New South Wales Environment Protection Authority (NSW EPA), Narrabri Shire Council, and the Community Consultative Committee (CCC).

Responses are summarised in Table 2-1 and provided in Appendix C.

TABLE 2-1 AGENCY AND STAKEHOLDER CONSULTATION SUMMARY

Agency/Stakeholder	Method	Consultation Summary	Response	This audit response
NSW Department of Planning, Housing, and Infrastructure (NSW DPPI) - Planning NSW	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<ul style="list-style-type: none"> The most common incident notification we get from Narrabri Coal is GW/SW trigger exceedance notifications. So, for the 2025 audit I would like an additional focus on Surface Water and Ground Water. In particular, a check of whether monitoring was carried out during the audit period as per the relevant management plan/s requirements (duration, frequency, required monitoring points, analytes). 	<p>The auditor examined surface and groundwater monitoring through reviewing the INXPreserve surface water monitoring database and EPL monitoring reports for raw data, Environmental Event Reports, Quarterly Groundwater Monitoring Reports, and Annual Groundwater Reviews for interpretation of any incidences recorded during monitoring over the audit period. Many surface monitoring points were dry preventing monitoring of water quality data.</p> <p>No non-compliances were recorded for surface and groundwater monitoring over the audit period.</p>
NSW Environmental Protection Authority (NSW EPA)	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<ul style="list-style-type: none"> The EPA does not have any issues to raise or comments to make in regard to the ToR in this instance. 	N/A
NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW)	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<p>Compliance with:</p> <ul style="list-style-type: none"> The requirement to prepare and implement management plans including: Water Management Plans and sub-plans Extraction Plans and sub-plans The requirement to prepare and implement trigger action response plans to be reported on within annual and exceedance based reporting Water supply availability is clearly defined Water take at the site via storage, diversion, interception or extraction is clearly documented Water metering is in accordance with NSW Non-Urban Metering Framework Water Licence/s used to account for water take nominates the work where water is taken from Annual reporting clearly documents water take, use and water source impacts, and compares results with previous years, and identified exceedances and how these are managed 	<p>NCO has prepared and implemented a Water Management Plan which documents water sources, management and storage infrastructure, water management monitoring, impact assessment criteria and controls.</p> <p>Water licences are listed in Annual Reports including licence limits and annual takes, which have been within licence limits over the audit period. Information on actual groundwater inflows is inferred from monitoring of the volume of water pumped underground and the volume of water returned via the box-cut dewatering pump.</p>
NSW Resources Regulator	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<ul style="list-style-type: none"> The independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. 	The Auditor reviewed evidence that NCO has submitted a Rehabilitation Management Plan and rehabilitation forward plan to the Resources Regulator in accordance with the standard condition of mining leases. The Rehabilitation Objectives and the Final Landform Rehabilitation Plan have been submitted but have not yet been approved.
Gunnedah Shire Council	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<ul style="list-style-type: none"> Notification of received consultation email, but no other response 	N/A
Community Consultation Committee (CCC)	Email 25 September 2025	Provision of audit Terms of Reference, including introduction to team, audit date, and invitation to comment	<ul style="list-style-type: none"> No response 	N/A

2.3 CLASSIFICATION OF AUDIT FINDINGS

Findings resulting from an assessment of audit evidence were divided into six categories as follows:

- Compliant (C): the intent and all elements of the audit criteria requirements have been complied with within the scope of the audit;
- Non-compliant (NC): Failure to meet the audit requirements, failure to achieve the field performance outcomes identified in documentation, or ineffective environmental management of the activity;
- Not Triggered (NT) – A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, and therefore a determination of compliance could not be made; and
- Note: A statement or fact, where no assessment of compliance is required.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS ISO31000:2018 and as described in the Department of Planning & Environment publication "Independent Audit Post Approval Requirements (2020)". The overall level of risk was estimated by combining the likelihood of harm occurring with the estimated level of harm associated with each finding. Risk levels have been assigned as follows:

- **High:** Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence;
- **Medium:** Non-compliance with:
 - 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:
 - potential for moderate environmental consequences, but is unlikely to occur; or
 - potential for low environmental consequences but is likely to occur.

2.4 AUDIT PROCESS

Terms of Reference, site inspection logistics and request for documentation required were arranged prior to the site inspection component of the audit.

An opening meeting was held at the NCO office on 4 November 2025 to confirm the audit objectives and scope for the site inspection. Attendees included:

- Toivo Zoete (ERM Lead Auditor);
- Gareth Swarbrick (PSM Subsidence Specialist);
- Brent Bake (NCO Manager Environment);
- Ashley Howland (NCO Surface Operations Manager);
- Ben Simpson (NCO Superintendent – Environment);
- Neville Paxton (NCO Environmental Advisor);
- Harriet Davies (NCO Environmental Advisor); and
- Sam Mahaffay (NCO Environmental Specialist).

A site visit at NCO was subsequently undertaken by all of the above personnel, driving along tracks and inspecting particular points of interest (e.g., sediment dams, fences, weather station) on foot where required. Photographs and notes of relevant features were taken.

After the site visit, a further interview was held with all of the above listed personnel to discuss the audit criteria back at the Whitehaven office. The audit was completed with a Closing Meeting attended by all of the above listed personnel on the afternoon of 5 November 2025.

A summary of all findings and recommendations arising as a result of the audit, are included in Section 4 of this report. Detailed compliance tables are presented in Appendix D. ERM note the audit report is based on objective evidence.

NCO is required to submit a copy of this independent audit report to the DPHI by 31 January 2026, together with its response to any recommendations contained in the independent audit report.

3. SITE OVERVIEW

3.1 APPROVALS

The Narrabri Mine Stage 1 Operations was granted approval (PA 05_0102) on 13 November 2007 over ML1609 (5,298ha). A modification to this approval was granted under approval PA 08_0144 on 26 July 2010 to allow for the construction of a CHPP, ventilation shaft and other long lead time items that would ultimately form part of an expanded longwall mining operation permitted to mine up to 11 million tonnes run of mine (ROM) coal per annum until 26 July 2031.

Stage 3 Extension Project was granted State Significant Development approval (SSD-10269) on 1 April 2022 over ML1639 (2,085ha). The Environment Protection and Biodiversity Conservation Approval (EPBC Approval) 2019/8427 was granted approval on 24 September 2024. SSD-10269 became effective on 1 August 2025.

The mine currently employs a longwall extraction method, with bord and pillar mining in selected panels approved via PA 08_0144 Modification 7 in November 2021 .

3.2 DESCRIPTION OF PRIMARY PROCESSES UNDERTAKEN DURING THE AUDIT PERIOD

3.2.1 CONSTRUCTION AND DEMOLITION

The following surface construction activities were conducted during the audit period:

- Construction of an alternative mine access track from the pit-top area to the surface areas above the southern underground mining area;
- Construction of the new Brine Dam (BR1) (completed and commissioned on 3 October 2023);
- Sediment Dam (SD) associated with BR1;
- Access track and services corridors from the existing rail loop dam;
- Installation of an office building within the CHPP area;
- Drilling of the western downcast shaft at southern end of LW205;
- Three sheds in the main administration area;
- Commencing construction of pad for eastern shaft facilities on southern extent of ML1609; and
- Clearing for powerline from main substation to eastern shaft facilities at southern extent of LW 204.

While no mine infrastructure was demolished during the audit period, decommissioning activities undertaken include reclaiming gas drainage poly pipe, cementing and rehabilitation of boreholes, and removal of dilapidated houses and associated infrastructure on mine-owned land no longer required and adversely affected by subsidence.

3.2.2 EXPLORATION

Exploration drilling was conducted during the audit period for the assessment of coal quality, geotechnical and/or hydrogeological evaluation purposes.

3.2.3 LAND PREPARATION

During the audit period, clearing of vegetation was conducted to facilitate surface gas drainage infrastructure works. Prior to the commencing of any clearing activities, threatened flora surveys and fauna pre-clearing surveys are conducted in accordance with the landscape management plan. Aboriginal Cultural Heritage inspections are undertaken prior to and during disturbance works. Once cleared, soil stripping and stockpiling is conducted in the areas above in order to facilitate gas draining infrastructure works.

3.2.4 MINING OPERATIONS

NCO operations during the reporting period consisted of Stage 2 underground longwall mining using a longwall mining unit and continuous miners, support by shuttle cars and feeder breakers, to support ongoing development of underground roadways, ventilation overcast and belt chambers. During the audit period, the longwall mining extracted or developed panels LW110, LW203, LW204, CF201, CF 202, MG204, MG205 and the 200 Mains.

Surface features include the Reject Emplacement Area (REA), access tracks, ventilation shaft and Goaf gas drainage sites and associated power and water infrastructure and a Water Conditioning Plant. A longwall assembly site and mining supplies storage area is located north of the box-cut Pit Top Area.

3.2.5 COAL PROCESSING AND TRANSPORT

ROM coal is stockpiled at the surface for coal handling preparation. The coal conveyor and stacking system includes a washing circuit for larger sized coal (>16mm) and by-pass system for smaller sized coal (<16mm). Product coal is stockpiled before being loaded to rail for transport to Port of Newcastle. Coarse reject material is transferred to the on-site Reject Emplacement Area.

3.2.6 MAINTENANCE ACTIVITIES

Maintenance of plant and equipment occurs within the maintenance workshop which is utilised and managed by NCO maintenance staff. Adjacent to the workshop is a concrete wash bay which is connected to an in-ground oil water separator pit. Bulk diesel storage is provided in the form of two 70,000 L self-bunded above-ground storage tanks. Drainage lines from the refuelling bay sump is understood to be connected to the wash bay. Sludge waste from the wash bay and refuelling bay is pumped from the oil water separator pits by a third party waste contractors on a routine basis.

3.2.7 WASTE MANAGEMENT

Production wastes generated at the site include mined rock, drill cuttings from exploration and gas drainage activities, coarse and fine reject, brine generated by the Water Conditioning Plant.

Non-production wastes generated include general domestic waste from onsite buildings, hydrocarbons and oils generated from the maintenance workshop, wash down pad and fuel storage area and treated sanitary wastewater. General wastes are disposed of on a routine basis by a waste contractor. The site recycles cardboards/paper and steel. Waste oils are collected by a third-party waste contractor for offsite treatment and recycling.

Sanitary wastewater is disposed via a self-irrigating eco-cycle septic system, which has been approved by Narrabri Shire Council.

Used tyre and wheel assemblies are managed by the equipment supplier as part of the service contract.

Waste segregation was noted to be good during the audit.

3.2.8 WATER MANAGEMENT

Water management at NCO is undertaken in accordance with the approved Water Management Plan. Surface water is managed in a closed loop of ponds located within the rail loop, comprising a series of water storage dams used to collect, store and dispose of pumped out mine water and dirty water run-off, sediment basins, and clean / dirty surface water drains were in place. An additional brine pond (BR1) was constructed during the audit period in response to groundwater modelling predictions for the mine.

Licensed surface water discharge points on-site included sediment dams SD2, SD4, SD7, SD8, and SD9. NR1, on the Namoi River is licensed for treated water discharges however not yet constructed.

A Water Conditioning Plant treats dewatered groundwater from the mine to a sufficient water quality for re-use in mining operations.

The dams are subject to weekly, monthly and quarterly inspections by a trained NCO employee. Annual and 5-yearly inspections are undertaken by a Dam Engineer in accordance with the Dams Safety Act.

A pipeline from the Namoi River is the main source of raw water for the mine. NCO holds several water licences for water take from sources including the Namoi River and several groundwater sources. Pumped volumes are metered, and reported to Water NSW, and recorded in Annual Reviews. Records indicate pumped volumes are within the licensed use limits.

3.2.9 SUBSIDENCE MANAGEMENT

The impacts of subsidence are managed through the approved Extraction Management Plan and Subsidence Monitoring Plan as well as subsidence prediction and monitoring of subsidence effects. NCO employs the services of a third-party Geotechnical Engineer to undertake subsidence predictions and monitoring.

3.2.10 REHABILITATION

Progressive rehabilitation activities have occurred during the audit period and generally consisted of decommissioning drill holes, filling in sumps associated with drilling activities, re-spreading topsoil/subsoil over drilling/access tracks and weed management.

4. AUDIT FINDINGS

4.1 PREVIOUS AUDIT FOLLOW UP

The last audit was conducted by ERM for the period 5 December 2019 through 9 December 2022. A summary of the 2022 audit findings and their status is summarised below in Table 4-1.

TABLE 4-1 SUMMARY OF 2022 AUDIT FINDINGS

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action	2025 Status														
Minister's Conditions of Approval PA 08_0144																			
4.1	<p>The Proponent shall ensure that the noise generated by the project does not exceed the levels set out in Table 1.</p> <p>Table 1: Impact assessment criteria dB(A)</p> <table border="1" data-bbox="261 453 973 667"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(1 minute)</th> </tr> </thead> <tbody> <tr> <td>All privately owned residences</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> To determine compliance with the L_{Aeq}(15 minute) limit, noise from the project is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable. These noise limits apply to applicable receivers under all meteorological conditions except for any one of the following: <ul style="list-style-type: none"> wind speeds greater than 3 metres/second at 10 metres above ground level; or stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or stability category G temperature inversion conditions. Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological weather station located in the vicinity of the site, or as otherwise agreed by the Secretary. To determine compliance with the LA₁(1 minute) noise limits, noise from the project is to be measured at 1 metre from the dwelling façade. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). <p>These limits do not apply if the Proponent has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (1 minute)	All privately owned residences	35	35	35	45	<p>The following exceedances of EPL noise limits were recorded during the audit period:</p> <ul style="list-style-type: none"> 23 June 2020: Point N6 Newhaven, Night - L_{Aeq} (15 minute) of 40dB 8 September 2020: Point N3, Day – L_{Aeq} (15 minute) of 39 dB and LA₁ of 44dBA <p>(Note: September 2020 recorded during non-compliant weather conditions of stability category G and as such does not represent a non-compliance with the Project Approval).</p> <p>Follow-up monitoring was undertaken on 03 November 2020 in accordance with the requirements of the Noise Management Plan, with monitoring results reporting noise levels below criteria (listed as inaudible). The auditor sighted evidence of correspondence with the landholder regarding the exceedance on 23/06/20 and follow up correspondence with additional monitoring results on 04/09/20.</p>	NC	Reported NC. No further action required.	N/A
Location	Day		Evening	Night															
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (1 minute)															
All privately owned residences	35	35	35	45															

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action	2025 Status
4.18	The Groundwater Monitoring Program must include: (a) further development of the regional and local groundwater model; (b) detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality (including at any privately owned bores in the vicinity of the site); (c) groundwater impact assessment criteria; (d) a program to monitor the impact of the project on groundwater levels, yield and quality; (e) a program to monitor any impacts of the project on the Namoi River Alluvium; (f) a program to monitor (by the use of shallow piezometers/lysimeters), detect, and quantify any leakage/leachate from the site's evaporation/storage ponds, brine storage area or coal reject emplacement area; and (g) procedures for reporting the results of this monitoring.	A Groundwater Monitoring program that meets the requirements is included in the WMP. An annual review of groundwater monitoring is undertaken by Groundwater Exploration Services. NCO notified DPE of a breach of the maximum predicted drawdown level at P16 in 2021. As per the TARP process, a hydrologist was engaged to review groundwater monitoring data and investigate the exceedance. It is considered that the groundwater model has under-predicted the impacts at P16. NCO engaged AGE to review the groundwater model and will incorporate revised triggers to the Groundwater Management Plan (to be finalised). Groundwater monitoring field sheets have also been updated to include groundwater level triggers.	Obs C	Revise the Groundwater Management Plan in accordance with updated predictions following recalibration of the Groundwater Model.	Deemed compliant
4.25D	The Proponent must implement the approved Shuttle Bus Traffic Control Protocol.	The Shuttle Bus Traffic Control Protocol requires the bus driver to coordinate phone contact with the CHPP control room to receive advice on coal train movements. No records of such contact are maintained to verify this occurs. The protocol also requires that where coal train movements may impact on the bus access to the site, the driver must not queue on the Kamilaroi Highway and Kurrajong Creek Road intersection. Drivers must continue along the highway and park at a safe place to wait the coal train to clear. This requirement has not been tested.	Obs C	It is recommended that NCO develop and maintain records of a verification process to ensure the protocol is being adhered to.	Deemed compliant
4.30	The Proponent shall revise the Energy Savings Action Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with energy management for the site (Stages 1 and 2) and subsequently implement this revised version of the Energy Savings Action Plan to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with OEH; b) be prepared in accordance with the <i>Guidelines for Energy Savings Action Plans</i> (DEUS, 2005), or its latest version; c) be submitted to the Secretary for approval prior to 30 June 2011; and include a program to monitor the effectiveness of measures to reduce energy use on site.	The effective Energy Savings Action Plan was approved by DPIE in May 2015. The ESAP details 12 management actions developed in the first iteration of the EAP in 2011. These include a range of management and reporting actions for identification of energy savings opportunities and monitoring of effectiveness including, adding ESAP implementation to site management meetings, reporting on monthly energy usage at monthly site meetings, develop and report energy targets, develop a site Energy Management Committee to review and report on energy management initiatives and develop energy efficiency training. Electricity use for FY20 and FY21 was tracked for individual meters and entered into Pulse. For FY22, electricity use has been tracked in a custom-built NGRS tracking platform. Monthly energy reports as referenced in the ESAP were reviewed during the previous IEA however, no evidence of this report being prepared during the current audit period was provided. Whilst there is efforts by site management to monitor and reduce energy consumption it does not appear to be organised as outlines in the ESAP i.e. Energy Management Committee, monthly reporting and setting of targets. The current ESAP is based on energy audits conducted in 2013 and assumptions made prior to production commenced.	NC	It is recommended the ESAP is reviewed and updated to consider actual production data since 2013 and work currently underway to review GHG emissions (see 4.31 below).	Deemed Compliant
6.4	The Proponent shall notify the Secretary in writing via the Major Projects website and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.	In response to the notification of breach of the drawdown trigger at P16, DPE recorded a breach of this condition due to NCO becoming aware of the drawdown breach on the 5 July 2022 and notification being provided to DPE on 9 September 2022. No further action has been taken by DPE on this matter to-date. All other incident notifications have been made within the required timeframe.	NC	Reported NC. No further action required.	N/A

Statement of Commitments

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action	2025 Status
9.18	Ensure that if any further Aboriginal artefacts are uncovered at any time during the life of the mine, work in the vicinity of the subject area ceases and the Proponent follows the procedures recorded in the ACHMP.	Refer CoA Sch 4 Cl 22	NC	Ensure the ACHMP continues to be implemented and employees made aware of requirements of the plan.	Deemed compliant

Environmental Protection Licence 12789

L4.1	<p>Noise generated at the premises must not exceed the noise limits in the table below.</p> <table border="1"> <thead> <tr> <th>Locality and location</th> <th>Day - LAeq (15 minute)</th> <th>Evening - LAeq (15 minute)</th> <th>Night - LAeq (15 minute)</th> <th>Night - LA1 (1 minute)</th> </tr> </thead> <tbody> <tr> <td>All privately owned residences</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table>	Locality and location	Day - LAeq (15 minute)	Evening - LAeq (15 minute)	Night - LAeq (15 minute)	Night - LA1 (1 minute)	All privately owned residences	35	35	35	45	<p>The following exceedances of EPL noise limits were recorded during the audit period:</p> <ul style="list-style-type: none"> 23 June 2020: Point N6, Night - LAeq (15 minute) of 40dB 8 September 2020: Point N3, Day - LAeq (15 minute) of 39 dB (Note: September 2020 recorded during non-compliant weather conditions of wind speed >3m/s and as such does not represent a non-compliance with the Project Approval). <p>For the exceedance recorded in June 2020, mining continuum was noted as the event cause and no community complaints were received at the time of the exceedance. Government agencies were notified as required and subsequent monitoring events have recorded noise levels within the approved noise limits.</p>	NC	<p>Duplicate NC Ref. CoA Sch 4 Cl 1 Reported NC. No further action required.</p>	N/A
Locality and location	Day - LAeq (15 minute)	Evening - LAeq (15 minute)	Night - LAeq (15 minute)	Night - LA1 (1 minute)											
All privately owned residences	35	35	35	45											

4.2 COMPLAINTS SUMMARY

Complaints registers for the audit period were available online and/or for review. Complaints recorded over the audit period include:

- Two complaints in relation to dust on complainants roof and water supply;
- One complaint about erratic driving of a white utility with yellow stripes; and
- One complaint about potential livestock welfare.

The detailed summaries as prepared by WCL are provided on the Whitehaven Coal website

4.3 INCIDENT SUMMARY

A review of incidents during the audit period was undertaken through a review of monitoring data. The following incidents were reported for the audit period:

- 2023:
 - PM10 data from site ND10 on 23/04, 29/04, 29/05 and 4/06/2023 were not collected due to mechanical failure of the HVAS on those days. The HVAS units were replaced at ND9 and ND10.
- 2024:
 - Elevated PM10 reading at ND9 on 12/03/2024;
 - EC trigger and water level triggers activated for bore water quality and levels on 10/10/2024; and
 - EC and pH triggers activated for bore water quality 14/11/2024.
- 2025:
 - EC and pH triggers activated for groundwater recorded 28/01/2025, 30/01/2025, 31/01/2025, 3/02/2025, and 4/02/2025;
 - Elevated PM10 reading at ND10 on 12/04/2025;
 - EC, pH, water level triggers activated for groundwater recorded 19/05/2025, 20/05/2025, 28/05/2025, and 27/06/2025;
 - EC surface water trigger activated recorded 28/07/2025; and
 - EC, pH, water level triggers activated for groundwater recorded 19/08/2025, 21/08/2025, 26/08/2025, 28/08/2025.

Following detailed investigations, none of the above exceedances were found to be related to mine related activities.

4.4 ENVIRONMENTAL MONITORING PERFORMANCE

4.4.1 NOISE

Quarterly acoustic monitoring was undertaken over the audit period by qualified third party contractors SLR. No noise exceedances nor any noise complaints were recorded.

No noise complaints were received by NCO during the audit period.

4.4.2 AIR QUALITY

Dust monitoring was conducted by an independent contractor during the audit period. No depositional dust exceedances were recorded. Three incidents relating to PM10 were as follows:

- PM10 24-hour exceedance was recorded at ND9 Claremont on 12 March 2024. The recorded value of 69.1µg/m³ exceeded the criterion of 50.0µg/m³. Investigations indicated that the exceedance was not the result of mining activities. The exceedance was reported to DPHI 4/04/2024;
- PM10 is required to be monitored every 6 days in accordance with the Air Quality Management Plan. NCO did not collect PM10 data from site ND10 on 23 April 2023, 29 April 2023, 29 May 2023 and 4 June 2023 due to mechanical failure of the HVAS, but representing a non-compliance with the Air Quality Management Plan. NCO replaced the HVAS at ND10 on 9 June 2023. The Environmental Event Report on this event notes that the assessment undertaken by an external specialist concluded that the criterion would unlikely have been exceeded on any of the missed days for a number of reasons. As a result of this event, the Air Quality Monitoring Procedure was revised by adding detail on catch-up days when minimum sample runtime is not achieved, while a question was added to the field checking sheet to prompt checking minimum runtime achieved, and, if Not, to escalate to NCO environment team to organise a catch-up sample; and
- A PM10 24-hour exceedance was recorded at ND10 on 12 April 2025, with a value of 54.6µg/m³. As wind direction was not from the mine, the cause was not mine related, as shown in The Environmental Event Report.

Auditors sighted the weather station onsite which provides the site's meteorological data. Meteorological data from the onsite weather station was provided for the audit period.

4.4.3 BLASTING

No blasting activities were conducted during the audit period.

4.5 WATER MANAGEMENT

4.5.1.1 SURFACE WATER

Surface water management comprising a series of water storage dams used to collect, store and dispose of pumped out mine water and dirty water run-off, sediment basins, and clean / dirty surface water drains were in place and established as per the Water Management Plan (dated 2013). Over the audit, period discharges occurred from SD2 (March and April 2025), SD4 (March 2025), SD7 (March 2023), and SD9 (June 2024, December 2024, March 2025). No discharges (including raffinate) to the Namoi River occurred over this time.

No significant issues were observed or identified with regards to erosion or sediment run off during the site tour, and none were reported.

4.5.1.2 GROUNDWATER

Groundwater monitoring locations are stipulated within Condition P1.3 of the EPL licence and in the EPL Monitoring Reports. Under the WMP, depending on their location, piezometers and groundwater bores are required to be monitored on a daily, monthly, quarterly, or annual

basis. Groundwater monitoring data provided showed that monitoring is completed within the WMP timeframes.

Five groundwater exceedance events occurred over the audit period, including during March – September 2024, November 2024, February 2025, May 2025, and September 2025. Bores involved include P2, P3, P4, P7, P9, P10, P11, P29, P39A, P39B, P43, P47, and P53. Most of the exceedances were for EC, except for P7, where the exceedance was related to pH, and P11, where water level was triggered in addition to EC. Detailed investigation reports for these incidents indicate that most of the EC exceedances events are likely to be related to groundwater adjustments following the Tinderbox Drought (end 2019) and/or natural variations. The pH exceedance at P7 appears to be an isolated case and is likely to be related to the natural variability of the aquifer formation. The elevated water level at P11 is likely to be related to lateral migration of water. The elevated EC at P53 is likely to be related to mixing with other groundwater and/or infiltration from the Rejects Emplacement Area. Further comparison with geochemistry of rejected coal material is indicated to confirm this linkage.

New baselines are being established over 2025 for a number of these bores (P3, P9, P10, P39A, and P43) to be reported on in the 2025 Annual Review.

Groundwater monitoring is ongoing and supplied to EPA on a quarterly basis.

4.5.1.3 WATER TAKE

The site holds a number of Water Access Licence (WAL), including:

- Upper Namoi Zone 5 Groundwater (WAL 12833, 20132, 12822);
- GAB Southern Recharge Groundwater Source (WAL 15922);
- Gunnedah Oxley Basin MDB Groundwater Source (WAL 29549, 43017);
- Lower Namoi Regulated River Water Source Regulated River (High Security) (WAL 6762);
- Lower Namoi Regulated River Water Source Regulated River (General Security) (WAL 2671, 2728, 20152).

All water take over the audit period was within licence entitlements.

4.6 MANAGEMENT PLAN ADEQUACY

The Management Plans for the site were reviewed and the adequacy in meeting the relevant approval requirements was assessed in view of current operations at the site. The site's Management Plans underwent review as per observed Action triggers in the CMO management system. In general, Management Plans were considered appropriate for the site's operations at the time of the audit.

4.7 ENVIRONMENTAL PROTECTION LICENCE

The site operated under Environment Protection Licence (EPL) 12789 issued to Narrabri Coal Operations Pty Ltd. The EPL has been varied four times during the audit period including on 26 July 2023, 05 February 2024, 29 January 2025, and 7 August 2025. Details of changes to EPL conditions are covered in the EPL Audit Tables presented in Appendix D.

The site submitted Annual Returns to the EPA, as required for the audit period. Findings identified against the site's EPL are outlined in Appendix D. No non-compliances were noted.

4.8 MINING LEASE

NCO lies within the ML1609 and ML1839. ML1609 was last amended on 19 August 2022 (effective 17 October 2022), while ML1839 was granted 13 September 2022. Conditions for both MLs in their current form are represented by the Standard Conditions as per Mining Regulation 2016, Schedule 8A, Part 2.

Findings identified against the Standard Conditions are presented in Appendix D. No non-conformances were noted.

4.9 COMPLIANCE WITH REGULATORY INSTRUMENTS

A compliance check of the CoA, EPL and ML conditions as well as management plan review has been completed and is provided in Appendix D. No non-compliances were recorded with any of the statutory conditions. One non-compliance was recorded during the review of the management plans. It relates to the failure of the HVAS monitoring during March 2023. The HVAS units have since been replaced, and measures have been incorporated into the Air Quality Monitoring Procedure to avoid future similar non-compliance.

This non-compliance was self-reported by the proponent within the 2023 Annual Review report required by PA 08_0144.

5. CONCLUSION

An audit of CoA, Mining Lease (Standard Conditions), and Environmental Protection Licence conditions has been completed as well as a check against commitments made in the management plans developed as part of CoA conditions for the site. The results are shown in Table 5-1 below.

TABLE 5-1 SUMMARY OF AUDIT FINDINGS

Review	Non-compliances (NC)
Statutory Instruments	-
Implementation of Plans	1 ³ (Low risk)

³ HVAS Failure (Non-compliance with Air Quality Management Plan)



APPENDIX A

PLANNING SECRETARY AUDIT TEAM
AGREEMENT

Department of Planning, Housing and Infrastructure

NSW Planning ref: MP08_0144-PA-83

Brent Baker

Environmental Manager

Narrabri Coal Operations Pty Ltd

09/09/2025

Sent via the Major Projects Portal only

Subject: Narrabri Coal Mine – 2025 IEA alternate lead auditor

Dear Mr Baker

I refer to your request for the Planning Secretary's approval of a suitably qualified, experienced, and independent alternate lead auditor to conduct an Independent Audit of Narrabri Coal Mine, submitted as required by Schedule 6, Condition 7 of MP08_0144 as modified (the consent) to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 3 September 2025.

NSW Planning has reviewed your request and based on the information you have provided is satisfied that the Toivo Zoete is suitably qualified, experienced, and independent.

In accordance with Schedule 6, Condition 7 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse Toivo Zoete as lead auditor for the 2025 Independent Environmental Audit of Narrabri Coal Mine.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Joel Curran, Senior Compliance Officer on 02 4904 2702 or email compliance@planning.nsw.gov.au

Department of Planning, Housing and Infrastructure

Yours sincerely

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

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

NSW Planning ref: MP08_0144-PA-80

Brent Baker (Environmental Manager)

Narrabri Coal Operations Pty Ltd

Kamilaroi Country

10 Kurrajong Creek Road

BAAN BAA NSW 2390

24/07/2025

Sent via the Major Projects Portal only

Subject: Narrabri Coal - Stage 2 - 2025 IEA change to audit period request

Dear Mr Baker

I refer to your request for the Planning Secretary's endorsement of suitably qualified, experienced, and independent persons to conduct the 2025 Independent Audit of the Narrabri Coal Mine Stage 2 development, submitted as required by Schedule 6, Condition 7 of MP08_0144 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 16 July 2025.

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

In accordance with Schedule 6, Condition 7 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Andrew Lewis – Lead Auditor
- Leanne Lee – Support Auditor
- Gareth Swarbrick – Technical Expert (Subsidence)
- Chris Gimber – Technical Expert (Water)
- Keshav Dhayam - Technical Expert (Noise)

NSW Planning further notes and agrees to your request for an extension of the timeframe to submit the audit report and response to audit recommendations to 31 January 2026, or as otherwise agreed by the Planning Secretary.

In accordance with Schedule 6, Condition 7 of the consent, the Planning Secretary requires that in undertaking the Independent Audit, the auditors consult with the following agencies prior to the site inspection, with all matters raised to be clearly tabulated and addressed in the audit report:

- NSW Department of Planning, Housing and Infrastructure.
- NSW Department of Primary Industries and Regional Development – NSW Resources branch.
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW).
- NSW Environmental Protection Authority.
- Narrabri Council.
- Narrabri Coal Operations Community Consultative Committee.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- The Subsidence technical expert must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Joel Curran, Senior Compliance Officer on 02 4904 2702 or email compliance@planning.nsw.gov.au

Yours sincerely

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

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary



APPENDIX B

INDEPENDENT AUDIT DECLARATION
FORM

Declaration of Independence Form

Declaration of Independence - Auditor

Project Name	Narrabri Mine
Consent Number	PA 08_0144
Description of Development	Underground mine
Project Address	10 Kurragong Creek Road, Baan Baa
Proponent	Narrabri Coal Operations Pty Ltd
Date	4 September 2025

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Toivo Zoete
Signature	
Qualification	BSc (Hons), MAppSc (Hons), PhD

Company

Environmental Resources Management Australia Pty Ltd (ERM)

Declaration of Independence Form

Declaration of Independence - Auditor

Project Name	Narrabri Mine
Consent Number	PA 08_0144
Description of Development	Open cut mine
Project Address	10 Kurragong Creek Road, Baan Baa
Proponent	Narrabri Coal Operations Pty Ltd
Date	20 June 2025

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Gareth Swarbrick
Signature	
Qualification	B.Eng (Civil Engineering), PhD (Civil Engineering)

Company

PSM Consulting Services



APPENDIX C CONSULTATION CORRESPONDENCE

29 September 2025

Mr Toivo Zoete
ERM Brisbane
By Email: Toivo.Zoete@erm.com

Re: Narrabri Colliery – Independent Environmental Audit

Dear Mr Zoete,

Thank you for your email dated 25 September 2025 (our reference AREQ0068237) requesting consultation on the independent audit to be undertaken of the Narrabri Colliery which is covered by mining leases ML1609 (1992) and ML1839 (1992).

The independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016.

The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. It would be appreciated if a copy of the final audit report could be sent to the Regulator at nswresourcesregulator@service-now.com upon completion of the audit.

Sincerely

Jenny Ehmsen
Principal Compliance Auditor
NSW Resources Regulator

From: DPIE Water Enquiries Mailbox <water.enquiries@dcceew.nsw.gov.au>
Sent: Thursday, 25 September 2025 11:46 AM
To: Toivo Zoete
Subject: Automatic reply: Narrabri Mine Independent Environmental Audit

EXTERNAL MESSAGE

Thank you for your email. Your enquiry is important to us.

We aim to resolve enquiries within the following timeframes:

- General enquiries - 5 business days.
- Complaints – 20 business days.
- Licensing and Approval applications – up to 80 business days, depending on the application type.

Your enquiry will be forwarded to the appropriate business unit, and a representative will contact you shortly.

If you need to follow up your enquiry, please reply to this email or call us on 1300 081 047. For urgent matters relating to water leaks or sewage, please contact your local council or your water provider.

[Please view our privacy statement](#)

From: Tim Baker <tim.baker@dcceew.nsw.gov.au> on behalf of DCCEEW Water Assessments Mailbox <water.assessments@dcceew.nsw.gov.au>
Sent: Tuesday, 4 November 2025 12:38 PM
To: Toivo Zoete
Subject: DCCEEW Water : Narrabri Mine Independent Environmental Audit
Attachments: DCCEEW Water - Narrabri Coal MP08_0144 - IEA.pdf

You don't often get email from water.assessments@dcceew.nsw.gov.au. [Learn why this is important](#)

EXTERNAL MESSAGE

Dear Toivo,

Please see attached response to your consultation request for the Narrabri Mine IEA.

Regards

Tim

Tim Baker
Senior Project Officer
Water Assessments
[Department of Climate Change, Energy, the Environment and Water](#)

From: Toivo Zoete <Toivo.Zoete@erm.com>
Sent: Thursday, 25 September 2025 11:45 AM
To: DPIE Water Enquiries Mailbox <water.enquiries@dcceew.nsw.gov.au>
Cc: BSimpson@whitehavencoal.com.au; Lucas Wilson <Lucas.Wilson@erm.com>; Leanne Lee <Leanne.Lee@erm.com>
Subject: Narrabri Mine Independent Environmental Audit

Dear Sir/Madam,

ERM are currently preparing for an Independent Environmental Audit (IEA) for Narrabri Coal Operations Pty Ltd's Narrabri Mine at 10 Kurrajong Creek Road, Baan Baa NSW 2390 against the Conditions of Approval issued to the mine, covered by the CoA PA 08_0144, the Environmental Protection License 12789 and Mining Lease 1609 & 1839.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies/stakeholders. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed on 4 & 5 November 2025. If you have any concerns or comments in relation to the audit, could you please reply to this email by 31 October 2025?

Thank you very much in advance and kind regards,

Toivo Zoete

Best Regards



Sustainability is our business

Toivo Zoete
Principal Consultant

Brisbane
+61428382375

erm.com

Working Monday - Wednesday



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Our ref: OUT25/14585

Toivo Zoete
ERM
Email: Toivo.Zoete@erm.com

4/11/2025

Subject: Narrabri Mine (MP08_0144) Independent Environmental Audit

Dear Toivo Zoete,

I refer to your email dated 25 September 2025 notifying the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group of the upcoming audit report for the Narrabri Mine.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit report be prepared to ensure it addresses compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au

Yours sincerely,



Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water



DOC25/821822-1

2 October 2025

Toivo Zoete
Principal Consultant
ERM

By Email: toivo.zoete@erm.com

Dear Toivo,

**Narrabri Coal Operations – Independent Environmental Audit Terms of Reference –
EPL12789**

The Environment Protection Authority (EPA) refers to the *Terms of Reference for the Narrabri Coal Mine Independent Environmental Audit* (the ToR). The ToR was provided to the EPA on 25 September 2025 for review and is a requirement of the Conditions of Approval issued to the mine, covered by the CoA PA 08_0144, the Environmental Protection License 12789 and Mining Lease 1609 & 1839 for the Narrabri Mine at 10 Kurrajong Creek Road, Baan Baa NSW 2390 (the Premises).

The Environment Protection Authority (EPA) thanks you for providing the ToR for our records.

The EPA does not have any issues to raise or comments to make regarding the ToR in this instance.

If you have any questions regarding this matter, please contact Ross Briggs on 131 555 or by email to info@epa.nsw.gov.au, marked to Ross Briggs' attention.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Turnbull', enclosed within a simple oval scribble.

KHARL TURNBULL
Acting Unit Head
Regulatory Operations Regional
Environment Protection Authority

From: Joel Curran <Joel.Curran@planning.nsw.gov.au>
Sent: Thursday, 25 September 2025 3:48 PM
To: Toivo Zoete
Subject: RE: Narrabri Mine Independent Environmental Audit

You don't often get email from joel.curran@planning.nsw.gov.au. [Learn why this is important](#)

EXTERNAL MESSAGE

Hi Toivo

Thank you for consulting with NSW Planning on the upcoming Narrabri Coal Mine Independent Audit.

The most common incident notification we get from Narrabri Coal is GW/SW trigger exceedance notifications. So, for the 2025 audit I would like an additional focus on Surface Water and Ground Water. In particular a check of whether monitoring was carried out during the audit period as per the relevant management plan/s requirements (duration, frequency, required monitoring points, analytes).

Regards

Joel Curran
Senior Compliance Officer

Development Assessment and Sustainability | Department of Planning, Housing and Infrastructure
T 02 4904 2702 | M 0412 323 331 | E joel.curran@planning.nsw.gov.au
PO Box 1226 | Newcastle NSW 2300
Please direct all email correspondence to compliance@planning.nsw.gov.au
www.dphi.nsw.gov.au



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

From: Sarah Cavaleri <sarah.cavaleri@dpie.nsw.gov.au> on behalf of DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Sent: Thursday, September 25, 2025 2:52:59 PM
To: Heidi Watters <Heidi.Watters@Planning.nsw.gov.au>
Subject: FW: Narrabri Mine Independent Environmental Audit

From: Toivo Zoete <Toivo.Zoete@erm.com>
Sent: Thursday, 25 September 2025 11:34 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: BSimpson@whitehavencoal.com.au; Lucas Wilson <Lucas.Wilson@erm.com>; Leanne Lee <Leanne.Lee@erm.com>

Subject: Narrabri Mine Independent Environmental Audit

Dear Sir/Madam,

ERM are currently preparing for an Independent Environmental Audit (IEA) for Narrabri Coal Operations Pty Ltd's Narrabri Mine at 10 Kurrajong Creek Road, Baan Baa NSW 2390 against the Conditions of Approval issued to the mine, covered by the CoA PA 08_0144, the Environmental Protection License 12789 and Mining Lease 1609 & 1839.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies/stakeholders. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed on 4 & 5 November 2025. If you have any concerns or comments in relation to the audit, could you please reply to this email by 31 October 2025?

Thank you very much in advance and kind regards,

Toivo Zoete

Best Regards



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Principal Consultant

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Working Monday - Wednesday



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APPENDIX D

CONDITIONS OF APPROVAL
ENVIRONMENTAL PROTECTION
LICENCE AND MINING LEASE
COMPLIANCE

Project Approval 08_0144 (in black) and Development Consent SSD-10269 (in red)

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
2.1	The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	This audit	Review of management plans, implementation of plans and site inspection to confirm – refer tables of this audit.	Note	N/A
TERMS OF APPROVAL					
2.2	The Proponent shall carry out the project generally in accordance with the: (a) EA; and (b) conditions of this approval. Note: The general layout of the project is shown in Figures 1 and 2 of Appendix 2.	This audit	Review of management plans, implementation of plans and site inspection to confirm – refer tables of this audit.	Note	N/A
2.3	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 approval shall prevail to the extent of any inconsistency.	Note	Noted	Note	N/A
2.4	The Proponent shall comply with any reasonable and feasible requirements of the Secretary arising from the Department’s assessment of: (a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with the conditions of this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.	Interview – Environment Superintendent, HSE Manager	NCO has complied with requirements of the Secretary as necessary during the audit period. Further details are provided in the below report.	C	N/A
LIMITS ON APPROVAL					
2.5	The Proponent may undertake mining operations on the site for 21 years from the date of this approval. <i>Note: Under this Approval, the Proponent is required to rehabilitate the site and to perform additional undertakings to the satisfaction of the Secretary. Consequently, this approval will continue to apply in all other respects other than the right to conduct mining operations until the site has been rehabilitated to a satisfactory standard.</i>	Note	Noted	Note	N/A
2.6	The Proponent shall not extract more than 11 million tonnes of ROM coal from the site per calendar year.	Annual Reviews 2022, 2023, 2024 ROM Coal Spreadsheet extract	2022 – 3.37Mt 2023 – 4.25Mt 2024 – 5.12Mt 2025 (January - September) – 2.55Mt	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
2.7	The Proponent shall transport all coal from the site by rail.	Interview with Superintendent-Environment CoalTrak records Site Observations	All coal is transported by rail. Train was observed to be loading during site inspection undertaken for this audit.	C	N/A
2.7A	The Proponent may undertake a one off transport of coal by road of an approximate 600 tonne bulk sample of coal in accordance with the procedures, vehicle traffic route and transport operating hours as specified in the modification application 08_0144 MOD 2 and accompanying letter dated 12 December 2011 from Whitehaven Coal Mining Limited.	N/A	Outside audit period	NT	N/A
2.8	The Proponent shall not transport any coal reject from the site.	Interview with Superintendent-Environment Site observations	All coal rejects are placed on the Reject Emplacement Area (REA). Observed on site by auditor. Hauled by truck from reject stockpile to REA	C	N/A
PLANNING AGREEMENTS					
2.9	<p>Within 6 months of this approval, the Proponent shall enter into planning agreements with Narrabri Shire Council (NSC), Gunnedah Shire Council (GSC) and the Minister in accordance with:</p> <p>(a) Division 6 of Part 4 of the EP&A Act; and</p> <p>(b) the terms of the Proponent's offers accepted at NSC's meeting of 16 February 2010, and GSC's meeting of 16 February 2010, which includes the matters set out in Appendix 4.</p> <p>If there is any dispute between the Proponent and either NSC or GSC during the formal drafting of the planning agreements, then any of the parties involved may refer the matter to the Secretary for resolution.</p>	Outside audit period	Outside audit period	NT	N/A
SURRENDER OF STAGE 1 APPROVAL					
2.10	Within 12 months of the date of this approval, the Proponent shall surrender its previous project approval for the Narrabri Coal Mine to the satisfaction of the Secretary, in accordance with section 75YA of the EP&A Act. Prior to the surrender of the Stage 1 approval, if there is any inconsistency between the Stage 1 and Stage 2 approvals, the conditions of the Stage 2 approval shall prevail to the extent of any inconsistency.	Outside audit period	Outside audit period	NT	N/A
MANAGEMENT PLANS/MONITORING PROGRAMS					
2.11	<p>With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.</p> <p><i>Note: The conditions of this approval require certain strategies, plans, and programs to be prepared for the project. They also require these documents to be reviewed and audited on a regular basis to ensure they remain effective. However, in some instances, it will not be necessary or practicable to prepare these documents for the whole project at any one time, particularly as these documents are intended to be dynamic and improved over time. Consequently, the documents may be prepared and implemented</i></p>	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Screen shot of CMO Action Evidence with regards to Environmental Management Strategy review/revision to be completed within 3</p>	<p>Management plans and monitoring programs have been developed and implemented.</p> <p>Management Plan departmental approvals are located on Whitehaven website with each Management Plan.</p> <p>Management Plans are reviewed and revised if necessary, on a regular basis.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<i>on a progressive basis, subject to the conditions of this approval. In doing this however, the Proponent will need to demonstrate that it has suitable documents in place to manage the existing operations of the project.</i>	months of incident report, audit, or any modification to the conditions Screen shot showing review dates 29/05/2024 and 12/06/2025 of each management plan or strategy after March submissions of 2023 and 2024 Annual Reports, respectively.			
2.12	Stage 1 strategies, plans or programs continue to have effect until replaced by an equivalent approved strategy, plan or program prepared and approved under this approval.	Interview with Manager Environment and Superintendent – Environment	Stage 2 Operations were granted on 26 July 2010. There are no environmental Management Plans or Strategies remaining in force that date from before that date unless reviewed since.	NT	N/A
STRUCTURAL ADEQUACY					
2.13	The Proponent 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. <i>Notes:</i> <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	Interview with Manager Environment and Superintendent – Environment Annual Reviews 2022, 2023, 2024 Certified plans for CM Workshop Shed, Gast Test Shed, Diesel Test Shed, LTS Shed	Construction subject to BCA during the audit period has included new CHPP office block and new ATCO (modular building) office block, as well as three sheds in the main administration area. The ATCO office block was constructed on an existing building footprint. Under EP&A the above constructions are exempt from requiring a DA. Certified plans for new sheds and structures observed by auditor	C	N/A
DEMOLITION					
2.14	The Proponent shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	Interview with Manager Environment and Superintendent – Environment Annual Reviews 2022, 2023, 2024 Demolition reports	No demolition of mining infrastructure has occurred over the audit period. Dilapidated houses (and associated infrastructure) on mine-owned land that are were longer required or that have been adversely affected by subsidence were demolished and materials were removed from mining lease by licenced waste removal company for disposal at suitable facility.	C	N/A
OPERATION OF PLANT AND EQUIPMENT					
2.15	The Proponent shall ensure that all plant and equipment used on site is: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	Interview with Manager Environment and Superintendent – Environment Noise calibration and maintenance records	(a) Maintenance scheduling and records are maintained in the Pulse maintenance system. The auditor sighted evidence of maintenance records for a selection of plant and equipment including maintenance and calibration records for	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<p>Weather station calibration and maintenance reports</p> <p>Training records on On-Site Track Easy</p>	<p>noise measuring equipment and weather station.</p> <p>(b) Training and competencies of all employees and contractors are recorded in the 'Onsite' platform. This also included verification of competency (VOC) records for operation of plant and equipment. The level of competency, i.e. trained, assessed, authorised or appointed, is recorded for each individual.</p> <p>Equipment VOC is subject to a 3 year refresher which is notified when logging on to the site. A Trainer Assessor is on crew to complete refreshers.</p> <p>Employee data were observed by auditor, including list of competencies per employee, issue date, and when due to expire (requiring refresher).</p>		

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS – MINING AREA

SUBSIDENCE IMPACT PERFORMANCE MEASURES

3.1	<p><i>Note: These conditions should be read in conjunction with section 5 of the revised Statement of Commitments.</i></p> <p>The Proponent shall ensure that mine subsidence does not cause any exceedances of the performance measures in Table 1.</p> <p><i>Table 1: Subsidence Impact Performance Measures</i></p> <table border="1"> <thead> <tr> <th colspan="2">Water Resources</th> </tr> </thead> <tbody> <tr> <td>Great Artesian Basin</td> <td>The Proponent shall ensure that, within 5 years of the date of this approval, any loss of water flow into the Great Artesian Basin aquifers (equal to the maximum predicted impact, or the measured impact of the project, whichever is the greater), is managed, licensed or offset (including the possibility of injection of raffinate) to the satisfaction of DPIE Water.</td> </tr> <tr> <th colspan="2">Biodiversity</th> </tr> <tr> <td>Flora and Fauna</td> <td>The Proponent shall ensure that clearing and disturbance of vegetation above the mining area is minimised, to the satisfaction of the Secretary.</td> </tr> </tbody> </table> <p><i>Note: The Proponent may be required to define other performance measures and performance indicators in management plans required under this approval (see eg condition 3 below).</i></p>	Water Resources		Great Artesian Basin	The Proponent shall ensure that, within 5 years of the date of this approval, any loss of water flow into the Great Artesian Basin aquifers (equal to the maximum predicted impact, or the measured impact of the project, whichever is the greater), is managed, licensed or offset (including the possibility of injection of raffinate) to the satisfaction of DPIE Water.	Biodiversity		Flora and Fauna	The Proponent shall ensure that clearing and disturbance of vegetation above the mining area is minimised, to the satisfaction of the Secretary.	<p>Sighted evidence includes</p> <ul style="list-style-type: none"> Annual Reviews (2022,2023,2024) Water Access Licenses Aquifer Interference License Groundwater modelling (Stage 2 MOD 7 recalibration AGE 2024) Water quality monitoring database Groundwater levels and quality monitoring reports (AGE 2022, 2023, Q3 2025) Groundwater reviews (AGE 2022, 2023, Q3 2025) Disturbance permits (sighted during site visit) Pre-clearance surveys (sighted while on site) Pre-clearance reports (sighted while on site) Revised Biodiversity offset strategy MOP and MOP Amendment B objectives and TARPS (SLR 2017, NCOPL 2021) 	<p>Water usage complies with current water access licenses based on mine outflow (pumping) records as reported by NCO in Annual Reviews 2022 to 2024.</p> <ul style="list-style-type: none"> NCOPL commissioned AGE to complete a full re-calibration of the groundwater model. Revised predictions are included in the LW203-206 Extraction Plans. Revised groundwater plans are in the LW203-206 Extraction plan, Table 3.3 AGE updated the groundwater model in 2024 and reassess trigger values. <p>Two environmental exceedances were recorded during the audit period that relates to groundwater use or loss:</p> <ul style="list-style-type: none"> Ground water exceedance in monitoring bore water quality and water level trigger exceedances, P10, P11, P29 and P53 were identified as exceeding their EC trigger for three consecutive recordings. P11 water level exceeded tier 2 water level trigger. (10/10/2024). Monitoring bore water exceedance P4, P39A, P39B, P43 and P47 were identified as exceeding their water quality EC triggers for three 	C	N/A
Water Resources													
Great Artesian Basin	The Proponent shall ensure that, within 5 years of the date of this approval, any loss of water flow into the Great Artesian Basin aquifers (equal to the maximum predicted impact, or the measured impact of the project, whichever is the greater), is managed, licensed or offset (including the possibility of injection of raffinate) to the satisfaction of DPIE Water.												
Biodiversity													
Flora and Fauna	The Proponent shall ensure that clearing and disturbance of vegetation above the mining area is minimised, to the satisfaction of the Secretary.												

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> • Ecological Report (Ecotone 2009) • piezometers levels (AGE 2022, 2023, Q3 2025, readings database) • extensometers (new exto installed in LW203) • ecological reports that note changes to vegetation or geomorphology (sighted while on site) • comparisons of mine water balance against model predictions (Annual reviews 2022,2023,2024) • ponding observations, survey measurements and multi-spectral imaging provided in Biodiversity and Land Annual Monitoring reports (2023, 2024), Biodiversity, Land and Subsidence Pond Annual Monitoring report (2023), Subsidence Pond Monitoring report (2024) • Annual Rehabilitation Monitoring reports (2022, 2023, 2024) • Measured subsidence has not exceeded predictions however measured tilts and strains have exceeded predictions, in some cases (Annual Reviews 2022, 2023, 2024) and survey data 	<p>consecutive recordings, P7 was identified as exceeding the pH minimum trigger for three consecutive readings (14/11/2024)</p> <p>P6 does not display a trigger level on the hydrograph. P10 WL is reducing and has breached trigger level 1. P11 trigger level 1 and 2 has been breached. P13 has repeatedly breached trigger 1. P14 does not display a trigger level. P15, P16, P75, WB2 shows downward trend and no apparent trigger level. P18, P20 shows downward trends, old data and no apparent trigger level. WB7 shows a significant drop in water level around 2023 and no apparent trigger level.</p> <p>No emergency procedures were activated due to subsidence, and no subsidence-related impacts were identified on:</p> <ul style="list-style-type: none"> • Telecommunications infrastructure • Public roads • Buildings or structures • Water storage dams • Mine infrastructure. • The mine holds Water Access Licence WAL15922 for the GAB Southern Recharge Groundwater Source. • Indirect water take from the GAB during 2024 was 9 ML, which is well within the licensed entitlement of 322.4 ML • No compensatory water supply was required, indicating no adverse impact on privately-owned water sources. • No raffinate was discharged to the Namoi River during the reporting period, and brine dam BR1 became operational in 2024. • All clearing activities were conducted under the Permit to Work (PTW) process and did not exceed approved disturbance limits under Project Approval PA 08_0144 <p>Floristic-Based Subsidence (FBS) monitoring showed:</p> <ul style="list-style-type: none"> • No significant surface cracks or erosion. • No decline in vegetation health in ponded areas. • No vegetation clearance outside approved areas. • Weed cover remained below thresholds ($\leq 5\%$ exotic species). 		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			Threatened fauna (e.g., microbats and birds) were detected, and monitoring will continue.		

Performance Measures – Built Features

3.2	<p>The Proponent shall ensure that the project does not cause any exceedances of the performance measures in Table 2, to the satisfaction of Resources Regulator.</p> <p><i>Table 2: Subsidence Impact Performance Measures</i></p> <table border="1"> <thead> <tr> <th colspan="2">Built Features</th> </tr> </thead> <tbody> <tr> <td>All built features</td> <td>Always safe. Serviceability should be maintained wherever practicable. Loss of serviceability must be fully compensated. Damage must be fully repairable, and must be fully repaired or else replaced or fully compensated.</td> </tr> <tr> <th colspan="2">Public Safety</th> </tr> <tr> <td>Public Safety</td> <td>No additional risk.</td> </tr> </tbody> </table> <p><i>Notes:</i></p> <p>1) The Proponent will be required to define more detailed performance indicators for each of these performance measures in Built Features Management Plans or Public Safety Management Plan (see condition 4 below).</p> <p>2) Requirements regarding safety or serviceability do not prevent preventative or mitigatory actions being taken prior to or during mining in order to achieve or maintain these outcomes.</p> <p>3) Compensation required under this condition includes any compensation payable under the Mine Subsidence Compensation Act 1961 and/or the Mining Act 1992.</p>	Built Features		All built features	Always safe. Serviceability should be maintained wherever practicable. Loss of serviceability must be fully compensated. Damage must be fully repairable, and must be fully repaired or else replaced or fully compensated.	Public Safety		Public Safety	No additional risk.	<p>Approved management plans including:</p> <ul style="list-style-type: none"> Extraction Plan & Appendices A to K Built Features Management Plan – Appendix D of LW107-110 & LW201-202, appendix E of LW203-206 EP Public Management Plan – Appendix E of LW107-110 & LW201-202 EP, Appendix F of LW203-206 EP Subsidence Monitoring Plan– Appendix C of LW107-110 & LW201-202, Appendix K of LW203-206 EP <p>Subsidence monitoring data including surface movement survey, LiDAR, piezometers and extensometer.</p> <p>New management plans for subsidence monitoring and risk assessment, land, water, landscape, built features, public safety and heritage all dated 21/08/2024. New extraction plan and subsidence risk assessment for LW203-206 also dated 21/08/2024.</p> <p>Subsidence data and summary provided by the NCO Subsidence Engineer.</p>	<p>These documents are approved and are undergoing continual review. Most LW201-202 and 203-206 documents were last updated in 2022 and 2024 respectively with two updated during the audit period:</p> <ul style="list-style-type: none"> Subsidence Monitoring Program LW107 to LW110 – last updated 9/05/2025 & reviewed 6/06/2024. Subsidence Monitoring Plan LW203 to LW206 – last reviewed 21/08/2024. <p>Documents that should have been updated every 3 years, but have not been, are:</p> <ul style="list-style-type: none"> Extraction Plan Subsidence Risk Assessment Report - last updated 30/09/2016 Water Management Plan LW107 to LW110 – last updated 6/04/2017 - superseded by Water Management Plan LW203 to LW206 dated 24 Jan 2025 Public Safety Management Plan LW107 to LW110 – last updated 6/04/2017 - superseded by Public Safety Management Plan LW203-206 dated 24 August 2024 Built Features Management Plan LW107 to LW110 – last updated 6/04/2017 – superseded by Built Features Management Plan LW203-206 dated 10 August 2024 <p>Subsidence monitoring confirmed that all built features remained safe during and after longwall extraction (LW203–206). No loss of serviceability and no damage or repair or compensation found.</p> <p>No additional public safety risks identified with no emergency procedures activated. Subsidence impacts within predicted limits however the limits do not seem to be updated for 2024 and beyond.</p>	C (Obs.)	Reviewed documents should be updated to reflect that a review has been undertaken even when there are no changes.
Built Features													
All built features	Always safe. Serviceability should be maintained wherever practicable. Loss of serviceability must be fully compensated. Damage must be fully repairable, and must be fully repaired or else replaced or fully compensated.												
Public Safety													
Public Safety	No additional risk.												
3.3	Any dispute between the Proponent and the owner of any built feature over the interpretation, application or implementation of the performance measures in Table 2 is to be settled by Resources Regulator. Resources Regulator may seek the advice of the SANSW on	Interview with Superintendent-Environment	No disputes over the audit period	NT	N/A								

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	the matter. Any decision by Resources Regulator shall be final and not subject to further dispute resolution under this approval.				
Extraction Plan					
3.4	<p>The Proponent shall prepare and implement Extraction Plans for any second workings to be mined to the satisfaction of the Secretary. Each Extraction Plan must:</p> <p>(a) be prepared by a team of suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>(b) be approved by the Secretary before the Proponent carries out any of the second workings covered by the plan;</p> <p>(c) include detailed plans of the proposed first and second workings and any associated surface development;</p> <p>(d) include detailed performance indicators for each of the performance measures in Tables 1 and 2;</p> <p>(e) provide revised predictions of the potential subsidence effects, subsidence impacts and environmental consequences of the proposed second workings, incorporating any relevant information obtained since this approval;</p> <p>(f) describe the measures that would be implemented to ensure compliance with the performance measures in Tables 1 and 2, and manage or remediate any impacts and/or environmental consequences;</p> <p>(g) include the following to the satisfaction of Resources Regulator:</p> <ul style="list-style-type: none"> • a Coal Resource Recovery Plan that demonstrates effective recovery of the available resource; • a Subsidence Monitoring Program to: <ul style="list-style-type: none"> - provide data to assist with the management of the risks associated with subsidence; - validate the subsidence predictions; and - analyse the relationship between the subsidence effects and impacts under the plan and any ensuing environmental consequences; • a Built Features Management Plan to manage the potential subsidence impacts and/or environmental consequences of the proposed second workings, and which: <ul style="list-style-type: none"> - addresses in appropriate detail all items of public infrastructure and all classes of other built features; and - has been prepared following appropriate consultation with the owner/s of potentially affected feature/s; • a Public Safety Management Plan to ensure public safety in the mining area; and • appropriate revisions to the Landscape Management Plan required under condition 3 of Schedule 5; and <p>(h) include a:</p> <ul style="list-style-type: none"> • Water Management Plan, which has been prepared in consultation with EPA and DPIE Water, which provides for the management of the potential impacts and/or environmental consequences of the proposed second workings on surface water resources, groundwater resources and flooding, and which includes: <ul style="list-style-type: none"> - surface and groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse impacts on water resources or water quality; - a program to monitor and report groundwater inflows to underground workings; and - a program to manage and monitor impacts on groundwater bores on privately-owned land; • Biodiversity Management Plan, which has been prepared in consultation with BCS and Resources Regulator, which provides for the management of the potential impacts and/or environmental consequences of the proposed second workings on flora and fauna; 	<p>Sighted evidence includes:</p> <p>Site inspection</p> <p>(a) Document authors include:</p> <ul style="list-style-type: none"> • Environmental consultants EcoLogical • Subsidence engineers Ditton Geotechnical Services (DgS) for LW107-110, LW201-202 • Australasian Groundwater and Environmental consultants (AGE) <p>(b) Program approvals</p> <ul style="list-style-type: none"> • All Stage 3 management plans understood to be approved <p>(a,c,d,e,f,g,h) Management plans:</p> <ul style="list-style-type: none"> • Extraction plans for LW 107-110 and LW201-202 (same appendix ids): <ul style="list-style-type: none"> • (c) Coal Resource Recovery Plans (Appendix A) • (c,e) Subsidence Predictions (Appendix B) updated • (d) Subsidence Monitoring (Appendix C) • (g) Built Features management (Appendix D) • (h) Water Management Plan (Appendix G) • (f) Land Management (Appendix I) • (h) Heritage Management Plan (Appendix J) • Extraction plans for LW 203-206: <ul style="list-style-type: none"> • (c) Coal Resource Recovery Plans (Appendix G) 	<p>During the auditor inspection significant surface cracking due to mine subsidence was observed over LW108 (mining completed in 2020) in similar areas noted in the 2019 and 2022 auditor inspections (monitoring of Line 108 ceased in 2022) and over LW110 in areas not inspected in previous auditor inspections.</p> <p>Inspections by the responsible subsidence engineer appear to be infrequent.</p> <p>The auditor team was shown the new subsidence impact management system called INX InViron which includes:</p> <ul style="list-style-type: none"> • details of cracking and other impacts observed during routine inspections, including: <ul style="list-style-type: none"> • location by hand-held GPS (built into mobile phone devices) • depth by manual measurement • photographs • changes in recorded features over time • date and of remediation when required with photographs of finished works. <p>All data is coordinated in ArcGIS which is accessible on a range of devices including 'smart' phones.</p> <p>Climate data is recorded, managed and shared through a Sentek database system. Thus, system appears to be effective.</p> <p>A selection of identified impacts was chosen from the database and examined during the audit inspection. All of the records examined indicated that remedial works had been completed in pace with mining and within the required completion timeframe of one month.</p> <p>The system was found to be reasonably effective with some exiting features being able to be located during the site inspection in the presence of auditors.</p> <p>There were some issues with the system, however, summarised as follows:</p>	C (Obs.)	It is recommended that Annual Reviews document the use of the INX InViron system including capabilities and its limitations given the heavy reliance on this system to record and manage impacts.

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<ul style="list-style-type: none"> Land Management Plan, which has been prepared in consultation with any affected public authorities, to manage the potential impacts and/or environmental consequences of the proposed second workings on land in general; Heritage Management Plan, which has been prepared in consultation with BCS and relevant stakeholders for Aboriginal heritage, to manage the potential environmental consequences of the proposed second workings on heritage sites or values; and (i) include a program to collect sufficient baseline data for future Extraction Plans. <p><i>Notes:</i></p> <p><i>Management plans prepared under condition 4(h) should address all potential impacts of proposed underground coal extraction on the relevant features. Other similar management plans required under this approval (e.g. under conditions 13 and 23 of schedule 4 or condition 3 of schedule 5) are not required to duplicate these plans or to otherwise address the impacts associated with underground coal extraction.</i></p>	<ul style="list-style-type: none"> (c,e) Subsidence Risk assessment (Appendix I) (d) Subsidence Monitoring (Appendix K) (g) Built Features management (Appendix E) (h) Water Management Plan (Appendix A) (f) Land Management (Appendix B) (h) Heritage Management Plan (Appendix D) <ul style="list-style-type: none"> LW 101-110 Annual Rehabilitation Monitoring Report (2024) <p>(d,g,h) Evidence of subsidence monitoring and performance measures sighted by the auditor includes:</p> <ul style="list-style-type: none"> summary movements are provided Annual Reviews subsidence predictions have not been updated over the audit period (not required) Water Management Plan monitoring including <ul style="list-style-type: none"> piezometers water quality vegetation changes in topography water course morphology groundwater inflows (Annual Reviews and AGE 2022, 2023) groundwater table drawdown against predictions (AGE calibrations 2021, 2024) Land and subsidence management plans monitoring: <ul style="list-style-type: none"> Vegetation changes (LiDAR) length of streambank erosion ecology (LiDAR) ponding observations and survey measurements 	<ul style="list-style-type: none"> the subsidence management system relies upon mobile phone reception to record and then relocate impacts simple GPS devices can often exhibit a very low location accuracy due to limited satellite coverage or interference such as dense vegetation or nearby sources of electromagnetic radiation. Detection of cracking relies heavily on access. However, much of the land above longwalls is heavily vegetated and covered with floor litter making visual detection of cracks problematic <p>Mobile phone coverage has improved over the audit period due to transmission tower upgrades and appears to give acceptable coordinate accuracy.</p> <p>The recoding of surface topography LiDAR appears to be effective in capturing ponding caused by subsidence and other impacts such as changes to vegetation with demonstrated resolution of around 0.1 m.</p> <p>During the on-site inspection the auditor noted:</p> <ul style="list-style-type: none"> Inspections were being undertaken fortnightly Additional inspections were being undertaken after 'significant' rainfall events of 38.4 mm over 5 days though this could not be confirmed in the data provided by NCO post-inspection. <p>Note: all built features not owned by Whitehaven Coal lie outside of the 20 mm subsidence limit and are therefore not monitored.</p> <p>Subsidence data provided to the auditor shows general agreement with summary values reported in annual reviews. Notable exceptions to this are:</p> <ul style="list-style-type: none"> the maximum subsidence over the H line recorded in 2022 of 2.655 m compared to 2.55 m as reported in the Annual Review 2022. This value still remains below the predicted value of 2.75 m. 		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> • multi-spectrum imaging • water quality changes • observation records of surface cracking and sinkholes including location, trace length and depth. <p>Subsidence data and summary provided by the NCO Subsidence Engineer.</p> <p>Heritage Management Plan (202 & 2024) detailing the location, nature and protection of heritage sites including areas of limited access and/or annexed from mining activities</p>			
3.5	<p>The Proponent shall ensure that the management plans required under condition 4(h) above include:</p> <p>(a) an assessment of the potential environmental consequences of the Extraction Plan, incorporating any relevant information that has been obtained since this approval;</p> <p>(b) a detailed description of the measures that would be implemented to remediate predicted impacts; and</p> <p>(c) a contingency plan that expressly provides for adaptive management.</p>	<p>Sighted evidence includes:</p> <ul style="list-style-type: none"> • (a) Extraction management plans (LW 107-110 & LW201-202) • (a) Extraction management plans (LW 107-110 & LW201-202) • (b) Rehabilitation Management Plan 26/08/2025 • (b) Annual rehabilitation report 2023 and 2024 • EcoLogical (2023) and EcoPlanning (2024) subsidence impact reports 	<p>(a) Extraction management plans (LW 107-110 & LW201-202) include:</p> <ul style="list-style-type: none"> • Coal Resources Recovery Management Plan (App A) • Subsidence predictions (App B) • Subsidence monitoring (App C) • Landscape management (App F) • Water Management (App G) <p>Extraction management plans (LW 203-206) include:</p> <ul style="list-style-type: none"> • Coal Resources Recovery Management Plan (App G) • Subsidence monitoring (App K) • Water Management (App A) <p>(b, c) Management plans include</p> <ul style="list-style-type: none"> • monitoring & triggers • contingency measures • remedial measures • Management plans typically mention that an 'adaptive management' approach is required. 	C	N/A
First Workings					
3.6	<p>The Proponent may carry out first workings within the underground mining area, other than in accordance with an approved extraction plan, provided that Resources Regulator is satisfied that the first workings are designed to remain stable and non-subsiding in the long-term, except insofar as they may be impacted by approved second workings.</p> <p><i>Note: The intent of this condition is not to require an additional approval for first workings, but to ensure that first workings are built to</i></p>	<p>Sighted evidence includes:</p> <ul style="list-style-type: none"> • Coal Resources Recovery Management Plan (LW107-110) dated 7/04/2017 therefore out of date. • Coal Resources Recovery Management Plan (LW201- 	<p>Estimation of the effects of first workings is largely based on experience and the need to make roadways safe for works which inherently means minimal subsidence.</p> <p>This approach is reasonable given experience to date which shows roadway designs have been stable over time.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<i>geotechnical and engineering standards sufficient to ensure long- term stability, with negligible resulting direct subsidence impacts.</i>	202) dated 30/03/2022 therefore out of date. <ul style="list-style-type: none"> Coal Resources Recovery Management Plan (LW203-206) dated 20/08/2024. This document supersedes the previous two Coal Resource Recovery Management Plans. 			

Payable of reasonable costs

3.7	The Proponent shall pay all reasonable costs incurred by the Department to engage independent experts to review the adequacy of any aspect of an Extraction Plan.	Note	Noted	NT	N/A
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SCHEDULE 4 – SPECIFIC ENVIRONMENTAL CONDITIONS – SURFACE AREA AND GENERAL

NOISE

Note: These conditions should be read in conjunction with section 10 of the revised Statement of Commitments

Impact Assessment Criteria

4.1	<p>The Proponent shall ensure that the noise generated by the project does not exceed the levels set out in Table 1.</p> <p>Table 1: Impact assessment criteria dB(A)</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th>Day</th> <th>Evening</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(15 minute)</th> <th>L_{Aeq}(1 minute)</th> </tr> </thead> <tbody> <tr> <td>All privately owned residences</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> <tr> <td>675a^b</td> <td>40</td> <td>39</td> <td>39</td> <td>52</td> </tr> <tr> <td>687a</td> <td>40</td> <td>36</td> <td>36</td> <td>52</td> </tr> <tr> <td>Any other residential receiver</td> <td>40</td> <td>35</td> <td>35</td> <td>52</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> To determine compliance with the L_{Aeq}(15 minute) limit, noise from the project is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of 	Location	Day	Evening	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (1 minute)	All privately owned residences	35	35	35	45	675a ^b	40	39	39	52	687a	40	36	36	52	Any other residential receiver	40	35	35	52	<p>Annual Reviews 2022, 2023, 2024</p> <p>EPL monitoring reports – 2023, 2024, 2025</p> <p>Quarterly attended noise monitoring reports – 2023, 2024, 2025</p>	<p>No exceedances due to any causes other than a-typical construction activities occurring onsite or inclement weather events were recorded during the audit period.</p> <p>The only privately owned residence subject to this condition (as it is not owned by NOC and not subject to private agreements) is Newhaven (N6).</p> <p>Quarterly noise reports are provided to Newhaven</p>	C	N/A
Location	Day		Evening	Night																														
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (1 minute)																														
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Any other residential receiver	40	35	35	52																														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<p><i>the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</i></p> <ul style="list-style-type: none"> • <i>These noise limits apply to applicable receivers under all meteorological conditions except for any one of the following:</i> <ul style="list-style-type: none"> o <i>wind speeds greater than 3 metres/second at 10 metres above ground level; or</i> o <i>stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</i> o <i>stability category G temperature inversion conditions.</i> • <i>Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological weather station located in the vicinity of the site, or as otherwise agreed by the Secretary.</i> • <i>To determine compliance with the $L_{A1(1\text{ minute})}$ noise limits, noise from the project is to be measured at 1 metre from the dwelling façade. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy).</i> <p><i>These limits do not apply if the Proponent has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</i></p> <p><i>a The Noise Assessment Locations referred to in Table 1 are shown in Appendix 4.</i></p> <p><i>b Receiver 675a is eligible for noise mitigation under condition 02.</i></p>				

Noise Acquisition Criteria

4.2	<p>If the noise generated by the project exceeds the criteria in Table 2 at any residence on privately-owned land then the Proponent shall, upon receiving a written request for acquisition from the landowner, acquire the land in accordance with the procedures in conditions 5-7 of schedule 7.</p> <p><i>Table 2: Noise acquisition criteria dB(A)</i></p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day $L_{Aeq(15\text{ minute})}$</th> <th>Evening $L_{Aeq(15\text{ minute})}$</th> <th>Night $L_{Aeq(15\text{ minute})}$</th> </tr> </thead> <tbody> <tr> <td>All privately owned residences</td> <td>40</td> <td>40</td> <td>40</td> </tr> </tbody> </table> <p><i>Note: Noise generated by the project is to be measured in accordance with the notes presented below Table 1. For this condition to apply, the exceedances of the criteria must be systemic.</i></p>	Location	Day $L_{Aeq(15\text{ minute})}$	Evening $L_{Aeq(15\text{ minute})}$	Night $L_{Aeq(15\text{ minute})}$	All privately owned residences	40	40	40	Interview with Manager Environment and Superintendent – Environment	Noise acquisition criteria have not been triggered during the audit period.	NT	N/A
Location	Day $L_{Aeq(15\text{ minute})}$	Evening $L_{Aeq(15\text{ minute})}$	Night $L_{Aeq(15\text{ minute})}$										
All privately owned residences	40	40	40										

Additional Noise Mitigation Measures

4.3	<p>If the noise generated by the project is equal to or exceeds the criteria in Table 3 at any residence on privately-owned land, then the Proponent shall, upon receiving a written request from the landowner, implement reasonable and feasible noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. If within 3 months of receiving this request from the landowner, the Proponent 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><i>Table 3: Additional noise mitigation criteria</i></p>	Interview with Environmental Superintendent and HSE Manager	No written requests received.	NT	N/A
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No	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)				
	All privately owned residences	38	38	38				

Note: Noise generated by the project is to be measured in accordance with the notes presented below Table 1.

For this condition to apply, the exceedances of the criteria must be systemic.

Noise Management Plan

4.4	<p>The Proponent shall revise the Noise Management Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with noise management (Stages 1 and 2) and subsequently implement this revised version of the Noise Management Plan to the satisfaction of the Secretary. This Plan shall:</p> <ol style="list-style-type: none"> be prepared in consultation with EPA by a suitably qualified expert whose appointment has been approved by the Secretary; be submitted to the Secretary for approval by 30 June 2011; include a Noise Monitoring Program incorporating: <ul style="list-style-type: none"> real-time noise and temperature inversion monitoring; and attended noise monitoring to monitor the performance of the project; include reactive noise control measures to manage noise impacts for sensitive receivers; and include a protocol to establish whether the project is complying with the noise impact assessment criteria in Table 1. 	<p>Independent Environmental Audit (ERM 2023)</p> <p>Noise Management Plan, 2 August 2023</p> <p>Correspondence from DPE to NCO dated 7 August 2023 approving the current Noise Management Plan</p> <p>Complaints register 2022 – 2025</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Quarterly attended noise monitoring reports – 2023, 2024, 2025</p> <p>Heavy machinery noise emission records 2023 - 2025</p> <p>Calibration and maintenance records for noise measuring equipment and weather station</p> <p>Induction Trainings slide on noise management outlining purpose of noise management and noise controls and the use of risk management practices</p> <p>M6 Inversion Station Data spreadsheets 2022 - 2025</p> <p>Interview with Manager Environment and Superintendent – Environment</p>	<p>The Noise Management Plan for Stage 2 of the project was prepared in consultation with the EPA outside the current audit period. It has since been updated to the current approved version. The Noise Management Plan meets the requirements of the condition. Real time noise and inversion monitoring data as required by the NMP was sighted in Sentinex. Attended noise monitoring reports were observed covering the audit period. Training related to noise, dust and water management is provided to all employees. NCO reported Sound Power Levels (SPLs) above the NMP criteria for the Main Ventilation Fan and one dozer in the 2022 Annual Review, and again for the Main Ventilation Fan in the 2024 Annual Review. The Main Ventilation Fan was taken off-line for cleaning and maintenance in 2022, with retesting undertaken in 2023, when no exceedances were recorded. The 2024 Main Ventilation Fan exceedance was only slight and no further action was undertaken to date. A new noise attenuation ring was installed in the dozer while maintenance requirements were implemented. No further exceedances were recorded for the dozer. No noise complaints have been received over the audit period.</p>	C	N/A
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Continuous Improvement

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
4.5	The Proponent shall: (a) implement all reasonable and feasible best practice noise mitigation measures; (b) investigate ways to reduce the noise generated by the project, including off-site road and rail noise and maximum noise levels which may result in sleep disturbance; and (c) report on these investigations and the implementation and effectiveness of these measures in the Annual Review, to the satisfaction of the Secretary.	Complaints register 2022 – 2025 Annual Reviews 2022, 2023, 2024 EPL monitoring reports – 2023, 2024, 2025 Quarterly attended noise monitoring reports – 2023, 2024, 2025 Interview with Environment Superintended and HSE Manager	No noise complaints have been received over the audit period. Additional noise mitigation measures implemented during the audit period include: • Addition of sound rings to the dozer as mentioned above • Predictive meteorological software that provides forecasts specific to the Narrabri Mine location was integrated into day-to-day operations to allow for better planning of operational activities Noise monitoring and implementation of the Noise Management Plan is ongoing.	C	N/A

AIR QUALITY

Impact Assessment Criteria

4.6	<p><i>Note: These conditions should be read in conjunction with section 11 of the revised Statement of Commitments.</i></p> <p>The Proponent shall ensure that dust emissions generated by the project do not cause additional exceedances of the criteria listed in Tables 4 to 6 at any residence on privately-owned land.</p> <p><i>Table 4: Long term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>^a 90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>Annual</td> <td>^a 30 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>Annual</td> <td>^{a, c} 25 µg/m³</td> </tr> </tbody> </table> <p><i>Table 5: Short term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^d Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>24 hour</td> <td>^a 50 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>24 hours</td> <td>^b 50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 6: Long term impact assessment criteria for deposited dust</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³	Particulate matter < 10 µm (PM10)	Annual	^a 30 µg/m ³	Particulate matter < 10 µm (PM10)	Annual	^{a, c} 25 µg/m ³	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM10)	24 hour	^a 50 µg/m ³	Particulate matter < 10 µm (PM10)	24 hours	^b 50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level					<p>Annual Reviews 2022, 2023, 2024 Air Quality Management Plan, 16 August 2023 EPL monitoring reports INXPreserve spreadsheet showing deposited dust and PM10 data for 2022 - 2025 Interview with Manager Environment and Superintendent – Environment Emails from NCO to DPHI dated 28/3/2024, 4/4/2025, and 5/4/2025 providing reports on Non-Compliance with Air Quality Management Plan Post Approval Form and Environmental Event Report (8/5/2025) on PM10 exceedance of 12/4/2025 Letters from DPHI to NCO stating compliance with incident reporting consent requirements dated:</p> <ul style="list-style-type: none"> 28/03/2024 Major Projects Portal report lodgement HVAS sample events 2023 11/04/2024 regarding elevated PM10 level reported 4/04/2024 	<p>All monitoring results are published in the Annual Reviews. Site ND3 is also reported monthly on the NO website in EPL Monitoring Reports</p> <ul style="list-style-type: none"> No exceedances for deposited dust and total suspended particulate matter were recorded over the audit period. PM10 is required to be monitored every 6 days, as per approved Air Quality Management Plan. NCO did not collect PM10 data from site ND10 on 23 April 2023, 29 April 2023, 29 May 2023 and 4 June 2023 due to mechanical failure of the HVAS. NCO replaced the HVAS at ND10 on 9 June 2023. Emails notifying the DPHI of this non-compliance with the Air Quality Management Plan were observed by auditor. The Event Report on this event notes that the assessment undertaken by an external specialist concluded that the criterion would unlikely to have been exceeded on any of the missed days for a number of reasons. As a result of this event, the Air Quality Monitoring Procedure was revised by adding detail on catch-up days when minimum sample runtime is not achieved, while a question was added to the field checking sheet to prompt checking minimum runtime achieved, and, if not, to escalate to NCO 	C	N/A
Pollutant	Averaging period	^d Criterion																																
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³																																
Particulate matter < 10 µm (PM10)	Annual	^a 30 µg/m ³																																
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Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																															

No	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Deposited dust	Annual	^b 2g/m ² /month	^a 4g/m ² /month	<ul style="list-style-type: none"> PM10 response from 12/04/2025 trigger activation Air Quality Monitoring Procedure (29/6/2023)	environment team to organise a catch-up sample. <ul style="list-style-type: none"> A PM10 24-hour exceedance was recorded at ND9 Claremont on 12 March 2024. The recorded value of 69.1µg/m³ exceeded the criterion of 50.0µg/m³. Investigations indicated that the exceedance was not the result of mining activities. The exceedance was reported to DPHI 4/04/2024. A PM10 24-hour exceedance was recorded at ND10 on 12 April 2025, with a value of 54.6µg/m³. As wind direction was not from the mine, the cause was not mine related, as shown in Event Report No annual averages for 2025 are yet available.		

Notes to Tables 4-6

- a Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to all other sources);
- b Incremental impact (i.e. incremental increase in concentrations due to the project on its own);
- c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and
- d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.
- a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources).
- b Incremental impact (i.e. incremental increase in concentrations due to the development on its own).
- c Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Planning Secretary.

Operating Conditions

4.7	<p>The Proponent shall:</p> <p>(a) implement all reasonable and feasible measures to minimise the:</p> <ul style="list-style-type: none"> odour, fume and dust emissions of the project; and release of greenhouse gas emissions from the project; <p>(b) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and real-time air quality monitoring data to guide the day to day planning of operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this approval;</p> <p>(c) minimise any visible air pollution; and</p> <p>(d) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see note d to Tables 4-6 above).</p> <p>to the satisfaction of the Secretary.</p>	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Air Quality Management Plan, 16 August 2023</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Complaints register 2022 – 2025</p> <p>Daily emails 1 – 7 September 2025 showing Operational Forecast Summaries</p> <p>CMO Detailed Action Report with task to review seven day weather forecast for Narrabri Mine using the above email forecasts and communicate risks to surface personnel.</p> <p>Email from Advisor – Environment dated 25 August 2025 to site personnel with warning about forecast high winds and elevated potential dust risk.</p> <p>Site observations</p> <p>CCTV reviews for TARP activations</p>	<p>The site operates under an approved Air Quality Management Plan which contains an Air Quality Management System and Trigger Action Response Plan (TARP).</p> <p>Weather forecasts that could potentially impact on operation conditions are processed and warnings are communicated to site personnel to implement relevant measures.</p> <p>The auditor observed activation of dust TARP during a visit to the CHPP control room. This included receipt of observations of visible dust.</p> <p>All Level 4 TARP activations are reviewed by the Environment Superintendent including review of CCTV recordings to verify visual observations. CCTV reviews are documented and maintained on the NCO file server.</p> <p>As per Condition 4.6, no air quality exceedances related to mining were recorded over the audit period, indicating that the Air Quality Management System measures are working satisfactorily.</p> <p>Two complaints were made on 4 January 2023 and 12 February 2023 about coal dust in the water supply and on the water collecting roof of a house. No coal dust was detected in water after the first complaint. However, after testing for the</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			second complaint, water in the tested tank was replaced with potable water.		
Air Quality Management Plan					
4.7A	<p>The Proponent shall prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary. This program must:</p> <p>(a) be prepared in consultation with the EPA, and be submitted to the Secretary for approval prior to 30 December 2015, unless otherwise agreed with the Secretary;</p> <p>(b) describe the measures that would be implemented to ensure compliance with relevant air quality criteria and operating conditions of this approval;</p> <p>(c) describe the proposed air quality management system; and</p> <p>(d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> 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. 	<p>Air Quality Management Plan, 16 August 2023</p> <p>Correspondence from DPE to NCO dated 24 August 2023 approving the current Air Quality Management Plan</p> <p>Correspondence from EPA to NCO dated 11 July 2023 confirming consultation about the current Air Quality Management Plan</p> <p>Annual Reviews 2022, 2023, 2024</p>	<p>The Air Quality Management Plan (AQMP) was last reviewed in 2023 in consultation with the EPA and approved by the DPE.</p> <p>The AQMP meets the requirements of the condition.</p> <p>As per Condition 4.6, no air quality exceedances related to mining were recorded over the audit period, indicating that the Air Quality Management System measures are working satisfactorily.</p>	C	N/A
METEOROLOGICAL MONITORING					
4.8	<p>For the life of the project, the Proponent shall ensure that there is a meteorological station in the vicinity of the site that:</p> <p>(a) complies with the requirements in Approved Methods for Sampling of Air Pollutants in New South Wales (DECC, 2007), or its latest version; and</p> <p>(b) is capable of real-time measurement of temperature lapse rate in accordance with the NSW Industrial Noise Policy, unless a suitable alternative is approved by the Secretary following consultation with the EPA.</p>	<p>Site observations</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Weather observations spreadsheets for monitoring points M4 and M6, showing data for Temp, Temp10m, Temp60m, Humidity, Rain, Windspeed, Wind Direction, Barometer, Solar Radiation, STheta, StabCat every 15 minutes</p> <p>Calibration records and service reports for weather stations</p>	<p>Locally collected weather data are reported in the Annual Reviews.</p> <p>Real-time weather data has been provided for the audit period.</p> <p>Auditor observed calibration records for the weather stations showing that these are maintained in good working order</p> <p>Weather station was observed on site by auditor</p>	C	N/A
WATER MANAGEMENT					
<i>Note: These conditions must be read in conjunction with Section 6 and 7 of the Statement of Commitments.</i>					
Groundwater Model					
4.9	<p>Within 2 years of the commencement of longwall coal extraction, and every 5 years thereafter, the Proponent shall undertake a transient calibration of the groundwater model presented in the EA, in consultation with DPIE Water, and to the satisfaction of the Secretary. This re-calibration of the groundwater model must include forward</p>	<p>Narrabri Coal Operations Groundwater Model Five Year Calibration Report Update, Australasian Groundwater and Environment Consultants, August 2021</p>	<p>The 5-yearly groundwater model calibration was completed and submitted to the DPE and NRAR in September 2020. DPE and NRAR provided feedback in March 2021 and the model resubmitted in August 2021. DPE</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	impact predictions of brine re-injection to the mine's goaf at the conclusion of mining operations.	Letter from DPE to NCO dated 02/12/2022 providing advice for next Groundwater Model update.	confirmed acceptance of the updated model in December 2022.		
Water Supply					
4.9A	<p>The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of operations on site to match its available water supply.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</i></p>	<p>NCO Site Water Balance Model Update March 2024</p> <p>NCO Site Water Balance Model Update July 2025</p>	The 2024 Water Balance Model predicted that the average annual external water demand supplied from external licensed sources may reach up to 91 ML/yr. However, upgrades to the water treatment plant (WTP) over the life of mine proposed in the 2025 water balance will increase water efficiency to the extent that external water demands are projected over the FY25-FY29 period.	C	N/A
Compensatory Water Supply					
4.9B	<p>The Proponent shall provide a compensatory water supply to any landowner of privately-owned land whose water supply is adversely and directly impacted as a result of the project (other than an impact that is minor or negligible), in consultation with DPIE Water, and to the satisfaction of the Secretary.</p> <p>The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent to the loss attributable to the project. Equivalent water supply should be provided (at least on an interim basis) as soon as practicable from the loss being identified, unless otherwise agreed with the landowner.</p> <p>If the Proponent 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 Proponent is unable to provide an alternative long-term supply of water, then the Proponent shall provide alternative compensation to the satisfaction of the Secretary.</p>	Noted	No compensatory water supply has been required during the audit period for Stage 2.	NT	N/A
Discharges					
4.10	Except as may be expressly provided for by an EPL, the Proponent shall not discharge any waters from the disturbed areas of the site. However, raffinate from the water conditioning plant may be transferred to water users in accordance with an approved Water Management Plan (see below).	Interview with Manager Environment and Superintendent – Environment Annual Reviews 2022, 2023, 2024	There has been no discharge from disturbed areas during the audit period. The only discharges have been from licenced discharge point regulated by the EPL.	NT	N/A
4.11	Any raffinate from the water conditioning plant discharged to the Namoi River must be discharged in accordance with the conditions of an EPL and meet the following criteria:	Interview with Manager Environment and Superintendent – Environment	No raffinate was discharged during the audit period. Raffinate was re-used in mining operation.	NT	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(a) 50 percentile of all samples (volume based) are below 250 mg/l of Total Dissolved Solids; (b) 100 percentile of all samples (volume based) are below 350 mg/l of Total Dissolved Solids; and (c) pH values of all sampled water to be between 6.5 and 8.5.	Annual Reviews 2022, 2023, 2024			
4.12	Within 3 years of the date of this approval, or otherwise agreed by the Secretary, the Proponent must commission the water conditioning plant identified in the EA, to the satisfaction of the Secretary.		Outside audit period	NT	N/A
Water Management Plan					
4.13	<p>Prior to 30 June 2011, the Proponent shall revise the Water Management Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with water management (Stages 1 and 2) and subsequently implement this revised version of the Water Management Plan to the satisfaction of the Secretary. This revised plan must be produced in consultation with EPA and DPIE Water by suitably qualified expert/s whose appointment/s have been approved by the Secretary and include a:</p> <ul style="list-style-type: none"> a) Site Water Balance; b) Erosion and Sediment Control Plan; c) Surface Water Monitoring Plan; d) Raffinate Discharge and Transfer Control and Monitoring Plan; e) Groundwater Monitoring Program; and f) Surface and Groundwater Response Plan, setting out the procedures for: <ul style="list-style-type: none"> • investigating, and if necessary mitigating, any exceedances of the surface or groundwater assessment criteria (see conditions 16(b) and 18(c)); and • responding to any unforeseen impacts of the project. <p><i>Note: The Raffinate Discharge and Transfer Control and Monitoring Plan does not need to be produced and approved until 3 months prior to the planned discharge or transfer of raffinate from the site.</i></p>	Water Management Plan, Issue 4, March 2013 Annual Reviews 2024	The Water Management Plan (WMP) was not revised during the current audit period. The Annual Review 2024 notes that and updated WMP (rev4A) was provided to DCCEEW for consultation on 26 June 2024. Letter advice was received from DCCEEW on 31 October 2024 and the WMP is undergoing further revisions to address DCCEEW recommendations.	C	N/A
Site Water Balance					
4.14	<p>The Site Water Balance must:</p> <p>(a) include details of:</p> <ul style="list-style-type: none"> • sources and security of water supply; • underground water make; • water use on site; • water management on site; • off-site water transfers; • reporting procedures; <p>(b) describe measures to minimise water use by the project; and (c) be reviewed and recalculated each year in the light of the most recent water monitoring data.</p>	Water Management Plan, Issue 4, March 2013 Annual Reviews 2022, 2023, 2024 NCO Site Water Balance Model Update March 2024 NCO Site Water Balance Model Update July 2025	The WMP includes the Site Water Balance which includes the required details. Site water balance is recalculated each year and reported on in the Annual Reviews The 2024 and 2025 Water Balance updates were observed by the auditor	C	N/A
Erosion and Sediment Control					
4.15	<p>The Erosion and Sediment Control Plan must:</p> <p>(a) be consistent with the requirements of <i>Managing Urban Stormwater: Soils and Construction</i> manual (Landcom, 2004), or its latest version; (b) identify activities that could cause soil erosion and generate sediment;</p>	Water Management Plan, Issue 4, March 2013 Site Inspection	The WMP contains an Erosion and Sediment Control Plan which meets the requirements.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<ul style="list-style-type: none"> (c) describe measures to minimise soil erosion and the potential for transport of sediment to downstream waters; (d) describe the location, function, and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to monitor and maintain the structures over time. 		The audit team observed deployment of erosion and sediment control equipment during the site inspection.		
Surface Water Monitoring Program					
4.16	<p>The Surface Water Monitoring Plan must include:</p> <ul style="list-style-type: none"> (a) detailed baseline data on surface water flows and quality in creeks and other water bodies that could be affected by the project; (b) surface water impact assessment criteria; (c) a program to monitor the impact of the project on surface water flows and quality; (d) procedures for reporting the results of this monitoring. 	<p>Water Management Plan, Issue 4, March 2013</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Surface water monitoring data in INXPReserve as per WMP</p>	<p>The WMP contains a Surface Water Monitoring Plan which meets the requirements.</p> <p>Surface water is being monitored.</p>	C	N/A
Raffinate Discharge and Transfer Control and Monitoring Plan					
4.17	<p>The Raffinate Discharge Control and Monitoring Plan must:</p> <ul style="list-style-type: none"> (a) be approved by the Secretary prior to any raffinate discharge to the Namoi River; (b) include measures for the continuous monitoring and recording of volumes of water discharged to the Namoi River; (c) contain an ambient water quality monitoring program upstream and downstream of the discharge point; and (d) contain a water quality monitoring program for discharged waters. 	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Raffinate Discharge and Transfer Control and Monitoring Plan (25/6/2024)</p>	<p>No raffinate was discharged during the audit period</p> <p>As per note to condition 4.13 (above) the Raffinate Discharge plan does not need to be approved until 3 months prior to the planned discharge or transfer of raffinate from the site. The current site water balance/demands require all treated water (raffinate) to be re-used to support mining operations. There are no short-term plans for discharge or transfer of raffinate from the site, hence this plan does not require approval and/or publishing on the web-page.</p>	NT	N/A
Groundwater Management Plan					
4.18	<p>The Groundwater Monitoring Program must include:</p> <ul style="list-style-type: none"> (a) further development of the regional and local groundwater model; (b) detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality (including at any privately owned bores in the vicinity of the site); (c) groundwater impact assessment criteria; (d) a program to monitor the impact of the project on groundwater levels, yield and quality; (e) a program to monitor any impacts of the project on the Namoi River Alluvium; (f) a program to monitor (by the use of shallow piezometers/lysimeters), detect, and quantify any leakage/leachate from the site's evaporation/storage ponds, brine storage area or coal reject emplacement area; and (g) procedures for reporting the results of this monitoring. 	<p>Water Management Plan, Issue 4, March 2013</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>1. Post Approval Form for "Event Report GW exceedance" dated 10/10/2024</p> <p>NCO Environmental Event Report dated 10/10/2024 for exceedances recorded 19/03/2024 and 10/09/2024, with attached detailed investigation report</p> <p>Email from DPE to NCO dated 14/10/2024 acknowledging receipt of</p>	<p>The WMP contains a Groundwater Monitoring Plan which meets the requirements. It includes a TARP specifying actions triggered by exceedances. For groundwater quality, exceedances trigger engagement of hydrogeologists to undertake investigations, notify agencies, and implement contingency responses as agreed with government agencies. For the exceedances below, the responses were to continue monitoring on a quarterly basis (bores P2, P4, P7, P11, P29, P39b, P47) or to examine the establishment of new baselines (P3, P9, P10, P39a, P43). The recommendation for bore P53 is for further comparison with geochemistry of rejects, to be reported on in 2025 Annual Review.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<p>P10, P11, P29, and P53 GW Bore exceedance report</p> <p>2. Post Approval Form for "Event Report groundwater quality exceedance" dated 14/11/2024</p> <p>NCO Environmental Event Report (DPHI 7 day report) dated 14/11/2024 for exceedances recorded 07/11/2024 (when proponent became aware)</p> <p>NCO Detailed Environmental Event Report dated 19/12/2024</p> <p>Letter from DPHI to NCO dated 10/01/2025 stating that incident reporting 7/11/2024 was compliant.</p> <p>3. NCO Environmental Event Report (DPHI 7 day report) dated 12/02/2025 for exceedances recorded 11/02/2025</p> <p>Email from DPE to NCO dated 13/02/2025 stating?</p> <p>NCO Environmental Event Report dated 14/03/2025 for exceedances recorded 11/02/2025 with attached detailed investigation report</p> <p>Letter from DPHI to NCO dated 19/03/2025 stating that 11/02/2025 incident reporting was compliant</p> <p>4. Post Approval Form for "Q2 2025 groundwater monitoring" dated 09/06/2025</p> <p>NCO Environmental Event Report (DPHI 7 day report) dated 10/06/2025 for exceedances recorded 29/05/2025</p> <p>NCO Environmental Event Report (DPHI 7 day report) dated 4/07/2025 for exceedances recorded 29/05/2025 (proponent</p>	<p>Annual Hydrogeological Review reports and/or data are included in the Annual Reviews.</p> <p>Five groundwater exceedance events occurred over the audit period, including during March – September 2024, November 2024, February 2025, May 2025, and September 2025.</p> <p>These were mostly related to groundwater bore EC exceedances (bores P2, P4, P29, P39A, P39B, P43, P47, P53, P10, P11), except for bore one bore (P7) where the exceedance was related to pH. Detailed investigation reports for these incidents were submitted.</p> <p>Letters from DPHI to NCO confirmed that incident reporting was compliant.</p> <p>New baselines are being established over 2025 for a number of these bores (P3, P9, P10, P39A, and P43) to be reported on in the 2025 Annual Review.</p> <p>Monitoring bore water quality and water level trigger exceedances were reported on 10 October 2024 for P10, P11, P29 and P53 as exceeding their EC trigger for three consecutive recordings, while P11 water level exceeded the Tier 2 water level trigger. A hydrogeological review was completed and attached to the event report submitted to DPHI in accordance with notification requirements.</p> <p>As reported 14 November 2024 monitoring indicated EC trigger exceedances for bores P4, P39A, P39B, P43, and P47 for three consecutive recordings, while pH was exceeded at P7 and water level at P11. A hydrogeological review was completed and attached to the event report submitted to DPHI in accordance with notification requirements.</p> <p>Groundwater exceedances were reported on 12 February 2025 for the same bores as those with exceedances reported 10/10/2024 and 14/11/2024 plus bores P2 and P3. A hydrogeological review was completed and attached to the event report submitted to DPE in accordance with notification requirements.</p> <p>Groundwater exceedances recorded on 29 May 2025 were reported on 10 June 2025 for bores P2, P4, P29, P39A, P39B,</p>		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<p>became first aware 2/07/2025)</p> <p>Letter from DPHI to NCO dated 10/06/2025 requesting detailed report by qualified hydrologist on exceedances notified on 10/06/2025</p> <p>Post Approval Form for "Q2 2025 groundwater monitoring – 2" dated 31/07/2025</p> <p>NCO Environmental Event Report dated 31/07/2025 for exceedances reported 10/06/225 and 4/07/2025 with attached detailed hydrological investigation report</p> <p>Letter from DPHI to NCO dated 4/08/2025 stating that 10/06/2025 incident reporting was compliant</p> <p>5. Post Approval Form for "Incident Notification- Q3 groundwater monitoring" dated 3/09/2025</p> <p>NCO Environmental Event Report dated 3/09/2025 for exceedances recorded 19/08/2025, 20/08/2025, 21/08/2025, 26/08/2025, and 28/09/2025</p> <p>NCO Environmental Event Report dated 30/09/2025 for exceedances recorded 19/08/2025, 20/08/2025, 21/08/2025, 26/08/2025, and 28/09/2025, with attached detailed investigation report</p> <p>Letter from DPHI to NCO dated 7/10/2025 stating that 3/09/2025 incident reporting was compliant</p>	<p>P43, P47, P53 (EC exceedance) and P7 (pH exceedance). A hydrogeological review was completed and attached to the event report submitted to DPHI in accordance with notification requirements. A further two EC exceedances were reported on 4 July for P10 and P11 after NCO became first aware of it on 2/07/2025.</p>		
Evaporation / Storage Ponds					
4.19	The Proponent shall ensure that the integrity of the low permeability layers lining the evaporation/storage ponds is maintained and achieves a permeability of less than 1×10^{-14} m/s whenever these ponds are in use for the storage of saline waters and less than 1×10^{-9} m/s when being used to store raffinate or captured surface waters.	Interview with Manager Environment and Superintendent – Environment Annual Reviews 2022, 2023, 2024	Rail Loop Dams are inspected weekly in accordance with the Dam Safety Management System. Inspections include an assessment of condition of HDPE liner. Inspections are captured by suitably trained personnel, and entered	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<p>Screenshot of NCO Environment and Rehabilitation Data Hub showing dam inspection records</p> <p>SQS Materials Test Report 13/12/202 for SB101 Floor and Wall</p>	<p>into NCO Environment & Rehabilitation Data Hub- Dam Inspection tool. A screenshot was observed by the auditor.</p> <p>During the audit period, SB1 required de-silting. A re-design was undertaken during planning for this task, and compacted clay liner was selected for the new floor. The SQS geotechnical report demonstrates permeability $<1 \times 10^{-9}$ m/s is achieved for captured surface water. EC of stored water in SB1 is typically within range of 5,000-7,000 us/cm EC and therefore not considered 'saline'.</p>		
Brine Storage Ponds					
4.20	<p>The Proponent shall ensure that the integrity of the low permeability layers lining the brine storage ponds is maintained and achieves a permeability of less than 1×10^{-14} m/s whenever these storage ponds are in use.</p>	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Screenshot of NCO Environment and Rehabilitation Data Hub showing dam inspection records</p> <p>Site inspection</p>	<p>Rail Loop Dams including brine dams are inspected weekly in accordance with the Dam Safety Management System. Inspections include an assessment of condition of HDPE liner. Inspections are captured by suitably trained personnel and entered into NCO Environment & Rehabilitation Data Hub- Dam Inspection tool. A screenshot was observed by the auditor.</p> <p>Liners appeared to be in good condition during site inspection undertaken for this audit.</p>	C	N/A
Review of Brine Management and Beneficial Use of Water and Brine					
4.21	<p>Within 2 years of commissioning the water conditioning plant, and every 5 years thereafter, unless otherwise directed by the Secretary, the Proponent shall engage suitably qualified experts approved by the Secretary to review brine management and beneficial use options for raffinate, brine and minewater produced by the project. The Proponent shall implement all reasonable and feasible recommendations of these reviews, to the satisfaction of the Secretary.</p>	<p>Annual Review 2024</p> <p>Interview with Manager Environment and Superintendent – Environment</p> <p>Brine Management and Beneficial Use Options Report (8/5/2025)</p>	<p>A beneficial use option review was undertaken in 2024, confirming that all recommendations from the 2019 review had been actioned, and provided the following recommendations for the five-year period 2024-2029:</p> <ul style="list-style-type: none"> Record current evaporation fan usage at SB3 and estimate efficiency. Continue to monitor site water use, groundwater inflows and reclaim / saline and brine inventories (dam water levels); and prepare concept designs for the water treatment plant upgrades, including a commissioning schedule and appropriate trial periods. <p>Following the commissioning of the brine dam BR1 in October 2023, NCO conducted additional testing and water transfers throughout 2024, and the dam is now operational.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			The Brine Management and Beneficial Use Options Report is published on the NCO website		
HERITAGE					
<i>Note: These conditions should be read in conjunction with section 9 of the revised Statement of Commitments.</i>					
Aboriginal Cultural Heritage Management Plan					
4.22	The Proponent shall not destroy damage or deface any known Aboriginal objects (as defined in the <i>National Parks and Wildlife Act 1974</i>) without the written approval of the Secretary.	Annual Reviews 2022, 2023, 2024 Interview with Manager Environment and Superintendent – Environment Aboriginal Cultural Heritage Management Plan, 8 June 2023	No Aboriginal objects have been destroyed, damaged or defaced during the audit period. A number of previously unidentified aboriginal cultural artefacts were recorded and salvaged by a qualified archaeologist with assistance of representatives from the Narrabri Local Aboriginal Land Council over the audit period.	C	N/A
4.23	The Proponent shall revise the Aboriginal Cultural Heritage Management Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with Aboriginal cultural heritage management for the site (Stages 1 and 2) and subsequently implement this revised version of the Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. This plan must: (a) be submitted the Secretary by 30 June 2011; (b) be prepared in consultation with the BCS, the Narrabri Local Aboriginal Land Council and the Narrabri Goomeroi Aboriginal Corporation; (c) include a protocol for the ongoing consultation and involvement of Aboriginal communities in the conservation and management of Aboriginal heritage on site; and (d) describe the measures that would be implemented to protect Aboriginal sites on the mine site, (in particular all known Aboriginal sites on lands overlying Longwalls 1-3 and sites 10b, 38, 39 and 106-112), or any new Aboriginal objects or skeletal remains that are identified during the project.	Aboriginal Cultural Heritage Management Plan, 8 June 2023 Correspondence from the DPE to NCO dated 3 October 2023 approving the current revision of the Aboriginal Cultural Heritage Management Plan Annual Reviews 2022, 2023, 2024 Interview with Manager Environment and Superintendent – Environment	The Aboriginal Cultural Heritage Management Plan (ACHMP) was last revised during the current audit period and approved by the DPE. The ACHMP addresses the requirements of the condition. Over the audit period, Registered Aboriginal Parties (RAPs) were involved in soil disturbance monitoring and formal biennial consultation meetings are held with RAP senior representatives. During 2023, NCO discovered a previously unidentified aboriginal cultural artefact scatter located north of an existing AHIMS site while undertaking a pre-disturbance survey. NCO engaged a qualified archaeologist and with the assistance of 2 representatives from the Narrabri Local Aboriginal Land Council (LALC), undertook a detailed review and successfully salvaged 149 artefacts. During 2024, cultural heritage monitors identified a previously unrecorded cultural artefact scatter and a scar tree during pre-disturbance surveys. NCO engaged a qualified archaeologist and, with the assistance of RAP representatives conducted a detailed review of the identified sites, which have been registered procedure outlined in the ACHMP. Another previously known site was extended when artefacts were found	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			outside of the site footprint. NCO engaged a qualified archaeologist and with the assistance of RAP representatives conducted a detailed review of the identified site. The additional artefacts were recorded and the existing site fence extended to include artefacts.		
4.24	Prior to undertaking any activities involving surface disturbance or vegetation removal for the lands overlying Longwalls 8-26, the Proponent shall undertake a detailed Aboriginal cultural heritage survey in consultation with the local Aboriginal community and BCS, and to the satisfaction of the Secretary. The Secretary may approve this survey being undertaken in several stages, as mining progresses.	N/A	Outside audit period	NT	N/A

TRANSPORT

Note: These conditions should be read in conjunction with section 13 of the revised Statement of Commitments.

Mine Access Road Intersection

4.25	The Proponent shall maintain the Mine Access Road Intersection with Kurrajong Creek Road and the Kamilaroi Highway in consultation with NSC and to the satisfaction of TfNSW.	Interview with Manager Environment and Superintendent – Environment	Maintenance undertaken during the audit period has been repair of pot holes which was observed during the site inspection.	C	N/A
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Shuttle Bus Traffic Control Protocol

4.25A	Unless otherwise agreed by the Secretary following consultation with TfNSW, the Proponent must ensure that at least 15 employees, calculated as a weekly average, are transported to and from the site by shuttle bus during each of the morning and evening peak traffic periods of 05:30 am to 07:30 am and 5:30 pm to 7:30 pm.	Shuttle Bus record spreadsheet 2022 – 2025 Interview with Manager Environment and Superintendent – Environment Annual Review 2023	Bus monitoring records showed an average number of passengers of 7.5 in December 2022, below the required number. However, as noted in the 2023 Annual Review, the workforce engaged for the cut and flit mine operations were less than the anticipated 15 employees per shift. Averages were 18 in 2023, 20 in 2024, and 21 in 2025 for each shift due to increased numbers of Mastermyne contractors.	C	N/A
4.25B	Should the modification application 08_0144 MOD 7 workforce requirements increase above 15 employees per shift, the Proponent must ensure that an equivalent number of additional employees are transported to and from the site by shuttle bus for each shift during peak traffic periods, as required by condition 25A. <i>Note: The modification application 08_0144 MOD 7 EA assumed that approximately 15 employees would be required for each shift (split between day and night). Therefore approximately 30 employees would be rostered on at any one time within a 24 hour period.</i>	Interview with Superintendent - Environment Shuttle Bus record spreadsheet 2022 – 2025 Interview with Manager Environment and Superintendent – Environment	Increased number of passengers was not due to cut and flit employees, but because of Mastermyne contractors. Mastermyne provide bus transport as part of worker contracts. At the time of the audit, Mastermyne uses 4-5 buses per shift.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
4.25C	<p>The Proponent must prepare a Shuttle Bus Traffic Control Protocol for the project to the satisfaction of the Secretary. The protocol must:</p> <p>(a) be submitted to the Secretary for approval prior to the commencement of bord and pillar mining operations in Longwalls 201 or 202; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> • a code of conduct for shuttle bus drivers; • appropriate communication measures to ensure that shuttle bus drivers are notified when a coal train movement on the Werris Creek Mungindi Railway impacts the level crossing at Kurrajong Creek Road (LXM 534); • appropriate procedures to ensure that shuttle bus drivers do not queue within the turning/ deceleration lanes at the Kamilaroi Highway/ Kurrajong Road intersection when coal train movements impact LXM 534; • nominated routes for shuttle buses accessing the site; and • a monitoring and reporting program to audit shuttle bus movements and employee numbers against the requirements of condition 25A and 25B. 	Shuttle Bus Traffic Control Protocol, 27 February 2023	<p>The Shuttle Bus Traffic Control Protocol was approved prior to the current audit period. It was revised in 2023.</p> <p>The Protocol contains the required measures.</p>	C	N/A
4.25D	The Proponent must implement the approved Shuttle Bus Traffic Control Protocol.	<p>Shuttle Bus Traffic Control Protocol, 27 February 2023</p> <p>Traffic Management Plan 12 August 2022 (Stage 3)</p> <p>Interview with Manager Environment and Superintendent – Environment</p> <p>Whole of Mine Training 2025 training package – Traffic Management Module</p> <p>Independent Environmental Audit (ERM 2023)</p>	<p>As noted in the previous IEA, the Shuttle Bus Traffic Control Protocol requires the bus driver to coordinate phone contact with the CHPP control room to receive advice on coal train movements. No records of such contact are maintained to verify this occurs.</p> <p>The protocol also requires that where coal train movements may impact on the bus access to the site, the driver must not queue on the Kamilaroi Highway and Kurrajong Creek Road intersection. Drivers must continue along the highway and park at a safe place to wait the coal train to clear. This requirement has not been tested.</p> <p>It is noted that these requirements are reproduced in the Stage 3 Traffic Management Plan, which also refers to the Shuttle Bus Traffic Control Protocol.</p> <p>Training is provided to all personnel via the Traffic Management Module of the Whole of Mine Training 2025, as observed by the auditor during the site visit.</p>	C (obs)	It is recommended that NCO develop and maintain records of a verification process to ensure the protocol is being adhered to.
Greylands and Scratch Roads					
4.26	<p>Prior to using Greylands and Scratch Roads to construct mine-related infrastructure, the Proponent shall enter into an agreement with NSC to:</p> <p>a) construct watercourse crossings (either culverts or concrete causeways) on those sections of these roads that it uses in a manner that does not restrict fish passage, in consultation with NSW T&I (Fisheries) and to the satisfaction of NSC; and</p>	Interview with Manager Environment and Superintendent – Environment	No mine infrastructure is located on Greylands or Scratch Roads. Scratch Road is used for access for routine ecology and groundwater monitoring.	NT	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	b) fund the maintenance of those sections of these roads that it uses to an all-weather unsealed road standard.				

Gunnedah Traffic Management Study

4.27	The Proponent shall contribute, on an equitable basis with other coal project rail users, to the costs of an independent Traffic Management Study analysing the impacts of increased rail traffic on road safety and congestion due to increased closure of rail level crossings within Gunnedah, prepared to the satisfaction of GSC. <i>Note: This study should examine funding mechanisms to implement any recommendations to improve road safety and reduce traffic congestion associated with rail level crossings and be completed by 30 June 2011.</i>	Interview with Manager Environment and Superintendent – Environment	Outside audit period.	NT	N/A
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VISUAL IMPACT

Note: These conditions should be read in conjunction with section 14 of the Statement of Commitments.

Visual Amenity

4.28	The Proponent shall minimise the visual impacts of the project to the satisfaction of the Secretary.	Complaints register 2022 - 2025	No complaints related to visual impacts have been received during the audit period.	C	N/A
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Lighting Emissions

4.29	The Proponent shall ensure that: a) no outdoor lights shine above the horizontal; and b) all external lighting associated with the project complies with <i>Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting</i> .	Complaints register 2022 - 2025	No complaints related to lighting have been received. Additional lighting installed in the car park is all LED. All surface operations are in daylight hours other than CHPP and shaft drilling.	C	N/A
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ENERGY EFFICIENCY AND GREENHOUSE GAS

Note: These conditions should be read in conjunction with section 11 of the revised Statement of Commitments.

Energy Saving Action Plan

4.30	The Proponent shall revise the Energy Savings Action Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with energy management for the site (Stages 1 and 2) and subsequently implement this revised version of the Energy Savings Action Plan to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with BCS; b) be prepared in accordance with the <i>Guidelines for Energy Savings Action Plans</i> (DEUS, 2005), or its latest version; c) be submitted to the Secretary for approval prior to 30 June 2011; and d) include a program to monitor the effectiveness of measures to reduce energy use on site.	Narrabri Mine Greenhouse Gas Minimisation Plan 28 August 2023 Letter from DPE to NCO dated 21 December 2023 stating approval of the Greenhouse Gas Minimisation Plan	The Greenhouse Gas Minimisation Plan required under Condition 4.32 was revised in 2023 and updated to incorporate the Energy Savings Action Plan required under Condition 4.30. It was prepared in consultation with the Independent Expert Advisory Panel (the panel) and the Department's Net Zero Emissions Modelling (NZEM) team and contains the information required by the conditions of consent.	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
Gas Drainage					
4.31	The Proponent shall implement all reasonable and feasible measures to minimise the greenhouse gas emissions from the underground mining operations to the satisfaction of the Secretary.	Narrabri Mine Greenhouse Gas Minimisation Plan 28 August 2023 Annual Review 2024 Interview with Manager Environment and Superintendent – Environment	Section 5 of the Greenhouse Gas (GHG) Minimisation Plan describes options for minimising GHG emissions. As per Section 6, an energy audit is being undertaken, due to be completed by the end of 2025. The 2024 Annual Review notes that several decarbonisation project strategies are being investigated at WHC, including: <ul style="list-style-type: none"> Reducing diesel fuel consumption – one diesel generator was decommissioned and replaced with mains power Fugitive emissions abatement opportunities – a flare was enclosed in 2024 to efficiently combust methane, LW107 goaf was successfully sealed to reduce fugitives emissions, and an investigation was conducted to assess the suitability of Ventilation Air Methane destruction Reducing Scope 2 emissions – an EIS for a 26MW solar farm was submitted to reduce reliance on grid electricity and lowering Scope 2 emissions, while carbon neutrality was achieved for Scope 2 emissions by purchasing Climate Active certified carbon neutral electricity Concept studies are being undertaken to separate methane from carbon dioxide in order to use methane for power generation. Options for an algae farm are being explored to use the carbon dioxide for algal growth 	C	N/A
4.32	Prior to carrying out longwall coal mining operations, the Proponent shall submit a Greenhouse Gas Minimisation Plan for the approval of the Secretary. This plan must: <ol style="list-style-type: none"> be prepared in consultation with BCS; identify options for minimising greenhouse gas emissions from underground mining operations, with a particular focus on capturing and/or using these emissions; investigate the feasibility of implementing each option; propose the measures that would be implemented in the short to medium term on site; and include a research program to inform the continuous improvement of the greenhouse gas minimisation measures on site. 	Narrabri Mine Greenhouse Gas Minimisation Plan 28 August 2023 Letter from DPE to NCO dated 21 December 2023 stating approval of the Greenhouse Gas Minimisation Plan Interview with Manager Environment and Superintendent – Environment	The Greenhouse Gas Minimisation Plan required under Condition 4.32 was revised in 2023 and updated to incorporate the Energy Savings Action Plan required under Condition 4.30. It was prepared in consultation with the Independent Expert Advisory Panel (the panel) and the Department’s Net Zero Emissions Modelling (NZEM) team and contains the information required by the conditions of consent. Implementation is as for Condition 4.31.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
WASTE					
Waste Minimisation					
4.33	<p><i>Note: These conditions should be read in conjunction with section 3 of the revised Statement of Commitments.</i></p> <p>The Proponent shall revise the Waste Management Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with waste management for the site (Stages 1 and 2) and subsequently implement this revised version of the Waste Management Plan to the satisfaction of the Secretary. This plan must:</p> <ol style="list-style-type: none"> be submitted to the Secretary for approval prior to 30 June 2011; identify the various waste streams of the project; describe what measures would be implemented to reuse, recycle, or minimise the waste generated by the project; ensure irrigation of treated wastewater is undertaken in accordance with <i>Environmental Guidelines: Use of Effluent by Irrigation</i> (DEC, 2004), or its latest version; and include a program to monitor the effectiveness of these measures. 	<p>Waste Management Plan, Version 4, 29 May 2020</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Interview with Manager Environment and Superintendent – Environment</p> <p>Surface Housekeeping Standard 20/5/2025</p> <p>CMO NCO Monthly Environmental Inspection Records showing waste area checks 31/7/2025</p>	<p>The current revision of the Waste Management Plan was approved by DPE in October 2020, prior to the current audit period.</p> <p>The Surface Housekeeping Standard introduced in 2025 shows a map of the pit top with demarcated areas listed in Section 6 together with the roles that are responsible for those areas.</p> <p>Monthly waste collection reports are provided by Namoi Waste and reviewed as part of the Annual Review preparation.</p>	C	N/A

SCHEDULE 5 - REHABILITATION AND OFFSETS

Note: These conditions should be read in conjunction with sections 4, 8 and 12 of the revised Statement of Commitments and condition 3(c) of schedule 3.

Rehabilitation Objectives

5.1	<p>The Proponent shall rehabilitate the site to the satisfaction of the Secretary and Resources Regulator in accordance with the rehabilitation objectives in Table 1.</p> <p><i>Table 1: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th>Domain</th> <th>Rehabilitation Objective</th> </tr> </thead> <tbody> <tr> <td>Surface Facilities Area</td> <td>Set through condition 4 below</td> </tr> <tr> <td>Other land affected by the project</td> <td>Restore ecosystem function, including maintaining or establishing self-sustaining native ecosystems: <ul style="list-style-type: none"> comprised of local native plant species; with a landform consistent with the surrounding environment </td> </tr> <tr> <td>Built features</td> <td>Repair/restore to pre-mining condition or equivalent</td> </tr> <tr> <td>Community</td> <td>Minimise the adverse socio-economic effects associated with mine closure including the reduction in local and regional employment Ensure public safety</td> </tr> </tbody> </table> <p><i>Note: The Proponent may be required to define other rehabilitation objectives in management plans or strategy required under this schedule.</i></p>	Domain	Rehabilitation Objective	Surface Facilities Area	Set through condition 4 below	Other land affected by the project	Restore ecosystem function, including maintaining or establishing self-sustaining native ecosystems: <ul style="list-style-type: none"> comprised of local native plant species; with a landform consistent with the surrounding environment 	Built features	Repair/restore to pre-mining condition or equivalent	Community	Minimise the adverse socio-economic effects associated with mine closure including the reduction in local and regional employment Ensure public safety	<p>Rehabilitation Management Plan 26 August 2025</p> <p>Annual Reviews 2022, 2023, 2024</p> <p>Narrabri Colliery Annual Rehabilitation Reports 2022, 2023, 2024</p> <p>Interview with Manager Environment and Superintendent – Environment</p> <p>2023 and 2024 EcoLogical Biodiversity and Land Annual Monitoring Reports for CF 201-202, LW101-106, LW107-110, LW203-206</p> <p>2024 EcoLogical Subsidence Pont Monitoring Report</p> <p>2025 EcoPlanning Vegetation and Landform Rehabilitation Monitoring Methodology (Longwalls 101-110)</p> <p>2025 EcoPlanning Annual Rehabilitation Monitoring</p>	<p>Rehabilitation objectives were approved by the Resources Regulator on 18/10/2023 and are presented in Section 4 of the Rehabilitation Management Plan.</p> <p>Rehabilitation progress is reported in the Annual Rehabilitation Reports.</p> <p>A total of 170 ha is currently under active rehabilitation. However, no rehabilitation has yet been completed.</p> <p>Prior to 2024, Rehabilitation monitoring was completed per Extraction Plan BMP/LMP monitoring reports. In 2024, NCO commissioned an Annual Rehabilitation Monitoring Report to assess completion criteria against Rehabilitation Objectives across the mine site. The 2025 EcoPlanning monitoring reports provide for baseline monitoring across the decommissioned LW101-110 in 2024.</p>	C	N/A
Domain	Rehabilitation Objective														
Surface Facilities Area	Set through condition 4 below														
Other land affected by the project	Restore ecosystem function, including maintaining or establishing self-sustaining native ecosystems: <ul style="list-style-type: none"> comprised of local native plant species; with a landform consistent with the surrounding environment 														
Built features	Repair/restore to pre-mining condition or equivalent														
Community	Minimise the adverse socio-economic effects associated with mine closure including the reduction in local and regional employment Ensure public safety														

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		Report 2024 (Longwalls 101-110)			
Progressive Rehabilitation					
5.2	To the extent that mining operations permit, the Proponent shall carry out rehabilitation progressively, that is, as soon as reasonably practicable following the disturbance.	Rehabilitation Management Plan 26 August 2025 Interview with Manager Environment and Superintendent – Environment Site inspection	Progressive rehabilitation is prescribed in the Rehabilitation Management Plan. Rehabilitation is carried out as soon as practicable. Ecologists are on site every 2 weeks to monitor rehabilitation sites and works completed are documented using Survey 123 and recorded in the NCO Environmental and Rehabilitation Hub in ArcGIS. Disturbed areas such as drill hole pads were observed to be rehabilitated during the site visit undertaken for this audit, with cleared areas topsoiled, ripped, and woody debris (where available) spread across. While there was regrowth of vegetation in some rehabilitated areas, others were relatively bare more than a year since topsoiling. It indicates that NCO's reliance on regrowth from the topsoil seedbank may need to be reviewed.	C (Obs)	To ensure timely revegetation of rehabilitated areas, additional seeding and/or tubestock planting is indicated. Topsoil storage methods may also need to be reviewed to ensure that topsoil seedbanks are preserved.
Landscape Management Plan					
5.3	The Proponent shall revise the Landscape Management Plan for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with landscape management for the site (Stages 1 and 2) and subsequently implement this revised version of the Landscape Management Plan to the satisfaction of the Secretary and Resources Regulator. This plan must: (a) be submitted to the Secretary for approval by 30 June 2011; (b) be prepared by suitably qualified expert/s whose appointment/s have been endorsed by the Secretary; (c) be prepared in consultation with DPIE Water, BCS and NSC; and (d) include a: <ul style="list-style-type: none"> • Rehabilitation Management Plan; and • Mine Closure Plan. 	Rehabilitation Management Plan 26 August 2025	The Landscape Plan in the Mine Operations Plan has been superseded by the Rehabilitation Management Plan as a result of the introduction of Standard Conditions of Mining Leases.	NT	N/A
Rehabilitation Management Plan					
5.4	The Rehabilitation Management Plan must include: a) the rehabilitation objectives for the site; b) a strategic description of how the rehabilitation of the site would be integrated with surrounding land use; c) a general description of the short and long term measures that would be implemented to rehabilitate the site; d) a detailed description of the measures that would be implemented to remediate predicted subsidence impacts under individual Extraction Plans; e) a detailed description of the measures that would be implemented to minimise environmental impacts of mining operations and to rehabilitate the site, including measures to be implemented for: <ul style="list-style-type: none"> • managing remnant vegetation and habitat on site; 	Rehabilitation Management Plan 26 August 2025 Site observations Interview with Manager Environment and Superintendent – Environment Weed Treatment Reports Notices of weed applications	The Rehabilitation Management Plan (RMP) meets the requirements of this condition. The auditor sighted records of weed treatment and weed contractor reports confirming actions taken to control weeds in accordance with the RMP. The auditor observed evidence of implementation of rehabilitation at the	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<ul style="list-style-type: none"> • minimising impacts on fauna; • minimising visual impacts; • conserving and reusing topsoil; • controlling weeds, feral pests, and access; • managing bushfires; and • managing any potential conflicts between rehabilitation works and Aboriginal cultural heritage. <p>f) detailed performance and completion criteria for the rehabilitation of the site;</p> <p>g) a detailed description of how the performance of the rehabilitation works would be monitored over time to achieve the stated objectives and against the relevant performance and completion criteria; and</p> <p>h) details of who is responsible for monitoring, reviewing and implementing the plan.</p> <p><i>Note: In accordance with condition 11 of schedule 2, the preparation and implementation of Rehabilitation Management Plans is likely to be staged, with each plan covering a defined area (or domain) for rehabilitation. In addition, while mining operations are being carried out, some of the proposed remediation or rehabilitation measures may be included in the detailed management plans that form part of the Extraction Plan. If this is the case, however, then the Proponent will be required to ensure that there is good cross-referencing between the various management plans.</i></p>	Chemical use records and spreadsheet	site including management of topsoil, vegetation and habitat (on-ground logs).		

Mine Closure Plan

5.5	<p>The Mine Closure Plan must:</p> <ol style="list-style-type: none"> define the objectives and criteria for mine closure; investigate options for the future use of the site; provide a detailed methodology for decommissioning the site's evaporation/storage ponds and the treatment of any accumulated salt within or around those ponds; investigate ways to minimise the adverse socio-economic effects associated with mine closure, including reduction in local and regional employment levels; describe the measures that would be implemented to minimise or manage the on-going environmental effects of the project; and describe how the performance of these measures would be monitored over time. 	<p>Rehabilitation Management Plan 26 August 2025</p> <p>Interview with Manager Environment and Superintendent – Environment</p>	The Mine Closure Plan is integrated into the RMP which meets the requirements of this condition.	C	N/A
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OFFSETS

Biodiversity Offset Strategy

5.6	<p>The Proponent shall provide a suitable biodiversity offset strategy to compensate for the impacts of Stages 1 and 2 of the project. This offset strategy must:</p> <ol style="list-style-type: none"> be prepared in consultation with BCS; be submitted to the Secretary for approval by 31 December 2010, or as otherwise agreed by the Secretary; provide a detailed assessment of offset proposal/s involving the property/ies (agreed to by BCS) adjoining Mt Kaputar National Park to confirm the ability of either of these property/ies to meet "like for like or better" and "maintain or improve" conservation outcomes; include and assess proposals to offset impacts to the Inland Grey Box EEC, <i>Bertya opposens</i>, and foraging habitat for the Superb Parrot; include proposals on offsetting both direct and indirect impacts (ie edge effects) of the project; and determine the best overall combination of lands to provide a suitable offset. 	<p>Biodiversity Offset Strategy, Rev 9, 17 February 2025</p> <p>Letter from DPHI to NCO dated 18 June 2025 stating approval of Biodiversity Offset Strategy</p>	The approved Biodiversity Offset Strategy was prepared in consultation with Conservation Programs, Heritage and Regulation (CPHR) and contains the information required by the conditions of approval.	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
5.7	The Proponent shall make suitable arrangements to provide appropriate long-term security for the offset areas by 31 December 2011, or other date agreed by the Secretary, to the satisfaction of the Secretary.	Biodiversity Offset Strategy, Rev 9, 17 February 2025 Interview with Manager Environment and Superintendent – Environment Email from WHC to BCT transmitting Annual Report to the BCT dated 31/3/2023, 26/3/2024, and 26/3/2025 Letters from BCT to WHC stating satisfaction with the completion of required management activities dated 31/5/2023, 31/5/2024, and 26/3/2025.	The Biodiversity Offset Conservation Agreements for Narrabri offset areas were registered between September 2019 (Kenna Biodiversity Offset Property – BOP) and July 2021 (Omeo, Greylands Road, Greylands, Rosevale, Kurrajong, and West Haven BOPs), prior to the current audit period. In accordance with requirements of the Conservation Agreements, WHC submits an annual report to BCT on the required management activities.	C	N/A

SCHEDULE 6 - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

Note: This schedule should be read in conjunction with sections 15, 16 and 17 of the revised Statement of Commitments.

ENVIRONMENTAL MANAGEMENT

Environmental Management Strategy

6.1	The Proponent shall revise the Environmental Management Strategy for the Stage 1 project to encompass all proposed mine activities and potential impacts associated with environmental management for the site (Stages 1 and 2) and subsequently implement this revised version of the Environmental Management Strategy to the satisfaction of the Secretary. This strategy must: <ul style="list-style-type: none"> a) be submitted to the Secretary for approval prior to 30 June 2011; b) provide the strategic context for environmental management of the project; c) identify the statutory requirements that apply to the project; d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project 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; and • respond to emergencies; and f) include a clear plan depicting all the monitoring currently being carried out in the project area. 	Environmental Management Strategy V4, 29/5/2020 Independent Environmental Audit (ERM 2023)	The Environmental Management System (EMS) has not been amended during the current audit period.	C	N/A
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Management Plan Requirements

6.2	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: 	Review of management plans	Management plans generally meet this requirement.	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<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 project or any management measures; <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> impacts and environmental performance of the project; effectiveness of any management measures (see (c) above); <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the project over time;</p> <p>(g) a protocol for managing and reporting any:</p> <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 <p>(h) a protocol for periodic review of the plan.</p>				

Revision of Strategies, Plan and Programs

6.3	<p>Within 3 months of the submission of an:</p> <ol style="list-style-type: none"> audit under condition 7 of schedule 6; incident report under condition 4 of schedule 6; and annual review under condition 5 of schedule 6; and any modification to the conditions of this approval (unless the conditions require otherwise), <p>the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</p> <p><i>Note: This is to ensure that the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</i></p>	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Screen shot of CMO Action Evidence with regards to Environmental Management Strategy review/revision to be completed within 3 months of any incident report, audit, or any modification to the conditions</p> <p>Screen shot showing review dates 29/05/2024 and 12/06/2025 of each management plan or strategy after March submissions of 2023 and 2024 Annual Reports, respectively.</p>	<p>Reviews are undertaken following Annual Review and as required. These are documented as required. Stage 3 documents have been reviewed to incorporate new conditions and currently in progress for approval. As these are approved, Stage 2 management plans are being removed.</p>	C	
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REPORTING

Incident

6.4	<p>The Proponent shall notify the Secretary in writing via the Major Projects website and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.</p>	<p>Interview with Manager Environment and Superintendent – Environment</p> <p>Annual Reviews 2022, 2023, 2024</p>	<p>Incidents over the audit period included: 2023:</p> <ul style="list-style-type: none"> PM10 data from site ND10 on 23/04, 29/04, 29/05 and 4/06/2023 were not collected due to mechanical failure of the HVAS on those days. 	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<p>Letters from DPHI to NCO stating compliance with incident reporting consent requirements dated:</p> <ul style="list-style-type: none"> • 11/04/2024 regarding elevated PM10 level reported 4/04/2024 • 10/01/2025 regarding groundwater triggers reported 7/11/2024 • 19/03/2025 regarding groundwater triggers reported 11/02/2025 • 4/08/2025 regarding groundwater triggers reported 10/06/2025 • 2/09/2025 regarding surface water trigger reported 31/07/2025 • 7/10/2025 regarding groundwater triggers reported 3/09/2025 <p>28/03/2024 Major Projects Portal report lodgement HVAS sample events 2023</p> <p>Post Approval Form and Environmental Event Report (8/5/2025) on PM10 exceedance of 12/4/2025</p>	<p>The incident was noticed during the compilation of the Annual Review 2023.</p> <p>2024:</p> <ul style="list-style-type: none"> • Elevated PM10 reading at ND9 on 12/03/2024 • EC trigger and water level triggers activated for bore water quality and levels on 10/10/2024 • EC and pH triggers activated for bore water quality 14/11/2024 <p>2025:</p> <ul style="list-style-type: none"> • EC and pH triggers activated for groundwater recorded 28/01/2025, 30/01/2025, 31/01/2025, 3/02/2025, and 4/02/2025 • PM10 trigger activated at ND10 on 12/04/2025 (Environmental Event Report 8/05/2025 after becoming aware of incident on 4/5/2025) • EC, pH, water level triggers activated for groundwater recorded 19/05/2025, 20/05/2025, 28/05/2025, and 27/06/2025 (Environmental Event Report 31/07/2025) • EC surface water trigger activated recorded 28/07/2025 (Environmental Event Report 29/08/2025) • EC, pH, water level triggers activated for groundwater recorded 19/08/2025, 21/08/2025, 26/08/2025, 28/08/2025 (Environmental Event Report 30/09/2025) <p>On the basis of the evidence reviewed, notification of all incidents during the audit period has been in made writing to the Secretary via the Major Projects website. Further detailed reports on all incidents have been provided to the Secretary within 7 days of the date of the incident, therefore NCO are considered compliant with this condition.</p>		
Regular					
6.5	The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval, and to the satisfaction of the Secretary.	Review of NCO website https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine	Monitoring reports are provided on the website.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
Annual Review					
6.6	<p>By the end of March each year, the Proponent must submit a review of the environmental performance of the project for the previous calendar year to the satisfaction of the Secretary. This review must:</p> <ol style="list-style-type: none"> describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next year; include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the: <ul style="list-style-type: none"> relevant statutory requirements, limits or performance measures/criteria; monitoring results of previous years; and relevant predictions in the EA and Extraction Plan; identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; identify any trends in the monitoring data over the life of the project; identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and describe what measures will be implemented over the next year to improve the environmental performance of the project. <p><i>Note: The "Post Approval Requirements for State Significant Developments - Annual Review Guideline 2015, NSW Government, October 2015" (or its latest version) provides a reporting framework to integrate the reporting requirements of the Annual Review required by the Department under the project approval and the Annual Environment Management Report (AEMR) required by Resources Regulator under the Mining Lease.</i></p>	<p>Annual Reviews 2022, 2023, 2024</p> <p>Post Approval Form dated 31/03/2023 for 2022 Annual Review</p> <p>Post Approval Form dated 3/04/2024 for 2023 Annual Review</p> <p>Email from Major Projects to NCO dated 28 March 2024 stating receipt of 2023 Annual Report</p> <p>Post Approval Form dated 31/03/2025 for 2024 Annual Review</p>	<p>Annual Reviews for the audit period contain the requirements of this condition.</p> <p>Annual Reviews were submitted on time.</p>	C	N/A
INDEPENDENT ENVIRONMENTAL AUDIT					
6.7	<p>Prior to 13 September 2010, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project (Stages 1 and 2). This audit must:</p> <ol style="list-style-type: none"> be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; include consultation with the relevant agencies assess the environmental performance of the project and assess whether it is complying with the relevant requirements of this approval and any relevant mining lease or EPL (including any strategy, plan or program required under these approvals); review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate, recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals. <p><i>Note: This audit team must be led by a suitably qualified auditor and include experts in the fields of subsidence, water and noise management (other than for the 2010 audit which is not required to include a subsidence expert in the audit team).</i></p>	<p>Independent Environmental Audit (ERM 2023)</p>	<p>Previous audit reported sighted. This audit also satisfies this condition.</p>	C	N/A
6.8	<p>Within 6 weeks of the completing of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	<p>Email from Major Projects portal to NCO dated 31 January 2023 stating receipt of IEA and also noting that</p>	<p>The IEA and accompanying Action Plan were submitted within the required timeframe.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		approved submission dated was 31 January 2023. Independent Environmental Audit, dated 25 January 2023			

COMMUNITY CONSUTLATIVE COMMITTEE

6.9	The Proponent shall maintain a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary, in general accordance with the <i>Guideline for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007)</i> , or its latest version. <i>Note: The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval.</i>	CCC meeting minutes available on NCO website https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine	CCC meetings are currently held on a quarterly basis. Meeting minutes are distributed and uploaded to the NCO website.	C	N/A
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ACCESS TO INFORMATION

6.10	The Proponent shall: <ul style="list-style-type: none"> a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> • the documents referred to in Condition 2 of Schedule 2; • all current statutory approvals for the project; • all approved strategies, plans and programs required under the conditions of this approval; • a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; • a complaints register, updated on a monthly basis; • minutes of CCC meetings; • the annual reviews of the project; • any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; • any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary. 	NCO website https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine	All documents available on the website	C	N/A
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SCHEDULE 7 - ADDITIONAL PROCEDURES FOR AIR QUALITY AND NOISE MANAGEMENT

NOTIFICATION OF LANDOWNERS

7.1	If the results of the monitoring required in schedule 4 identify that impacts generated by the project are greater than the relevant impact assessment criteria, except where a negotiated agreement has been entered into in relation to that impact, then the Proponent shall, within 2 weeks of obtaining the monitoring results, notify the Secretary, the affected landowners and tenants (including tenants of mine-owned properties) accordingly, and provide quarterly monitoring results to each of these parties until the results show that the project is complying with the criteria in schedule 4.	Interview with Manager Environment and Superintendent – Environment Private Agreement between NCO and the owners of Bow Hills property showing agreed noise criteria.	Not triggered during audit period. Existing agreement for increased noise levels in place with private landholder Bow Hills property	C	N/A
7.2	If the results of monitoring required in schedule 4 identify that impacts generated by the project are greater than the relevant air quality impact assessment criteria in schedule 4, then the Proponent	Interview with Manager Environment and	Exceedance of PM10 were as a result of extraordinary events or off-site sources and were not notified to landowners.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	shall send the relevant landowners and tenants (including tenants of mine-owned properties) a copy of the NSW Health fact sheet entitled "Mine Dust and You" (and associated updates) in conjunction with the notification required in condition 1.	Superintendent – Environment			
INDEPENDENT REVIEW					
7.3	<p>If a landowner considers the project to be exceeding the impact assessment criteria in schedule 4, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land.</p> <p>If the Secretary is satisfied that an independent review is warranted, the Proponent shall within 2 months of the Secretary's decision:</p> <p>(a) consult with the landowner to determine his/her concerns;</p> <p>(b) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to conduct monitoring on the land, to:</p> <ul style="list-style-type: none"> • determine whether the project is complying with the relevant impact assessment criteria in schedule 4; and • identify the source(s) and scale of any impact on the land, and the project's contribution to this impact; and <p>(c) give the Secretary and landowner a copy of the independent review.</p>	Interview with Manager Environment and Superintendent – Environment	None requested	NT	N/A
7.4	<p>If the independent review determines that the project is complying with the relevant impact assessment criteria in schedule 4, then the Proponent may discontinue the independent review with the approval of the Secretary.</p> <p>If the independent review determines that the project is not complying with the relevant impact assessment criteria in schedule 4, and that the project is primarily responsible for this non-compliance, then the Proponent shall:</p> <p>a) take all reasonable and feasible measures, in consultation with the landowner, to ensure that the project complies with the relevant criteria and conduct further monitoring to determine whether these measures ensure compliance; or</p> <p>b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.</p> <p>If further monitoring under paragraph (a) determines that the project is complying with the relevant criteria, then the Proponent may discontinue the independent review with the approval of the Secretary.</p> <p>If the independent review determines that the project is not complying with the relevant land acquisition criteria in schedule 4, then the Proponent shall offer to acquire all or part of the landowner's land in accordance with the procedures in conditions 5-7 below, to the satisfaction of the Secretary.</p>	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	N/A
LAND ACQUISITION					
7.5	<p>Within 3 months of receiving a written request from a landowner with acquisition rights, the Proponent shall make a binding written offer to the landowner based on:</p> <p>(a) the current market value of the landowner's interest in the property at the date of this written request, as if the property was unaffected by the project the subject of the project application, having regard to the:</p>	Interview with Manager Environment and Superintendent – Environment	No requests received during the audit period.	NT	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<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 property and/or any approved building or structure which has been physically commenced 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 'reasonable and feasible measures' under schedule 4 or condition 4(a) of this schedule; <p>(b) the reasonable costs associated with:</p> <ul style="list-style-type: none"> • relocating within the Narrabri or Gunnedah local government areas, or to any other local government area determined by the Secretary; • 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 <p>(c) reasonable compensation for any disturbance caused by the land acquisition process.</p> <p>However, if following this period, the Proponent and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution.</p> <p>Upon receiving such a request, the Secretary shall request the President of the NSW Division of the Australian Property Institute (the API) to appoint a qualified independent valuer to:</p> <p>(a) consider submissions from both parties;</p> <p>(b) 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;</p> <p>(c) prepare a detailed report setting out the reasons for any determination; and</p> <p>(d) provide a copy of the report to both parties and the Secretary.</p> <p>Within 14 days of receiving the independent valuer's report, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.</p> <p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, they may refer the matter to the Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Secretary shall determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in paragraphs (a)-(c) above and the independent valuer's report. Within 14 days of this determination, the Proponent shall make a binding written offer to the landowner to purchase the land at a price not less than the Secretary's determination.</p> <p>If the landowner refuses to accept the Proponent's binding written offer under this condition within 6 months of the offer being made, then the Proponent's obligations to acquire the land shall cease, unless the Secretary determines otherwise.</p>				
7.6	The Proponent shall pay all reasonable costs associated with the land acquisition process described in condition 5 above.	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
7.7	If the Proponent and landowner agree that only part of the land shall be acquired, then the Proponent shall also pay all reasonable costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of the plan at the Office of the Registrar-General.	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	N/A

Licence versions:

- 7 September 2022
- [26 July 2023](#)
- [05 February 2024](#)
- [29 January 2025](#)
- [7 August 2025](#)

EPL 12789

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations									
A1 What the licence authorises and regulates														
A1.1	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Coal works</td> <td>Coal works</td> <td>>5000000 T annual handing capacity</td> </tr> <tr> <td>Mining for coal</td> <td>Mining for coal</td> <td>>5000000 T annual handing capacity</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Coal works	Coal works	>5000000 T annual handing capacity	Mining for coal	Mining for coal	>5000000 T annual handing capacity	<ul style="list-style-type: none"> • Annual Reviews 2022, 2023, 2024 • ROM Survey Monthly Report (September 2025) 	<p>Annual ROM coal from site for reporting period:</p> <ul style="list-style-type: none"> ■ 2022 – 3.37MT ■ 2023 - 4.25MT ■ 2024 - 5.12MT ■ 2025 (Jan-Sep) – 1.55 MT 	C	N/A
Scheduled Activity	Fee Based Activity	Scale												
Coal works	Coal works	>5000000 T annual handing capacity												
Mining for coal	Mining for coal	>5000000 T annual handing capacity												
A2 Premises or plant to which this licence applies														
A2.1	<p>The licence applies to the following premises:</p> <p>Premises Details NARRABRI COAL OPERATIONS 10 KURRAJONG CREEK ROAD BAAN BAA NSW 2390 THE LAND APPROVED UNDER PROJECT APPROVAL 08_0144 INDICATED IN APPENDIX 1 SCHEDULE OF PROJECT LAND OF PROJECT APPROVAL 08_0144, DATED 26 JULY 2010 (DOC13/91155). THE LAND APPROVED UNDER STATE SIGNIFICANT DEVELOPMENT 10269- INDICATED IN APPENDIX 3- APPROVED MINE PLAN OF SSD10269, DATED 1 APRIL 2022 (DOC25/645636-2).</p>	Note	Noted	Note	N/A									
A3 Information supplied to the EPA														
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p>	Note	Noted	Note	N/A									

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																
	(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.																				
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS																					
P1 Location of monitoring/discharge points and areas																					
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. Air <table border="1" data-bbox="273 699 1311 1148"> <thead> <tr> <th data-bbox="273 699 409 768">EPA ID no.</th> <th data-bbox="409 699 655 768">Type of monitoring point</th> <th data-bbox="655 699 902 768">Type of discharge point</th> <th data-bbox="902 699 1311 768">Location description</th> </tr> </thead> <tbody> <tr> <td data-bbox="273 768 409 989">3</td> <td data-bbox="409 768 655 989">Ambient Air Quality Monitoring</td> <td data-bbox="655 768 902 989"></td> <td data-bbox="902 768 1311 989">Monitoring point located at 'Bow Hills' and labelled ND3 as shown on map titled "EPL 12789 Monitoring Locations" dated 21/02/2017 - EPA DOC17/131971</td> </tr> <tr> <td data-bbox="273 989 409 1148">23</td> <td data-bbox="409 989 655 1148"></td> <td data-bbox="655 989 902 1148">Gas Drainage Network</td> <td data-bbox="902 989 1311 1148">Pre-drainage and Goaf Gas drainage network associated with the underground mining operations.</td> </tr> </tbody> </table>	EPA ID no.	Type of monitoring point	Type of discharge point	Location description	3	Ambient Air Quality Monitoring		Monitoring point located at 'Bow Hills' and labelled ND3 as shown on map titled "EPL 12789 Monitoring Locations" dated 21/02/2017 - EPA DOC17/131971	23		Gas Drainage Network	Pre-drainage and Goaf Gas drainage network associated with the underground mining operations.	EPL Monitoring Reports 2022 - 2025	Current monitoring points are included in both the EPL Monitoring Reports and the Current Environmental Monitoring Locations map.	C	N/A				
EPA ID no.	Type of monitoring point	Type of discharge point	Location description																		
3	Ambient Air Quality Monitoring		Monitoring point located at 'Bow Hills' and labelled ND3 as shown on map titled "EPL 12789 Monitoring Locations" dated 21/02/2017 - EPA DOC17/131971																		
23		Gas Drainage Network	Pre-drainage and Goaf Gas drainage network associated with the underground mining operations.																		
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.	Note	Noted	Note	N/A																
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 <table border="1" data-bbox="273 1423 1311 1942"> <thead> <tr> <th data-bbox="273 1423 409 1493">EPA ID no.</th> <th data-bbox="409 1423 655 1493">Type of monitoring point</th> <th data-bbox="655 1423 902 1493">Type of discharge point</th> <th data-bbox="902 1423 1311 1493">Location description</th> </tr> </thead> <tbody> <tr> <td data-bbox="273 1493 409 1713">11</td> <td data-bbox="409 1493 655 1713">Wet weather discharge Discharge water quality monitoring</td> <td data-bbox="655 1493 902 1713">Wet weather discharge Discharge water quality monitoring</td> <td data-bbox="902 1493 1311 1713">Discharge point on northern side of mine boundary labelled as "SD4" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.</td> </tr> <tr> <td data-bbox="273 1713 409 1892">13</td> <td data-bbox="409 1713 655 1892">Wet weather discharge Discharge water quality monitoring</td> <td data-bbox="655 1713 902 1892">Wet weather discharge Discharge water quality monitoring</td> <td data-bbox="902 1713 1311 1892">Discharge point on south eastern side of mine boundary labelled as "SD2" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.</td> </tr> <tr> <td data-bbox="273 1892 409 1942">14</td> <td data-bbox="409 1892 655 1942">Ambient Water Quality Monitoring</td> <td data-bbox="655 1892 902 1942"></td> <td data-bbox="902 1892 1311 1942">Upstream of mine discharge point on Kurrajong Creek</td> </tr> </tbody> </table>	EPA ID no.	Type of monitoring point	Type of discharge point	Location description	11	Wet weather discharge Discharge water quality monitoring	Wet weather discharge Discharge water quality monitoring	Discharge point on northern side of mine boundary labelled as "SD4" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.	13	Wet weather discharge Discharge water quality monitoring	Wet weather discharge Discharge water quality monitoring	Discharge point on south eastern side of mine boundary labelled as "SD2" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.	14	Ambient Water Quality Monitoring		Upstream of mine discharge point on Kurrajong Creek	EPL Monitoring Reports 2022 - 2025	Points observed on map and results tables as included in EPL Monitoring Reports from February 2024 onwards.	Note	N/A
EPA ID no.	Type of monitoring point	Type of discharge point	Location description																		
11	Wet weather discharge Discharge water quality monitoring	Wet weather discharge Discharge water quality monitoring	Discharge point on northern side of mine boundary labelled as "SD4" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.																		
13	Wet weather discharge Discharge water quality monitoring	Wet weather discharge Discharge water quality monitoring	Discharge point on south eastern side of mine boundary labelled as "SD2" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.																		
14	Ambient Water Quality Monitoring		Upstream of mine discharge point on Kurrajong Creek																		

Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
15	Ambient Water Quality Monitoring	Tributary 1 labelled as "KC1US" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971."				
16	Ambient Water Quality Monitoring	Downstream of mine discharge point on Kurrajong Creek Tributary 1 labelled as "KC1DS" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971."				
17	Ambient Water Quality Monitoring	Upstream of mine discharge point on Kurrajong Creek Tributary 2 labelled as "KC2US" on Figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971."				
18	Wet weather discharge Discharge water quality monitoring	Wet weather discharge Discharge water quality monitoring	Discharge point on western side of mine boundary labelled as "SD7" on figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.			
19	Ambient Water Quality Monitoring		Discharge point on eastern side of mine boundary labelled as "SD7" on figure titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.			
20	Ambient Water Quality Monitoring	Upstream location of Kurrajong Creek labelled as "KCUS" on figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971."				
21	Ambient Water Quality Monitoring	Upstream location of Kurrajong Creek labelled as "KCDS" on figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971."	Downstream location of Kurrajong Creek labelled as "KCDS" on figure titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.			
21	Ambient Water Quality Monitoring	Northern portion of mining area in Pine Creek labelled as "PCa" on figure titled "EPL 12789				

Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
22	Ambient Water Quality Monitoring		Monitoring Locations" dated 21/02/2017, EPA DOC17/131971. Monitoring point in Pine Creek Tributary 1 labelled as "PC1" on figure titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.			
24	Water Quality Monitoring	Water Quality Monitoring	Discharge point at Namoi River Labelled as NR1 on Map titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971. Discharge point at Namoi River Labelled as NR1 on Map titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351			
25	Ambient Water Quality Monitoring	Ambient Water Quality Monitoring	Discharge point at Namoi River Labelled as NRUS on Map titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971. Upstream location on Namoi River Labelled as NRUS on Map titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.			
26	Ambient Water Quality Monitoring	Ambient Water Quality Monitoring	Ambient Water Quality Ambient Water Quality Discharge point at Namoi River Monitoring Labelled as NRDS on Map titled "EPL 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971. Downstream location on Namoi River Labelled as NRDS on Map titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.			
27	Wet Weather Discharge Discharge water quality monitoring	Wet Weather Discharge Discharge water quality monitoring	Wet Weather Discharge Wet Weather Discharge point at Ventilation Shaft Discharge water quality Discharge water quality Labelled as SD8 on Map titled "EPL monitoring 12789 Monitoring Locations" dated 21/02/2017, EPA DOC17/131971.			
28	Ground Water Monitoring Bore		As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P28(DOC20/555691).			
29	Ground Water Monitoring Bore		As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P29(DOC20/555691).			

Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
30	Ground Water Monitoring Bore	As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P30(DOC20/555691).				
31	Ground Water Monitoring Bore	As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P31(DOC20/555691).				
32	Ground Water Monitoring Bore	As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P32(DOC20/555691).				
33	Ground Water Monitoring Bore	As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P33(DOC20/555691).				
34	Ground Water Monitoring Bore	As shown in Report "EPL 12789 Technical advise for Hydrology" existing Groundwater monitoring network mark P34(DOC20/555691).				
35	Ground Water Monitoring Bore	Approximately 200m SW of bore at location 30 known as P58				
36	Groundwater Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point P83 (DOC23/539638)				
37	Groundwater Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point P84 (DOC23/539638)				
38	Groundwater Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point P85 (DOC23/539638)				
39	Groundwater Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point P88 (DOC23/539638)				
40	Groundwater Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point P89 (DOC23/539638)				
41	Surface Water Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point TLUS (DOC23/539638)				

Item	Assessment Requirement			Reference/ Evidence	Comments	Compliance	Recommendations
	42	Surface Water Monitoring	As shown in Map EPL12789 Variation Proposed Monitoring marked as point TLDS (DOC23/539638)				
	43	Wet Weather discharge water quality monitoring	Wet Weather discharge water quality monitoring Discharge point at Ventilation Shaft Labelled as SD9 on Map titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.				
	44	Ambient water quality monitoring	Upstream location of Kurrajong Creek labelled as "KCTOP" on figure titled "EPL 12789 Monitoring Locations" January 2024, EPA DOC24/83351.				
	45	Wet weather discharge water quality monitoring	Wet weather discharge water quality monitoring Discharge point on Eastern Shaft sediment dam labelled as "SD10" on Figure 3.1 titled "Monitoring Locations" Tuesday 1 July 2025, EPA DOC25/645636-1.				
P1.4	Point W1 in the table, is identified in this license for the purpose of monitoring of weather parameters at that point. Point W2 in the table, is identified in this license for the purpose of monitoring Inversion conditions.			<ul style="list-style-type: none"> EPL Monitoring Reports 2022 – 2025 Site inspection 	Observed to be present on monitoring maps provided and in place during site audit.	C	N/A
	EPA ID no.	Type of monitoring point	Location of description point				
	W1	Weather analysis					
	W2	Measurement of Inversion conditions	Inversion tower identified as "W2" on map titled "EPL 12789 Monitoring Locations" dated 21/02/2017 - EPA DOC 17/131971.				
L1 Pollution of Waters							
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.			<ul style="list-style-type: none"> EPL Monitoring Reports 2022 – 2025 Annual Reviews 2022, 2023, 2024 Narrabri Mine 2024 Groundwater Review (Australasian Groundwater and Environmental Consultants [AGEC] 2025) 	<p>No exceedances, leaks or significant spills to waters were reported during the audit period.</p> <p>While groundwater EC levels were exceeded at several bores during the 2024 reporting period, this was considered to be due to flushing of salts accumulated during the Tinder Drought (2017-2019) by subsequent prolonged period of above average rainfall (AGEC 2025).</p>	C	N/A
L2 Concentration Limits							

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																																				
L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	<ul style="list-style-type: none"> EPL Monitoring Reports 2022 – 2025 	<p>No water or land concentration limits were exceeded at the specified monitoring points for Oil & Grease, pH, TSS, or TDS in the Narrabri Mine EPL monitoring data for 2022, 2023, or 2024.</p> <p>Where TSS values were above 50 mg/L, the concentration limit did not apply as per Condition L2.5(a), as the controlled discharge occurred solely as a result of rainfall exceeding 38.4mm over a consecutive 5-day period.</p> <p>All other parameters were either below detection, within range, or not applicable due to no discharge.</p>	C	N/A																																				
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Note	Noted	Note	N/A																																				
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	Note	Noted	Note	N/A																																				
L2.4	<p>Water and/or Land Concentration Limits</p> <p>Points 11, 13, 18, 27, 43</p> <table border="1" data-bbox="281 1108 1305 1312"> <thead> <tr> <th>Pollutant</th> <th>Unit of measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Oil and grease</td> <td>Milligrams per litre</td> <td>-</td> <td>-</td> <td>-</td> <td>10</td> </tr> </tbody> </table> <p>Points 11, 13, 18, 24, 27, 43</p> <table border="1" data-bbox="281 1360 1305 1533"> <thead> <tr> <th>Pollutant</th> <th>Unit of measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>pH</td> <td>-</td> <td>-</td> <td>-</td> <td>6.5-8.5</td> </tr> </tbody> </table> <p>Points 11, 13, 18, 27, 43</p> <table border="1" data-bbox="281 1627 1305 1848"> <thead> <tr> <th>Pollutant</th> <th>Unit of measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>Total suspended solids</td> <td>Milligrams per litre</td> <td>-</td> <td>-</td> <td>-</td> <td>50</td> </tr> </tbody> </table> <p>Point 24</p>	Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and grease	Milligrams per litre	-	-	-	10	Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	pH	pH	-	-	-	6.5-8.5	Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Total suspended solids	Milligrams per litre	-	-	-	50	<ul style="list-style-type: none"> EPL Monitoring Reports 2022 – 2025 	<p>No water or land concentration limits were exceeded at the specified monitoring points for Oil & Grease, pH, TSS, or TDS in the Narrabri Mine EPL monitoring data for 2022, 2023, or 2024.</p> <p>Where TSS values were above 50 mg/L, the concentration limit did not apply as per Condition L2.5(a), as the controlled discharge occurred solely as a result of rainfall exceeding 38.4mm over a consecutive 5-day period.</p> <p>All other parameters were either below detection, within range, or not applicable due to no discharge.</p>	C	N/A
Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																																				
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Total suspended solids	Milligrams per litre	-	-	-	50																																				

Item	Assessment Requirement					Reference/ Evidence	Comments	Compliance	Recommendations
	Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit			
	Total dissolved solids	Milligrams per litre	250			350			
L2.5	<p>The Total Suspended Solids concentration limits specified for Points 11, 13, 18, and 27 and 43 may be exceeded for water discharged provided that:</p> <p>a) the discharge occurs solely as a result of rainfall measured at the premises that exceeds 38.4 millimetres over any consecutive 5 day period immediately prior to the discharge occurring; and</p> <p>b) all practical measures have been implemented to dewater all sediment dams within 5 days of rainfall such that they have sufficient capacity to store run off from a 38.4 millimetre, 5 day rainfall event.</p> <p>Note: 38.4 mm equates to the 5 day 90%ile rainfall depth for Gunnedah sourced from Table 6.3a Managing Urban Stormwater: Soils and Construction Volume 1: 4th edition, March 2004.</p>					<ul style="list-style-type: none"> EPL Monitoring Reports Interview with Manager Environment and Superintendent – Environment 	<p>Noted. Triggered during the following periods:</p> <ul style="list-style-type: none"> Point 18: sampled on 30 March 2023 with rainfall exceeding 38.4mm on 29 March 2023; Point 43: sampled on 1 June 2024. The footnote on this page notes rainfall exceeding 38.4mm on 5 April 2024. This is a type error, as rainfall data shows high rainfall on 1/6/2024 Point 43: sampled on 2 December 2024, with rainfall exceeding 38.4mm on 29 November 2024 Point 11: sampled on 30 March 2025, with rainfall exceeding 38.4mm on 28 March 2025; Point 13: sampled on 29 March 2025 and 3 April 2025, with rainfall exceeding 38.4mm on 28 March 2025; Point 43: sampled on 29 March 2025, with rainfall exceeding 38.4mm on 28 March 2025; 	Note (Obs.)	Footnote in EPL Monitoring Report for TSS sampling at Point 43 to read 1 June 2024, rather than 5 April 2024
L3 Waste									
This condition was removed in the January 2025 EPA Licence. In the interest of simplicity, the numbering of the remainder of this Audit Table remains as per the pre-January 2025 EPA licence but keeping in mind that the Noise Limits are listed as L3 from January 2025 onwards.									
L3.1	The licensee is permitted to receive hollow logs and tree stumps generated from Kamilaroi Highway upgrade works carried out in December 2020.					Note	Noted	Note	
L3.2	Green waste generated from the Kamilaroi Highway upgrade works is to be stored on the premises in a clearly defined area and is to be used for ecological rehabilitation purposes and velocity reducing features within the landscape only.					Interview with Manager Environment and Superintendent – Environment	Upgrade was prior to audit period	NT	N/A
L3.3	Green waste generated from the Kamilaroi Highway upgrade works is to be placed in a manner that will not pollute land or waters.					Interview with Manager Environment and Superintendent – Environment	Upgrade was prior to audit period	NT	N/A
L4 Noise limits									
L4.1	Noise generated at the premises must not exceed the noise limits in the table below.					<ul style="list-style-type: none"> EPL Monitoring Reports 2022 – September 2025 Annual Reviews 2022, 2023, 2024 	No noise exceedances were recorded during the audit period at private residences not owned by NCO.	C	N/A
	Locality and location	Day - LAeq (15 minute)	Evening – LAeq (15 minute)	Night – LAeq (15 minute)	Night – LA1 (1 minute)				

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	All privately owned residences 35 35 35 45	<ul style="list-style-type: none"> Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025 Q1-Q3) 			
L4.2	<p>The noise limits identified in the above table do not apply at privately owned residences that are:</p> <p>a) identified as residences subject to acquisition or noise mitigation on request within the Project Approval; or</p> <p>b) subject to a private agreement, relating to the noise levels, between the licensee and the land owner.</p>	Note	<p>Points N5 (Oakleigh), N7 (Merriman), N8 (Haylin View), N8_{mnp} (Matilda) and N9 (High Range) are owned by NCO and are not considered to be private properties in terms of the EPL conditions.</p> <p>NCO has a private agreement with N1 (Bow Hills).</p>	Note	N/A
L4.3	<p>For the purpose of the table above:</p> <p>a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays;</p> <p>b) Evening is defined as the period from 6pm to 10pm;</p> <p>c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</p>	Note	Noted	Note	N/A
L4.4	<p>Determining compliance</p> <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 property 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 facade.</p> <p>c) with the noise limits in the Noise Limits table, the noise measurement equipment must be located:</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>	<ul style="list-style-type: none"> Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) Interview with Manager Environment and Superintendent – Environment 	Quarterly attended noise monitoring reports state that operational noise monitoring was in accordance with these conditions.	C	N/A
L4.5	<p>The noise limits set out in the Noise Limits table apply under all meteorological conditions except for the following:</p> <p>a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or</p> <p>b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</p> <p>c) Stability category G temperature inversion conditions.</p> <p>For the purposes of this condition:</p> <p>i) Data recorded by the meteorological station identified as EPA Identification Point(s) WW1 must be used to determine meteorological conditions; and</p>	Note	Noted	Note	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	ii) Temperature inversion conditions (stability category) are to be determined by direct measurement over a minimum 50m height interval as referred to in Part E2 of Appendix E of the "New South Wales Industrial Noise Policy" dated January 2000 ISBN 0 7313 2715 2.				
L4.6	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	<ul style="list-style-type: none"> Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) Independent Environmental Audit (ERM 2023) 	<p>Review of sample SLR noise monitoring reports identify low frequency noise components being evaluated as per the NSW Noise Policy for Industry (2017).</p> <p>As noted in the previous Independent Environmental Audit, whilst Condition L4.6 implies that the NSW Industrial Noise Policy (2000) should apply, justification for the use of NSW Noise Policy for Industry (2017) was provided through reference to Clause 8 under the 'Implementation and transitional arrangements for the Noise Policy for Industry (2017)' prepared by EPA. Clause 8 states that "The NSW Industrial Noise Policy (2000) will continue to apply where it is referenced in existing statutory instruments (such as consents and licences), except for the NSW Industrial Noise Policy Section 4 modifying factors, which will be transitioned to the Noise Policy for Industry (2017) Fact Sheet C through a NSW Industrial Noise Policy application note. This approach has been taken because the Noise Policy for Industry (2017) modification factor approach reflects more recent understanding of the impact of tonal and low-frequency noise on the community."</p>	C	N/A
L5 Blasting					
L5.1	The overpressure level from blasting operations at the premises must not exceed 115dB (Lin Peak) for more than five per cent of the total number of blasts over each reporting period. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.2	The overpressure level from blasting operations at the premises must not exceed 120dB (Lin Peak) at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.3	The airblast overpressure level from blasting operations listed in Conditions L4.1 and L4.2 must not be exceeded at any point within 30 metres of any non-project related residential building or other noise sensitive location.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.4	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 5mm/sec for more than five per cent of the total	Interview with Manager Environment and	Not triggered – no blasting conducted during audit period	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	number of blasts over each reporting period. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	Superintendent – Environment			
L5.5	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 10mm/sec at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.6	The ground vibration peak particle velocity limits listed in Conditions L4.5 and L4.4 must not be exceeded at any point within 3.5 metres of any non-project related residential building or other noise sensitive location.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.7	Blasting operations at the premises may only take place between 10:00am-4:00pm Monday to Friday. (Where compelling safety reasons exist, the Authority may permit a blast to occur outside the abovementioned hours. Prior written (or facsimile) notification of any such blast must be made to the Authority).	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
L5.8	Blasting at the premises is limited to: a) A maximum of two (2) blasts per day; b) Five (5) blasts a week, averaged over a twelve month period; on each day on which blasting is permitted.	Interview with Manager Environment and Superintendent – Environment	Not triggered – no blasting conducted during audit period	NT	N/A
4 Operating Conditions					
O1	Activities must be carried out in a competent manner				
O1.1	Licensed activities must be carried out in a competent manner This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Interview with Manager Environment and Superintendent – Environment Site Inspection	Labelled bins for segregated waste were observed by the auditor during a walking tour of the pit top. Fuels and other liquids are stored in bunded tanks. Spill kits and fire fighting equipment were observed strategically placed around the site. Waste is removed by Namoi Wastecorp licensed waste removal operator. No tyres were observed to be stored onsite.	C	N/A
O2	Maintenance of plant and equipment				
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	As per PA, Condition 2.15	As per PA, Condition 2.15	C	N/A
O3	Dust				
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.	<ul style="list-style-type: none"> Annual Reviews 2022, 2023, 2024 Air Quality Management Plan, 16 August 2023 EPL monitoring reports – 2022, 2023, 2024, 2025 INXPreserve spreadsheet showing deposited dust 	Air quality control measures employed at NCO include: <ul style="list-style-type: none"> Cleared trees and branches are retained for use in stabilising disturbed areas until they are rehabilitated; Trigger Action Response Plans (TARPs) have been developed for 	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> and PM10 data for 2022 – 2025 • Interview with Manager Environment and Superintendent – Environment • Air Quality Monitoring Procedure (29/6/2023) 	<p>the major dust generating activities onsite;</p> <ul style="list-style-type: none"> • All conveyers are fitted with appropriate cleaning and dust collection devices; • The coal rotary breaker is enclosed; • The CHPP and stockpile areas have a fully automated water spray systems; • Clear definition of all the site roads and the restriction of vehicles and equipment to the roads. • All site roads and hardstand areas are routinely watered by water cart; • Progressive rehabilitation of areas of disturbance including topsoil and subsoil stockpiles; • Maintaining a perimeter amenity bund and windbreaks. <p>The above measures are appropriate to minimise emission of dust from the premises.</p>		
O4	Other operating conditions Pollution Incident Response Management Plan				
O4.1	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions, 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.	<ul style="list-style-type: none"> • Pollution Incident Response Management Plan dated 20/01/2025 • Annual PIRMP Test Report 2023, 2024, 2025 	<p>Review of the PIRMP for the sites indicates that it covers legislative requirement and considers the major pollution risks across the facility. The PIRMP has been tested on a 12-month basis during the audit period with various scenarios being tested:</p> <ul style="list-style-type: none"> • 13 December 2023: overflowing of Dam (SB2); • 31 October 2024: a spontaneous combustion event, with visible flames occurring on the Reject Emplacement Area (REA); • 1 October 2025: water discharge event. 	C	N/A
O4.2	The licensee must keep the PIRMP on the premises at all times.	<ul style="list-style-type: none"> • Whitehaven Website: https://whitehavencoal.com.au/our-business/documentation/ • Observation during site walkover 	<p>The PIRMP is available on the Narrabri Mine website for anyone to access. The auditor observed a hard copy of the PIRMP with internal contacts kept at reception</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																
5 Monitoring and Recording Conditions																					
M1	Monitoring records																				
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.	Note	Noted	Note	N/A																
M1.2	All records required to be kept by this licence must be: <ul style="list-style-type: none"> a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them. 	<ul style="list-style-type: none"> • Whitehaven Website: https://whitehavencoal.com.au/our-business/documentation/ • EPL monitoring reports – 2022, 2023, 2024, 2025 	Legible EPL monitoring records were observed to be maintained back to 2017.	C	N/A																
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ul style="list-style-type: none"> a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample. 	<ul style="list-style-type: none"> • Example sighted for deposited dust, HVAS, surface water and groundwater sampling chain of custody documentation • Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) 	Records were observed to be maintained as required. Noise monitoring reports present all of the required records as per this condition.	C	N/A																
M2	Requirement to monitor concentration of pollutants discharged																				
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	<ul style="list-style-type: none"> • ALS Current Best Method environmental dusts – sampling of depositional dust, revised 28/10/2022 • ALS Current Best Method water sampling – surface waters documentation, revised 17/03/2021 and 02/10/2025 	The ALS Current Best Method Documentation describes the methods used as per specified sampling method. Air particulates sampling procedure was as per the Australian Standard 3580.10:2003 as required under Sampling Method AM-19.	C	N/A																
M2.2	Air monitoring requirements Point 3 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>Particulates – deposited matter</td> <td>Grams per square metre per month</td> <td>Once a month (min. of 4 weeks)</td> <td>AM-19</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling method	Particulates – deposited matter	Grams per square metre per month	Once a month (min. of 4 weeks)	AM-19	EPL monitoring reports – 2022, 2023, 2024, 2025	Sampling of particulates is undertaken on a monthly basis. The maximum recorded deposition was 1.8 g/m ² /month in December 2022.	C	N/A								
Pollutant	Units of measure	Frequency	Sampling method																		
Particulates – deposited matter	Grams per square metre per month	Once a month (min. of 4 weeks)	AM-19																		
M2.3	Water and/or Land Monitoring Requirements Point 11, 13, 18, 27, 43, 45 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>Conductivity</td> <td>Microsiemens per litre</td> <td>Special Frequency 1</td> <td>In Situ</td> </tr> <tr> <td>Oil and Grease</td> <td>Milligrams per litre</td> <td>Special Frequency 1</td> <td>Grab sample</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Special Frequency 1</td> <td>In Situ</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling method	Conductivity	Microsiemens per litre	Special Frequency 1	In Situ	Oil and Grease	Milligrams per litre	Special Frequency 1	Grab sample	pH	pH	Special Frequency 1	In Situ	<ul style="list-style-type: none"> • EPL monitoring reports – 2022, 2023, 2024, 2025 • Interview with Manager Environment and Superintendent – Environment 	Point 11, 13, 18, 27, 43, 45 - Special Frequency 1 Monitoring conducted during discharge events from Discharge <ul style="list-style-type: none"> • Point 11: 30/03/2025 • Point 13: 29/03/2025, 3/04/2025 • Point 18: 30/3/2023 	C	N/A
Pollutant	Units of measure	Frequency	Sampling method																		
Conductivity	Microsiemens per litre	Special Frequency 1	In Situ																		
Oil and Grease	Milligrams per litre	Special Frequency 1	Grab sample																		
pH	pH	Special Frequency 1	In Situ																		

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Total organic carbon	Milligrams per litre	Special Frequency 1	Grab sample		<ul style="list-style-type: none"> Point 43: 29/03/2025 <p>Note that Point 45 was added to this condition in August 2025 and no discharge has been recorded since.</p> <p>Point 14, 15, 16, 17, 19, 20, 21, 22, 44 - Special Frequency 2</p> <p>Monitoring conducted during discharge events at</p> <ul style="list-style-type: none"> Point 19: 30/3/2023, 30/11/2024 <p>No discharge recorded at 14, 15, 16, 17, 20, 21, 22 over the audit period.</p> <p>Point 24, 25, 26 - Special Frequency 3</p> <p>There was no raffinate discharge over the audit period. Raffinate is re-used by mine.</p> <p>Point 28,29,30,31,32,33,34,35, 36,37,38,39,40 – Quarterly</p> <p>Monitoring events were conducted in:</p> <ul style="list-style-type: none"> December 2022, March, June, September and December 2023 March, June, August and November 2024 February, May and August 2025 <p>Note that:</p> <ul style="list-style-type: none"> Point 28, 34, 36, 38, 39, 40 were not sampled during the audit period since the bores were dry during sampling periods. Point 33 was not sampled from December 2022 to July 2024, and the first quarter of 2025 since the bore was dry during these sampling periods. Point 37 was sampled monthly from September 2023 to December 2023 as per Condition U3.1, and quarterly since 2024. <p>POINT 41,42 –</p> <p>No leak has been detected in pipe between BR1 and rail loop ponds during the audit period, therefore sampling is not required in accordance with Special Frequency 4 as defined in condition M2.8.</p>		
	Total suspended solids	Milligrams per litre	Special Frequency 1	Grab sample				
	POINT 14, 15, 16, 17, 19, 20, 21, 22, 44							
	Pollutant	Units of measure	Frequency	Sampling method				
	Conductivity	microsiemens per centimetre	Special Frequency 2	In situ				
	Oil and Grease	milligrams per litre	Special Frequency 2	Grab sample				
	Total organic carbon	milligrams per litre	Special Frequency 2	Grab sample				
	pH	pH	Special Frequency 2	In Situ				
	Total suspended solids	milligrams per litre	Special Frequency 2	Grab sample				
	Point 24, 25, 26							
	Pollutant	Units of measure	Frequency	Sampling method				
	pH	pH	Special Frequency 3	In Situ				
	Total dissolved solids	Milligrams per litre	Special Frequency 3	Grab sample				
	POINT 28,29,30,31,32,33,34,35,36,37,38,39,40							
	Pollutant	Units of measure	Frequency	Sampling method				
	Bicarbonate	milligrams per litre	Quarterly	Representative sample				
	Calcium	milligrams per litre	Quarterly	Representative sample				
	Carbonate	milligrams per litre	Quarterly	Representative sample				
	Chloride	milligrams per litre	Quarterly	Representative sample				
	Electrical conductivity	microsiemens per centimetre	Quarterly	In situ				
	Magnesium	milligrams per litre	Quarterly	Representative sample				
	pH	pH	Quarterly	In situ				
	Potassium	milligrams per litre	Quarterly	Representative sample				
	Sodium	milligrams per litre	Quarterly	Representative sample				
	Standing Water Level	-	Quarterly	In situ				
	Sulfate	milligrams per litre	Quarterly	Representative sample				
	POINT 41,42							
	Pollutant	Units of measure	Frequency	Sampling method				
	Bicarbonate	micrograms per litre	Special Frequency 4	Representative sample				
	Calcium	micrograms per litre	Special Frequency 4	Representative sample				
	Carbonate	milligrams per litre	Special Frequency 4	Representative sample				

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Chloride	milligrams per litre	Special Frequency 4	Representative sample				
	Electrical conductivity	milligrams per centimetre	Special Frequency 4	In situ				
	Magnesium	milligrams per litre	Special Frequency 4	Representative sample				
	pH	pH	Special Frequency 4	In situ				
	Potassium	milligrams per litre	Special Frequency 4	Representative sample				
	Sodium	milligrams per litre	Special Frequency 4	Representative sample				
	Sulfate	milligrams per litre	Special Frequency 4	Representative sample				
M2.4	For the purposes of the table(s) above Special Frequency 1 means the collection of samples as soon as practicable after each discharge commences and in any case not more than 12 hours after each discharge commences.				Note	Noted	Note	N/A
M2.5	For the purposes of the table(s) above Special Frequency 2 means the collection of samples quarterly (in the event of flow during the quarter) at a time when there is flow and as soon as practicable after each wet weather discharge from points 11,13,18, 27, 43, 45 commences and in any case not more than 12 hours after each discharge commences.				Note	Noted	Note	N/A
M2.6	<p>Note: Groundwater monitoring has not been formally included in the licence. However, the licensee is required to undertake groundwater monitoring in accordance with the Department of Planning and Environment approved "Stage 2 Water Management Plan" required under Schedule 4, condition 18 of the Project Approval (08_0144) for the Stage 2 project. The results of this monitoring are required to be reported in the Annual Review.</p> <p>Note: Groundwater monitoring has not been formally included in the licence. However, the licensee is required to undertake groundwater monitoring in accordance with the Department of Planning and Environment approved Water Management Plan (as modified) required under Condition B35 of SSD-10269 The results of this monitoring are required to be reported in the Annual Review.</p>				<ul style="list-style-type: none"> Water Management Plan, Issue 4, March 2013 Annual Reviews 2022, 2023, 2024 EPL monitoring reports – 2022, 2023, 2024, 2025 	Groundwater monitoring is conducted in accordance with the Water Management Plan and is reported in Annual Reviews.	C	N/A
M2.7	For the purposes of the table(s) above Special Frequency 3 means the collection of samples as soon as practicable after each discharge commences from point NR1 and in any case not more than 4 hours after each discharge.				Note	Noted	Note	N/A
M2.8	<p>For the purposes of the Tables above special frequency 4 means anytime that a leak is detected in the pipe transfer system between brine dams and in the vicinity of Kurralong creek, samples are taken at point 41 and 42. The frequency of those samples should be 1 sample taken at each point every 6 hours, until such time as the leak is repaired.</p> <p>Where there is no natural flow in Kurralong Creek, visual inspections are to be undertaken if any leaks are detected. Any liquid found pooled in the Creek and downstream of the pipeline is to be sampled. If no liquid is present in Kurralong Creek samples are not required to be collected.</p>				Note	Noted	Note	N/A
M3 Testing Methods – Concentration Limits								

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																																								
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: <ul style="list-style-type: none"> a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or 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 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. 	<ul style="list-style-type: none"> • ALS Current Best Method environmental dusts – sampling of depositional dust, revised 28/10/2022 • ALS Current Best Method water sampling – surface waters documentation, revised 17/03/2021 and 02/10/2025 	The ALS Current Best Method Documentation describes the methods used as per specified sampling method. Air particulates sampling procedure was as per the Australian Standard 3580.10:2003 as required under Sampling Method AM-19.	C	N/A																																								
M3.2	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. Note: The Protection of the Environment Operations (Clean Air) Regulation 2021 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	<ul style="list-style-type: none"> • ALS Current Best Method environmental dusts – sampling of depositional dust, revised 28/10/2022 • ALS Current Best Method water sampling – surface waters documentation, revised 17/03/2021 and 02/10/2025 	The ALS Current Best Method Documentation describes the methods used as per specified sampling method. Air particulates sampling procedure was as per the Australian Standard 3580.10:2003 as required under Sampling Method AM-19.	C	N/A																																								
M4 Weather Monitoring																																													
M4.1	<p>Requirement to monitor weather</p> <p>For each monitoring point specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the parameter specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns:</p> <p>Point W1:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of Measure</th> <th>Frequency</th> <th>Averaging Period</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Rainfall</td> <td>mm</td> <td>Continuous</td> <td>1 hour</td> <td>AM-4</td> </tr> <tr> <td>Wind speed @ 10 metres</td> <td>m/s</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Wind direction @ 10 metres</td> <td>°</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Temperature @ 2 metres</td> <td>°C</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> <tr> <td>Temperature @ 10 metres</td> <td>°C</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> <tr> <td>Sigma theta @ 10 metres</td> <td>°</td> <td>Continuous</td> <td>15 minute</td> <td>AM-2 & AM-4</td> </tr> <tr> <td>Solar radiation</td> <td>W/m2</td> <td>Continuous</td> <td>15 minute</td> <td>AM-4</td> </tr> </tbody> </table>	Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method	Rainfall	mm	Continuous	1 hour	AM-4	Wind speed @ 10 metres	m/s	Continuous	15 minute	AM-2 & AM-4	Wind direction @ 10 metres	°	Continuous	15 minute	AM-2 & AM-4	Temperature @ 2 metres	°C	Continuous	15 minute	AM-4	Temperature @ 10 metres	°C	Continuous	15 minute	AM-4	Sigma theta @ 10 metres	°	Continuous	15 minute	AM-2 & AM-4	Solar radiation	W/m2	Continuous	15 minute	AM-4	<ul style="list-style-type: none"> • Sentinex Weather Station Calibration Reports: <ul style="list-style-type: none"> ○ 7 February 2023 ○ 23 August 2023 ○ 6 March 2024 ○ 2 October 2024 ○ 20 July 2025 • Field Inspection 	The weather station was observed to monitor required parameters via unit of method and averaging period in real-time. According to the Sentinex Weather Station Calibration reports, the weather stations are calibrated to <i>AS3580.14-2011: Methods for sampling and analysis of ambient air, Part 14: Meteorological monitoring for ambient air quality monitoring applications</i> , as required under Method Nos. AM-2 and AM-4.	C	N/A
Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method																																									
Rainfall	mm	Continuous	1 hour	AM-4																																									
Wind speed @ 10 metres	m/s	Continuous	15 minute	AM-2 & AM-4																																									
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Solar radiation	W/m2	Continuous	15 minute	AM-4																																									

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	Additional requirements - siting - measurement	AM-1 & AM-4 AM-2 & AM-4			
M5 Recording of pollution complaints					
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Complaint Register 2022, 2023, 2024, 2025	Complaint Register observed to be a legible document. Three complaints were made during the audit period, dated 4 January 2023, 12 February 2023 and 13 September 2023	C	N/A
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.	<ul style="list-style-type: none"> Complaint Register 2022, 2023, 2024, 2025 Personal details kept on NCO server 	The Complaints Registers provides the details required of this condition, except for personal details, though these are held with NCO, as observed by auditor.	C	N/A
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Whitehaven Website: https://whitehavencoal.com.au/our-business/documentation/	The Community Complaints Registers for the years 2019 – 2025 are available on the company website for more than four years.	C	N/A
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Whitehaven Website: https://whitehavencoal.com.au/our-business/documentation/	The Complaints Register is available on the company website for anyone to access anytime.	C	N/A
M6 Telephone complaints line					
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Whitehaven Website: https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine/	Complaints number is available on company website, 1800 942 836. The complaints line is managed by a third party who takes details and forwards complaints to the Environment Superintendent. Auditor tested the complaint hotline on 20 October 2025. Environmental Superintendent confirmed receiving the details of the test call.	C	N/A
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.	Whitehaven Website: https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine/	Telephone number available on company website (1800 942 836) is labelled 'Feedback and complaints'.	C	N/A
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Note	Noted	Note	

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations												
M7 Noise monitoring																	
M7.1	<p>For each monitoring point specified below, the Licensee must monitor the noise or vibration 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> <p>POINTS: N5, N6, and N8</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>Ambient noise</td> <td>LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin</td> <td>Quarterly monitoring as details in the most recently approved "Noise Management Plan" for the premises.</td> <td>As detailed in the most recently approved "Noise Management Plan" for the premises.</td> </tr> </tbody> </table>	Parameter	Units of measure	Frequency	Sampling method	Ambient noise	LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin	Quarterly monitoring as details in the most recently approved "Noise Management Plan" for the premises.	As detailed in the most recently approved "Noise Management Plan" for the premises.	<ul style="list-style-type: none"> Annual Reviews 2022, 2023, 2024 EPL monitoring reports – 2023, 2024, 2025 Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) 	Monitoring was conducted on a quarterly basis for Points N5, N6, N8 and N9 during the audit period.	C	N/A				
Parameter	Units of measure	Frequency	Sampling method														
Ambient noise	LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin	Quarterly monitoring as details in the most recently approved "Noise Management Plan" for the premises.	As detailed in the most recently approved "Noise Management Plan" for the premises.														
M7.2	<p>POINT: N10</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>Ambient noise</td> <td>LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin</td> <td>Continuous real time noise monitoring as detailed in the most recently approved "Noise Management Plan" for the premises.</td> <td>As detailed in the most recently approved "Noise Management Plan" for the premises.</td> </tr> </tbody> </table>	Parameter	Units of measure	Frequency	Sampling method	Ambient noise	LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin	Continuous real time noise monitoring as detailed in the most recently approved "Noise Management Plan" for the premises.	As detailed in the most recently approved "Noise Management Plan" for the premises.	Site inspection	Trailer mounted Monitor N10 sighted during site inspection by auditor	C	N/A				
Parameter	Units of measure	Frequency	Sampling method														
Ambient noise	LAeq (15 minute) LAmx LA1 LA10 LA90 LAmin	Continuous real time noise monitoring as detailed in the most recently approved "Noise Management Plan" for the premises.	As detailed in the most recently approved "Noise Management Plan" for the premises.														
M7.3	<p>For the purposes of conditions M7.1 and M7.2 the monitoring locations are described as:</p> <table border="1"> <thead> <tr> <th>EPA ID no.</th> <th>Description of location</th> </tr> </thead> <tbody> <tr> <td>N5</td> <td>Within 30 metres of the residence on the property "Oakleigh"</td> </tr> <tr> <td>N6</td> <td>Within 30 metres of the residence on the property "Newhaven"</td> </tr> <tr> <td>N8</td> <td>Within 30 metres of the residence on the property "Haylin View"</td> </tr> <tr> <td>N10</td> <td>Portable Monitor</td> </tr> <tr> <td>N9</td> <td>Within 30 metres of the residence on the property "High Range"</td> </tr> </tbody> </table> <p>Note: Monitoring at N8 to commence when surface activities approach the eastern end of the southern longwall panels.</p> <p>Note: N10 is a portable monitor enabling the monitor to be relocated to areas of potential greatest impact. The licensee is responsible to ensure that it is located at the most suitable location.</p>	EPA ID no.	Description of location	N5	Within 30 metres of the residence on the property "Oakleigh"	N6	Within 30 metres of the residence on the property "Newhaven"	N8	Within 30 metres of the residence on the property "Haylin View"	N10	Portable Monitor	N9	Within 30 metres of the residence on the property "High Range"	<ul style="list-style-type: none"> Annual Reviews 2022, 2023, 2024 EPL monitoring reports – 2023, 2024, 2025 Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) Site inspection 	Monitoring was conducted on a quarterly basis for Points N5, N6, N8 and N9 during the audit period. Trailer mounted Monitor N10 sighted during site inspection by auditor	C	N/A
EPA ID no.	Description of location																
N5	Within 30 metres of the residence on the property "Oakleigh"																
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N8	Within 30 metres of the residence on the property "Haylin View"																
N10	Portable Monitor																
N9	Within 30 metres of the residence on the property "High Range"																
M7.4	<p>To assess compliance with the noise limits presented in the Noise Limits table, attended noise monitoring must be undertaken in accordance with the condition titled Determining Compliance, outlined above, and:</p> <ol style="list-style-type: none"> at each one of the monitoring locations N5, N6, N8 and N9; occur Quarterly in a reporting period; occur during each day, evening and night period as defined in the NSW Industrial Noise Policy for a minimum of: <ol style="list-style-type: none"> 1.5 hours during the day; 30 minutes during the evening; and 1 hour during the night. 	<ul style="list-style-type: none"> Annual Reviews 2022, 2023, 2024 EPL monitoring reports – 2023, 2024, 2025 Narrabri Mine Noise Monitoring Quarterly Summary Reports (SLR 2023, 2024, 2025) 	Quarterly noise monitoring reports show that the requirements of this conditions are met.	C	N/A												

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	d) occur for three consecutive operating days.				
6 Reporting Conditions					
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 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. <p>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.</p>	Annual Returns for 2021-2022, 2022-2023, 2023-2024, 2024-2025	Noted to be compliant	C	N/A
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Annual Returns for 2021-2022, 2022-2023, 2023-2024, 2024-2025	Noted to be compliant	C	N/A
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. 	Note	Not triggered	NT	N/A
R1.4	<p>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:</p> <ol style="list-style-type: none"> 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. 	Note	Not triggered	NT	N/A
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').	NSW EPA POEO Public Register	The reporting period under the EPL is 20 February to 19 February each year, given this, the Annual Returns were submitted on: <ul style="list-style-type: none"> • 19 February 2023, • 19 February 2024, and • 19 February 2025. 	C	N/A
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.	Annual Returns for 2021-22, 2022-2023, 2023-2024, 2024-2025	Noted to be compliant	C	N/A
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence	Annual Returns for 2021-22, 2022-2023, 2023-2024,	Noted to be signed by Company Directors	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<p>holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	2024-2025 eConnect EPA Annual Return Form			
R2 Notification of environmental harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Note	No incidents or events of environmental harm were recorded during the audit period.	NT	N/A
R2.2	<p>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	Note	No incidents or events of environmental harm were recorded during the audit period.	NT	N/A
R3 Written Report					
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>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.</p>	Note	EPA officers did not request a written report of events during the audit period	NT	N/A
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.	Note	EPA officers did not request a written report of events during the audit period	NT	N/A
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>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;</p> <p>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;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p>	Note	EPA officers did not request a written report of events during the audit period	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	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.				
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.	Note	EPA officers did not request a written report of events during the audit period	NT	N/A
R4 Other reporting conditions					
R4.1	A noise compliance assessment report must be submitted to the EPA within thirty (30) days of the completion of the quarterly noise monitoring. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits detailed in the limit conditions of this licence; and b) an outline of any management actions taken within the monitoring period to address any exceedances of the limits detailed in the limit conditions of this licence.	<ul style="list-style-type: none"> NCO email to EPA dated 9 October 2025 Quarterly Noise Monitoring (SLR 7 October 2025) 	Report was submitted to the EPA on the 9 October 2025 two days after the date of the report.	C	N/A
R4.2	The licensee must submit to the EPA Armidale Office within 30 days of obtaining the quarterly groundwater sampling results (required under condition M2.3), a report that provides: 1. The quarterly ground water sampling results; and 2. Delineation of potential pollution sources and 3. A graph of the sampling results, inclusive of historical results, that allows visualisation of the trends over time being shown by sample results.	<ul style="list-style-type: none"> Email sent from NCO to EPA Armidale with quarterly groundwater sampling results attached, dated 19 March 2025. Quarterly Seepage Report (AGE 19 March 2025) 	Quarterly groundwater sampling results were submitted to the EPA on 19 March 2025 following receipt on the same day	C	N/A
7 General Conditions					
G1	Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Whitehaven Website: https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine/ Site inspection	The licence is posted on the company website for anyone to access from anywhere. The auditor observed a hard copy of the licence kept at reception	C	N/A
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Whitehaven Website: https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine/	The licence is posted on the company website for anyone to access from anywhere.	NT	N/A
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Whitehaven Website: https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine/ Site inspection	The licence is posted on the company website for anyone to access from anywhere. The auditor observed a hard copy of the licence kept at reception	C	N/A
8 Pollution Studies and Reduction Programs					
U1	U1 Ground Water Characterisation and Leak Detection	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment 	Groundwater monitoring reports included annual review and	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<p>For EPL monitoring points 28, 29, 30, 31, 32, 33 and 34, The licensee must submit as part of their annual return, a groundwater monitoring report that includes and is not limited to:</p> <ol style="list-style-type: none"> 1. An annual review and summary of quarterly findings from the ongoing groundwater sampling occurring on the premises and 2. A delineation of potential groundwater pollution sources. <p>This report must be submitted as part of the annual return</p>	<ul style="list-style-type: none"> • Narrabri Coal– Rail Loop Groundwater Monitoring- Summary Review – of 2022/23 Reporting Period (Groundwater Exploration 17 April 2023) • Rail Loop Dams Groundwater Monitoring Network Annual Review 2023 (Groundwater Exploration 3 November 2024) • Narrabri Mine Annual Seepage Report (AGE 9 April 2025) 	delineation of potential pollution sources		
U2	<p>U2 Ground Water Background Data Note: Conditions U2 and U3 are pollution studies that are part of the commissioning process of the Brine Dam and form part of the QA/QC checks post construction. These conditions will be removed once dam liner integrity has been confirmed. U2.1 Prior to using the New Brine Dam the licensee must take ground water samples from EPL points 36,37,38,39 and 40 in accordance with conditions M2.2. Samples must include analysis for Total and Dissolved Metals.</p> <p>Auditor’s note: this condition was added in July 2023 version and was removed in the January 2025 version. Auditor also assumes that this condition is referring to M2.3 instead of M2.2.</p>	<ul style="list-style-type: none"> • EPL monitoring reports – 2022, 2023, 2024, 2025 • Interview with Manager Environment and Superintendent – Environment • Letter from NCO to EPA dated 28/3/2024 providing groundwater monitoring data as required 	<p>The new Brine Dam BR1 came in use on 5 October 2023.</p> <p>Point 36, 38, 39, 40 were monitored quarterly during the audit period however no sample was able to be collected as the bores were recorded as dry.</p> <p>Point 37 (= P84) was sampled monthly from 29/6/2023 to 23/2/2024 for all of the required parameters.</p>	C	N/A
U3	<p>U3 QA/QC checks for Brine Dam After the initial fill of the brine dam, Ground Water monitoring bores points 36, 37, 38, 39 and 40 must be sampled monthly for a period of 4 months after initial use of the dam. Samples taken must include the analytes for points 36, 37, 38, 39 and 40 in condition M2.2 plus dissolved metals and total metals.</p> <p>Auditor’s note: this condition was added in July 2023 version and was removed in the January 2025 version. Auditor also assumes that this condition is referring to M2.3 instead of M2.2.</p>	<ul style="list-style-type: none"> • EPL monitoring reports – 2022, 2023, 2024, 2025 • Letter from NCO to EPA dated 28/3/2024 providing groundwater monitoring data as required 	<p>The new Brine Dam BR1 came in use on 5 October 2023.</p> <p>Point 36, 38, 39, 40 were monitored quarterly during the audit period however no sample was able to be collected as the bores were recorded as dry.</p> <p>Point 37 (= P84) was sampled monthly from 29/6/2023 to 23/2/2024 for all of the required parameters.</p>	C	N/A
9 Special Conditions					
E1	Quality Assurance and Verification Report				
	<p>Prior to the commissioning of the Brine Storage Ponds (approved per Stage 2 Development Consent 08_0144), the licensee must provide the EPA Armidale office with an "as constructed" report, produced by an experienced and qualified engineer. The report must include detailed design plans for the ponds and illustrate the use of low permeability layers to manage mine waters generated by the project. The report also must include a detailed Quality Assurance/Quality Control program that was used throughout the construction of the ponds.</p>	<p>Email from NCO to Armidale EPA dated 7/6/2023 conveying Brine Dam BR1 as constructed report, detailed design plans and Operations and Maintenance Plan</p>	<p>The required reports were produced and provided.</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	Auditor's note: This condition was removed in 29 Jan 2025 version				
E2-E1	Noise Impacts				
	<p>Noise impacts where wind speed exceeds 3 metres per second at 10 metres above the ground must be addressed by:</p> <p>a) documenting noise complaints received to identify any higher level of impacts or wind patterns;</p> <p>where levels of noise complaints indicated a higher level of impact then actions to quantify and ameliorate any enhanced impacts where wind speed exceeds 3 metres per second at 10 metres above the ground should be developed and implemented.</p> <p>Auditor's note: This condition was renumbered from E2 to E1 in 29 Jan 2025 version</p>	Complaints Summary 2022 to 2025	<p>It was noted in previous IEA that a procedure was developed which requires the wind speed to be documented when a community noise complaint is made or recorded.</p> <p>Upon review of the community complaints summary, it was noted that no noise complaints were recorded during the audit period.</p>	C	N/A
E2	Waste - Activated Sludge receipt				
	<p>The licensee is permitted to receive mixed liquids suspended solids for the purpose of activating new aeration tanks at the sewage treatment plant located on the premises.</p> <p>The receipt of the mixed liquids suspended solids is for a one time seeding of the two new aeration tanks and is limited to 20,000L.</p> <p>The Licensee is to only receive the mixed liquids suspended solids from Tamworth Regional Council.</p> <p>Records for the receipt of the waste showing quantities and supplier are to be submitted to the EPA within two weeks of receipt.</p>	Interview with Manager Environment and Superintendent – Environment	No activated sludge was received during the audit period. Site management advised the auditor that receipt of activated sludge is no longer required for the operations	NT	N/A

Standard Conditions

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
SCHEDULE B – Standard Conditions					
Division 1 - Protection of the environment and rehabilitation					
4	<p>Must prevent or minimise harm to environment</p> <p>(1) The holder of a mining lease must take all reasonable measures to prevent, or if that is not reasonably practicable, to minimise, harm to the environment caused by activities under the mining lease.</p> <p>(2) In this clause— harm to the environment has the same meaning as in the Protection of the Environment Operations Act 1997.</p>	This audit	Refer to the findings of this audit.	C	N/A
5	<p>Rehabilitation to occur as soon as reasonably practicable after disturbance</p> <p>The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.</p>	<ul style="list-style-type: none"> Rehabilitation Management Plan 26 August 2025 with Rehabilitation Objectives and Completion Criteria Forward Programs 2023-2025, 2023-2026, 2025-2027 Annual Rehabilitation Reports 2023, 2024 Annual Reviews 2022, 2023, 2024 Site Observations Rehabilitation status plans are represented by Plan 2A, 2B, 2C attached to the 2025 Forward Program 	<p>Rehabilitation observed during the site visit is progressing in accordance with current Forward Program with results reported in the relevant Annual Rehabilitation Report and Annual Review.</p> <p>Rehabilitation activities during the audit period have included decommissioning of drill holes, grading landforms, and revegetation was primarily achieved via natural regeneration during the audit period, with topsoil respread over areas prepared for rehabilitation and fertilisers applied. Maintenance activities include weed management programs and feral animal control program.</p>	C (Obs)	To ensure timely revegetation of rehabilitated areas, additional seeding and/or tubestock planting is recommended. Topsoil storage methods may also need to be reviewed to ensure that topsoil seedbanks are preserved.
6	<p>Rehabilitation must achieve final land use</p> <p>(1) The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area.</p> <p>(2) The holder of the mining lease must ensure any planning approval has been obtained that is necessary to enable the holder to comply with subclause (1).</p> <p>(3) The holder of the mining lease must identify and record any reasonably foreseeable hazard that presents a risk to the holder’s ability to comply with subclause (1).</p>	<ul style="list-style-type: none"> Rehabilitation Management Plan 26 August 2025 with Risk Assessment, Final Landform and Rehabilitation Plan (FLRP) Email from Department of Primary Industry and Regional Development to NCO dated 22/07/2025 confirming receipt of FLRP 	<p>(1) Rehabilitation observed during the site visit being undertaken in accordance with the RMP to achieve the submitted FLRP.</p> <p>(2) Stage 2 Project Approval PA 08_0144 and Stage 3 Extension Project State Significant Development (SSD 10269)</p> <p>(3) Risk assessment as part of the RMP. Risk assessment was in process of being updated at the time of audit in response to both</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>Note—</p> <p>Clause 7 requires a rehabilitation risk assessment to be conducted whenever a hazard is identified under this subclause.</p> <p>(4) In this clause—</p> <p>final land use for the mining area means the final landform and land uses to be achieved for the mining area—</p> <p>(a) as set out in the rehabilitation objectives statement and rehabilitation completion criteria statement, and</p> <p>(b) for a large mine—as spatially depicted in the final landform and rehabilitation plan, and</p> <p>(c) if the final land use for the mining area is required by a condition of development consent for activities under the mining lease—as stated in the condition.</p> <p>planning approval means—</p> <p>(a) a development consent within the meaning of the <i>Environmental Planning and Assessment Act 1979</i>, or</p> <p>(b) an approval under that Act, Division 5.1.</p>	<ul style="list-style-type: none"> • Forward Programs 2025-2027 • Annual Rehabilitation Reports 2023, 2024 • Annual Reviews 2022, 2023, 2024 • Site Observations • Risk Assessment 21 August 2025 • Letter from Resources Regulator to NCO dated 9 October 2025, with outcomes from targeted assessment programs site visit on 27/8/2025 	<p>an internally identified need and subsequent recommendation from the Resources Regulator's Targeted Assessment Program (TAP) conducted on 27 August 2025</p> <p>(4) Note</p>		

Division 2 - Risk assessment

7	<p>Rehabilitation risk assessment</p> <p>(1) The holder of a mining lease must conduct a risk assessment (a rehabilitation risk assessment) that—</p> <p>(a) identifies, assesses and evaluates the risks that need to be addressed to achieve the following in relation to the mining lease—</p> <p>i. the rehabilitation objectives,</p> <p>ii. the rehabilitation completion criteria,</p> <p>iii. for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan, and</p> <p>(b) identifies the measures that need to be implemented to eliminate, minimise or mitigate the risks.</p> <p>(2) The holder of the mining lease must implement the measures identified.</p> <p>(3) The holder of a mining lease must conduct a rehabilitation risk assessment—</p> <p>(a) for a large mine—before preparing a rehabilitation management plan, and</p> <p>(b) for a small mine—before preparing the rehabilitation outcome documents for the mine, and</p>	<ul style="list-style-type: none"> • Rehabilitation Management Plan 26 August 2025 • CMO Monthly Environmental Inspection Checklist record 25 September 2025 • Interview with Manager Environment and Superintendent – Environment • Risk Assessment 21 August 2025 • Letter from Resources Regulator to NCO dated 9 October 2025, with outcomes from targeted assessment programs site visit on 27/8/2025 	<p>(1) a. Risk assessments are regularly undertaken. The latest at the time of audit was undertaken on 21 August 2025. It is being updated in response to both an internally identified need and subsequent recommendation from the Resources Regulator's Targeted Assessment Program (TAP) conducted on 27 August 2025. The objectives of the risk assessment are to:</p> <ul style="list-style-type: none"> • identify the risks associated with rehabilitation and closure of the mine to achieve the approved final land use/s; • identify knowledge gaps in Whitehaven's current understanding of the risks to rehabilitation; • identify the investigations/controls/actions necessary to effectively mitigate risks and/or identify opportunities; • inform the development of this RMP; and 	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>(c) whenever a hazard is identified under clause 6(3)—as soon as reasonably practicable after it is identified, and</p> <p>(d) whenever given a written direction to do so by the Secretary.</p>		<ul style="list-style-type: none"> provide the framework to satisfy relevant internal and Departmental guidelines, requiring implementation of a risk-based approach to closure. Key risk controls are provided. Monthly field and procedural inspections are held covering a range of topics, including e.g. subsidence monitoring, weed management, hydrocarbon management, spill response. Records are stored in CMO. <p>(2) Risk assessment did not identify any risks ranked high or critical. The risks ranked as 'moderate' relate to the decommissioning of brine dams and mine water storages, management of mineral waste, surface water impacts from rehabilitation areas, and potential impacts on areas/sites of heritage and cultural significance</p> <p>(3) A risk assessment workshop was undertaken on 19 May 2025 as reported on in the RMP dated 26 August 2025.</p>		

Division 3 - Rehabilitation documents

8	<p>Application of Division</p> <p>This Division does not apply to a mining lease unless—</p> <p>(a) the security deposit required under the mining lease is greater than the minimum deposit prescribed under the Act, section 261BF in relation to that type of mining lease, or</p> <p>(b) the Secretary gives a written direction to the holder of the mining lease that this Division, or a provision of this Division, applies to the mining lease.</p>	<ul style="list-style-type: none"> Security deposit calculations Email 23/10/2025 with attached bank guarantee of ML1609 and 1839 	<p>Security deposits required under the mining leases are greater than minimum deposits prescribed under the Act, section 261BF. Therefore, the Division (for Rehabilitation documents) applies.</p> <p>Security is in place as evidenced by bank guarantee.</p>	C	N/A
9	<p>General requirements for documents</p> <p>A document required to be prepared under this Division must—</p> <p>(a) be in a form approved by the Secretary, and</p> <p>Note— The approved forms are available on the Department's website.</p> <p>(b) include any matter required to be included by the form, and</p>	<ul style="list-style-type: none"> Rehabilitation Management Plan with Rehabilitation Objectives and Completion Criteria, Final Landform and Rehabilitation Plans 26 August 2025 Forward Programs 2025-2027 dated submission 10 April 2025 	<p>All documents sighted as evidence were in the approved form, submitted in the approved way and appeared to include all required matters.</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(c) if required to be given to the Secretary—be given in a way approved by the Secretary.	<ul style="list-style-type: none"> Annual Rehabilitation Report 2023, dated submission 28 March 2024 Annual Rehabilitation Report 2024, dated submission 10 April 2025 Email submission receipt for ROBJ dated 4 September 2025 Email submission receipt for Final Landform and Rehabilitation Plan dated 22 July 2025 			
10	<p>Rehabilitation management plans for large mines</p> <p>(1) The holder of a mining lease relating to a large mine must prepare a plan (a rehabilitation management plan) for the mining lease that includes the following—</p> <p>(a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area,</p> <p>(b) a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation,</p> <p>(c) a summary of rehabilitation risk assessments conducted by the holder,</p> <p>(d) the risk control measures identified in the rehabilitation risk assessments,</p> <p>(e) the rehabilitation outcome documents for the mining lease,</p> <p>(f) a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.</p> <p>(2) If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must include a proposed version of the document.</p> <p>(3) A rehabilitation management plan is not required to be given to the Secretary for approval.</p> <p>(4) The holder of the mining lease—</p> <p>(a) must implement the matters set out in the rehabilitation management plan, and</p> <p>(b) if the forward program specifies timeframes for the implementation of the matters—must implement the matters within those timeframes.</p>	<ul style="list-style-type: none"> Rehabilitation Objectives Statement 9 July 2025 (revised version submitted 4 September 2025 on but not approved yet) Rehabilitation Management Plan 26 August 2025 Forward Programs 2025-2027 Annual Rehabilitation Reports 2023 Annual Reviews 2022, 2023, 2024 2023 and 2024 EcoLogical Biodiversity and Land Annual Monitoring Reports for CF 201 - 202, LW101-106, LW107-110, LW203-206 2024 EcoLogical Subsidence Pont Monitoring Report 2025 Ecoplanning Vegetation and Landform Rehabilitation Monitoring Methodology (Longwalls 101-110) 2025 Ecoplanning Annual Rehabilitation Monitoring Report 2024 (Longwalls 101-110) 	<p>(1) The RMP has been developed and addresses items (a) – (f).</p> <p>(2) Among the outcome documents, the Final Land Use and Rehabilitation Plan is included in the Rehabilitation Plan, while, objectives and completion criteria are included within Appendix B of the RMP. These were submitted for approval to the Resources Regulator 23 July 2025, but have not yet been approved at the time of the audit.</p> <p>(3) Noted.</p> <p>(4) Monitoring reports and site observations indicate the RMP is being implemented. Forward Programs and Annual Rehabilitation reports show progress over the duration of the audit period has achieved the schedule timeframes.</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
11	<p>Amendment of rehabilitation management plans</p> <p>The holder of a mining lease must amend the rehabilitation management plan for the mining lease as follows—</p> <p>(a) to substitute the proposed version of a rehabilitation outcome document with the version approved by the Secretary—within 30 days after the document is approved,</p> <p>(b) as a consequence of an amendment made under clause 14 to a rehabilitation outcome document—within 30 days after the amendment is made,</p> <p>(c) to reflect any changes to the risk control measures in the prepared plan that are identified in a rehabilitation risk assessment—as soon as practicable after the rehabilitation risk assessment is conducted,</p> <p>(d) whenever given a written direction to do so by the Secretary—in accordance with the direction.</p>	<ul style="list-style-type: none"> Rehabilitation Management Plan November 2025 Interview with Manager Environment and Superintendent – Environment 	<p>a) The RMP has been updated twice since development:</p> <ul style="list-style-type: none"> V1 29 July 2022 (prior to current audit period). V2A 16 November 2023, to include approved rehabilitation objectives. V3 26 August 2025, to incorporate Stage 3 requirements, refine methods, updated rehabilitation objectives. <p>b) NT</p> <p>c) Risk Assessment was undertaken 21 August 2025. As a result, V3 of RMP was developed.</p> <p>d) NT</p>	C	N/A
12	<p>Rehabilitation outcome documents</p> <p>(1) The holder of a mining lease must prepare the following documents (the rehabilitation outcome documents) for the mining lease and give them to the Secretary for approval—</p> <p>(a) the rehabilitation objectives statement, which sets out the rehabilitation objectives required to achieve the final land use for the mining area,</p> <p>(b) the rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives,</p> <p>(c) for a large mine, the final landform and rehabilitation plan, showing a spatial depiction of the final land use.</p> <p>(2) If the final land use for the mining area is required by a condition of development consent for activities under the mining lease, the holder of the mining lease must ensure the rehabilitation outcome documents are consistent with that condition.</p>	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment Rehabilitation Management Plan with Rehabilitation Objectives and Completion Criteria, Final Landform and Rehabilitation Plans 26 August 2025, and dated submission on the same date Email from Department of Primary Industry and Regional Development to NCO dated 22/07/2025 confirming receipt of FLRP Email from Department of Primary Industry and Regional Development to NCO dated 4/09/2025 confirming receipt of Rehabilitation Objectives Statement Forward Programs 2025-2027 dated submission 10 April 2025 Annual Rehabilitation Report 2023, dated submission 28 March 2024 	<p>(1) (a) The Rehabilitation Objectives Statement was submitted 4 September 2025</p> <p>(b) The rehabilitation completion criteria are part of the Rehabilitation Management Plan, submitted on 26 August 2025.</p> <p>(c) The FLRP was submitted on 22 July 2025</p> <p>(2) The FLRP is consistent with the conditions of Stage 2 Project Approval PA 08_0144 and Stage 3 Extension Project State Significant Development (SSD 10269)</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
		<ul style="list-style-type: none"> Annual Rehabilitation Report 2024, dated submission 10 April 2025 			
13	<p>Forward program and annual rehabilitation report</p> <p>(1) The holder of a mining lease must prepare a program (a forward program) for the mining lease that includes the following—</p> <p>(a) a schedule of mining activities for the mining area for the next 3 years,</p> <p>(b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years,</p> <p>(c) a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs.</p> <p>(2) The holder of a mining lease must prepare a report (an annual rehabilitation report) for the mining lease that includes—</p> <p>(a) a description of the rehabilitation undertaken over the annual reporting period,</p> <p>(b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period,</p> <p>(c) a report demonstrating progress made towards the achievement of the following—</p> <p>i. the objectives set out in the rehabilitation objectives statement,</p> <p>ii. the criteria set out in the rehabilitation completion criteria statement,</p> <p>iii. for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan.</p> <p>(3) If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must rely on a proposed version of the document.</p> <p>(4) The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary.</p> <p>(5) In this clause—</p> <p>annual reporting period means each period of 12 months commencing on—</p> <p>(a) the date on which the mining lease is granted, or</p>	<ul style="list-style-type: none"> Rehabilitation Management Plan 26 August 2025 Forward Program 2023 – 2025 dated submission 5 June 2023 Forward Program 2023 – 2026 dated submission 2 April 2024 Forward Program 2025-2027 dated submission 10 April 2025 Annual Rehabilitation Report 2022 dated submission 1 June 2023 Annual Rehabilitation Report 2023, dated submission 28 March 2024 Annual Rehabilitation Report 2024, dated submission 10 April 2025 Email from Department of Primary Industry and Regional Development to NCO dated 22/07/2025 confirming receipt of FLRP Email from Department of Primary Industry and Regional Development to NCO dated 4/09/2025 confirming receipt of Rehabilitation Objectives Statement 	<p>(1) (a) Forward Program 2025-2027 describes the mining schedule and development of for 2025, 2026 and 2027. The Forward Program lists the planned mine production and extraction forecasts.</p> <p>(b) A summary of the spatial progression of rehabilitation is provided as both tables and figures as part of the forward program.</p> <p>(c) No statement to the effect of this requirement could be found in the Forward Program by the auditor. However, Manager Environment notes that over 95% of all areas available have been rehabilitated, providing evidence of rehabilitation as soon as reasonably practical.</p> <p>(2) (a) Annual reports include a description of rehabilitation undertaken during the reporting period.</p> <p>(b) Annual reports include progress made the rehabilitation phases</p> <p>(c) Objectives and Criteria are addressed directly in the Annual Rehabilitation Reports with reference to FLRP. It notes that rehabilitation is progressing well against these, providing details.</p> <p>(3) The 2023 and 2024 Annual Rehabilitation Reports relied on the outcome documents incorporated into the 2023 Rehabilitation Management Plan. New FLRP and objectives were submitted in July-September 2025 and will be relied upon for the 2025 Annual Rehabilitation Report. Rehabilitation objectives and criteria have not yet been approved</p> <p>(4) Forward Programs and Annual Reports are submitted in the approved form and way during the audit period.</p>	C (Obs)	Statement as required in 1(c) to be included in future Forward Programs

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(b) if the Secretary approves another date in relation to the mining lease—the other date.		(5) Noted.		
14	<p>Amendment of rehabilitation outcome documents and forward program</p> <p>(1) This clause applies to—</p> <p>(a) a rehabilitation outcome document if it has been approved by the Secretary, and</p> <p>(b) a forward program if it has been given to the Secretary.</p> <p>(2) The holder of a mining lease must not amend a document to which this clause applies that relates to the mining lease unless—</p> <p>(a) the Secretary gives the holder a written direction to do so, or</p> <p>(b) the Secretary, on written application by the holder, gives a written approval of the amendment.</p> <p>(3) The holder of the mining lease must amend the document in accordance with the Secretary’s direction or approval.</p> <p>(4) Nothing in this clause prevents the holder of a mining lease preparing a draft amendment for submission to the Secretary for approval.</p>	<ul style="list-style-type: none"> • Interview with Manager Environment and Superintendent – Environment • Rehabilitation Management Plan 2023 • Rehabilitation Management Plan 26 August 2025 • Forward Program 2023 – 2025 dated submission 5 June 2023 • Forward Program 2023 – 2026 dated submission 2 April 2024 • Forward Programs 2025-2027 dated submission 10 April 2025 	<p>(1) (a) Rehabilitation Management Plan including rehabilitation completion criteria were submitted in the approved form on 26 August 2025</p> <p>(b) Forward Programs 2023 - 2027</p> <p>(2) (a) NT</p> <p>(b) NT</p> <p>(3) NT</p> <p>(4) Noted</p>	C	N/A
15	<p>Times at which documents must be prepared and given</p> <p>(1) The holder of a mining lease must do the following before the end of the initial period—</p> <p>(a) prepare a rehabilitation management plan, and</p> <p>(b) prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and</p> <p>(c) prepare a forward program and give it to the Secretary.</p> <p>(2) The holder of the mining lease must prepare a forward program and annual rehabilitation report and give them to the Secretary before—</p> <p>(a) 60 days after the last day of each annual reporting period, commencing with the annual reporting period in which the forward program was given to Secretary under subclause (1)(c), or</p> <p>(b) a later date approved by the Secretary.</p> <p>(3) A rehabilitation completion criteria statement relating to completion of rehabilitation during a period covered by a forward program must be given to the Secretary for approval</p>	<ul style="list-style-type: none"> • Interview with Manager Environment and Superintendent – Environment • Rehabilitation Management Plan 26 August 2025 • Email from Department of Primary Industry and Regional Development to NCO dated 22/07/2025 confirming receipt of FLRP • Email from Department of Primary Industry and Regional Development to NCO dated 4/09/2025 confirming receipt of Rehabilitation Objectives Statement • Forward Program 2023 – 2025 dated submission 5 June 2023 	<p>(1) (a, b, c) The initial period is outside the current audit period</p> <p>(2) Annual Rehabilitation Reports and Forward Programs were consistently marked as submitted beyond the 60 day period. However, there have been ongoing issues with the Resources Regulator portal, as evidenced from the email from the Resources Regulator to NCO dated 28 March 2025.</p> <p>(3) Rehabilitation completion criteria statement not yet required for submission as rehabilitation completion is not scheduled within the current Forward Program.</p> <p>(4) FLRP and Rehabilitation Objectives Statement submitted within 60 days from 1 August 2025, when Stage 3 Development Consent SSD-10269 became effective.</p> <p>(5) Noted</p> <p>(6) NT</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>when the forward program is required to be given to the Secretary.</p> <p>(4) The holder of the mining lease must prepare updated rehabilitation outcome documents for the mining lease and give them to the Secretary for approval before—</p> <p>(a) 60 days after a development consent is modified following an application referred to in clause 20(1)(b), or</p> <p>(b) a later date approved by the Secretary.</p> <p>(5) A rehabilitation completion criteria statement is not required to be given to the Secretary under subclause (4) unless a rehabilitation completion criteria statement has already been given to the Secretary under subclause (3).</p> <p>(6) The Secretary may, by written notice, direct the holder of a mining lease to prepare, or give to the Secretary, a document required to be prepared under this Division at a time other than that specified in this clause.</p> <p>(7) The holder of the mining lease must comply with the direction.</p> <p>(8) In this clause—</p> <p>initial period means the period commencing when the mining lease is granted and ending—</p> <p>(a) 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or</p> <p>(b) if this Division applies to the mining lease because of an increase in the required security deposit—</p> <p>i. when the surface of the mining area is disturbed by activities under the mining lease, or</p> <p>ii. at a later date approved by the Secretary.</p>	<ul style="list-style-type: none"> Forward Program 2023 – 2026 dated submission 2 April 2024 Forward Program 2025-2027 dated submission 10 April 2025 Annual Rehabilitation Report 2022 dated submission 1 June 2023 Annual Rehabilitation Report 2023, dated submission 28 March 2024 Annual Rehabilitation Report 2024, dated submission 10 April 2025 Email from NCO to Resources Regulator dated 28 March 2025 outlining issues with submission portals, confirming advice from Resources Regulator to not submit Annual Rehabilitation Report and Forward Program until issues have been resolved. 	<p>(7) Noted</p> <p>(8) Noted</p>		
16	<p>Certain documents to be publicly available</p> <p>(1) This clause applies to the following documents—</p> <p>(a) a rehabilitation management plan,</p> <p>(b) a forward program,</p> <p>(c) an annual rehabilitation report.</p> <p>(2) The holder of a mining lease must make a document to which this clause applies publicly available by—</p> <p>(a) publishing it on its website in a prominent position, or</p> <p>(b) if the holder does not have a website— providing a copy of it to a person—</p> <p>i. on the written request of a person, and</p>	<p>Review of NCO website https://whitehavencoal.com.au/our-business/our-assets/narrabri-mine</p>	<p>(1) These documents are available on the NCO website.</p> <p>(2) Forward Program, Site Rehabilitation Management Plan and annual rehabilitation reports are publicly available on the NCO website.</p> <p>(3, 4) Noted</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>ii. without charge, and</p> <p>iii. within 14 days after the request is received.</p> <p>(3) If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published—</p> <p>(a) for a rehabilitation management plan—within 14 days after it is prepared or amended, or</p> <p>(b) for a forward program or an annual rehabilitation report—within 14 days after it is given to the Secretary or amended,</p> <p>(4) Personal information within the meaning of the <i>Privacy and Personal Information Protection Act 1998</i> is not required to be included in a document made available to a person under this clause.</p>				

Division 4 - Records, reporting and notification

17	<p>Records demonstrating compliance</p> <p>The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the conditions set out in this Part.</p> <p>Note—</p> <p>(a) The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.</p>	<ul style="list-style-type: none"> • Interview with Manager Environment and Superintendent – Environment • Annual Reviews 2022, 2023 and 2024 • CMO Monthly Environmental Inspection Checklist record, example 25 September 2025 	<p>Internal CMO compliance management software is used for creating and maintaining records of actions to demonstrate compliance.</p> <p>Compliance status of Project Approval and EPL is reported through Annual Reviews and Annual Returns.</p> <p>The auditor reviewed the CMO compliance management action records that demonstrate compliance during the audit.</p>	C	N/A
18	<p>Report on non-compliance</p> <p>(1) The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with—</p> <p>(a) a condition of the mining lease, or</p> <p>Note—</p> <p>The Act, section 364A contains provisions relating to the use and disclosure of information provided under this condition.</p> <p>(b) a requirement of the Act or this Regulation relating to activities under the mining lease.</p> <p>(2) The holder of the mining lease must provide the report within 7 days after becoming aware of the non-compliance.</p> <p>(3) The holder of the mining lease must ensure the report—</p> <p>(a) identifies the condition of the mining lease, or the requirement of the Act or this Regulation, to which the non-compliance relates, and</p>	<ul style="list-style-type: none"> • Interview with Manager Environment and Superintendent – Environment • Annual Reviews 2022, 2023, 2024 • 28/03/2024 Major Projects Portal report lodgement (ID: MP08_0144-PA-62) HVAS sample • Environmental Event Report 5/4/2024 on HVAS malfunction on 23/04/2023, 29/04/2023, 29/05/2023 and 04/06/2023 • Air Quality Monitoring Procedure (29/6/2023) 	<p>While NCO reported an incident relating to HVAS equipment malfunction as a non-compliance with the Air Quality Management Plan in the 2023 Annual Review, the Environmental Event Report notes that the assessment undertaken by an external specialist concluded that the criterion would unlikely to have been exceeded on any of the missed days for a number of reasons. As a result of this event, the Air Quality Monitoring Procedure was revised by adding detail on catch-up days when minimum sample runtime is not achieved, while a question was added to the field checking sheet to prompt checking minimum runtime achieved, and, if Not, to escalate to NCO environment team to organise a catch-up sample. The event did not</p>	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>(b) describes the non-compliance and specifies the date or dates on which, or the period during which, the non-compliance occurred, and</p> <p>(c) describes the causes or likely causes of the non-compliance, and</p> <p>(d) describes the action that has been taken, or will be taken, to mitigate the effects, and to prevent any recurrence, of the non-compliance.</p>		<p>represent a non-compliance with the approval conditions and this audit does not consider it as a non-compliance.</p> <p>No non-compliances were recorded over the audit period.</p>		
19	<p>Nominated contact person</p> <p>(1) The holder of a mining lease must nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Act.</p> <p>Note— The Act, section 383 sets out the ways in which notices or other documents may be issued or given to, or served on, a person for the purposes of the Act.</p> <p>(2) The holder of the mining lease must give written notice to the Secretary of—</p> <p>(a) the full name and contact details of the nominated person—within 28 days after the date on which the standard conditions apply to the mining lease under clause 31A of this Regulation, and</p> <p>(b) any change in nomination or in the nominated person’s contact details—within 28 days after the change occurs.</p> <p>(3) The holder of the mining lease must ensure that the contact details for the nominated person include the person’s phone number and postal and email addresses.</p>	<ul style="list-style-type: none"> NCO Letter to NSW Resources Regulator – RE: Narrabri Colliery – Nominated Contact Person, Dated 30 April 2025 	<p>Contact person is – Brent Baker-NCP0001462</p>	C	N/A
Division 5 - Applications relating to development consent					
20	<p>Additional requirements—application for or to modify development consent</p> <p>(1) The holder of a mining lease must give written notice to the Secretary within 10 days after—</p> <p>(a) making an application for development consent that relates to the mining area, or</p> <p>(b) making an application for modification of a development consent—</p> <p>i. under the <i>Environmental Planning and Assessment Act 1979</i>, section 4.55(2), and</p>	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment 	<p>None were requested</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>ii. that proposes to modify a condition of the consent that relates to rehabilitation of the mining area in a way that may affect an obligation under the mining lease relating to rehabilitation of the mining area.</p> <p>(2) This clause does not apply if the development is State significant development.</p>				
General Conditions					
1	<p>Notice to Landholders</p> <p>(a) Within 90 days from the date of grant or renewal of this mining lease, the lease holder must give each landholder notice in writing:</p> <p>i. that this mining lease has been granted or renewed; and</p> <p>ii. whether the lease includes the surface.</p> <p>The notice must include a plan identifying the lease area and each landholder and individual land parcel within the lease area.</p> <p>(b) If there are ten or more landholders to which notice must be given, the lease holder will be taken to have complied with condition 1(a) if a notice complying with condition 1(a) is published in a newspaper circulating in the region where the lease area is situated.</p>	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment Letters from NCO to the owners of Uambi and The Bulga and Crown Lands office dated 4/11/2022 stating granting of ML1839 on 13/9/2022 	<p>ML1609 was granted 18 January 2008</p> <p>ML1839 was granted 13 September 2022</p> <p>Notices were sent to two private landholders and Crown Land</p>	C	N/A
2	<p>Security</p> <p>The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining lease, including obligations under the mining lease that may arise in the future.</p> <p>The amount of the security deposit to be provided has been assessed at \$25,541,000 (ML1609) and \$10,000 (ML1839).</p>	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment Email 23/10/2025 with attached bank guarantee of ML1609 and 1839 	<p>NCO provided an Instrument of Variation which stated that the lease holder is required to provide a group security deposit of \$25,551,000 for ML 1609 and ML 1839 by 28 April 2025.</p> <p>Security deposit is in place as evidenced by the bank guarantee.</p>	C	N/A
3	<p>Cooperation Agreement</p> <p>The lease holder must make every reasonable attempt, and be able to demonstrate its attempts to the satisfaction of the Secretary, to enter into a cooperation agreement with the holder(s) of any overlapping authorisations issued under the <i>Mining Act 1992</i> and petroleum titles issued under the <i>Petroleum (Onshore) Act 1991</i>. The cooperation agreement should address but not be limited to:</p> <ul style="list-style-type: none"> access arrangements operational interaction procedures dispute resolution information exchange 	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment NSW Department of Mining, Exploration and GeoScience MinView mapping WHC Santos Overlapping Tenements Cooperations Agreement Meeting Minutes 4 August 2023 	<p>A review of MinView confirmed that SANTOS NSW PTY LTD; SANTOS NSW (NARRABRI GAS) PTY LTD titles overlaps part of NCO. The last meeting held was in August 2023. A draft Cooperation Agreement has been provided to Santos and WHC is currently waiting for a response.</p> <p>WHC advised that discussions on a draft agreement with Santos are ongoing between the parties.</p>	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<ul style="list-style-type: none"> well location timing of drilling potential resource extraction conflicts; and rehabilitation issues. 				
4.	<p>Assessable Prospecting Operations</p> <p>(a) The lease holder must not carry out any assessable prospecting operation on land over which this lease has been granted unless:</p> <ol style="list-style-type: none"> it is carried out in accordance with any necessary development consent; or if development consent is not required, the prior written approval of the Minister has been obtained. <p>(b) The Minister may require the lease holder to provide such information as required to assist the Minister to consider an application for approval.</p> <p>(c) An approval granted by the Minister under this condition may be granted subject to terms.</p> <p>(d) The lease holder must comply with the approval granted to the holder under this condition.</p>	<ul style="list-style-type: none"> Interview with Manager Environment and Superintendent – Environment 	<p>(a) Any exploration drilling in ML1609 was carried out in accordance with Project Approval. No exploration drilling was carried out in ML1839.</p> <p>(b) NT</p> <p>(c) Noted</p> <p>(d) Noted</p>	C	N/A

Special Conditions - NIL

Exploration Reporting

	<p>The lease holder must lodge reports in accordance with the requirements in section 163C of the Mining Act 1992 and clauses 59, 60 and 61 of the Mining Regulation 2016 as well as any further requirements issued by the Secretary under clause 62 of the Mining Regulation.</p> <p>Guidelines for the structure, content and data format requirements for reports are set out in the Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.</p>	<ul style="list-style-type: none"> Annual Exploration Report ML1839 2023, lodged 13/10/2023 Email from Planning NSW to WHC Titles dated 6/11/2023 stating satisfactory preparation of Annual report on ML1839 Annual Exploration Reports ML1609 2024, lodged 18/02/2024 and 20/02/2024 Email from Planning NSW to WHC Titles dated 28/02/2024 stating satisfactory preparation of Annual report on ML1609 Letter from DPIRD to NCO dated 30 September 2024 stating approval of request to combine 	<p>ERM reviewed the submitted exploration reports for 2023 – 2025 for ML1609 and ML1839. The reports cover the following report periods:</p> <ul style="list-style-type: none"> ML1839 2023: 13 September 2022 to 12 September 2023 ML1609 2024: 18 January 2023 to 17 January 2024 Grouped 2025: ML 1609 – 18/01/2024 to 17/01/2025 ML 1839 – 13/09/2023 to 17/01/2025 	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
		<p>ML1839 and 1609 reporting under index title ML1609</p> <ul style="list-style-type: none">• Grouped Exploration Report 2025, lodged 11/02/2025• Email from Planning NSW to WHC Titles dated 1/8/2025 stating satisfactory preparation of Annual report on ML1609			

TABLE A.2: STATEMENT OF COMMITMENTS

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
1. General Project Development						
Desired Outcome: All approved activities are undertaken in the area(s) nominated on the approved plans and figures (unless moved slightly to avoid industrial trees).						
1.1	Survey and mark the boundaries of the areas of disturbance on the ground.	Prior to surface disturbance in nominated areas.	Review of disturbance permits and survey reports. LiDAR and multispectral imaging prior to disturbance	Areas of planned disturbance are surveyed as part of pre-clearance assessment. Examples of disturbance reports, plans, LiDAR and multispectral imaging were sighted during the site inspection	C	
1.2	(If not already surveyed), commission an ecologist and/or archaeologist (along with representatives of the Aboriginal community) to advise of any constraints posed by threatened flora or fauna, or archaeological sites.	Prior to surface disturbance in nominated areas.	Review of disturbance permits and survey reports Ecological report by Ecotone Ecological Consultants Pty Ltd (2009) provides general objective of the assessment including survey of threatened flora species that may be present and threatened and migratory species that may be present. Historical Heritage Assessment for Stage 3 of Narrabri mine (2020) which found no impact to heritage values of Narrabri region.	Areas of planned disturbance are subject to heritage and ecological survey prior to clearance. Table 2/3 of the ecological report highlights the previously recorded flora and fauna within the study locality. No updated flora/fauna survey has been sighted however the annual rehabilitation reports discusses these topics. The Historical Heritage Assessment for stage 3 concludes there will be no impacts on heritage.	C	
1.3	Relocated or redesign the area of disturbance (if mine safety is not compromised) to avoid sites of ecological or heritage significance.	Prior to surface disturbance in nominated areas.	Review of disturbance permits and survey reports	Areas of planned disturbance are subject to heritage and ecological survey prior to clearance.	C	
1.4	Align access to sites of surface disturbance following advice from ecologist and/or archaeologist.	Prior to surface disturbance in nominated areas.	Review of disturbance	Areas of planned disturbance are subject to heritage and ecological survey prior to clearance.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
			permits and survey reports	Ecological report by Ecotone Ecological Consultants Pty Ltd (2009) notes requirement for an ecologist to be involved in this process		
1.5	Advise relevant personnel on restrictions placed on activities by identification of sites of ecological or heritage significance and management requirements.	Prior to surface disturbance in nominated areas.	Review of disturbance permits and survey reports	Areas of planned disturbance are subject to heritage and ecological survey prior to clearance.	C	

2. Operating Hours

Desired Outcome: Management of site activities in accordance with the approved operating hours.

2.1	Undertake vegetation clearing/soil removal within the hours of: 7:00am to 10:00pm / 7 days.	Continuous as required.	Interview with Manager Environment and Superintendent – Environment	Team operates on day shift.	C	
2.2	Undertake construction within the Pit Top Area within the hours of: 7:00am to 10:00pm / 7 days.	Continuous.	Interview with Manager Environment and Superintendent – Environment	Construction is undertaken during day shift	C	
2.3	Undertake construction of the Reject Emplacement Area and Brine Storage Ponds within the hours of: 7:00am to 10:00pm / 7 days.	Continuous.	Interview with Manager Environment and Superintendent – Environment	Construction is undertaken during day shift	C	
2.4	Undertake ventilation shaft construction and gas drainage installation within the hours of: 24 hours / 7 days.	As required.	Interview with Manager Environment and Superintendent – Environment	Site is operational 24 hours / 7 days	C	
2.5	Undertake ventilation and gas drainage operations within the hours of: 24 hours / 7 days.	Continuous.	Interview with Manager Environment and Superintendent – Environment	Site is operational 24 hours / 7 days	C	
2.6	Undertake mining operations within the hours of: 24 hours / 7 days.	Continuous.	Interview with Manager Environment and Superintendent – Environment	Site is operational 24 hours / 7 days	C	
2.7	Undertake coal crushing screening and processing operations within the hours of:	Continuous.	Interview with Manager	Site is operational 24 hours / 7 days	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
	24 hours / 7 days.		Environment and Superintendent – Environment			
2.8	Undertake CPP reject disposal within the hours of: 7:00am to 10:00pm / 7 days. Contingent hours of operation will be 24 hour / 7 days to account for those periods of elevated reject production.	Continuous.	Interview with Manager Environment and Superintendent – Environment Annual Reviews	Reject disposal is from 7:00am to 10:00pm / 7 days. Contingent hours of operation will be 24 hour / 7 days to account for those periods of elevated reject production and when inversion conditions do not prevail	C	
2.9	Undertake rail loading and transportation within the hours of: 24 hours / 7 days	Continuous.	Interview with Manager Environment and Superintendent – Environment	Site is operational 24 hours / 7 days	C	
2.10	Undertake raw materials / supply delivery within the hours: 7:00am to 10:00pm / 7 days	Continuous.	Interview with Manager Environment and Superintendent – Environment Annual Reviews	7:00am to 10:00pm / 7 days. No evidence was identified during the audit to suggest that raw materials/sup[ply deliveries occurred outside these prescribed hours.	C	

3. Waste Management

Desired Outcome: Minimisation of the potential risk of environmental impact due to general waste creation, storage and/or disposal.

3.1	Dispose all paper and general waste in suitable waste receptacles.	Ongoing.	Site observations	The audit team observed appropriate receptacles around the site.	C	
3.2	Collect general waste bins as required to eliminate potential for environmental harm and place contents in large, lidded waste storage receptacles or dumpsters to await removal by licenced contractor.	Ongoing.	Site observations Namoï Waste EPL	General waste collected in 3m ³ waste bins Open skips for large general waste, steel etc. Waste removed by Namoï Waste which is a licenced contractor.	C	
3.3	Collect industrial waste fortnightly, or more frequently if required.	At least fortnightly.	Namoï Waste reports	Industrial bins collected every 4 days. General waste is collected a number of times per week.	C	
3.4	Install separate containers for the collection of recyclable items and despatch off site at appropriate intervals.	Ongoing.	Site observation	There is separate collection of cardboard and steel. Pallets are separated on site for recycling Drum crusher is available on site.	C	
3.5	Employ a licenced waste collection contractor for all general waste / garbage at least on a weekly basis.	Ongoing.	Interview with Manager	Licensed waste contractors are used.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
			Environment and Superintendent – Environment Annual Review			
3.6	Collect waste oils and grease and pump to bulk storage tanks.	As required.	Site observations	Waste oils and grease are collected in bulk tanks in the yard outside the maintenance workshop	C	
3.7	Collect all parts/packaging and transfer to the site workshop for disposal or recycling.	As required.	Site observations	The audit team observed hydraulic hose bins, industrial waste bins and a cardboard crate.	C	
3.8	Install adequate toilet and ablution facilities within the mine facilities area for the site workforce and visitors.	Initial activities of site establishment phase.	Site observations	Bathroom facilities are provided.	C	
3.9	Install a self irrigating septic sewage system approved by Narrabri Shire Council.	Initial activities of site establishment phase.		Septic system is in place.	C	
3.10	Service facilities by a licenced sewage collection / disposal contractor.	As required.	Interview with Manager Environment and Superintendent – Environment Annual Review	Narrabri septic services contracted by Namoi Waste who services the septic system once per week.	C	
Desired Outcome: Minimisation of the potential risk of environmental impact due to coal reject storage and/or disposal.						
3.11	Characterise coal rejects to establish whether any deleterious products would be produced by leachate during emplacement.	Within initial month of production of CPP reject and annual thereafter, if relevant.	Outside audit period	Outside audit period	N/A	
3.12	Dispose of coal rejects within the nominated Reject Emplacement Area, constructed immediately to the west of the Pit Top Area.	Continuous.	Site observations	Verified by observations	C	
3.13	Construct the Reject Emplacement Area as a series of 20m wide, elongated (north- south oriented) cells commencing on the eastern side (with a compacted base with a permeability <math> < 1 \times 10^{-9}</math>m/sec if elevated salinity or other deleterious contaminant is identified as likely to be present within the leachate - see Commitment 3. 11).	Continuous.	Narrabri Mine Rejects Emplacement Area Capping Assessment and Closure Design (ATC Williams January 2022) Narrabri Reject Emplacement Area Principal Control Plan (August 2025)	A re-design of the REA was undertaken for Stage 3, comprising a series of flat cross-bunded cells (minimum 0.5m bund height) that not only retain all stormwater on the landform plateau, but also ensures that it is kept evenly spread, thereby minimising any potential impacts of runoff concentration and infiltration of relatively large volumes at some point across the plateau. The Reject Emplacement Area Principal Control Plan provides measures for effective control and management of risks in the activities	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
				associated with the REA, including cell preparation and basal layer.		
3.14	Construct drainage features for each cell to divert clean water around and capture and store sediment-laden water generated by run-off from the disturbed areas.	Prior to the commencement of each cell.	Narrabri Mine Rejects Emplacement Area Capping Assessment and Closure Design (ATC Williams January 2022) Narrabri Reject Emplacement Area Principal Control Plan (August 2025)	The ATC Williams REA re-design report provides design documentation on stormwater management, perimeter drains, erosion and sediment control measures and monitoring. Water management measures are also provided in Section 4.5 of the Narrabri Reject Emplacement Area Principal Control Plan	C	
3.15	Strip and store topsoil from each cell for future re-spreading over the final landform or re-spread immediately following stripping.	Prior to the commencement of each cell.	Site observations	The audit team observed topsoil stored at the REA.	C	
3.16	Paddock-dump, spread by bulldozer and then compact the coal reject to form typical lifts of about 1.5m thick. The maximum height of the reject emplacement will be restricted to 15m, ie. 10 lifts with final side slopes not exceeding 14°.	Continuous.	Narrabri Mine Rejects Emplacement Area Capping Assessment and Closure Design (ATC Williams January 2022)	Landform, landform capacity, landform evolution, and landform modelling are described in the ATC Williams REA re-design report. The maximum height is 15m above the natural surface level.	C	
3.17	Install up to four lysimeters on the downslope side of the Reject Emplacement Area. (If saline leachate is generated by CPP reject).	As the structure is constructed, if required.	Interview with Manager Environment and Superintendent – Environment High Risk Notification – Operation of a Reject Emplacement Area at the Narrabri Mine (September 2017) Narrabri Mine Quarterly Groundwater Monitoring Review Q3 2025 (AGE October 2025)	The High Risk Notification for the REA notes that it is unlikely that leachate from the rejects would be a source of surface or groundwater contamination. An acid forming potential assessment of the reject material indicates that the rejects to be emplaced are not likely to be a source of acid leachate generation. Three standpipe piezometers (P51, P52, P53) have been installed around the perimeter of the REA to identify if any saline leachate is being generated from the REA. These bores are monitored quarterly for water level and field parameters (pH, EC and temperature). To date, no leachate has been positively identified, and therefore this condition is Not Triggered, although the recently increasing EC levels in P53 may indicate infiltration of water from the REA (AGE 2025).	NT	Increasing EC in Bore P53 may indicate infiltration of water from REA. It is recommended to continue monitoring in this area, as per AGE (2025).

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
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Minimisation of the potential risk of environmental impact due to saline waste creation, storage and/or disposal.

3.18	Line each dam or pond designed to hold either raw groundwater or processed brine with a HDPE liner with a permeability of $<1 \times 10^{-14}$ m/sec.	Prior to the commencement of water discharge into pond or dam.	Site observations	BR1 dam was observed to be lined with HDPE liner	C	
3.19	Confirm by QA inspection of the liner that the nominated permeability is achieved.	Prior to the commencement of water discharge.	Whitehaven Coal Brine Dam (BR1) Construction Quality Assurance Report (ADE 16/5/2023) Attached to Construction Completion Report (SLR June 2023)	ADE report attached to SLR (2023) notes that nominated permeability was achieved.	C	
3.20	Prohibit vehicular access to the walls of the lined dam or pond.	Continuous.	Site observations	The audit team observed that vehicle access is not permitted on the dam walls.	C	
3.21	Remove impermeable liner at completion of mining and dispose of to a facility licenced to accept saline waste.	Following removal of all saline groundwater or brine from the dam/pond.	Not triggered	Not triggered	NT	
3.22	Inspect, sample and analyse ground beneath each dam or pond to confirm no leakage has occurred over the life of the pond.	Prior to final rehabilitation.	Not triggered	Not triggered	NT	
3.23	(should saline contamination be identified), Remove and dispose of saline contaminated material (within the backfilled box cut).	As required and prior to final rehabilitation.	Not triggered	Not triggered	NT	

4. Rehabilitation

Desired Outcome: Decommission and remove the infrastructure and services no longer required for ongoing activities on the land of the Mine Site.

4.1	Confirm the proposed final land use of the Mine Site lands and identify the infrastructure and services to be retained to support this land use.	As part of the Mine Closure Plan for the mine.	Rehabilitation Management Plan	As per Rehabilitation Management Plan	C	
4.2	Demolish or deconstruct and remove infrastructure and services not required by the confirmed future land use.	Prior to relinquishment of Mining Lease.	Not triggered	Not triggered	NT	

Desired outcome: The creation of a stable final landform on the Pit Top Area (and surrounding long-term disturbance areas, ie, ventilation shaft areas, Reject Emplacement Area and brine storage ponds), available for the proposed future uses(s) of agriculture, and/or nature conservation.

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
4.3	Stabilise all earthworks, drainage lines and disturbed areas no longer required for mine-related activities in order to minimise erosion and sedimentation, and to reduce the visibility of the activities from adjacent properties and the local road network.	As required.	Rehabilitation Management Plan	As per Rehabilitation Management Plan	C	
4.4	Provide a low maintenance, stable and safe landform that blends with the surrounding topography and which is commensurate with re-established agricultural land uses.	Prior to mine closure.	Not triggered	Not triggered	NT	
4.5	Ensure any areas of disturbance that require profiling meet the requirements of the final landform.	As area becomes available.	Rehabilitation Management Plan	As per Rehabilitation Management Plan	C	
4.6	Replace subsoil and topsoil over areas of disturbance in the same order and approximately the same depth as it was removed.	As area becomes available.	Rehabilitation Management Plan	As per Rehabilitation Management Plan	C	
4.7	Ensure the most appropriate crop/pasture species are planted in the areas with returned for agricultural use.	As area becomes available.	Rehabilitation Management Plan	As per Rehabilitation Management Plan	C	
4.8	Conduct ongoing rehabilitation monitoring and maintenance throughout and beyond the operation.	Ongoing.	EcoLogical and EcoPlanning Biodiversity Monitoring Annual Reports	Annual monitoring is conducted of the rehabilitated areas.	C	
Desired outcome: The progressive rehabilitation of disturbance associated with the Mining Area, ie gas drainage and temporary ventilation activities, to create a stable final landform available for the proposed future use(s) of agricultural, forestry and/or nature conservation.						
4.9	Restrict areas of disturbance to the areas identified and marked in accordance with Commitments 1.1 to 1.5.	Ongoing.	Interview with Manager Environment and Superintendent – Environment Annual Reviews	Area of disturbance is restricted as far as possible.	C	
4.10	Remove gas drainage equipment and backfill and cap each remaining bore hole in accordance with the former NSW Department of Primary Industries – Mineral Resources EDG01 guideline “Borehole Sealing Requirements on Land: Coal Exploration”.	At completion of gas drainage activities.	Rehabilitation Management Plan Annual Reviews	Gas drainage equipment is removed as describes in the RMP and reported in the Annual Review	C	
4.11	Allow water retained within the sump(s) to evaporate, excavate any consolidated drill cuttings and fines, remove the plastic liner and backfill each sump.	At completion of gas drainage activities.	Rehabilitation Management Plan	Gas drainage equipment is removed as describes in the RMP and reported in the Annual Review	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
4.12	Respread previously stripped and stockpiled topsoil and vegetation over the backfilled sumps and other cleared areas.	At completion of gas drainage activities.	Annual Reviews	Gas drainage equipment is removed as describes in the RMP and reported in the Annual Review	C	
4.13	Complete periodic inspections of rehabilitated sites to confirm a return to the vegetation of the surrounding landform.	Annually.	Eco-Logical and EcoPlanning Biodiversity Monitoring Annual Reports	Annual monitoring is conducted of the rehabilitated areas.	C	
4.14	(Unless required for future access to monitor or manage subsidence related impacts), close, cross-rip and respread previously cleared vegetation over access tracks.	Once no longer required for site inspection purposes.	Rehabilitation Management Plan EcoLogical and EcoPlanning Biodiversity Monitoring Annual Reports	Access tracks are rehabilitated in accordance with the RMP.	C	

Desired outcome: Cracking or surface deformation is identified promptly and remediated such that general rehabilitation objectives are not compromised. See *Commitments 5.1 to 5.7*. Prevent any noxious weed infestation.

4.15	Obtain certification from plant supplier / contractor that equipment imported to the Mine Site has been cleaned and is free of soil and vegetation.	Prior to movement of equipment from hardstand of the working areas.	WHC-FRM-NAR-Vehicle Equipment Weed Clean Down WHC-FRM-NAR-Introduction to Site Surface Mobile Plant	Documentation shows that vehicles are cleaned prior to site entry.	C	
4.16	Undertake campaign weed spraying over the Pit Top Area and areas of surface disturbance of the Mining Area in consultation with the I&I NSW-Agriculture and/or the local Noxious Weeds Inspector.	Prior to the stripping of the topsoil.	Weed Treatment Reports Notices of weed applications Chemical use records and spreadsheet	The auditor sighted records of weed treatment and weed contractor reports confirming actions taken to control weeds in accordance with the RMP	C	

5. Subsidence Management

Desired Outcome: Identify and remediate surface cracks to minimise impacts on local hydrology, ecology and soils are minimised.

5.1	Inspect the identified 'cracking zones' above each longwall panel to identify occurrence of cracks.	During and for a period of up to 2 years following mining of each longwall panel.	INX InViron Subsidence identification, tracking and management system and ArcGIS database demonstrated to	The ESRI field maps application utilised for subsidence crack inspections has an 'offline ability' feature, which enables GPS location of the users phone and data capture saved to the device, then when the user's device/phone returns to wifi and/or cellular signal, the saved data	C	
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Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
			auditors, EcoLogic subsidence reports.	is automatically uploaded to the cloud.		
5.2	Rip the surface over cracks not filled in by natural processes.	Continuous and as required.	Evidence shown before and after treatment in the form of photos, database record extracts and EcoLogic subsidence reports, affected land mapping. Remediation system showing areas before and after treatment shown to auditors while on site.	Several sites were chosen at random by the auditor. All selected sites were shown to have been well documented. Subsidence cracks are tracked via NCO Environment & Rehabilitation Data Hub application (ESRI field maps)	C	
5.3	(For larger cracks for which surface ripping will not completely fill) fill with subsoil material sourced from stockpiles maintained at nearby gas drainage or ventilation sites, or within the footprint of the Reject Emplacement Area.	Continuous and as required.	Evidence shown in the form of database record extracts and EcoLogic subsidence reports. Areas of large cracking over LW108 were inspected during the audit and observed to have been filled in with suitable material. The infill material stockpile was also inspected and photographed. A new slurry infill system for large cracks (water and site won sands) of infill was also observed the LW109-110 pillar was observed.	Infilling of large cracks by the previous approach using dry material was found to subside over time due collapse under wetting. The revised (new) system appeared to be far more effective.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
5.4	Undertake a detailed condition assessment of the 3 rd order waterways within the predicted subsidence zone to enable assessment of changes post mining.	Prior to commencing longwall mining.	LiDAR and multi-spectral imaging sighted Biodiversity Monitoring Report	Data recording devices have "offline ability", as noted under 5.1 above.	C	
5.5	Inspect local drainage lines above the active and completed longwall panels. Monitoring should access any restriction of flows and hence restriction of fish passage to facilitate appropriate restorative measures.	As required.	Ecological Biodiversity reports – cross sections and POIs, inspection record database extracts, field inspection sheets and EcoLogic subsidence reports, affected land mapping.	Data recording devices have "offline ability", as noted under 5.1 above.	C	
5.6	Undertake water quality sampling from watercourses within the subsidence impact zone to determine any impacts on sediment loading and other parameters including salt loads.	During creek flow events.	Water Quality pond monitoring. Inspection record database extracts and field inspection sheets. Biodiversity reports – cross sections and POIs.	Data recording devices have "offline ability", as noted under 5.1 above.	C	
5.7	Note the effects of any ponding and commission a hydrologist or ecologist to recommend remedial actions should the area of ponding encroach upon sites of conservation or heritage significance.	During and for a period of up to 2 years following mining of each longwall panel.	Subsidence Pond Management Plan. Ponding observations, survey measurements and multi-spectral imaging provided in Biodiversity and Land Annual Monitoring reports (2023, 2024), Biodiversity, Land and Subsidence Pond Annual Monitoring report (2023), Subsidence Pond	Data recording devices have "offline ability", as noted under 5.1 above.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
			Monitoring report (2024) Inspection record database extracts and field inspection sheets, affected land mapping. Field inspection sheets were sighted during site inspection			
Desired outcome: Identify and minimise the impacts of the subsidence-induced erosion on the local environment.						
5.8	Inspect areas of the Mine Site susceptible to landslip or accelerated erosion, e.g. drainage lines and steeply slopped areas of exposed Purlawaugh Formation derived subsoils.	Quarterly following mining activities which may provide subsidence.	Biodiversity and Land Monitoring Report – areas noted. Area inspected as part of SI. Field inspection sheets and Inspection record database extracts	Documents reviewed by auditor indicate that inspections are undertaken.	C	
5.9	(In the event of large-scale slope instability), undertake appropriate stabilisation works e.g. installation of deep sub-surface drainage trenches or construction of strategic catch drains along slope crests.	Continuous and as required.	Area over LW 203/206 in Extraction Plan	No large scale instabilities have been observed to date.	C	
5.10	(In the event of erosion within Mine Site watercourses), stabilise the damaged or eroded banks (in accordance with an Erosion and Sediment Control Plan for the Longwall Project).	Continuous and as required.	Biodiversity and Land Monitoring Report – areas noted.	Documents reviewed by auditor indicate that inspections are undertaken.	C	
Desired outcome: Identify and minimise the impacts of valley closure and uplift ('upsidence') induced erosion on the local environment.						
5.11	Establish survey lines along ephemeral drainage gullies and along gully crests and monitor during and after mining of each longwall panel to identify any signs of cracking or 'upsidence'.	Prior to the commencement of mining each longwall panel.	Survey lines, Subsidence predictions (App B), Biodiversity and Land Monitoring Reports. Survey line data and subsequent lodgment with the Subsidence Portal was observed during the site visit.	DGS reports report closure and subsidence effects derived from monitoring data. It is noted that 'Figure 3d' of DGS Report NAR-004/8 which refers to upsidence is mis-referenced or missing.	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
5.12	Review predictions of 'upsidence' and valley crest movements after each longwall is completed.	Following completion of each longwall.	DGS reports.	DGS reports report closure and subsidence effects derived from monitoring data.	C	
5.13	In the event that 'upsidence' results in surface cracking or erosion), undertake remedial works identified by <i>Commitments 5.1 to 5.7</i> .	Continuous and as required.	Biodiversity and Land Monitoring Reports, crack management, EcoLogic subsidence inspections, inspection record database extracts. Subsidence monitoring data has been uploaded to the Subsidence Portal (sighted while on site).	No remedial works specific to upsidence have been required to date as these effects have been small. Some increased effects due to closure are likely to have occurred but appear to be accommodated by subsidence monitoring, inspection and management.	C	

Desired outcome: Identify and minimise the impacts of ponding on the local environment.

5.14	Sample ponded water to determine if there is any increase in salinity.	Quarterly for a period of up to 2 years upon identification of subsidence induced ponding.	Subsidence Pond Management Plan. Field inspection sheets. Ponding observations, survey measurements and multi-spectral imaging provided in Biodiversity and Land Annual Monitoring reports (2023, 2024), Biodiversity, Land and Subsidence Pond Annual Monitoring report (2023), Subsidence Pond Monitoring report (2024). Select cases of ponded water sampling were observed	Documentation inspected by the auditor indicate that ponded water is sampled.	C	
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Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
				during the site visit.		
5.15	Inspect the water courses over the subsidence zone to identify the location and extent of ponding.	Quarterly for a period of up to 2 years following identified subsidence.	Biodiversity and Land Monitoring Reports, Subsidence Pond Management Plan, LiDAR analysis, Multispectral analysis. Field inspection sheets and inspection record database extracts (sighted while on site)	Documentation inspected by the auditor indicate that water courses over the subsidence zone are inspected.	C	
5.16	For ponding where there is little or no vegetation of conservation significance monitor the location and extent of ponding. (If ponded area continues to increase in area, encroaches on vegetation of conservation significance or there is an increase in water salinity), excavate a channel to reduce the gradient change over the retained chain pillars. The excavation will be undertaken in accordance with an Aboriginal Cultural Heritage Management Plan and vegetation clearing procedures.	Continuous and as required.	Subsidence Pond Management Plan. Field inspection sheets and inspection record database extracts. Pre-clearing reports.	Documentation inspected by the auditor indicate that location and extent of ponded water is monitored.	C	
Desired outcome: Identify and minimise the impacts of far field displacement on local infrastructure.						
5.17	Monitor surface features (such as culverts) within 800m of the eastern edge and 1.5km of the western edge of the Mining Area.	Prior to mining that may result in subsidence at the relevant structure.	N/A	Such surface features that are not owned by NCO lie outside the approved monitoring area.	NT	
5.18	(In the event of damage to surface structures such as pipes, culverts, water tanks, dams or other soil or water conservation structures), repair the damaged infrastructure or provide appropriate compensation.	Continuous and as required.	N/A	Such surface features that are not owned by NCO lie outside the approved monitoring area.	NT	
Desired outcome: Identify and manage the impacts of subsidence on the local property infrastructure (including residences).						
5.19	Commission a dilapidation survey and inspection of all structures on non-project related land within the Mine Site by a qualified building consultant.	Prior to mining that may result in subsidence at the relevant structure.	N/A	Such surface features that are not owned by NCO lie outside the approved monitoring area.	NT	
5.20	Use the dilapidation survey and subsequent report in an individual property subsidence management plans (IPSMP) (or similar as required under any Extraction Plan requirements) prepared for each non-project related property to be impacted	Prior to mining that may result in subsidence at the relevant structure.	N/A	Such surface features that are not owned by NCO lie outside the approved monitoring area.	NT	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
	(to provide fair and reasonable outcomes between the affected property owner and the Proponent).					
5.21	<p>Each IPSMP will address the following issues.</p> <ul style="list-style-type: none"> • Timing and scale of predicted impacts. • Monitoring on the affected property during mining. • Timing for any remaining disconnection of services. <p>Post-mining inspection and reporting.</p>	Prior to mining that may result in subsidence at the relevant structure.	N/A	Such surface features that are not owned by NCO lie outside the approved monitoring area.	NT	
Desired outcome: Prepare and implement a Subsidence Monitoring Program (or similar as required under any Extraction Plan requirements) which includes the following element.						
5.22	<p>Prepare a Subsidence Monitoring Program (or similar as required under any Extraction Plan requirements) which includes the following elements.</p> <ul style="list-style-type: none"> • A transverse subsidence line across the northern and southern panels. The lines will be installed to at least the middle of the next adjacent longwall before undermining occurs. • A longitudinal line extending in-bye and out-bye from the starting and finishing point of each panel, for a minimum distance equal to the cover depth. • A survey line along the riparian management zone of Kurrajong and Pine Creeks and their tributaries over the Mine Site. • A minimum of three monitoring pegs space 10 m apart in a line or triangle at any feature of interest, e.g. dam, walls, archaeological sites, to measure subsidence, tilt and strain. • Visual inspections and mapping of damage before, during and after mining. 	Prior to the commencement of mining in each longwall panel.	<p>Subsidence monitoring data and procedure</p> <p>3D data for transverse and creek survey lines 107, 108, 109, B, D, H and L. Data complies with commitment of longitudinal, transverse and creek surveys. Additional survey at key features such as heritage sites sighted on a subsidence monitoring network plan. All data at 10 m spacing except transverse lines B & D.</p> <p>EcoLogic subsidence impact reports.</p> <p>Field inspection sheets and inspection record database extracts.</p>	<p>The committed accuracy of +/- 3 mm is not evidenced in the documents provided. However, discussions with the surveyor indicate industry practice including regional control points is being adopted to minimise survey error.</p> <p>Subsidence data provided for the audit shows conformance to this commitment in terms of spacing, frequency and location. Note that LW108 was mined 2020, and monitoring ceased 2022, outside audit period.</p>	C	
5.23	Place monitoring survey pegs between 10 m and 20 m apart with a minimum of two baseline surveys of subsidence and strain completed before mine subsidence effects occur.	Prior to the commencement of mining in each longwall panel.	Subsidence monitoring procedure provided.		C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
				All data at 10 m spacing except transverse lines B & D. Two baselines sighted per survey line.		
5.24	Prepare and implement and Extraction Management Plan to manage subsidence impact(s) to the satisfaction of I&I NSW and DoP.	Prior to Longwall mining commencing.	Extraction plans examined and approval confirmed (Mod 7). Subsidence Monitoring Plan Appendix K of LW203-206 EP		C	
6. Groundwater						
Desired Outcome: Minimise the volume of mine in-flow to the underground workings.						
6.1	Seal the mine drifts and ventilation shaft using in strata grouting or hydrophobic sealant.	At time of Mine Closure.	Not triggered	Not triggered	NT	
Desired Outcome: Manage mine-in flows to minimise the potential for contamination of surface catchments.						
6.2	Divert groundwater accumulating in the underground workings to designated sumps for pumping to surface.	Ongoing.	Water Management Plan	Groundwater is collected in box cut sump as per Water Management Plan	C	
6.3	Discharge groundwater pumped from the underground sumps into Dam A1 only.	Ongoing.	Water Management Plan	Groundwater is diverted to Dam A1	C	
Desired Outcome: Implement a comprehensive and ongoing groundwater monitoring program.						
6.4	Record extraction volumes including weekly totals from all pumping bores, and weekly totals from the underground mine and box cut sump.	Weekly.	Underground Flow Report of Box Cut Removal for week in CITEC	Real time telemetry on pumping bores, underground mine and box cut sump.	C	
6.5	Record Volumes of water introduced to the mine for longwall operation and other requirements.	Weekly.	Spreadsheet flow meter readings	Weekly records of underground feed, water treatment plant, Namoi bore and river levels.	C	
6.6	Record the groundwater quality (EC and pH) discharged from the underground workings and water supply bores.	Monthly.	Spreadsheet flow meter readings	Weekly records of underground feed, water treatment plant, Namoi bore and river levels.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
6.7	Sample and analyse water from all pumping bores and underground pumping stations.	Monthly.	Spreadsheet flow meter readings	Weekly records of underground feed, water treatment plant, Namoi bore and river levels.	C	
6.8	Record (by manual monitoring, or continuous automated monitoring) the standing water levels of piezometers P1 to P27 and WB1 to WB8 (and others as constructed).	Monthly initially and hence quarterly when stable flow established.	Quarterly and Annual Groundwater Reviews Groundwater monitoring spreadsheet	Standing water levels are recorded for piezometers and bores.	C	
6.9	Monitor the flow rate and water quality of the spring discharge from "Mayfield Spring".	Monthly initially and hence quarterly when stable flow established.	IMERCS database screenshots of Quarterly GDE and Surface Water (Alluvial Bore) Monitoring on 26/3/2025, 26/6/2025, and 24/9/2025	Water not extracted from here, but monitoring does occur (flow rate, EC, pH, surface water level, vegetation health)	C	
6.10	Install additional multi-level vibrating wire piezometers over LW1 to LW3 to obtain detailed data as to the impact of mine subsidence on the groundwater of the various strata above the underground workings.	Prior to commencement of longwall mining.	Outside audit period	Outside audit period	C	
6.11	Collect data from the vibrating wire piezometers and compare against initial groundwater and subsidence modelling.	Data collected continuously and downloaded and analysed quarterly.	Water Management Plan Quarterly and Annual Groundwater Reviews	Data is analysed on an ongoing basis.	C	
6.12	Commission an experienced hydrogeologist to collate and review the monitoring data collected annually in order to assess the impacts of the project on the groundwater environment, and to compare any observed impacts with those predicted from groundwater modelling (<i>see also Commitment 16.11</i>).	Annually.	Annual Groundwater Reviews	Annual reports are prepared by Groundwater Exploration Services Pty Ltd (2022, 2023) and AGE (2024)	C	
6.13	Develop the groundwater monitoring program in consultation with the Proponent's consultant hydrogeologist, the Department of Environment, Climate Change and Water - Office of Water and those groundwater users potentially affected by the Longwall Project. (<i>see also Commitment 16.12</i>).	Prior to commencement of longwall mining.	Water Management Plan	The groundwater monitoring program is detailed in the Water Management Plan.	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
6.14	Complete an initial audit of the groundwater model predictions against monitoring data.	6 months after the commencement of longwall mining.	Outside audit period	Outside audit period	N/A	
6.15	Recalibrate the groundwater model based on groundwater model audit and generate confirmatory forward impact predictions made. Include in all forward impact predictions the impact of brine re-injection at the conclusion of mine operations and check against initial predictions. (also required for Mine Closure Plan).	6 months after the commencement of longwall mining, every 5 years thereafter, and at least 12 to 18 months prior to cessation of mining.	Narrabri Coal Mine Groundwater Model - Re-calibration Stage 2 MOD 7 (AGE March 2024)	The Narrabri Coal Mine Groundwater Model - Re-calibration Stage 2 MOD 7 report provides a calibrated model and predicted impacts.	C	
6.16	Carry out regular reviews of the groundwater model predictions against monitoring data.	Every 5 years (or more frequently if in-flows deviate significantly from predictions).	Narrabri Coal Mine Groundwater Model - Re-calibration Stage 2 MOD 7 (AGE March 2024)	The Narrabri Coal Mine Groundwater Model - Re-calibration Stage 2 MOD 7 represents and update on the previous review by AGE (2021), within the 5 year period	C	
6.17	Should the recalibrated model show groundwater inflows beyond those cases described in the EA, a separate detailed impact assessment will be conducted and mitigating measures determined.	Every 5 years (or more frequently if in-flows deviate significantly from predictions).	Narrabri Coal Mine Groundwater Model - Re-calibration Stage 2 MOD 7 (AGE March 2024)	Revised predictions by AGE (2024) suggest peak inflows of 1,252 ML/year occurring in 2030 i.e. around 15% less than the 1,465 ML/year predicted previously by AGE (2021)	C	
Desired Outcome: Preparation of a contingency plan in the event that the availability or quality of groundwater is reduced for local groundwater users.						
6.18	Undertake remedial action if groundwater drawdown attributable to the mine reduces the saturated thickness of any non-project related bore by 15% or more. In the event that an existing water supply is deemed (by the hydrogeologist) to be adversely affected by the Longwall Project, the Proponent will mitigate, or compensate for this impact through the provision of a replacement water supply.	As required.	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	
6.19	Undertake remedial action if the water quality of the dewatering discharge indicates an inflow salinity of more than 20% above that predicted by Aquaterra (2009).	As required.	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	
6.20	Ensure all monitoring bores are licenced with the NSW Office of Water. All <i>Form A</i> 's associated with the bores will be submitted to NOW at the time drilling is undertaken.	At time of drilling.	Outside audit period	Outside audit period	N/A	
6.21	Ensure the project is appropriately licensed for all groundwater make and use in accordance with required licensing arrangements through the NOW.	As required.	Water management Plan	Water access licenses and works approvals are in place.	C	

7. Surface Water

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
Desired Outcome: Minimisation of changes to existing drainage patterns of the Mine Site.						
7.1	Retain selected surface water structures such as the farm dams and diversion swales to allow for continued water management across the Pit Top Area.	During construction period.	Outside audit period	Outside audit period	N/A	
Desired Outcome: Prevention of discharge of sediment-laden water from the Pit Top Area.						
7.2	Direct runoff collected within potentially contaminated catchments of the coal processing area and Reject Emplacement Area to storage basins (SB1, SB2 and SB3).	Ongoing.	Water Management Plan Site observations	Runoff collection is described in the WMP.	C	
7.3	Dewater storage basins SB1, B82 and SB3 and discharge the water to Dam A 1 (or Dams C or D) to ensure no discharge or overflow.	Ongoing.	Interview with Manager Environment and Superintendent – Environment	Not required	NT	
7.4	Design and construct the storage basins to provide the capacity nominated by WRM (2009).	Prior to commencement of longwall mining.	Water Management Plan	As described in the WMP	C	
7.5	Design and construct the sediment dams to provide sufficient water settlement and sediment storage zones to contain the 5 day 90%ile storm event.	Prior to commencement of longwall mining.	Water Management Plan	Water Management Plan	C	
7.6	Dewater sediment dams within 5 days of significant rainfall event.	With 5 days.	Interview with Manager Environment and Superintendent – Environment Sediment Dam Catchment Plans (SD1 and SD2) Monthly Water Reports providing forecasts	Sediment Dam Catchment Plans have been prepared to ensure that sufficient capacity is maintained within dam to accommodate rainfall events. Includes TARP levels that trigger requirement for dewatering. Dewatering has occurred based forecasts from monthly water reports (rainfall)	C	
7.7	Direct all water from wash-down areas and workshops to oil/water separators and containment systems. The oily fraction will be placed in a containment system for removal, as necessary.	Ongoing.	Site observations	Oil/water separators were observed in the yard servicing the wash-down facilities, refuelling and waste oil storage areas.	C	
7.8	Ensure all storage tanks are either self-bunded tanks or bunded with an impermeable surface and have a capacity to contain a minimum 110% of the largest storage tank capacity.	Ongoing.	Site observations	Storage tanks were observed to be adequately bunded.	C	
7.9	Restrict refuelling, oiling and greasing of designated areas, away from drainage and where spill kits are readily available.	Ongoing.	Site observations	Oil/water separators were observed in the yard servicing the wash-down	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
				facilities, refuelling and waste oil storage areas. Spill kits were available		
7.10	Discharge all groundwater into Dam A1, and either use without processing in selected areas on site or process through the Water Conditioning Plant to produce fresh water raffinate and concentrated brine.	Ongoing.	Water Management Plan	All groundwater pumped from underground is collected in Dam A1 which is the main feed for the conditioning plant.	C	
7.11	Construct storages for saline groundwater (Dam A 1) and brine (Dams A2, A3, B2 and BR1 to BR5 [as required]) using in-situ material which have an average depth of 5m and batter slopes of ~1:3 (V:H).	Dams A2, A3 and B2 Prior to commencement of mine dewatering and BR1 to BR5 as required.	Engineering Design Report for BR1	BR1 was constructed as required. Other dams were constructed outside audit period.	C	
7.12	Line all dams to be used to store groundwater or brine with HDPE liner (permeability $<1 \times 10^{-14}$ m/sec).	Prior to commencement of mine dewatering.	Engineering Design Report for BR1	BR1 was constructed as required. Other dams were constructed outside audit period.	C	
7.13	Maintain at least 0.5m freeboard in each brine storage (sufficient to cater for design 1 in 100 year ARI event).	Ongoing.	Engineering Design Report for BR1	BR1 was constructed as required. Other dams were constructed outside audit period.	C	
7.14	Commence construction of brine storage ponds from 12 months prior to the anticipated requirement to accept brine discharge.	As required.	Outside audit period	Rail loop ponds were constructed prior to the audit period	NT	
7.15	Ensure all storages used for the storage of treated raffinate are constructed using a compacted clay lining, to an average depth of 5m and with batter slopes of ~1:3 (V:H).	Prior to commencement of use for raffinate storage.	Outside audit period	Outside audit period	NT	
7.16	Maintain discharge water quality from the Water Conditioning Plant at the 100%ile limit of 350mg/LTDS.	During discharge events to the Namoi River.	Interview with Manager Environment and Superintendent – Environment	No water has been discharged	NT	
7.17	Develop, in consultation with the DECCW, a routine discharge quality and continuous discharge volume monitoring program and incorporate these requirements into a revised Site Water Management Plan.	At least 6 months prior to initial discharge.	Interview with Manager Environment and Superintendent – Environment	Water Management Plan has been updated to include raffinate discharge control plan	C	
7.18	Maintain the pH level of water discharged beyond ML1609 within the range 6.5-8.0.	During discharge events.	Interview with Manager Environment and Superintendent – Environment	During the audit period, discharges occurred from SD2, SD4, SD7, and SD9. pH values recorded were all between the EPL pH limits of 6.5 and 8.5.	C	

Desired Outcome: Prevention of discharge of dirty, contaminated or saline water from the progressive disturbance areas of the Mining Area.

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
7.19	<p>Prepare and implement a general Erosion and Sediment Control Plan (ESCP) (in accordance with the requirements of Landcom, 2004) to manage surface water flows within each gas drainage or ventilation shaft area. The ESCP will provide for the following management.</p> <ul style="list-style-type: none"> – Prior to disturbance, the area will be marked out and 'no-go' zones identified. – If located on or adjacent to a natural drainage line, a diversion bank will be constructed up-slope of the area to be disturbed. – the requirement for a sediment basin will be determined, using the Revised Universal Soil Loss Equation (RUSLE). – If a sediment basin is required, i.e. soil loss >200Uha/year, the sediment basin design capacity will be calculated. – Soil will stockpiled away from natural drainage lines. – Sediment fencing will be installed along the down-slope boundaries of the disturbed areas. – All sediment control structures will be regularly inspected and repaired. 	Prior to the commencement of gas drainage or ventilation shaft construction.	Water Management Plan	Verified via CoA	C	
7.20	Store potential contaminants, e.g. drilling fluid, hydrocarbons, within bunded areas away from natural drainage lines.	Ongoing.	Site observations	Potential contaminates were observed to be stored in bunded areas away from surface drains.	C	
7.21	Ensure all contaminated liquids are contained in lined sumps at each drill site.	Ongoing.	Interview with Manager Environment and Superintendent – Environment	All drilling sites use above ground tanks, subsequently emptied into truck and disposed in the REA	C	
7.22	Discharge any groundwater to a lined sump, with this water immediately directed to Dam A1 within the Pit Top Area.	Ongoing.	Water Management Plan	Groundwater is discharged to a lined sump and then to Dam A1.	C	
Desired outcome: Minimisation of impact from dirty water contamination event.						
7.23	Sample water discharging from licensed discharge points and analyse the water for suspended solids, turbidity, electrical conductivity, oil and grease, and pH.	With 24 hours of discharge.	EPL Monitoring reports	During the audit period, discharges occurred from SD2, SD4, SD7, and SD9. No water quality exceedances were recorded during these events.	C	
7.24	<p>In the event monitoring confirms pollution has occurred, one or more of the following measures will be adopted.</p> <ul style="list-style-type: none"> – The DECCW will be advised. – Salient preceding weather information will also 	Within 7 days.	Interview with Manager Environment and	During the audit period, discharges occurred from SD2, SD4, SD7, and SD9. No water quality exceedances were recorded during these events.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>be provided.</p> <ul style="list-style-type: none"> - Additional flocculants will be used to expedite settlement of sediments. - Plans will be set for the subject sediment dam will be enlarged or an additional sediment dam will be constructed downstream which will become the new site discharge point and monitoring location. 		Superintendent – Environment			
Desired Outcome: Minimisation of impact from hydrocarbon contaminated water event.						
7.25	<p>Undertake the following actions (in the event of a major hydrocarbon spill).</p> <ul style="list-style-type: none"> - Collect the contaminated soil at the site of the spill and transport to an approved waste depot or designated 'land farming' area of the Mine Site. - Construct pits around the spill with sufficient hydraulic gradient to capture seepage water and contaminated material. - Pump out water captured in pits. <p>Monitor the local groundwater for signs of contamination.</p>	As required.	Interview with Manager Environment and Superintendent – Environment Whitehaven Coal Procedure for Bioremediation	Hydrocarbon spills are managed in accordance with the Procedure for Bioremediation. The hydrocarbon contaminated material is placed into elongated, above ground windrows or 'bioplies' within the REA, mixed with mulched vegetation and left for a period of time with periodic turning or aeration. In time, the concentration of hydrocarbons is reduced by natural attenuation to the level where disposal in the rejects emplacement area (REA) or offsite as nonhazardous waste is acceptable. Each cell is compacted to minimise leachate with a drainage system that directs run off into a drain that is directed to SB3. Hydrocarbon spills have not occurred outside Pit Top area, reducing risk of pollution.	C	
Desired Outcome: Minimisation of impact from saline contamination event.						
7.26	<p>Prepare a formal contingency plan for a saline contamination event. The plan may include one or a combination of the following measures.</p> <ul style="list-style-type: none"> - Dewatering from the underground workings will be transferred to an intact and lined storage structure (or ceased) along with any water remaining in the breached pond. - The breached pond or pipe will be repaired immediately and inspected by a suitably qualified person prior to re-integration into the saline water management system. - The water cart will be used to transfer non-saline water to the area of the spill to flush and dilute the water discharged. As far as practical, at least 4 times the - Volume of the spilled water will be used to flush the downstream environment. 	Prior to commencement of longwall mining.	Outside audit period	Outside audit period	N/A	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
	– Downstream vegetation will be monitored for any impacts of increased salinity and treated appropriately.					
Desired Outcome: Minimisation of erosion and sedimentation.						
7.27	Maintain a ground cover of vegetation at 70% or better over areas disturbed but no longer required by the project.	Ongoing.	Annual Monitoring Reports	Ground cover is measured and reported in the annual monitoring reports.	C	
7.28	Armour the banks of the rail loop with ballast in flood zone (larger diameter competent rock).	Ongoing.	Not triggered	Not triggered	NT	
7.29	Inspect the banks of the rail loop and remediate erosion damage within Kurrajong Creek Tributary 1.	Following flood events.	Not triggered	Not triggered	NT	
Desired Outcome: Ensure no additional salt load is added to the Namoi River catchment as a consequence of the Longwall Project.						
7.30	Participate in, as required, the development of a salt accounting protocol with the DoP, DECCW and NOW.	Prior to any discharge to the Namoi River.	Interview with Manager Environment and Superintendent – Environment	No discharge has taken place during the audit period.	NT	
7.31	Enter into an agreement for, and contribute sufficient funds to the 'Cap and Pipe the Bores' Program to ensure that there is a sufficient salt 'credit' for the Proponent to offset all planned salt discharges over the life of the mine. (Any agreement that NCOPL enters in relation to this matter will include the opportunity to 'trade' or otherwise dispose of salt credit in excess of that required to offset salt load attributable to mine water discharges.)	Prior to any discharge to the Namoi River.	Interview with Manager Environment and Superintendent – Environment	No discharge has taken place during the audit period.	NT	
7.32	Should the Cap and Pipe Bores Program prove not to be viable, develop an alternate Green Offset program in consultation with NOW and DECCW.	Prior to any discharge to the Namoi River.	Interview with Manager Environment and Superintendent – Environment	No discharge has taken place during the audit period.	NT	
Desired Outcome: Identification of alternative methods of disposal/use of brine.						
7.33	Initiate a study by a recognized firm of engineering consultants to investigate the technical and economic viability of alternative methods of disposal (or use) of brine and raffinate produced by the on-site Water conditioning plant.	Initial report to be developed within 3 years of project approval, with a revised report prepared every 5 years thereafter.	Brine Management and Beneficial Use Options Report (Hydro Balance 8 May 2025)	Engineering consultant undertook options review in 2025	C	
Desired Outcome: Implement a comprehensive and ongoing surface water monitoring program.						

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
7.34	Monitor surface water quality for pH, EC, TDS, TSS, Total Organic Carbon at locations upstream and downstream of the Pit Top Area on Kurrajong and Pine Creeks and their tributaries.	Quarterly during surface flow events.	EPL Monitoring Data	Water quality is assessed at undisturbed monitoring locations (KCUS, KC1US and KC2US) and at those located downstream of the Narrabri Mine (KCDS, KC1DS, KC2DS, PC and PC1), as per EPL Monitoring Data	C	
7.35	Record the volume and quality (pH, EC, TDS, TSS, Total Organic Carbon) of water extracted and discharged to the Namoi River.	Weekly.	Interview with Manager Environment and Superintendent – Environment	No discharge to the Namoi River during the audit period	NT	
7.36	Monitor the quality of water within the Brine Storage Ponds.	Quarterly.	Surface water and wet weather monitoring report Annual Reports	Monitoring is conducted monthly	C	
7.37	Prepare and implement contingency plans in the event elevated levels of heavy metals are recorded.	Quarterly.	Water Management Plan	TARP contained in WMP	C	

Desired Outcome: Avoidance of structures in drainage lines to prevent fish passage.

7.38	Construction of drainage line crossings will be undertaken in accordance with the policy and guideline document of the I&I NSW "Why do fish need to cross the road?"	As required.	Surface Disturbance Form	Permit to disturb procedure has aquatic checks if there is potential aquatic fauna or semi-permanent pools. Where there are aquatic environment works must include fish passage	C	
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8. Ecology

Desired Outcome: Manage disturbance within the Pit Top Area to minimise disturbance to flora and fauna of conservation significance.

8.1	Clearly identify the boundaries of disturbance within the Pit Top Area and progressive disturbance associated with ventilation and gas drainage infrastructure. Ensure no clearing occurs outside these boundaries.	Prior to clearing (see also <i>Commitments 1.1 and 1.2</i>).	Rehabilitation Management Plan	As per RMP	C	
8.2	Avoid disturbance to the vegetation of Community 3 along Kurrajong Creek Tributary 1.	During clearing.	Interview with Manager Environment and Superintendent – Environment	Not triggered	NT	
8.3	Disperse and spread cleared native vegetation around disturbed areas to provide habitat, increase the seed bank and to provide a mulch material for nutrient cycling and water retention purposes.	Ongoing.	Site observations	The audit team observed the use of cleared vegetation as habitat and mulch	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
8.4	Strip all groundcover vegetation with the topsoil to ensure maximum retention of nutrients and native seeds to facilitate rapid vegetation of the soil stockpiles.	Ongoing.	Site observations	Stripped topsoil was observed during the site inspection.	C	
Desired Outcome: Manage progressive disturbance over the Mine Site to minimise disturbance to flora and fauna of conversation significance.						
8.5	Clearly identify the boundaries of proposed disturbance. As far as practicable avoid disturbance to the vegetation of Community 3 along watercourses of the Mine Site.	Prior to clearing the nominated area(s).	Rehabilitation Management Plan	As per RMP	C	
8.6	Commission a qualified ecologist to complete a pre-clearance survey of nominated areas of disturbance (to identify whether any threatened species, population or community or their habitat is present).	Prior to clearing the nominated area(s).	Rehabilitation Management Plan	As per RMP	C	
8.7	Include an assessment of whether aquatic or fish habitat is present within the drainage features to be traversed by the access road and/or power line corridors. The location of access tracks will be determined in conjunction with an ecologist after inspecting each proposed route and determining the path with least impact on environmental values.	Prior to clearing the nominated area(s).	Surface Disturbance Form in ePTW in IMERCS	Permit to disturb and pre-clearing surveys	C	
8.8	(In the event that an EEC or threatened species or population is identified), relocate or reorientate proposed disturbance, if practicable.	Prior to clearing the nominated area(s).	Interview with Manager Environment and Superintendent – Environment	The audit team was advised that disturbance tries to avoid habitat trees	C	
8.9	If the relocation or re-orientation of the area to be disturbed is not practicable (for reasons of mine I operational safety), the consultant ecologist will relocate any fauna species residing within the area to be cleared.		Interview with Manager Environment and Superintendent – Environment	The audit team was advised that relocation is undertaken only if required during pre-clearing survey	C	
8.10	Retain all substantial habitat trees, wherever possible.	During construction.	Interview with Manager Environment and Superintendent – Environment	The audit team was advised that disturbance tries to avoid habitat trees	C	
8.11	Undertake any tree-felling in accordance with a Tree Felling Protocol. The Tree Felling Protocol will be developed by a qualified ecologist and will include, but not necessarily be limited to a description of: <ul style="list-style-type: none"> - the best time of the year for felling; - pre-felling mapping of habitat trees; - inspections of trees on the day of felling; - procedures for the safe removal of fauna species; - a relocation/release protocol; and - a protocol for the assessment and salvaging of 	During construction.	Annual Reviews	All trees with habitat features are felled following a clearing protocol and is done in the presence of a suitably qualified Ecologist. All trees identified as having habitat features were recorded using a hand-held GPS unit.	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
	tree hollows.					
8.12	Disperse and spread cleared native vegetation around disturbed areas to provide habitat, increase the seed bank and to provide a mulch material for nutrient cycling and water retention purposes.	Following clearing if areas available, otherwise when revegetation area available.	Site observations	The audit team observed the use of cleared vegetation as habitat and mulch	C	
8.13	Strip all groundcover vegetation with the topsoil to ensure maximum retention of nutrients and native seeds to facilitate rapid vegetation of the soil stockpiles.	Ongoing.	Site observations	Stripped topsoil was observed during the site inspection.	C	
8.14	Re-site all hollows from hollow-bearing trees removed where practicable.	Ongoing.	Interview with Manager Environment and Superintendent – Environment	Where practical hollows will be avoided by adjusting the disturbance boundary	C	
Desired Outcome: Minimise long term impact on flora and fauna on and around the Mine Site.						
8.15	Implement a weed management strategy, in consultation with the Livestock Heath and Pest Authority and the Narrabri Shire Council weeds officer, for the retained or rehabilitate natural vegetation within the Mine Site.	To be developed in the Landscape Management Plan for the Project in accordance with the Stage 1 conditional requirement.		Verified via CoA	C	
8.16	Implement a feral animal management program to lower the predator impact upon small terrestrial native species.	In accordance with Landscape Management Plan.		Verified via CoA	C	
8.17	Inspect the sediment dams, evaporation ponds and brine storage ponds for fauna during the course of regular maintenance and operational inspections.	Ongoing.		Verified via CoA	C	
8.18	Undertake regular reviews of the revegetation program to ensure it remains relevant.	Annually.	Annual Monitoring Reports Annual Reviews	Rehabilitation monitoring reports are prepared annually Reviewed annual review.	C	
8.19	Time clearing within woodland communities, where practicable, to avoid fauna breeding seasons.	Ongoing.	Interview with Manager Environment and Superintendent – Environment	Clearing is undertaken to avoid breeding seasons where practicable	C	
8.20	Undertake progressive and final rehabilitation across the Project Site to recreate a final land use of agriculture and native vegetation.	Ongoing.	Rehabilitation Management Plan	Rehabilitation objectives are set out in the RMP.	C	

Desired Outcome: Ensure the biodiversity value of the Mine Site and surrounding areas is maintained or improved.

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
8.21	Establish and implement a Biodiversity Offset Management Plan to the satisfaction of the DoP (and in consultation with the DECCW), to account for the area disturbed by the Longwall Project and in particular regard for Bertya Opponens, the Superb Parrot and Inland Grey Box EEC.	Within 9 months of Project Approval.	Outside audit period	Outside audit period	N/A	

9. Indigenous Heritage

Desired Outcome: Employees and contractors who are sensitive to, and respectful of, the Aboriginal heritage on the Mine Site.

9.1	Involve all site employees and contractors in an awareness program re: Aboriginal Heritage Issues.	At Site Induction (and re-induction).	WHC generic induction sighted	Aboriginal heritage issues are included in the Whitehaven Coal and Narrabri surface inductions. All employees and contractors are required to complete both inductions.	C	
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Desired Outcome: Ensure protection of Aboriginal sites and artefacts of scientific significance (Aboriginal Sites 10, 19, 38 and 39).

9.2	Identify the boundaries of Aboriginal Sites 10, 19 38 and 39, design surface disturbing activities such as gas drainage operation, ventilation and access road construction to provide a buffer of at least 10m from the site fencing.	Prior to any surface disturbance within 100 m of the nominated sites.		Verified via CoA	C	
9.3	Erect a sign on the fencing identifying an "Environmental Protection Zone".	Prior to any surface disturbance within 100 m of the nominated sites.	Site observations	The audit team observed appropriate fencing	C	
9.4	Prohibit access to these sites by locating all surface disturbance (including roads) at least 10 m from these fence off areas.	Prior to any surface disturbance within 100 m of the nominated sites.	Aboriginal Cultural Heritage Management Plan	10m buffer is described in the ACHMP	C	
9.5	Remove the fencing (erected as nominated in Commitment 9.3) to allow the return of grazing to reduce the potential grass-fire hazard.	Following the completion of surface disturbance in the vicinity of the protected site.	Aboriginal Cultural Heritage Management Plan	Fencing is removed as required.	C	

Desired Outcome: Manage identified Aboriginal sites and artefacts (of Panels 1 to 7) in accordance with agreed management principles.

9.6	For Aboriginal Sites 10, 19, 38, 39, design surface disturbing activities such as gas drainage operation, ventilation and access road construction to provide a buffer of at least 10 m from the site fencing.	Prior to any surface disturbance.	Aboriginal Cultural Heritage Management Plan	10m buffer is described in the ACHMP	C	
9.7	For all other Aboriginal sites, design surface disturbing activities such as gas drainage operations, ventilation and access road construction to avoid wherever possible the identified Aboriginal sites.	Prior to any surface disturbance within 100 m of any other Aboriginal site.	Aboriginal Cultural Heritage Management Plan	As above	C	
9.8	In the event that one of the Aboriginal sites (other than Aboriginal Sites 10, 19, 38 and 39) cannot be avoided,	Prior to salvage.	Aboriginal Cultural Heritage	Qualified archaeologists with assistance of TO representatives have	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
	commission an archaeologist and invite representatives of registered Aboriginal stakeholder (Gomerioi and Narrabri LALC) to salvage the artefacts identified at the affected site ("the Salvage Area").		Management Plan Annual Reviews	salvaged artefacts during the audit period		
9.9	Undertake a full analysis of the material salvaged from within the Salvage Area by allowing the archaeologist to take the artefacts for further analysis.	Following salvage and prior to any surface disturbance.	Aboriginal Cultural Heritage Management Plan Annual Reviews	Qualified archaeologists with assistance of TO representatives have salvaged artefacts during the audit period and undertook a detailed review	C	
9.10	Return the salvaged artefacts to the authorised Aboriginal organisation.	Within 21 days of salvage.	Interview with Manager Environment and Superintendent – Environment	Salvaged artefacts are in the care and control of the relevant Tos for re-installment on land post mine closure	C	
9.11	Place the salvaged artefacts in the care and control of the Aboriginal organisation agreed to by Narrabri LALC and Gomerioi. (The Proponent (if required) has agreed to provide an interim 'keeping place' in a designated storage facility with the Pit Top Area until such time as a suitable location is identified and agreed to by Narrabri LALC and Gomerioi).	Following salvage.	Interview with Manager Environment and Superintendent – Environment	Salvaged artefacts are in the care and control of the relevant Tos for re-installment on land post mine closure	C	
9.12	Commission the preparation of a report ("Salvage Report") including full descriptions of the salvaged material, and an interpretation of the archaeological record within the Salvage Area.	Following salvage.	Westhaven AS1 Salvage (Whincop Archaeology 23 August 2023)	Whincop Archaeology (2023) provides description and photographs of salvaged material at NCO.	C	
9.13	Provide copies of the Salvage Report to Narrabri LALC, Gomerioi and the DECCW.	Within 3 months of salvage.	Email from NCO to Narrabri LALC dated 30 August 2023.	Auditor observed email from NCO to LALC transmitting Whincop Archaeology salvage report, letter from Department of Planning and Environment dated 16/8/2023 approving salvage works, and completed application for the transfer of Aboriginal objects for safekeeping.	C	
Desired Outcome: Manage Aboriginal sites and artefacts (within the remaining Mining Area) in accordance with agreed management principles.						
9.14	As mining approaches the completion of Panels 1 to 7, undertake a further detailed field survey, involving representatives of the registered Aboriginal stakeholders, above the Mining Area to be disturbed over the ensuing 7 years.	At least 12 months prior to completion of mining in Panel 7.	Outside audit period	Outside audit period	NT	
9.15	Identify and protect through fencing and signage, those sites determined to be of high scientific significance as agreed and determined in consultation between the Proponent, the registered Aboriginal stakeholders and the archaeologist.	Prior to surface disturbance associated with Panel 8.	Outside audit period	Outside audit period	NT	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
9.16	In the event that an identified site cannot be avoided, commission an archaeologist and invite representatives of registered Aboriginal stakeholders (Gomeri and Narrabri LALC) to salvage the identified artefacts. All salvage is to be undertaken as per <i>Commitments 9.9 to 9.13</i> above.	Prior to surface disturbance.	Aboriginal Cultural Heritage Management Plan	The procedure is described in the ACHMP and has been implemented as required.	C	
Desired Outcome: Manage Aboriginal heritage values in accordance with agreed management principles.						
9.17	Prepare, in consultation with the registered Aboriginal stakeholders and the DECCW, an updated Aboriginal Heritage Cultural Management Plan (AHCMP). The AHCMP will include: <ul style="list-style-type: none"> - protocols and procedures to ensure that all commitments (see Commitments 9. 1 to 9.20) are implemented in full; - consultation and communication framework between the Proponent, registered Aboriginal stakeholders and the DECCW; - the accountabilities and responsibilities of the Proponent and registered Aboriginal stakeholders; and - All legal reporting requirements nominated by the DECCW. 	Within 6 months of receiving Project Approval.	Outside audit period	Outside audit period	NT	
Desired Outcome: Appropriate protection and/or salvage of Aboriginal sites and artefacts identified beyond the identified beyond the Aboriginal sites defined during previous field surveys.						
9.18	Ensure that if any further Aboriginal artefacts are uncovered at any time during the life of the mine, work in the vicinity of the subject area ceases and the Proponent follows the procedures recorded in the ACHMP.	In the event of an Aboriginal site or artefact being identified.		Refer to CoA	C	
9.19	Wherever possible, if a tree is identified as having culturally made scars, it is retained in situ and protected.	In the event of a scarred tree being identified.	Interview with Manager Environment and Superintendent – Environment Annual Reviews	A previously unrecorded scar tree was encountered. NCO engaged a qualified archaeologist and, with the assistance of RAP representatives conducted a detailed review of the identified sites, which have been registered procedure outlined in the ACHMP	C	
9.20	Ensure that, where it is not possible to retain a scarred tree <i>in-situ</i> , the tree is cut down to preserve the scar, and relocated into a designated protected area. All activity associated with cutting of the tree and preservation of the scar is to be conducted in consultation with the Aboriginal stakeholders and the archaeologist.	In the event of a scarred tree being identified.	Interview with Manager Environment and Superintendent – Environment Annual Reviews	A previously unrecorded scar tree was encountered. NCO engaged a qualified archaeologist and, with the assistance of RAP representatives conducted a detailed review of the identified sites, which have been registered procedure outlined in the ACHMP	C	
10. Noise						
Desired Outcome: All activities are undertaken in such a manner as to reduce the noise level generated and minimise impacts on surrounding landholders and/or residents.						
10.1	Ensure that the approved hours of operation are adhered to.	Ongoing.		Verified via CoA	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
10.2	Use equipment with lower sound power levels in preference to more noisy equipment.	Ongoing.		Verified via CoA	C	
10.3	Regularly service all equipment used on-site to ensure the sound power levels remain at or below the levels used in the modelling to assess generated noise levels and compliance with the criteria.	Ongoing.		Verified via CoA	C	
10.4	Maintain a dialogue between the Proponent and surrounding neighbours and the local community to ensure any concerns over construction, operational or transport noise are addressed.	Ongoing.		Verified via CoA	C	
Desired outcome: Noise generated by construction activities does not DECCW nominated criteria nor significantly impact on neighbouring landowners and/or residents.						
10.5	Ensure that all equipment emits sound power levels consistent with the schedules in Appendix A of Spectrum Acoustics (2009).	Ongoing.		Verified via CoA	C	
10.6	Restrict the operation of a maximum of two (2) scrapers during construction operations under temperature inversion conditions, to one of the following areas only. <ul style="list-style-type: none"> the longwall unit assembly area; the ROM coal pad area; the Reject Emplacement Area; or the Brine Storage Area. 	During construction phase.		Outside audit period	N/A	
10.7	Undertake noise monitoring at the private residences most likely to be affected by construction noise.	As required during construction works with real time noise monitoring and attended quarterly monitoring.		Verified via CoA	C	
10.8	In the event that noise monitoring confirms exceedance of noise criteria at privately owned residences, where noise mitigation measures prove ineffective, negotiated agreements will be sought with the affected parties in accordance with the Industrial Noise Policy	As required if exceedances cannot be mitigated.		Verified via CoA	C	
10.9	In accordance with the Noise Management Plan and to account for inversion impacts, develop an operational protocol in consultation with the DECCW to clearly define operational procedures to be adopted during inversion conditions to minimise impact at adjoining privately owned residences.	Within 3 months of approval.		Verified via CoA	C	
Desired outcome: Noise generated by operational activities does not exceed DECCW nominated criteria more significantly impact on neighbouring landowners and/or residents.						
10.10	Fully enclose the rotary breaker within a shed (or similar) clad with tilt-up aerated concrete panels, or similar.	Prior to commencement of coal processing.		Verified via CoA	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
10.11	Enclose the coal processing plant with clad steel sheeting and line 50% of the internal surface with acoustic insulation.	Prior to commencement of coal processing.		Verified via CoA	C	
10.12	Refrain from using the bulldozer on the Reject Emplacement Area in both the morning and evening periods.	During temperature inversion conditions.		Verified via CoA	C	
10.13	Limit the number of truck movements to the Reject Emplacement Area to 1 load per 15 minute period.	During temperature inversion conditions.		Verified via CoA	C	
10.14	Ensure specific noise attenuation is provided to surface drills when operating over LW1 to LW3 and LW24 to LW26 to achieve a sound power level of 109dB (A).	Prior to surface drilling (under inversion conditions) above the nominated longwall panels.		Verified via CoA	C	
10.15	Update the existing Noise Management Plan.	Within 6 months of approval.		Verified via CoA	C	
Desired outcome: Noise generated by transport activities does not exceed DECCW nominated criteria nor significantly impact on neighbouring landowners and/or residents.						
10.16	Ensure strict adherence to hours of operation, including transport activities.	Ongoing.		Verified via CoA	C	
10.17	Instruct all project employees and contractors to enter and exit the Mine Site in a courteous manner and without causing undue traffic noise.	On inductions (and re-induction).		Verified via CoA	C	
10.18	Maintain the on-site road network to limit body noise from empty trucks travelling on internal roads.	Ongoing.		Verified via CoA	C	
Desired outcome: Blasting undertaken that complies with the nominated DECCW criteria.						
10.19	Ensure that all blasts are designed by a suitably qualified and experienced blasting engineer or shot-firer and that each blast is designed to ensure compliance with the relevant assessment criteria or conditional requirements.	As required.		No blasting has been conducted	NT	
Desired outcome: Implementation of an appropriate noise monitoring program to ensure continuing compliance with the DECCW guideline levels during longwall mining operations.						
10.20	Undertake attended noise monitoring at the residences most likely to be affected by Longwall Project generated noise. "Bow Hills" "Belah Park" "Naroo" "Matilda" ¹ "Oakleigh" "Haylin View" "Newhaven" "Merrilong" ¹	Quarterly.		Verified via CoA	C	
10.21	Increase the frequency of monitoring during the first winter (May to September) of mining operations proposed under this approval. This will also incorporate real time noise monitoring as required under the Stage 1 modification approval.	Monthly.		Outside audit period	N/A	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
10.22	Review and submit noise monitoring results to the DECCW.	Annually.		Verified via CoA/EPL	C	

11. Air Quality

Desired outcome: Site activities are undertaken without exceeding DECCW air quality criteria or goals.

11.1	Minimise the extent of clearing across the Mine Site including the campaigns to construct the area for reject emplacement and construct brine storage ponds.	Ongoing.		Verified via CoA	C	
11.2	Retain cleared trees and branches on the margins of cleared areas for use in stabilising disturbed areas once they are no longer required.	Ongoing.		Verified via CoA	C	
11.3	Undertake soil stripping at times when most appropriate (such as when there is sufficient soil moisture to prevent significant lift-off of dust and at times other than periods of high winds).	Ongoing.		Verified via CoA	C	
11.4	Operate water sprays on all continuous miners, the longwall unit and the breaker feeder to minimise dust creation underground.	Ongoing.		Verified via CoA	C	
11.5	Apply water to the coal at the feed hopper, crusher and at all conveyor transfer and discharge points.	Ongoing.		Verified via CoA	C	
11.6	Fit all surface conveyors with appropriate cleaning and collection devices to minimise the amount of material falling from the return conveyor belts.	Prior to commencement of coal processing.		Verified via CoA	C	
11.7	Enclose the rotary breaker (<i>see Commitment 10.10</i>).	Prior to commencement of coal processing.		Verified via CoA	C	
11.8	Partially enclose all surface conveyors to minimise dust lift off.	Prior to commencement of coal processing.		Verified via CoA	C	
11.9	Cease construction of the brine storage ponds when the prevailing winds are from the northwest quadrant.	Ongoing.		Verified via CoA	C	
11.10	Apply water onto stockpiles and hardstand areas.	Ongoing.		Verified via CoA	C	
11.11	Progressively rehabilitate areas of disturbance including gas drainage areas.	Ongoing.		Verified via CoA	C	
11.12	Progressively rehabilitate areas no longer required for operational purposes.	Ongoing.		Verified via CoA	C	

Desired outcome: Minimise the potential for spontaneous combustion of the coal stored and handled on site.

11.13	Minimise the length of time coal is held in stockpiles.	Ongoing.	Spontaneous Combustion in Surface Coal Stockpiles	Stockpiles are inspected on a minimum of 24 hour basis. In the event combustion is identified the TARP will be initiated.	C	
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Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
			Procedure (May 2021)			
11.14	Monitor coal stockpiles for signs of spontaneous combustion.	Ongoing.	Spontaneous Combustion in Surface Coal Stockpiles Procedure (May 2021)	Stockpiles are inspected on a minimum of 24 hour basis. In the event combustion is identified the TARP will be initiated.	C	
11.15	Immediately report incidents to the appropriate authorities.	Ongoing.	Stockpile Heating and Spontaneous Combustion TARP, March 2025	If an uncontrolled event is identified, the PIRMP would be activated, requiring Notification to appropriate authorities (i.e. fire authority, EPA etc.)	C	
11.16	Extinguish fire by removal from stockpile, spreading and saturation with water.	In the event of ignition.	Stockpile Heating and Spontaneous Combustion TARP, March 2025	Included in procedure – hot coal rolled out and sprayed with water	C	
Desired outcome: Ensure no employee's health is adversely affected as a result of employment at the Longwall Project.						
11.17	Install underground ventilation system to provide fresh air to employees.	Ongoing and as required.		Verified by CoA		
Desired outcome: Minimise greenhouse gas, other gas and odour emissions through reduction in diesel consumption.						
11.18	Optimise and schedule vehicle operations to minimise vehicle movements.	Ongoing.		Verified by CoA	C	
11.19	Maintain engines according to manufacturer's guidelines and keep tyres at optimum pressure.	Ongoing.		Verified by CoA	C	
11.20	Minimises vehicle idling time.	Ongoing.		Verified by CoA	C	
11.21	Prepare an updated Energy Savings Action Plan (ESAP).	Within 12 months of Project Approval.		Verified by CoA	C	
Desired outcome: Implementation of an appropriate air quality monitoring program to ensure continuing compliance with DECCW guideline levels.						
11.22	Monitor deposited dust levels at 8 sites (ND1 to ND8).	Monthly.		Verified by CoA	C	
11.23	Monitor PM ₁₀ levels at 2 sites (ND9 to ND10).	1 in 6 days as per DECCW schedule.		Verified by CoA	C	
11.24	Review and submit dust monitoring results to relevant government agency.	Annually.		Verified by CoA/EPL	C	

12. Soils and Land Capability

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
Desired outcome: Maintenance of soil value for rehabilitation and minimisation of soil loss through erosion.						
12.1	Strip topsoil to a depth of 15 cm and strip subsoil to a depth of 25 cm (where sufficient soil depths are available).	During soil stripping operations.	Interview with Manager Environment and Superintendent – Environment	There are no stockpiles above longwalls – only at the REA for capping the final landform	C	
12.2	Avoid stripping or replacing under wet conditions.	During soil stripping operations.	Interview with Manager Environment and Superintendent – Environment	The audit team was advised that soil stripping is not undertaken during wet conditions	C	
12.3	Stockpile topsoil and subsoil separately with topsoil stockpiles not exceeding 2m in height and subsoil stockpiles not exceeding 3m in height.	During stockpiling operations.	Site observations	The audit team observed separate stockpiles at the REA that appeared to be not exceeding 2m for topsoil and 3m for subsoil.	C	
12.4	Carefully select soil stockpile locations to avoid subsequent movement, to ensure that the soil structure is not degraded.	During soil stripping operations.	Site observations	All stockpiles are within the REA footprint	C	
12.5	Position soil stockpiles to prevent surface water runoff coming into contact with the soil stockpiles.	During soil stockpiling operations.	Site observations	Stockpile appeared to be positioned to avoid surface runoff.	C	
12.6	Construct soil stockpiles with a 'rough' surface to assist in runoff control and seed retention and germination.	During soil stockpiling operations.	Site observations	Stockpiles were observed to have a rough surface.	C	
12.7	Construct up slope water diversion banks to direct overland surface water flow away from soil stockpiles.	During soil stockpiling operations.	Site observations	Upslope water diversion banks were observed to be in place.	C	
12.8	Install protective earthworks such as straw bale or contour bank protection to protect the soil stockpile from overland flow as required.	Following stockpile construction.	Site inspection	Coir logs were observed by the auditor in areas with potential sedimentation.	C	
12.9	Install silt-stop fencing or similar protection immediately down slope of stockpiles and retain until such time as they develop a stable cover of vegetation.	Following stockpile construction.	Site observations	Silt fences were observed on site.	C	
12.10	Sow soil stockpiles with stabilising groundcover species.	Following stockpile construction.	Interview with Manager Environment and Superintendent – Environment	Topsoil stockpile at REA is seeded.	C	
12.11	Retain soil conservation structures, or if disturbed, reinstate these structures to maintain pre-mining soil and water management on the Mine Site.	Ongoing.	Site observations	Re-instatement carried out as required.	C	

Desired outcome: Minimise erosion on the Mine Site as a consequence of subsidence.

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
12.12	Inspect drainage lines, predicted surface cracking zones and other areas of the Mine Site susceptible to erosion, ie. soils of the Purlawaugh Formation on slopes >10°.	At least quarterly.	Site observations	No significant erosion was observed during the site inspection undertaken for this audit. Surface cracking was observed to be repaired using innovative sand slurry pumping technique	C	
12.13	Undertake remedial actions on areas of accelerated erosion, eg. reinstatement or realignment of contour banks, regrading of channels, sowing of cover crops, etc.	Ongoing as required.	Interview with Manager Environment and Superintendent – Environment	The audit team was advised that remedial action are undertaken as required.	C	
Desired outcome: Ensure no tunnelling erosion occurs as a consequence of pipeline channel excavation.						
12.14	Replace soil material in the reverse order to that removed, ie. lower subsoil layers, upper subsoil layers then topsoil	When under construction.		Outside audit period	NT	
Desired outcome: Remediate contaminated soils.						
12.15	Excavate and remove soils contaminated with hydrocarbons or saline water.	Within one month of contamination occurring.	WHC-PRO-NAR-Bioremediation Process Procedure	Contaminated soils are removed to the bioremediation pad and managed as per the BPP.	C	
12.16	(If the contamination is widespread) Remove contaminated material to facility licensed to accept the nominated contamination.	Within one month of contamination occurring.		Not triggered	NT	
12.17	(If the hydrocarbon contamination is limited in area) Remove to a designated 'land farming' location (away from natural drainage) for bio- remediation of hydrocarbon contaminated material.	Within one month of contamination occurring.	WHC-PRO-NAR-Bioremediation Process Procedure	Contaminated soils are removed to the bioremediation pad and managed as per the BPP.	C	
13. Transportation						
Desired Outcome: All motorists travel safely to and from the Mine Site with minimal disruption to Kamilaroi Highway or Kurrajong Creek Road Traffic.						
13.1	Transport coal entirely by rail.	Ongoing.		Verified by CoA	C	
13.2	Erect appropriate road signage.	As required.	Site observations	Appropriate road signage was observed	C	
13.3	Ensure all employees and contractors are regularly informed about the safe driving requirements to and from the mine site.	On induction and ongoing.		Information on safe driving and speeding is included in regular tool box briefings.	C	
13.4	Instruct all employees regarding the possible scenario where the rail crossing is closed at shift change-over and requirement for patience whilst the crossing is closed.	On induction.		In NCO induction	C	
13.5	Transport all oversize loads with all necessary permits.	As required.		As required	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
13.6	Manage the maintenance of the Mine Access Road, Kurrajong Creek Road, North Western Branch Railway Crossing.	Ongoing for the life of the mine.	Site observations	The mine access road was observed to be in good condition	C	
Desired outcome: An improved understanding of the cumulative impacts of increased rail traffic on all stakeholders impacted by increased rail traffic to Port Newcastle.						
13.7	Work co-operatively with the relevant authorities, and as required ARTC, in terms of financial and in kind commitment of resources (to be agreed with the relevant authority and on an equitable basis with other rail users) in a study into the cumulative impacts of increased rail traffic from all sources.	When commissions by the relevant authority.		Not triggered	NT	
Desired outcome: An understanding of the implications of the cumulative impacts of increased rail traffic, on traffic flow in and about the township of Gunnedah.						
13.8	Work co-operatively with Gunnedah Shire Council in terms of financial and in-kind commitment of resources (to be agreed with Gunnedah Shire Council and on an equitable basis with other rail uses) in an Integrated Traffic Management Study to be commissioned by Gunnedah Shire Council.	When commissioned by Gunnedah Shire Council.		Not triggered	NT	
14. Visual						
Desired Outcome: The operation of the Siding Springs Observatory is not affected by project operations.						
14.1	Use soft lighting on the Pit Top Area to minimise impact on surrounding residents while allowing for evening maintenance and deliveries / night train loading activities.	Night-time operations.		No complaints received	NT	
Desired Outcome: Restriction of vantage points of project activities from neighbouring residences and public roads.						
14.2	Maintain the perimeter amenity bund and vegetate with native grasses, shrubs and trees.	During the site establishment phase.		Outside audit period	N/A	
14.3	Construct and vegetate a bund wall around the ventilation shaft areas to restrict the visibility of the activities from neighbouring residences.	During the site establishment phase.		Outside audit period	N/A	
14.4	Rehabilitate and revegetate all areas no longer required for site operations to ensure the maximum area of grassed paddock is present.	Ongoing.		Verified via CoA	C	
14.5	Construct / paint the load-out bin above the rail load-out area and site buildings in a grey / green hue to limit their overall visibility.	During the site establishment phase.		The load out bin was observed to be of a grey/green hue.	C	
15. Community Contributions						
Desired Outcome: Keep surrounding land owners and land users informed about site activities.						
15.1	Maintain the Community Consultative Committee or similar and include local community representatives.	Ongoing.	CCC meeting minutes	The CCC is maintained and meetings are held on a quarterly basis	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
15.2	Provide regular newsletters regarding project progress and operations.	Ongoing.	CCC meeting minutes NCO Website	CCC minutes are published on the website Newsletters are posted on the website	C	
Desired Outcome: Contribute to the Local Community through appropriate contributions to Community Enhancement Activities.						
15.3	Provide funding of \$100,000 to the Gunnedah Shire Council Community Enhancement fund. Funding to be spread out equally over 5 annual instalments.	For 5 years.		Outside audit period	N/A	
15.4	Provide funding of \$1,500,000 to the Narrabri Shire Council Community Enhancement Fund. Funding to be provided in two instalments over two years.	2 years.		Outside audit period	N/A	
16. Environmental Monitoring						
Desired Outcome: Implement a comprehensive and ongoing surface water monitoring program.						
16.1	Monitor surface water quality for: pH, EC, TDS, TSS, Total Organic Carbon at locations upstream and downstream of the Pit Top Area on Kurrajong and Pine Creeks and their tributaries (See also <i>Commitment 7.27</i>).	Quarterly during surface flows.		Verified via CoA	C	
16.2	Record the volume and quality (pH, EC, TDS, TSS, Total Organic Carbon) of water extracted and discharged to the Namoi River (see also <i>Commitment 7.28</i>).	Weekly.		Verified via CoA	C	
16.3	Record extraction volumes including weekly totals from all pumping bores and weekly totals from underground and open cut sump (see also <i>Commitment 6.4</i>).	Weekly.		Verified via CoA	C	
16.4	Record Volumes of water introduced to the mine for longwall operation and other requirements (see also <i>Commitment 6.5</i>).	Weekly.		Verified via CoA	C	
16.5	Record the groundwater quality (EC and pH) discharged from the underground workings and water supply bores (See also <i>Commitment 6.6</i>).	Monthly.		Verified via CoA	C	
16.6	Sample and analyse water from all pumping bores and underground for the following parameters. <ul style="list-style-type: none"> • EC, TDS, TSS and pH. • Calcium, magnesium, sodium and potassium. • Carbonate, bicarbonate, sulphate and chloride. • Aluminium, arsenic, boron, cobalt, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, silver, selenium, zinc. • Ammonia, nitrate, phosphorus, reactive phosphorus (see also <i>Commitment 6.7</i>). 	Quarterly.		Verified via CoA	C	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
16.7	Record (by manual monitoring, or continuous automated monitoring) the standing water levels of piezometers P1 to P27 and WB1 and WB8 (and others as constructed) (see also <i>Commitment 6.8</i>).	Monthly initially and Quarterly after first 12 months.		Verified via CoA	C	
16.8	Monitor the flow rate and water quality of the spring discharge from "Mayfield Spring" (see also <i>Commitment 6.9</i>).	Monthly initially and Quarterly after first 12 months.		Verified via CoA	C	
16.9	Install additional multi-level vibrating wire piezometers over LW1 to LW3 to obtain detailed data as to the impact of mine subsidence on the groundwater of the various strata above the underground workings (see also <i>Commitment 6.10</i>).	Prior to commencement of longwall mining.		Verified via CoA	C	
16.10	Collect data from the vibrating wire piezometers and compare against initial groundwater and subsidence modelling predictions (see also <i>Commitment 6.11</i>).	Data collected continuously and downloaded and analysed quarterly.		Verified via CoA	C	
16.11	Commission an experienced hydrogeologist to collate and review the monitoring data collected annually in order to assess the impacts of the project on the groundwater environment, and to compare any observed impacts with those predicted from groundwater modelling (see also <i>Commitment 6.12</i>).	Annually.		Verified via CoA	C	
16.12	Develop the groundwater monitoring program in consultation with the Proponent's consultant hydrogeologist, the Department of Environment, Climate Change and Water – Office of Water and those groundwater users potentially affected by the project (see also <i>Commitment 6.13</i>).	Prior to commencement of longwall mining.		Verified via CoA	C	
Desired Outcome: Implementation of an appropriate noise monitoring program to ensure continuing compliance with DEC guideline levels.						
16.13	Undertake attended noise monitoring at the residences most likely to be affected by Longwall Project generated noise. "Bow Hills" "Belah Park" "Naroo" "Matilda" "Oakleigh" "Haylin View" "Newhaven" "Merrilong" (see also <i>Commitment 10.20</i>)	Quarterly.		Verified via CoA	C	
16.14	Increase the frequency of monitoring during the first winter (May to September) of construction or mining operations. (see also <i>Commitment 10.21</i>) This will also incorporate real time noise monitoring in accordance with requirements under the Stage 1 modification approval.	Monthly.		Verified via CoA	C	
16.15	Review and submit noise monitoring results to the DECCW. (see also <i>Commitment 10.22</i>).	Annually.		Verified via CoA/EPL	C	

Action No	Action	Timing	Reference/Evidence	Comments	Compliance Status	Recommendations
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Desired Outcome: Implementation of an appropriate air quality monitoring program to ensure continuing compliance with DEC guideline levels.

16.16	Monitor deposited dust levels at 8 sites (ND1 to ND8). (see also <i>Commitment 11.22</i>).	Monthly.		Verified via CoA	C	
16.17	Monitor PM ₁₀ levels at 2 sites (ND9 to ND10). (see also <i>Commitment 11.23</i>).	1 in 6 days as per DECCW schedule.		Verified via CoA	C	
16.18	Review and submit dust monitoring result to relevant government agency. (see also <i>Commitment 11.24</i>).	Annually.		Verified via CoA/EPL	C	

17. Documentation

Desired Outcome: A systematic set of documents are in place to guide the planning and implementation of all environmental management strategies.

17.1	Incorporate the environmental procedures in an on-site management system.	Prior to relevant activity.	Interview with Manager Environment and Superintendent – Environment	A management system is implemented	C	
17.2	Prepare or update the following management and monitoring plans; <ul style="list-style-type: none"> • Mining Operations Plan • Aboriginal Cultural Heritage Management Plan • Energy Savings Action Plan • Waste Management Plan • Water Management Plan • Landscape Management Plan • Greenhouse Gas Minimisation Plan • Gas Drainage & Outburst Management Plan • Major Hazard Management Plan • Salinity Contamination Contingency Plan • Extraction Management Plan • Erosion & Sediment Control Plan • Noise Monitoring Program 	Various and as nominated by project approval.	NCO Website	All management plans are developed and documented.	C	
17.3	Incorporate relevant environmental data and information in Annual Environmental Management Reports.	Annually.	Annual Reviews	Annual reviews	C	

18. General

Desired Outcome: All buildings meet necessary building codes and specifications.

18.1	Construct all buildings with certification by Narrabri Shire Council.	During site establishment phase.		Outside audit period	N/A	
18.2	Implement a policy encouraging employment of local district personnel, with arrangements for training and certification.	Prior to commencement of project.		Outside audit period	N/A	

Action No	Action	Timing	Reference/ Evidence	Comments	Compliance Status	Recommendations
18.3	Include environmental issues in the site induction process for new employees and/or contractors.	Prior to commencement of project.		Outside audit period	N/A	
18.4	Develop and incorporate an environmental training program to ensure all employees and contractors are environmentally responsible and follow all relevant site-specific procedures.	Prior to commencement of project.		Outside audit period	N/A	
18.5	Include environmental issues in the agenda for toolbox meetings with employees and/or contractors.	Ongoing.	Manager Environment and Superintendent – Environment	There is no regular agenda item in toolbox talks, items are included as required or if there is an issue.	C	



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