

Project Approval No: 05_0102 (including modification 05_0102_MOD 1) - Stage 1 Operations Approval dated 13 November 2007, Modification 1 dated 26 March 2010							
Schedule	Condition No.	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
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.	N	Site inspection and audit of compliance documentation found no significant issues relating to environmental management, however non-conformances have been identified. Environmental Management Plans are established. Good level of environmental awareness amongst all staff interviewed as part of the audit.		Refer to responses and proposed actions outlined below.	
	2	The Proponent shall carry out the project generally in accordance with the: (c) conditions of this approval.	N	Non-compliances identified	See separate compliance checklist	Refer to responses and proposed actions outlined below.	
			N	Non-compliances identified	As noted in this checklist	Refer to responses and proposed actions outlined below.	
	8	With the approval of the Director-General, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	N	Management plans submitted progressively. Water management plan submitted in two stages - construction stage and operation stage - both plans approved. DOP have provided approval to submit the greenhouse gas management plan as part of the Stage 2 operations. The environmental monitoring program has not been submitted and DoP have not provided approval for the delayed submission of this document. It is noted however the preparation of environmental monitoring program is not a requirement of the Stage 2 approval. It is noted that the stage 1 approval will be surrendered within 12 months of approval of Stage 2.		All management plans are currently being revised with the majority due to be lodged by 30 June 2011 (as required by the Stage 2 approval). Once lodged, these management plans will supersede the complimentary management plan approved for Stage 1 operations	As required, majority of revised plans due by 30 June 2011
3	6	The Proponent shall: (c) prior to commissioning the ponds, submit an "as constructed" report, produced by an experienced and qualified engineer, to DECC.	N	"As Constructed" report prepared by URS (September 2010) was sighted during the audit but NCM has advised that it has not yet been submitted to DECCW. Ponds A1, A2, and A3 have been commissioned and were in operation at the time of the audit.		Narrabri Mine will submit the 'As Constructed' report to the Office of Environment and Heritage (OEH) (Formerly DECCW)	Within 1 month of receiving approval for this document
	8	The Site Water Balance must: (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.	N	Not specifically described in Site Water Management Plan		The Site Water Balance, part of the Water Management Plan, is being revised for the Stage 2 operations and will include information on measures to minimise water use onsite	30-Jun-11
			N	Requirements for review and recalculation of the site water balance are not specifically identified in the Site Water Management Plan.		The Site Water Balance, part of the Water Management Plan, is being revised for the Stage 2 operations and the requirement for yearly reviews/recalculations will be clearly stated	30-Jun-11
	10	The Surface Water Monitoring Plan must include: (a) detailed baseline data on surface water flows and quality in creeks and other waterbodies that could be affected by the project;	N	Nearby creeks / waterbodies are ephemeral and as such NCM advised that the collection of baseline data was not possible at the time of preparing the SWMP. Since approval of the plan by DoP, NCM have undertaken sampling during wet weather / flow events to establish baseline conditions. NCM have committed to including this information in the Stage 2 SWMP.		The revised Water Management Plan required by the Stage 2 project approval will include information relating to baseline surface water flows and quality. The revised plan is due for submission prior to 30 June 2011	30-Jun-11
	11	The Groundwater Monitoring Program must include: (e) a program to monitor, (by the use of shallow piezometers/lysimeters), detect, and quantify any leakage from the site's evaporation/storage ponds; and	N	Not specifically addressed in either Water Management Plan. NCM advises that piezometers have been constructed however no monitoring has occurred to date.		Monitoring of the piezometers will be outlined in the revised Water Management Plan, which includes water levels, frequency and parameters. The revised Water Management Plan is due for submission prior to 30 June 2011	30-Jun-11
	12	The Proponent shall ensure that the noise generated by the project does not exceed the levels set out in Table 1 at any	N	Results show no exceedances for 2009/2010 reporting period - results discussed in AEMR. For 2008/2009 reporting period, exceedances were recorded in June, July and August 2008. AEMR 2008-2009 outlined reasons for exceedances and mitigative measures put in place. Exceedances were reported to both DoP and DECCW by letters dated 21/8/08 (letters sighted).	Noise monitoring undertaken by Spectrum Acoustics - both attended and non-attended monitoring undertaken. One landowner (Kurrajong) has refused access for monitoring - monitoring conducted at boundary of property and correction factor applied based on calibrated noise model. Following ongoing complaints from the resident of Kurrajong, a Barn-Owl monitor was placed at the boundary between Kurrajong and Claremont for a one month period in May/June 2009. Results of the monitoring showed the mine to be compliant. Sentinex real time noise monitoring delivered to site December 2010. The Kurrajong property was the main source of noise complaints. Narrabri Coal Mine have acquired the property in mid 2010.	The exceedances were managed in accordance with the project approval requirements and measures have been implemented to minimise exceedances from re-occurring. Real time noise monitoring is, and will continue to be, utilised on site to assist in managing noise from the operation. The noise protocol is also being revised as part of the Stage 2 approval.	30-Jun-11
	13	The Proponent shall: (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 AEMR;	N	Management safeguards and ameliorative actions identified in Section 3 of Noise Monitoring Program. The proposed control however only cover road transport. No documentation is provided in relation to undertaking any investigation works for road, rail and / or sleep disturbance issues.		The AEMR prepared for the period 1 April 2010 to 31 March 2011 states that given the noise compliance during the reporting period, no additional investigations have been conducted	On going
		N	Requirements identified in Section 5 of the Noise Monitoring Program. Effectiveness of individual measures not discussed in 2009/2010 AEMR. Quarterly monitoring noted in the AEMR identifies noise emissions from the site were below the criterion of 35dBA at all receivers		The investigations undertaken to minimise noise generated from the project will be documented in the relevant AEMR. As compliance has been achieved there has been no specific requirement for implementation of other noise management measures to date	On going	

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	23	The Proponent shall ensure that dust emissions generated by the project does not cause additional exceedances of the criteria listed in Tables 4 to 6 at any residence on privately owned land, or on more than 25 percent of any privately-owned land. <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>50 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>30 µg/m³</td> </tr> </tbody> </table> <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>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>50 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>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>2 g/m²/month</td> <td>4 g/m²/month</td> </tr> </tbody> </table> <p><i>Table 6: Long term impact assessment criteria for deposited dust</i></p> <p><small>Note: Deposited dust is assessed as in-situ dust as defined by Standards Australia, 1981, AS/NZS 3560.1.0-2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.</small></p>	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	50 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	30 µg/m ³	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	2 g/m ² /month	4 g/m ² /month	N	Air quality monitoring results reviewed. PM10 24 hr criteria exceeded on 2 occasions at Claremont (both in December 09 (114 ug/m3, and 58 ug/m3)), on 2 occasions at Turrabaa (both in December 09 (86 ug/m3, and 53 ug/m3)), and once exceedance at Turrabaa in May 08 (70ug/m3). Exceedances were reported to DECCW and DOP by letters dated 25/7/08 and 10/2/10 (sighted).	Specific TSP monitoring is not being undertaken. While the approval does not specifically require TSP monitoring to be undertaken, it has specified a criterion. NCM advised that compliance with the TSP criterion is assessed via the interpolation of PM10 monitoring results. It is also noted that while DoP has not confirmed TSP monitoring is not required, it has approved the Air Quality Monitoring Program for the mine which did not include the monitoring of TSP.	Narrabri Mine will submit a letter to DoPI confirming that TSP monitoring is not required	Within 3 months of receiving approval for this document
Pollutant	Averaging period	Criterion																												
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	29	The Proponent shall prepare and implement a detailed Landscape Management Plan for the site to the satisfaction of the Director-General and DPI. This plan must: (a) be submitted to the Director-General for approval within 12 months of this approval;	N	Was due to be submitted by Nov 2008 but Plan not prepared until September 2009. No evidence sighted of any extension of time requested or approved.		Submission of the LMP was late, however was subsequently approved by the DoP. A revised plan will be submitted by the due date of 30th June 2011 for Stage 2 operations.	30-Jun-11																							
	30	The Rehabilitation Management Plan must include: (b) a strategic description of how the rehabilitation of the site would be integrated with surrounding land use;	N	Does not appear to be specifically addressed in management plan.		The revised Landscape Management Plan, including a Rehabilitation Management Plan, includes details on how site rehabilitation will be integrated with the surrounding land use. The revised plan is due to be submitted prior to 30 June 2011	30-Jun-11																							
	34	The Proponent shall construct the Kamaroi Highway intersection in consultation with NSC and to the satisfaction of RTA. This intersection must: (d) include illumination of the Kurradjong Creek Road level crossing during construction of the intersection;	V	This was reported to have been done, however this cannot be verified at this stage as construction has been completed. It was noted that there is currently illumination of the intersection and level crossing.		Narrabri Mine did illuminate the Kurradjong Creek Road level crossing during construction and have therefore met the requirements of this condition	Complete																							
	38	The Proponent shall prepare and implement an Energy Savings Action Plan for the project to the satisfaction of the Director-General. This plan must be: (c) be submitted to the Director-General for approval within 3 months of this approval; and (d) include a program to monitor the effectiveness of measures to reduce energy use on site.	N	Was due to be lodged by February 2008. Sighted email from DoP giving extension of time for submission to 13/5/08. However, Plan was not lodged until September 08.		Submission of the ESAP was late to the DoP, however was subsequently approved. A revised ESAP is currently being prepared to cover Stage 2 development.	30-Jun-11																							
			N	Not clearly specified in Energy Savings Action Plan - some identified in Table 7.2 but does not really meet the intent of the condition.		The revised Energy Savings Action Plan required for the Stage 2 approval will include details of a program to identify and monitor the effectiveness of measures to reduce energy use on site. Once this document is approved, it will replace the existing plan. The revised plan is due to be submitted prior to 30 June 2011	30-Jun-11																							
	40	Prior to carrying out underground coal mining operations, the Proponent shall submit a Greenhouse Gas Minimisation Plan to the Director-General. This plan must: (a) identify options for minimising greenhouse gas emissions from underground mining operations, with a particular focus on capturing and/or using these emissions;	N	Options for minimising greenhouse gas emissions from underground mining have not been specifically identified and discussed in the draft Plan.		The Greenhouse Gas Minimisation Plan will be revised as required by the Stage 2 consent conditions and will incorporate the requirements of this condition	Due prior to the commencement of longwall mining, planned for early 2012																							
		(b) investigate the feasibility of implementing each option;	N	Not specifically addressed in the draft Plan.		The Greenhouse Gas Minimisation Plan will be revised as required by the Stage 2 consent conditions and will incorporate the requirements of this condition	Due prior to the commencement of longwall mining, planned for early 2012																							
		(c) propose the measures that would be implemented in the short to medium term on site; and	N	Some mitigative measures are included in Section 8.3 of the draft Plan, however these do not address the issues associated with pre-mining gas drainage from the underground operations. It was noted on site that CO2 from the pre-mining gas drainage is vented to atmosphere		The Greenhouse Gas Minimisation Plan will be revised as required by the Stage 2 consent conditions and will incorporate the requirements of this condition	Due prior to the commencement of longwall mining, planned for early 2012																							
		(d) include a research program to inform the continuous improvement of the greenhouse gas minimisation measures on site.	N	Not specifically addressed in the draft Plan.		The Greenhouse Gas Minimisation Plan will be revised as required by the Stage 2 consent conditions and will incorporate the requirements of this condition	Due prior to the commencement of longwall mining, planned for early 2012																							

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4	1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must be submitted to the Director-General prior to the commencement of construction activities, and: (b) identify the statutory requirements that apply to the project;	N	The additional requirements associated with the modification need to be included in Section 3 of EMS.	Version provided for audit and available on website has not been amended to include the modification, nor has it been updated to reflect changes in legislation (eg Dangerous Goods). There is no evidence to indicate that a revised version has been submitted to DoP.	The EMS is being revised in accordance with the Stage 2 approval which will include revising the statutory requirements relating to the project. The EMS is due for submission prior to 30 June 2011. Once approved, the Stage 2 EMS, and all other revised management plans, will be published on the Whitehaven website. The Stage 2 EMS also has no requirement to describe the procedures to manage cumulative impacts	30-Jun-11
		(d) describe the procedures that would be implemented to: manage cumulative impacts; and	N	Not specifically addressed			
	2	The Proponent shall prepare and implement an Environmental Monitoring Program for the project to the satisfaction of the Director-General. This program must be submitted to the Director-General within 6 months of this approval and consolidate the various monitoring requirements in schedule 3 of this approval into a single document.	N	The environmental monitoring program has not been submitted and DoP have not provided approval for the delayed submission of this document. It is noted however the preparation of environmental monitoring program is not a requirement of the Stage 2 approval. It is also noted that the stage 1 approval will be surrendered within 12 months of approval of Stage 2 (ie the Stage 1 consent will be surrendered by July 2011).			
3	As soon as practicable, and in any event within 24 hours of detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the exceedance/incident.	N	Noise and air exceedances have been reported - notified to DoP and DECCW - letters sighted as described in Conditions 12 and 23 above - notification was not provided within 24 hours of detecting exceedance.		Narrabri Mine will endeavour to report any future exceedances within the required timeframes	On going	

Compliance:
 N No
 V Verification required

Stage 1 Statement of Commitments

Statement of Commitments - Stage 1 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
1.1	Survey and mark the boundaries of the areas of disturbance on the ground.	V	Construction of Stage 1 has generally been completed. Therefore, it is not possible to verify if the disturbance boundaries were marked out beforehand.	A review of the approved plans and comparison to the actual facilities constructed shows that construction has been undertaken within the approved boundary - this would indicate that areas were most likely marked out beforehand	Continue to mark disturbance areas prior to disturbance and follow the permit to disturb procedure	On going
1.2	Survey and peg the centre line of the site access road.	V	The site access road has been completed, therefore it is not possible to verify if the centreline was pegged		The centre line of the site access road was pegged and the road has been constructed	Complete
2.1	Undertake vegetation clearing/soil removal within the hours of 7.00am to 6.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.2	Undertake box cut excavation and rail loop construction of Surface Infrastructure and Pit Top Area within the hours of 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.3	Undertake raw materials/supply delivery within the hours 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.4	Undertake construction of drifts from box cut during the hours of 7.00am to 10.00pm/7 days.	N	Drift construction undertaken 24 hours 7 days a week as indicated in EA and in various management plans	This commitment is inconsistent with the EA and the various management plans that have been approved, all of which permit drift construction 24/7. Refer to Section 3.3.3 of the Audit Report for further details	As outlined by the auditor, this commitment is inconsistent with the EA and other documentation and Narrabri Mine consider that no further action is required as this is now complete	Complete
3.5	Undertake raw materials/supply delivery within the hours 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
5.8	Undertake noxious weed control or eradication in consultation with DPI (Agriculture) and/or local Noxious Weeds Inspector.	N	No documented evidence of consultation with DPI or local Noxious Weeds Inspector, however D. Young (Whitehaven) advised that local Noxious Weeds Inspector (John Busby from NSC) had been on site approximately 18 months ago and was satisfied with weed management on site		Narrabri Mine will consult with DPI, the Livestock Health and Pest Authority and NSC to confirm current practices of weed control are sufficient. The Landscape Management Plan will also be updated with current weed management practices undertaken on site	Within 6 months of receiving approval for this document
6.6	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.	N	There are a number of self bunded facilities which are considered adequate however, there are also locations where 1000L isotainers and 20L drums were placed at the edge of the bund facility such that if a leak occurred it may not be captured within		Although not specifically required, Narrabri Mine is in the process of developing a Hydrocarbon Management Plan for the site. In addition, a dedicated hydrocarbon storage area has been constructed, which includes an oil/water separator	Develop and implement prior to 31 December 2011
6.7	Securely store all hydrocarbon products.	N	Hydrocarbons including oils and greases were generally observed to be stored in lockable bunded storage containers. However, waste oil was not securely stored.	The location of the temporary waste oil facility adjacent workshop access door is consider to be a high risk area i.e damage due to collision. NCM to consider suitability of the location for a placement waste oil facility	All hydrocarbons will be moved to the newly constructed storage area. Any area that has been used for temporary storage of hydrocarbons will be subject of a contamination assessment, and if required, remediated	As soon as practicable and following the completion of CHPP construction activities
6.12	Monitor the volume of water discharged to, and remaining storage capacity of, the evaporation ponds.	N	The volume of water discharge to the dam is being monitored. The remaining capacity in the dam is however not being monitored at present.		Narrabri Mine is in the process of implementing methods for monitoring water storage levels in the evaporation ponds. The two methods being investigated are gauging boards or electronic water level monitoring equipment	Narrabri Mine is endeavouring to have water level monitoring equipment installed by 31 December 2011
6.13	Undertake an annual review of the water balance and submit a report demonstrating a nil discharge for the equivalent wettest 10 year cycle of the 116 year rainfall record. Following completion of the transient calibration of the groundwater model and first annual review of the water balance, prepare a Dewatering Plan for the project. The plan will include identification of lead times to implement the proposed management strategies.	N	Some assessment undertaken in AEMR. The water management plan is being revised as part of Stage 2 and assessment will be undertaken once the stage 2 plan has been approved.		The Water Management Plan, includes the site water balance, is being revised for the Stage 2 operation and is due for submission prior to 30 June 2011	When the groundwater model has been updated and the revised Water Management Plan approved, a Dewatering Plan will be developed for the Narrabri Mine
6.17	Armour the banks of the rail loop with ballast (larger diameter competent rock).	N	Batters of the rail loop are covered in vegetation negating the need for rock armouring.		As outlined by the auditor, no further action is considered necessary. Narrabri Mine will monitor the condition of the vegetation at the rail loop to ensure a good cover is maintained	On going
7.4	Complete and submit to the DECC a post-construction verification report which includes works as executed drawings for the completed works; final surveyed dimensions and capacities; and results of QA/QC testing verifying that design clay liner depth and permeability has been achieved	N	Sighted As Built Report Narrabri Coal Evaporation and Storage dams dated September 2010. NCM state submission pending.		Narrabri Mine will submit the 'As Constructed' report to the Office of Environment and Heritage (Formerly DECCW)	Within 1 month of receiving approval for this document

Stage 1 Statement of Commitments

Statement of Commitments - Stage 1 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
7.6	Update predictions of salt accumulation within the ponds based on measured dewatered mine in-flows and water quality.	N	No evidence sighted to suggest this is being undertaken.	Commitment relates to a commitment made in the Response to Submissions	Narrabri Mine will develop a procedure for predicting salt accumulation in the evaporation ponds	Within 6 months of receiving approval for this document
7.9	Construct shallow piezometers or soil lysimeters around the evaporation ponds and monitor soil and/or water quality within these (for salinity).	N	Piezometers constructed however no monitoring has occurred to date.		Monitoring program for the piezometers around the evaporation ponds will be outlined in the revised Water Management Plan, which includes water levels, frequency and parameters. The revised Water Management Plan is due for submission prior to 30 June 2011. Once approved, the monitoring program will be implemented on site to replace the existing program	30-Jun-11
7.10	Prepare a Salinity Contamination Contingency Plan, in consultation with the DWE and DECC, presenting details of monitoring and remedial measures to identify and mitigate any salinity contamination	N	No evidence sighted that this has been undertaken although some information on salinity contamination contingencies is contained in Site Water Management Plan	Commitment relates to a commitment made in the Response to Submissions	A Salinity Contamination Contingency Plan will be developed, in consultation with NOW and OEH	Within 6 months of receiving approval for this document
8.3	Prepare quarterly summary reports of monitoring that include average and maximum daily mine water inflow, average water quality (salinity), stored volume of water within the evaporation/storage dam system and remaining capacity within the evaporation/storage dam system.	N	No evidence sighted to indicate that summary reports are being prepared.		Narrabri Mine is in the process of implementing methods for monitoring water storage levels in the evaporation ponds. The two methods being investigated are gauging boards or electronic water level monitoring equipment. Once implemented, quarterly summery reports will be written to summarise water storage volumes	Narrabri Mine is endeavouring to have water level monitoring equipment installed by 31 December 2011
9.1	Clearly identify the boundaries of the Pit Top construction areas. Ensure no clearing occurs outside these boundaries.	V	Construction of the Stage 1 pit top area has been completed, therefore this commitment cannot be verified at this time. However, it was observed that the pit top area appears to have been constructed as outlined in the FA	A review of the approved plans and comparison to the actual facilities constructed shows that construction has been undertaken within the approved boundary - this would indicate that areas were most likely marked out beforehand	Continue to mark disturbance areas prior to disturbance and follow the permit to disturb procedure	On going
9.9	Undertake noxious weed control or eradication in consultation with DPI (Agriculture), Rural Lands Protection office and/or local Noxious Weeds Inspector (Narrabri Coucil weeds officer).	N	No evidence that consultation has been undertaken with DPI or Rural Lands Protection Office. D. Young (Whitehaven) advised that local Noxious Weeds Inspector (John Busby from NSC) had been on site approximately 18 months ago and was satisfied with weed management on site		Narrabri Mine will consult with DPI, the Livestock Health and Pest Authority and NSC to confirm current practices of weed control are sufficient. The Landscape Management Plan will also be updated with current weed management practices undertaken on site	Within 6 months of receiving approval for this document
9.10	Undertake regular inspections of all Pit Top Area water storages for fauna and instigate appropriate measures if fauna identified.	V	Reported to be undertaken however no documented evidence provided to support this statement		Narrabri Mine will develop a checklist to document the findings of inspections of all Pit Top Area water storages	Within 3 months of receiving approval for this document
9.11	Undertake regular reviews of the revegetation program to ensure it remains relevant.	N	No evidence sighted during the audit to indicate that this has been undertaken.		Narrabri Mine will develop a system to document regular reviews of the revegetation program being undertaken on site	Within 3 months of receiving approval for this document
9.15	Prepare a Flora and Fauna Management Plan.	N	No specific Flora and Fauna Management Plan has been prepared, however, components included in the Landscape Management Plan.		The Landscape Management Plan is being revised for the Stage 2 operation and is due for submission prior to 30 June 2011. The revised plan will include details on the fauna and flora management at the site	30-Jun-11
11.3	Avoid stripping or replacing under wet conditions.	V	Reported to be undertaken but no evidence provided at the time of the audit.		Narrabri Mine will develop a checklist to document stripping works being undertaken, including ground condition. Employees/contractors avoid working in wet conditions	On going
11.6	Install silt-stop fencing or similar protection immediately downslope of stockpiles and retain until such time as they develop a stable cover of vegetation.	V	No evidence of control sighted at the time of inspection, although it was noted that the soil stockpiles were generally well vegetated.		Install silt-fencing as necessary. Revised Landscape Management Plan includes measures and controls to be implemented for topsoil and subsoil stockpiles	On going
11.7	Strip topsoil to a depth of 15cm and strip subsoil to a depth of 25cm (where sufficient soil depths are available).	V	Requirements identified in EMS but no documented evidence provided at the time of the audit.		Narrabri Mine will develop a checklist to document stripping works being undertaken, including soil depths	On going
11.12	Implement downslope sedimentation controls as required.	N	Controls were either absent or consisted of a sediment basin (larger disturbance areas only) at the time of the inspection (eg ventilation shaft site). Further measures to be implemented such as diversion bunds and silt fences to be considered		The revised Sediment and Erosion Control Plan will include details on controls to be implemented at the site. The revised Landscape Management Plan will also include measures and controls to be implemented for topsoil and subsoil stockpiles	On going
13.5	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).	V	Requirements identified in EMS but no documented evidence provided at the time of the audit.		Narrabri Mine will develop a checklist to document stripping works being undertaken, including ground condition. Employees/contractors avoid working in wet conditions	On going

Stage 1 Statement of Commitments

Statement of Commitments - Stage 1 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
14.8	Erect appropriate road signage.	V	Road signage has been installed along Site Access Road and at Kurrajong Road/Site Access and Kamilaroi Highway intersection. It is assumed that as both RTA and Council have signed off on the works, the signage is appropriate.	This commitment does not specify what is appropriate road signage or who is responsible for assessing whether the signage is appropriate or not. Whilst signage has been provided as part of the site access road construction and intersection upgrade works, this condition cannot be verified at this time, although in the auditors opinion, the road signage that has been erected is appropriate for the area	Narrabri Mine consider that as the road works were approved by NSC/RTA, the erected road signage is appropriate and the requirements of this condition have been met	Complete
14.10	Transport all oversize loads with all necessary permits.	V	Requirements identified in management plans but no documented evidence available at the time of the audit		Continue to operate in accordance with management plans	On going
15.4	Ensure construction of the eastern end of the rail loop does not occur at times when temperature inversions exist.	V	Noted in Section 3 of the NMP. Rail loop has now been completed.		Construction of the rail loop complete	Complete
15.5	Ensure that excavation of the box cut does not occur under temperature inversion conditions or when winds from the south and east (bearing 90°- 225°) exceed 3m/s until the excavator can be operated below natural surface topography.	V	Noted in Section 3 of the NMP. Box cut has now been completed.		Construction of the box cut complete	Complete
15.6	Ensure that the approved hours of operation are adhered to.	V	Commitment noted but no specific hours documented		Continue to operate in approved hours	On going
15.11	Ensure strict adherence to hours of operation, including transport activities through enforcement by Mine Management.	V	Not specifically included in the site induction		Continue to operate in approved hours	On going
15.12	Instruct project employees and contractors to enter and exit the Project Site in a courteous manner and without causing undue traffic noise	V	Not specifically included in the site induction		Continue to enter/exit the site in a courteous manner and continue to provide information during Daily Startup Meetings	On going
16.2	Provide regular newsletters regarding project progress and operations.	N	NCM reports that regular newsletters have not been provided in the last 12 months but is scheduled to restart in the coming months.		Narrabri Mine will produce a bi-annual newsletter to keep the local community informed on project progress and operations	31-Dec-11
17.7	Monitor the water quality with the evaporation/brine ponds. The analysis will include EC, TDS, pH, TSS, TOC, heavy metals, Sodium Adsorption Ratio (SAR)	N	Water quality monitoring of the evap ponds has only included EC, TDS, pH, TSS, TOC and heavy metals. No results to date for SAR		Narrabri Mine will include SAR in the analysis suite for the evaporation/brine ponds	Within 1 month of receiving approval for this document
17.13	Develop the groundwater monitoring program in consultation with the Proponent's consultant hydrogeologist, the Department of Natural Resources and will include contingency for any identified affected groundwater users.	N	No evidence to indicate that development of the groundwater monitoring program has included consultation with DNR and affected groundwater users.		The revised Water Management Plan will be prepared in consultation with OEH and NOW as required by the Stage 2 consent conditions. Contingency measures will be included for any identified potentially affected groundwater users in the revised plan, due to be submitted prior to 30 June 2011	30-Jun-11
17.14	Commission a review by a qualified hydrogeologist of the results and frequency of monitoring to determine the adequacy of the monitoring program and to provide interim assessment of operational impacts on groundwater levels and identify data gaps in monitoring or impact assessment needs.	V	Some assessment undertaken in AEMR. NCM advised that a complete review has not been undertaken to date as a sufficient time period has not elapsed since the commencement of mining to enable a meaningful assessment of data to be undertaken. NCM are proposing to undertake this assessment in conjunction with the review of the Site Water Management Plan requires as part of the Stage 2 consent		The revision to the Water Management Plan is being undertaken by suitably qualified experts whose appointment has been approved by DoPI. The revision to the plan will include reviewing the frequency and results of the groundwater monitoring program currently being undertaken. The revised plan is due for submission prior to 30 June 2011	30-Jun-11
17.16	Monitor potential leakage of salts from the ponds.	N	Monitoring has not yet commenced.		Monitoring program for the piezometers around the evaporation ponds will be outlined in the revised Water Management Plan, which includes water levels, frequency and parameters. The revised Water Management Plan is due for submission prior to 30 June 2011. Once approved, the monitoring program will be implemented on site to replace the existing program	30-Jun-11
17.17	Undertake soil profile testing down-gradient of the evaporation pond system to assess whether seepage of salts into the soils is occurring	N	Monitoring has not yet commenced.		Soil profile testing will be implemented to complement the revised monitoring program around the evaporation ponds outlined above	Within 3 months of receiving approval for this document
18.4	Prepare the following environmental plans for the project: Flora and Fauna Management Plan	N	Not specifically prepared but components included in Rehabilitation Management Plan Dated September 2009		The Landscape Management Plan is being revised for the Stage 2 operation and is due for submission prior to 30 June 2011. The revised plan will include details on the fauna and flora management at the site	30-Jun-11
	Salinity Contamination Contingency Plan	N	Not yet prepared - water conditioning plant not yet commissioned		A Salinity Contamination Contingency Plan will be developed, in consultation with NOW and OEH	Within 6 months of receiving approval for this document

Stage 1 Statement of Commitments

Statement of Commitments - Stage 1 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
19.2	Implement a policy encouraging employment of local district personnel, with arrangements for training and certification.	N	Staff reported no official policy but generally try to recruit locals where possible.		Narrabri Mine will maintain a preference for employing local personnel, however, this will be contingent on the position and the extent of expertise required for the role. A number of cleanskin personnel have already been employed at site and are undertaking appropriate training as part of their development	On going
19.4	Develop and incorporate an environmental training program to ensure all employees and contractors are environmentally responsible and follow all relevant site-specific procedures.	N	No specific training program in place and training not necessarily formally recorded. However, environmental training is undertaken Eg enviro staff have undertaken Mine Closure training		The site induction, which is completed by all personnel, includes information on appropriate environmental performance on site. In addition to this, where required, specific tool box discussions are held with personnel to confirm awareness of environmental requirements prior to commencing certain tasks	On going

Compliance:

- N No
- V Verification required

Project Approval No: 08_0144 - Stage 2 Operations
Approval dated 26 July 2010

Schedule	Condition No.	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
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.	N	Site inspection and audit of compliance documentation found no significant issues relating to environmental management, however non-conformances have been identified. Environmental Management Plans are established. Good level of environmental awareness amongst all staff interviewed as part of the audit.		Refer to responses and proposed actions outlined in this document.	
	2	(b) statement of commitments (see Appendix 3); and	N	See separate compliance assessment	Non-Conformances were identified.	Refer to responses and proposed actions outlined in this document.	
		(c) conditions of this approval.	N	As discussed in this compliance assessment	Non-Conformances were identified.	Refer to responses and proposed actions outlined in this document.	
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 RTA	V	Sighted letter from Narrabri Council in relation to roadworks. Intersection was observed to be well maintained at the time of the audit.	It is recommended that NCM continue to liaise with NSC and RTA in relation to maintenance of the intersection.	Narrabri Mine will continue to liaise with NSC and the RTA, and any correspondence will be documented	On going
	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.	V	Narrabri Coal has been involved in the study but have not been asked to make a monetary contribution to date.	Continue to liaise with GSC in relation to the study.	Narrabri Mine will continue to liaise with GSC in relation to the Traffic Management Study, and any correspondence will be documented	Modelling work currently being completed by the RTA. Expect completion by end of August 2011
	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 Director-General.	V	The predominant gas associated with the operations is carbon dioxide. During the construction of the gas drainage works, CO ₂ is vented to atmosphere at the gas drainage site. Once the gas drainage infrastructure is completed at each site, gas is pumped to a gas drainage plant in the Pit Top area where it is vented to atmosphere through a diffuser. The GHG Minimisation Plan has been submitted to DoP but not yet approved.	Information on gas volumes and gas quality is being collected as the gas drainage infrastructure is constructed. This information will be utilised to update the Greenhouse Gas Minimisation Plan for the Stage 2 operations.	The information being collected will be used to update the Greenhouse Gas Minimisation Plan	Due prior to the commencement of longwall mining, planned for early 2012

Compliance:

N No
V Verification required

Statement of Commitments - Stage 2 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
1.1	Survey and mark the boundaries of the areas of disturbance on the ground.	V	A review of the approved plans and comparison to the actual facilities constructed shows that construction has been undertaken within the approved boundary - this would indicate that areas were most likely marked out beforehand.		Continue to mark disturbance areas prior to disturbance and follow the permit to disturb procedure	On going
2.1	Undertake vegetation clearing/soil removal within the hours of 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.2	Undertake construction within the Pit Top Area within the hours of 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.3	Undertake construction of the Reject Emplacement Area and Brine Storage Ponds within the hours of 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
2.9	Undertake raw materials/supply delivery within the hours 7.00am to 10.00pm/7 days.	V	Hours of operation identified in Environmental Management Strategy for the site. Interviews with site personnel also identified correct operating hours		Continue to operate in approved hours	On going
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.	N	Not included in Introduction to Site Surface Mobile Plant Checklist.		Narrabri Mine will amend the Introduction to Site procedure to ensure equipment entering the site is clean and free of soil and vegetation.	Within 3 months of receiving approval for this document
4.16	Undertake campaign weed spraying over the Pit Top Area and areas of surface disturbance of the Mining Area in consultation with I&I NSW-Agriculture and/or the local Noxious Weeds Inspector.	N	Weed spraying is undertaken on an ad hoc basis. No evidence of consultation with NSW Agriculture or local Noxious Weeds Inspector.	During the site inspection, it was noted that weeds are not a significant issue for the mine. Some patches of weeds were observed but many of these were dying off after being sprayed.	Narrabri Mine will consult with DPI, the Livestock Health and Pest Authority and NSC to confirm current practices of weed control are sufficient. The Landscape Management Plan will also be updated with current weed management practices undertaken on site.	Within 6 months of receiving approval for this document
7.6	Dewater sediment dams within 5 days of significant rainfall event.	V	Requirements identified in site water management plan.		Undertake operations in accordance with Site Water Management Plan. Implement site procedures in relation to sediment dam requirements and assign responsibilities, as outlined in the Site Water Management Plan	Within 3 months of receiving approval for this document
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.	N	There are a number of self bunded facilities which are considered adequate however, there are also locations where 1000L isotainers and 20L drums were placed at the edge of the bund facility such that if a leak occurred it may not be captured within the bund (refer to Plate 1 in Appendix 8).		Although not specifically required, Narrabri Mine is in the process of developing a Hydrocarbon Management Plan for the site. In addition, a dedicated hydrocarbon storage area has been constructed, which includes an oil/water separator.	Develop and implement prior to 31 December 2011
7.19	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.	V	Whilst some information on erosion and sediment control was noted to be included in the Site Water Management Plan (Stage 1), it does not specifically address the requirements outlined in this commitment. The Stage 1 plan is required to be revised in accordance with the Stage 2 approval with the revised plan due to be submitted by June 2011.		The revised sediment and erosion control plan will include controls relevant to all aspects of operations at Narrabri Mine	Plan due for submission prior to 30 June 2011
7.28	Armour the banks of the rail loop with ballast in flood zone (larger diameter competent rock).	N	Batters of the rail loop are covered in vegetation negating the need for rock armouring.		As outlined in the auditor's report, no further action is considered necessary. Narrabri Mine will monitor the condition of the vegetation at the rail loop to ensure a good cover is maintained.	On going

Statement of Commitments - Stage 2 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
7.30	Participate in, as required, the development of a salt accounting protocol with the DoP, DECCW and NOW.	V	This has not been undertaken as the water conditioning plant has yet to be constructed. Given that Whitehaven personnel advised during the audit that the water conditioning plant is expected to be completed by June 2011, it is considered appropriate that Whitehaven commence consultation with DoP, DECCW and NOW, to determine the requirements for the development of a salt accounting protocol.		Narrabri Mine will liaise with DoPI, OEH and NOW in relation to developing a salt accounting protocol. A Salt Balance will also be included as part of the Site Water Balance revision.	Consultation to commence prior to the commissioning of the water conditioning plant
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).	V	This has not been undertaken as the water conditioning plant has yet to be constructed. As discussed for Commitment 7.30 above, given that Whitehaven personnel advised during the audit that the water conditioning plant is expected to be completed by June 2011, it is considered appropriate that Whitehaven commence negotiations with NOW in relation to the Cap and Pipe the Bores Program, such that an agreement is in place prior to the commissioning of the water conditioning plant.		Narrabri Mine will liaise with OEH and NOW in relation to the "Cap and Pipe the Bores" program	Within 3 months of receiving approval for this document
7.38	Construction of drainage line crossings will be undertaken in accordance with the policy and guideline document of I&I NSW "Why do fish need to cross the road?"	N	No evidence sighted to indicate that this has been undertaken.		Narrabri Mine will expand the ground disturbance permitting process to include assessment of fish and aquatic habitat	Within 3 months of receiving approval for this document
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.	N	No evidence to suggest this has been undertaken. Assessment was not included in the EcoLogical report Water Pipeline and Powerline Pre-Clearing Survey (November 2010).		Narrabri Mine will expand the ground disturbance permitting process to include assessment of fish and aquatic habitat	Within 3 months of receiving approval for this document
8.15	Implement a weed management strategy, in consultation with the Livestock Health and Pest Authority and the Narrabri Shire Council weeds officer, for the retained or rehabilitated natural vegetation within the Mine Site.	N	Weed management is included in the Landscape Management Plan but there is no evidence that consultation with Livestock Pest and Health Authority has occurred as required by this commitment. D. Young (Whitehaven) advised that local Noxious Weed Inspector (John Busby from NSC) had been on site approximately 18 months ago and was satisfied with weed management on site.		Narrabri Mine will consult with the Livestock Health and Pest Authority and NSC to confirm current practices of weed control are sufficient. The Landscape Management Plan will also be updated with current weed management practices undertaken on site.	Within 6 months of receiving approval for this document
8.17	Inspect the sediment dams, evaporation ponds and brine storage ponds for fauna during the course of regular maintenance and operational inspections.	N	Reported to be undertaken however no documented evidence provided to support this statement.		Narrabri Mine will develop a checklist to document the findings of inspections of all Pit Top Area water storages.	Within 3 months of receiving approval for this document
8.18	Undertake regular reviews of the revegetation program to ensure it remains relevant.	N	No evidence to indicate that this is being undertaken.		Narrabri Mine will develop a system to document regular reviews of the revegetation program being undertaken on site	Within 3 months of receiving approval for this document
10.1	Ensure that the approved hours of operation are adhered to.	V	Commitment noted but no specific hours documented		Continue to operate in approved hours and continue to provide information during site inductions	On going
10.16	Ensure strict adherence to hours of operation, including transport activities.	V	Not specifically included in the site induction but reported to be reinforced at Daily Startup meetings.		Continue to operate in approved hours and continue to provide information during Daily Startup Meetings	On going
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	V	Not specifically included in the site induction but reported to be reinforced at Daily Startup meetings.		Continue to enter/exit the site in a courteous manner and continue to provide information during Daily Startup Meetings	On going
11.18	Optimise and schedule vehicle operations to minimise vehicle movements.	V	Reported to be undertaken but no documented evidence available at the time of the audit.		Continue to optimise and schedule vehicle operations. Document measures adopted to meet this commitment	Within 6 months of receiving approval for this document
12.1	Strip topsoil to a depth of 15cm and strip subsoil to a depth of 25cm (where sufficient soil depths are available).	V	Requirements identified in EMS but no documented evidence provided at the time of the audit.		Narrabri Mine will develop a checklist to document stripping works being undertaken, including soil depths	On going

Statement of Commitments - Stage 2 Approval						
	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
12.2	Avoid stripping or replacing under wet conditions.	V	Requirements identified in EMS but no documented evidence provided at the time of the audit.		Narrabri Mine will develop a checklist to document stripping works being undertaken, including ground condition. Employees/contractors avoid working in wet conditions	On going
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.	V	No evidence of control sighted at the time of inspection, although it was noted that the soil stockpiles were generally well vegetated.		Install silt-fencing as necessary. Revised Landscape Management Plan includes measures and controls to be implemented for topsoil and subsoil stockpiles	On going
13.2	Erect appropriate road signage.	V	Road signage has been installed along Site Access Road and at Kurrajong Road/Site Access and Kamilaroi Highway intersection. It is assumed that as both RTA and Council have signed off on the works, the signage is appropriate.	This commitment does not specify what is appropriate road signage or who is responsible for assessing whether the signage is appropriate or not. Whilst signage has been provided as part of the site access road construction and intersection upgrade works, this condition cannot be verified at this time, although in the auditors opinion, the road signage that has been erected is appropriate for the area.	Narrabri Mine consider that as the road works were approved by NSC/RTA, the erected road signage is appropriate and the requirements of this condition have been met	Complete
13.5	Transport all oversize loads with all necessary permits.	V	Requirements identified in management plans.		Continue to operate in accordance with management plans	On going
13.6	Manage the maintenance of the Mine Access Road, Kurrajong Creek Road, North Western Branch Railway Crossing.	V	Sighted letter from Narrabri Council in relation to roadworks. Intersection was observed to be well maintained at the time of the audit.	It is recommended that NCM continue to liaise with NSC and RTA in relation to maintenance of the intersection.	Narrabri Mine will continue to liaise with NSC and RTA in relation intersection maintenance	On going
13.7	Work co-operatively with the relevant authorities, and as required by 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.	V	Narrabri Coal has been involved in the study but have not been asked to make a monetary contribution to date. NCM contribution to the study is based on impacts of additional rail movements on traffic in Gunnedah.	Continue to liaise with ARTC in relation to the study.	Narrabri Mine will continue to liaise with ARTC in relation to the study	On going
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 users) in an Integrated Traffic Management Study to be commissioned by Gunnedah Shire Council.	V	Narrabri Coal has been involved in the study but have not been asked to make a monetary contribution to date. NCM contribution to the study is based on impacts of additional rail movements on traffic in Gunnedah.	Continue to liaise with GSC in relation to the study.	Narrabri Mine will continue to liaise with GSC in relation to the study	On going
14.3	Construct and vegetate a bund wall around the ventilation shaft areas to restrict the visibility of the activities from neighbouring residences.	V	The bund wall around the ventilation shaft area has not yet been constructed, although construction of the ventilation shaft is in progress. It is understood that this control was associated with the Kurrajong property which has since been acquired by NCM and is therefore considered no longer relevant.		Narrabri Mine will construct a bund after the ventilation shaft has been completed with material left over from the construction process.	Following construction of the ventilation shaft
15.2	Provide regular newsletters regarding project progress and operations.	N	NCM reports that this hasn't been happening but is scheduled to restart in the coming months.		Narrabri Mine will produce a bi-annual newsletter to keep the local community informed on project progress and operations	31-Dec-11
18.2	Implement a policy encouraging employment of local district personnel, with arrangements for training and certification.	N	Staff reported no official policy but generally try to recruit locals where possible.		NCM will maintain a preference for employing local personnel, however, this will be contingent on the position and the extent of expertise required for the role. A number of cleanskin personnel have already been employed at site and are undertaking appropriate training as part of their development	On going
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.	N	No specific training program in place and training not necessarily formally recorded. However, environmental training is undertaken Eg enviro staff have undertaken Mine Closure training		The site induction, which is completed by all personnel includes information on appropriate environmental performance on site. In addition to this, where required, specific tool box discussions are held with personnel to confirm awareness of environmental requirements prior to commencing certain tasks	On going

Compliance:
 N No
 V Verification required

Environment Protection Licence No. 12789

Review Due Date: 20/2/2013

Condition No.	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
L6.1	Noise from the premises must not exceed: (a) 35 dB(A)LAeq(15minute) during the day (7am to 6pm), evening (6pm to 10pm) and night (10pm to 7am) for construction activities. Where LAeq means the equivalent continuous noise level - the level of noise equivalent to the energy-average of noise levels occurring over a measurement period.	N	Monitoring data shows that noise exceedances were recorded during the winter months of 2008.	Exceedances were reported to DECCW, investigations were undertaken, reasons for exceedances identified and mitigative measures put in place.	The exceedances were managed in accordance with the project approval requirements and measures have been implemented to minimise exceedances from re-occurring. Real time noise monitoring is, and will continue to be utilised on site to assist in managing noise from the operation. The noise protocol is also being revised as part of the Stage 2 approval	On going
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	N	No written evidence that notifications made by phone.		Narrabri Mine will document all calls made to the Environmental Line	On going
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	N	Written notifications of air and noise exceedances were provided to DECCW by letters dated 25/7/08, 21/08/08 and 10/2/10 but these were not provided within 7 days of the incident.		Narrabri Mine will endeavour to report any future exceedances within the required timeframes	On going
E1.1	Prior to the commissioning of the evaporation and storage ponds, the licensee must provide the DECC 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.	N	"As Constructed" report prepared by URS (September 2010) was sighted during the audit but NCM has advised that it has not yet been submitted to DECCW.		Narrabri Mine will submit the 'As Constructed' report to the Armidale office of OEH (Formerly DECCW)	Within 1 month of receiving approval for this document

Compliance:

N No
V Verification required

Mining Lease No: 1609
 Lease granted 18 January 2008 - due to expire January 2029
 Conditions 2-8 and 17-23 are identified as conditions relating to environmental management.

No non-conformances identified

Condition No.	Requirement	Compliance Y/N/NT	Evidence	Auditor's Comments/Additional Information	Proposed Action/Response	Due Date
17	(1) At least twenty eight days prior to commencement of drilling operations the lease holder must notify the relevant Department of Climate Change and Environment regional hydrogeologist of the intention to drill exploratory drill holes together with information on the location of the proposed holes.	V	Evidence required to confirm that exploratory holes have been drilled.		Narrabri Mine notified DPI in February 2008 and again in March 2011 of pending exploration activities. Letters are saved on the Narrabri Mine server for reference.	Notify as required

Compliance:

N No
 V Verification required