



Independent Environmental Audit 2025

Rocglen Mine

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Independent Environmental Audit 2025

Rocglen Mine

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EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd ('ERM') was commissioned to perform an Independent Environmental Audit (IEA) of the Rocglen Mine (or 'the Site') located in Gunnedah, New South Wales on behalf of Whitehaven Coal Limited (herein referred to as 'WHC'). The primary purpose of the audit was to satisfy the Department of Planning Minister's Conditions of Approval (CoA) for the Rocglen Project Approval Number 10_0015 as modified (up to and including MOD4) dated October 2018, which requires completion of an independent audit by the end of March 2013 and every three years thereafter. The audit period assessed in this IEA is 7 April 2022 through 22 May 2025 (the date of the site visit's completion).

The audit included a review of:

- Department of Planning, Heritage and Infrastructure (DPHI), Minister's Conditions of Approval (CoA) Project Approval Number 10_0015 (PA) as modified (up to and including MOD 4);
- Environmental Protection Licence (EPL) 12870;
- Mining Leases 1620 and 1662;
- Water Access Licences 29461 and 36758; and
- Implementation of Management Plans developed as part of the Ministers Conditions of Approval.

The Rocglen mine has completed mining operations and was in the current audit period undertaking rehabilitation works. WHC has established the control systems generally required for the current stage of development. Non-compliances identified are generally considered to be related to discrete events. 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 ISO 19011:2018 and as described in the Department of Planning & Environment publication "Post Approval Requirements – Independent Audit" issued May 2020. The number of non-compliances with the statutory conditions and implementation of the management plans is summarised in Table E.0.1 below.

TABLE E.1 SUMMARY OF AUDIT FINDINGS

Review	Non-compliances (NC)	Observations
Statutory Instruments	3 (+ 1 duplicate)	1 Observation
Implementation of Plans	-	1 Observation (+ 1 duplicate)

The assessment determined there were 3 instances of non-compliance (+ 1 duplicate NC) with the CoA during the audit period. 2 Observations (+1 duplicate Obs), opportunities for improvement were also identified.

The Rocglen Mine was observed to be largely well managed with appropriate management systems in place for the rehabilitation activities being undertaken.

An action response table is to be developed by the Rocglen Mine addressing all audit findings and will be submitted separately to this report.

1. INTRODUCTION

Environmental Resources Management Australia Pty Ltd ('ERM') was commissioned to perform an Independent Environmental Audit (IEA) of the Rocglen Mine (or 'the Site') located in the Gunnedah Local Government Area (LGA), New South Wales on behalf of Whitehaven Coal (herein referred to as 'WHC'). The primary purpose of the audit was to satisfy the Department of Planning Minister's Conditions of Approval (CoA) for the Rocglen Project Approval Number 10_0015 ('PA') as modified (up to and including MOD4) dated October 2018, which requires completion of an independent audit by the end of March 2013 and every three years thereafter. The audit period assessed in this IEA is 7 April 2022 through 22 May 2025. The audit must:

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

Within 6 weeks of conducting the Independent Environmental Audit site inspection, or within another timeframe agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.

1.1 OVERVIEW OF OPERATION AND APPROVALS

The Rocglen Mine was an open cut coal mine, now closed and in the rehabilitation phase, in the Gunnedah Local Government Area, New South Wales. The mine is wholly owned and operated by WHC. It is located about 30 km north of Gunnedah. The operation commenced in 2008 and ceased production in June 2019. The mine is now undertaking rehabilitation activities.

The Rocglen Mine was granted with the following main approvals:

- The mine was originally approved on 15 April 2008 under PA 06_0198. WHC submitted a new Project Application, under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in March 2010 (Rocglen Mine Extension Project). PA 10_0015 was then issued on 27 September 2011 for the extension project. The final modification (MOD 4) was approved in October 2018 which is the current project approval. PA 06_0198 was formally surrendered on 1 February 2021.
- The project operates over 2 Mining Leases (ML) issued under the *Mining Act 1992*:
 - Mining Lease 1620 was originally issued in June 2008 approving the mining of 1.5 Mtpa of coal using truck and shovel method. The licence was last varied on 17 October 2022; and

- Mining Lease 1622 was originally issued in January 2012 to cover the Rocglen Extension Project, specifically for the water management and overburden placement activities proposed to occur outside the bounds of ML 1620. The licence was last varied on 17 October 2022.
- The Rocglen EPL Number 12870 was first issued on 31 July 2008 and last varied on 25 October 2021. The licence was approved for the following activities: i) coal works 0-2,000,000 T annual handling capacity and ii) Mining for coal 0-500,000 T annual production capacity.
- The mine also holds 2 water access licences (WAL 29461 and WAL 36758) issued under the *Water Management Act 2000*, which include a combined share total of 820 ML per year.

The Rocglen Mine was an open pit coal mining operation that ceased operations in 2019 and moved to a closure and rehabilitation stage. Following cessation of mining activities, coal rejects continued to be placed within the pit void until 2020. Final landform contouring and rehabilitation activities were the primary focus of site activities during the audit period, with shaping, soil emplacement, establishment of drainage lines and establishment of vegetation cover and woodland species, the primary objectives of site management.

1.1.1 DESCRIPTION OF PRIMARY PROCESSES UNDERTAKEN DURING THE AUDIT PERIOD

As mining at Rocglen ceased in 2019, operations at site have been primarily focused on rehabilitation activities. All areas, excluding the 2.54 ha of area in which the remaining infrastructure sits, have progressed through Landform establishment and growth medium development during the audit period. Ecosystem and Land Use Establishment continues.

The Site maintains a functioning workshop, which was used to service machinery utilized for rehabilitation bulk earthworks, these servicing activities have largely ceased at site although the workshop is maintained for use if needed in future. In addition, the site has an office and a series of water management dams.

The site produces wastes including:

- General domestic waste from on-site buildings and routine maintenance activities;
- Oils and other hydrocarbons associated with the workshop activities; and
- Steel / scrap metal.

Minimal waste is currently generated at site, but it is still segregated into waste streams and stored on-site for collection and disposal. Waste for the facility is managed by Namoi Waste.

1.2 AUDIT OBJECTIVES

The primary objectives of the audit included:

- assessment of the environmental performance of the site, and its effects on the surrounding environment and sensitive receivers;
- assess whether the site is complying with the requirements in the CoA, and any other relevant consents/approvals (including any assessment, plan or program required under these consents/approvals);
- review the adequacy of any approved strategy, plan, or program required under the abovementioned consents/approvals; and
- identify opportunities for improved environmental management and 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.

1.3 AUDIT SCOPE

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

- the audit to be carried out in accordance with AS/NZS ISO 19011:2018 and as described in the DPHI publication “Post Approval Requirements – Independent Audit” issued May 2020;
- review of compliance against the documentation identified in CoA (as it relates to the current activities at Rocglen Mine) which included:
 - document review of compliance against the CoA;
 - a site inspection to assess compliance against field based CoA;
 - review of supporting plans developed as part of the Consent Conditions and assessment of their adequacy towards effective environmental performance;
 - draft report with results of compliance assessment; issued for comment to WHC; and
 - a final report issued for submission to the DPHI.

The audit covers the period 7 April 2022 through 22 May 2025 and is limited to assessing the activities completed during the audit period.

1.4 AUDIT CRITERIA

The audit covered the following specifications and standards, with a particular focus on activities associated with the current stages of operation. The documents relevant to this audit included:

- Project Approval Number 10_0015;
- EPL 12870;
- Mining Lease 1620 and 1622;
- Implementation of Management Plans:
 - Air Quality and Greenhouse Gas Management Plan;
 - Biodiversity Offset Management Plan;
 - Blast Management Plan;
 - Environmental Management Strategy;
 - Heritage Management Plan;
 - Noise Management Plan;
 - Pollution Incident Response Management Plan;
 - Rehabilitation Management Plan;
 - Road Traffic Noise Management Plan;
 - Traffic Management Plan; and
 - Water Management Plan.
- monitoring results and trends;
- comparison of monitoring results against regulatory limits and CoA limits (where applicable);
- community complaints with review completed for any trends and identifying the source of an established trend; and
- regulatory actions including any letters, penalty notices and prosecutions.

ERM notes that for the assessment of compliance for mining leases, prior to 1 July 2022, is to be conducted against the original ML conditions, and from 2 July 2022, against the requirement of Schedule 8A Standard conditions of the mining leases, as set out in the *Mining Regulations 2016*.

1.5 AUDIT TEAM

The proposed audit team consisted of the lead and support auditors, Rehabilitation Specialist, Partner / technical review and other specialist to advise the auditors (as necessary), endorsed by the Secretary were as follows:

- Andrew Lewis – Lead Auditor and Project Manager;
- Leanne Lee – Support Auditor;
- Andrew Osbourne – Rehabilitation Specialist;
- Heather McKay – Technical review; and
- Oliver Moore – Partner in Charge.

The lead auditor, support auditor and rehabilitation specialist all attended the mine site inspection. Support technical specialists for this IEA were available to provide subject matter expertise to the auditors throughout the duration of the audit if required.

1.6 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:

- a) 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
- b) information taken at or under the particular times and conditions specified, and ERM do not accept responsibility for any subsequent changes.

This report has been prepared solely for use by, and is confidential to, the client and ERM accepts no responsibility for its use by other persons. This report is subject to copyright protection and the copyright owner reserves its rights. This report does not constitute legal or financial advice.

2. AUDIT METHODOLOGY

2.1 METHODOLOGY AND PROCESS

The audit comprised review and assessment of all relevant project documentation, a site inspection, interviews with key personnel and review of records and other related documentation during the dates 21 to 22 of May 2025.

The audit process included the following primary components:

- development of a Terms of Reference developed which included:
 - audit scope and objectives;
 - date and location of audit;
 - members of audit team;
 - list of people to be audited; and
 - list of reference documents and audit criteria;
- a project inception meeting was held on 26 March 2025 to confirm details of the Terms of Reference, site inspection logistics and request for documentation required prior to the site inspection component of the audit;
- an opening meeting was held on 21 May 2025 at site to confirm the audit objectives and scope for the site inspection. It should be noted that the opening (and closing) meetings were attended by the Lead Auditor, Support Auditor and Rehabilitation Specialist. Attendees included:
 - Andrew Lewis – ERM Lead Auditor;
 - Leanne Lee – ERM Support Auditor;
 - Andrew Osborn – ERM Rehabilitation Specialist;
 - Darryl Robinson – Environment and Mine Rehabilitation Manager;
 - Olivia Hulbert – Environmental Advisor (Rehabilitation);
 - Alison Quiroz - Environmental Officer (Rehabilitation); and
 - Sam Mahaffey - Environment Compliance Specialist.
- Site inspection was undertaken on 21 May 2025.
- Any identified gaps/issues were documented and followed up with site personnel and additional information was requested as required. The following personnel provided information and/or accompanied ERM during the site inspection:
 - Darryl Robinson – Environment and Mine Rehabilitation Manager;
 - Olivia Hulbert – Environmental Advisor (Rehabilitation);
 - Alison Quiroz - Environmental Officer (Rehabilitation); and
 - Sam Mahaffey - Environment Compliance Specialist.
- A closeout meeting was held on 22 May 2025 to discuss initial findings and recommendations. Attendees were as per the opening meeting; Attendees included:
 - Andrew Lewis – ERM Lead Auditor;
 - Leanne Lee – ERM Support Auditor;
 - Andrew Osborn – ERM Rehabilitation Specialist;

- Darryl Robinson – Environment and Mine Rehabilitation Manager;
- Olivia Hulbert – Environmental Advisor (Rehabilitation);
- Alison Quiroz - Environmental Officer (Rehabilitation); and
- Sam Mahaffey - Environment Compliance Specialist.
- Preparation of a Final audit report (this report).

2.2 AGENCY AND COMMUNITY CONSULTATION

ERM consulted with the agencies and stakeholders as required including the DPHI Compliance team, Department of Primary Industries and Regional Development Resources Regulator, Rocglen Mine Community Consultative Committee, New South Wales Environment Protection Authority (NSW EPA), as well as the Gunnedah Shire Council. Emails were issued on 2 May 2025. The request for consultation emailed to stakeholders is summarised below:

Consultation email:

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn - Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the EPA. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

Responses are outlined in Table 2.1.

TABLE 2.1 AGENCY AND STAKEHOLDER CONSULTATION SUMMARY

Agency/Stakeholder	Response	Location Addressed in Report
Department of Planning, Housing, and Infrastructure (DPHI) – Compliance	The DPHI requested a focus on the current monitoring requirements from the consent/management plans versus what is actually being carried out. Additionally, a focus on rehabilitation progress against the targets in the Rehabilitation Management Plan and the Rehabilitation Objectives in the consent.	Monitoring conducted at site during the audit period was largely in accordance with CoA and plans. It was noted that there were gaps in the frequency of air monitoring as required by the project EPL and that real-time noise monitoring is no longer conducted due to a variation to the EPL removing the requirement, though the Project Approval does not reflect this change. See report section 3.5.1 and the assessment tables for more details

Agency/Stakeholder	Response	Location Addressed in Report
		Site rehabilitation activities and progress were assessed during the audit and were found to be largely in accordance with targets and objectives. See report section 3.6 and the assessment tables for more details.
Department of Primary Industries and Regional Development NSW – Resources Regulator	No response received.	N/A
New South Wales Environment Protection Authority (NSW EPA)	The EPA responded that following their last inspection of the site in August last year (2024), there were no significant concerns noted.	N/A
Community Consultative Committee (CCC)	No response received.	N/A
Gunnedah Shire Council (GSC)	The GSC responded, Council does not raise any concerns around the parameters of the audit.	N/A
Narrabri Shire Council	No response received.	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 auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit;
- **Non-compliant (NC):** The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit;
- **Not Triggered (NT):** A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant;
- **Note:** A statement or fact, where no assessment of compliance is required; and
- **Obs:** Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS ISO 19011:2018 and as described in the DPHI publication "Post Approval Requirements – Independent Audit" issued May 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.

3. AUDIT FINDINGS

3.1 PREVIOUS AUDIT FOLLOW UP

The last audit was conducted by ERM for the period 22 February 2019 to 6 April 2022. A summary of the 2022 audit findings and their status is summarised below in Table 3.1.

TABLE 3.1 SUMMARY OF 2021 AUDIT FINDINGS

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
<i>Minister's Conditions of consent PA10_0015</i>					
Sch 2, C7	By the end of September 2012, or as otherwise agreed by the Secretary, the Proponent shall surrender the existing approval for the Rocglen Coal Mine (06_0198) in accordance with section 75YA of the EP&A Act.	ERM reviewed a letter formally surrendering the approval (06_0198) dated 1/2/21. The surrender date was after the deadline required by this condition and ERM was not provided with documentation formally extending the deadline. Given that during the audit period, the proponent held the approval (06_0198) and the deadline had passed, an administrative non-compliance has occurred within the audit period. The approval was surrendered during the audit period, therefore no further action is required to rectify this item.	ANC	No further action required, item closed.	Deemed as Not Triggered in current audit period (as closed in previous audit period).
Sch 2, C11	The Proponent shall ensure that all the plant and equipment used on site, or to transport coal from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	During the site inspection it was observed that plant and equipment were generally maintained in a proper and efficient condition and operated appropriately. There were no examples of failure to maintain equipment identified by ERM. Rocglen utilises the Pulse system to track maintenance by creation of work orders that are tracked in the database and closed out upon completion of the works by verification checklists and other means. Maintenance schedules are put into the system based on manufacturers specifications when the plant/equipment is procured and ad hoc requirements are entered by site staff as needed. ERM interviewed the engineer in charge of maintaining the work order system and reviewed the open work orders for the Rocglen mine. The majority of work orders reviewed demonstrated completion of the task and close out with verification documentation. It was observed that a number of work orders associated with routine maintenance remained beyond the due date of the work order, indicating that the plant and equipment in question has not been subject to the required maintenance or servicing or that the work order system was not updated to reflect completion of the work. These work orders included maintenance for a light vehicle (alternator replacement required in 2018) and a 500 hour inspection for a dump truck (required in 2020). Site management reported that these activities were either undertaken or completed externally and that the work orders were not closed out in the system, despite the work being completed.	C (Obs)	Review management of the Pulse system and ensure that work orders associated with Rocglen are either closed out in the system or removed from Pulse if they are not required.	This condition was deemed Compliant during the current audit period.

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
Sch 3, C22	The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be prepared in consultation with the EPA, DoI Lands & Water and DRG by suitably qualified and experienced persons whose appointment has been approved by the Secretary, and submitted to the Secretary for approval by the end of February 2012. In addition to the standard requirements for management plans (see condition 2 of schedule 5), this plan must include: (a) a Site Water Balance that: - includes details of: - sources and security of water supply; - water use on site; - water management on site; - any off-site water transfers; - describes what measures would be implemented to minimise water use on site; and - is to be updated each year during the annual review; (b) a Surface Water Management Plan, that includes: - a detailed description of the water management system on site, including the: - clean water diversion systems; - erosion and sediment controls; and - water storages; - detailed plans, including design objectives and performance criteria, for: - design and management of the final void; - reinstatement of drainage lines on the rehabilitated areas of the site; and - control of any potential water pollution from the rehabilitated areas of the site; - performance criteria for the following, including trigger levels for investigating any potentially adverse impacts: - the water management system; - surface water quality in Driggle Draggie Creek or the unnamed creek to the south of the site; - the health of any riparian vegetation in Driggle Draggie Creek or the unnamed creek to the south of the site; - a program to monitor: - the effectiveness of the water management system; - surface water flows and quality in Driggle Draggie Creek and the unnamed creek to the south of the site; - the health of any riparian vegetation in Driggle Draggie Creek or the unnamed creek to the south of the site; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project; (c) a Groundwater Management Plan, which includes: - performance criteria, including trigger levels for investigating any potentially adverse groundwater impacts; - a program to monitor: - groundwater inflows to the mining operations;	The site operates under a Water Management Plan, dated 6/6/18. The plan's original submission to the Department was required prior to this audit period, therefore the February 2012 deadline was not triggered for this audit. The current version of the plan has been endorsed by the Department and includes the following items: (a) a detailed site water balance – sources and security of water supply is discussed (model inputs) along with the water consumption methods (model outputs) and the measures to manage water on-site and details of any off-site water transfers, in Section 3. (b) a surface water management plan – this includes the water management system, displaying the storage locations, clean water diversion system and erosion and sediment controls. The design objectives and performance criteria for the final voice, drainage lines and pollution control are detailed in Section 4. (c) a groundwater management plan – this plan includes baseline data and assessment criteria, a detailed monitoring schedule and response plan for any identified impacts, an annual groundwater model validation program and a plan for and an exceedance response plan. It was observed that not all storage dams had appropriate level monitors to assess the current storage and available capacity. Groundwater monitoring was undertaken across the site at the locations required by the planning documentation. A comparison to trigger values was not provided in the monitoring spreadsheet but was discussed in the Annual Reviews. Quality of groundwater was identified to be generally consistent across the audit period and examples of impacts were not identified.	NC (Obs)	Reinstate depth level gauge to Dam B.	Deemed as Compliant in current audit period.

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
	- the impacts of the project on any alluvial aquifers; - the seepage/leachate from water storages, backfilled voids, and the final void on site; - a program to validate the groundwater model for the project, and calibrate it to site specific conditions; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse groundwater impacts.				
Sch 3, C32	The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled and disposed of in a lawful manner.	(a) Waste generated by the site is generally limited to waste oil, waste tyres, domestic waste and sewage. Waste was not observed to be generated in quantities exceeding the reasonable expectations of this type of site. Namoi Waste conduct all waste management services for the site and ERM reviewed the waste transport spreadsheet associated with waste removal from the site. Excessive waste removal was not identified. (b) ERM reviewed example checklists that demonstrated that waste management is audited regularly and continuous improvement is taking place at the site. ERM observed waste oil stored in a tank within a sea container in the vicinity of the maintenance area. The sea container was not stored within a bunded area. The bunding for the tank included a dedicated spill tray around the tank and a leak tray in the base of the sea container. The dedicated spill tray was observed not to be in accordance with the requirements of AS1940-2017, which require a minimum of 1 m distance from the tank to the bund. The capacity and integrity of the sea container leak tray are unknown, therefore it is unclear whether the secondary containment for the waste oil storage tank is in compliance with AS1940-2017.	NC (Obs)	Review AS 1940-2017 for secondary containment of used oil storage. Implement review recommendations.	Deemed as Compliant in current audit period.
Sch 3, C34	The Proponent shall rehabilitate the site to the satisfaction of DRG. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EA (and depicted conceptually in Figure 1 in Appendix 5), and comply with the objectives in Table 8. Table 8: Rehabilitation Objectives	In relation to the rehabilitation program being generally consistent with the proposed strategy described in the 2011 EA, ERM identified differences between the EA rehabilitation strategy and the strategy currently being implemented at the site. The primary difference is in the progressive rehabilitation program undertaken for the site, with the EA displaying a more advanced state of rehabilitation for the period covered by the audit than has been achieved. The site has updated rehabilitation planning documents, (including as part of the response to the Section 240 notice) since the EA was published in 2011 and the updated plans have been approved by the Department, therefore Rocglen's divergence from the EA rehabilitation strategy is not considered to represent a non-compliance. In relation to the objectives in Table 8, the final landform has been designed to be a safe, stable and non-polluting landform. Erosive features were observed in the pit void during the audit inspection. Erosion is monitored by the site and repaired where necessary. The extent of rehabilitation is not yet at a stage of maturity where a robust data set is available to demonstrate the mine site, although monitoring is undertaken by the site, including in the final pit void, to assess the site as safe, stable and non-polluting. The final void size and depth has been minimised as far as practicable and the landform is being established consistent with the surrounding environment, therefore Rocglen is compliant with the mine site (as a whole) and final void rows of Table 8. Surface infrastructure remains at the site and is earmarked for decommissioning as part of future stages of rehabilitation, therefore Rocglen is compliant with the surface infrastructure row of Table 8. Other land affected by the project, specifically ecosystem functionality is being established in the rehabilitated areas of the	NC (Obs)	Ecologist currently engaged to Identify and evaluate management methods to reduce exotic ground flora. Management methods will be implemented.	Deemed as Compliant in current audit period.

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
		site, with the CMOP designating the woodland ecosystem extent planned to be achieved by the rehabilitation program. Planting and vegetation establishment is ongoing across the site, with the northern emplacement area comprising the most established rehabilitation work during the audit period. Based on ecological monitoring data from the northern emplacement area from the audit period, the woodland ecosystem areas assessed are dominated by exotic grass species, including pasture species. Trees <2 m tall were observed to be absent in 42% of Rehabilitation Point Assessment areas assessed in 2020 with a decrease observed in 2021. According to the data available and the conclusions of the monitoring reports, further works to promote the native woodland ecosystem in these areas is required. Additional works are being implemented and have been implemented by the site during the audit period to this end, including infill planting. Site management also reported that a plan is in development with expert advice to address the grass species dominant in the woodland ecosystem areas of the northern emplacement area and ensure the rehabilitation of woodland ecosystems is on a trajectory to achieve the outcomes required by this condition. At the time of the audit, this plan had not been finalised or implemented. ERM's observation against this condition is that the woodland ecosystem areas are currently dominated by grasses and without remedial actions, which have not been undertaken during the audit period, to address the prevalence of grasses and promote development of native woodland ecosystem, some areas earmarked for woodland ecosystems are not being established successfully. Adverse socio-economic impacts associated with the mine closure have not been identified during the audit period.			
Sch 3 C35	The Proponent shall carry out the rehabilitation of the site progressively, that is, as soon as reasonably practicable following disturbance.	The site received a Section 240 notice (2020) from the Resources Regulator that raised concerns relating to rehabilitation, including a lack of successful progressive rehabilitation at the site. The notice required an assessment of progressive rehabilitation planning and implementation and identification of corrective actions to mitigate the risks of adverse impact to the environment. The site response to the notice, provided on 18th December 2020 addressed the requirements of the Section 240 notice. Due to the receipt of the Section 240 notice within the audit period, Rocglen were non-compliant with this condition during the audit period under assessment. The site has implemented numerous improvement measures throughout the audit period, including updated planning documentation, improved and newly developed procedures, improved monitoring and maintenance processes and remedial works for rehabilitation areas identified to have limited success. The 2019 CMOP, which was in force during the audit period, contains plans related to the progressive rehabilitation program committed to by the site during the audit period. Plans 3A, 3B and 3C from Appendix A in the 2019 CMOP present indicative figures of the rehabilitation program that was planned for the audit period. The rehabilitation status observed during the audit period and presented in the Annual Reviews and the Annual Site Rehabilitation Plan generally aligns with the quantitative measures from the 2019 CMOP (Total Disturbance Footprint, Total Active Disturbance, Rehabilitation Land Preparation, Ecosystem and Land Use Establishment and Ecosystem and Land Use Development) but does not match the spatial plans presented in Plans 3A, 3B and 3C from Appendix A of the CMOP. Site management advised that the CMOP was under review at the time of the audit.	NC	Actions relating to the Section 240 Notice (2020) have been completed. Updated rehabilitation plans will be presented in the Rehabilitation Management Plan (RMP) and forward program in July 2022.	Deemed as Compliant in current audit period.

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
Sch 5 C4	Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 6 below; (c) the submission of an audit report under condition 8 below; and (d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. <i>Note: This is to ensure 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>	The register details the reviews conducted against the management plans over time. ERM observed that the plans have been subject to review following each of the following annual reviews, IEAs and approval modifications with two exceptions. Reviews were not conducted for the Blast and Noise Traffic Management Plans in 2021 due to these plans no longer being applicable to operations occurring at the site or in the future. Failure to review the plans constitutes an administrative non-compliance against this condition. It is recommended that Rocglen review all plans required under the Planning Approval or obtain written approval from the Department confirming these plans no longer require maintenance and enforcement at Rocglen.	ANC	All Management Plans will be reviewed. Submission to DPIE to remove MP's no longer required	Deemed as Compliant in current audit period.
Sch 5 C10	The Proponent shall: (a) make copies of the following publicly available on its website: - 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, which have been reported in accordance with the 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.	(a) The Rocglen website includes the documents in Condition 2 of Schedule 2 (EA, statement of commitments and a copy of this approval). The following were also identified on the website: - All current approvals - Approved strategies, plans and programs - Monitoring results summaries - Complaints register - CCC meeting minutes - Annual reviews, IEAs and other relevant project data ERM did not identify TOC results within the EPL monitoring data PDFs provided on the website for all samples reviewed, however the lab certificates demonstrated that the testing had been undertaken. Due to the failure to provide a fully comprehensive summary of the monitoring results of the project, an opportunity for improvement exists.	NC (Obs)	Update template to include Total Organic Carbon (TOC). Historic monitoring reports for monitoring points 11 and 12 will be updated to include TOC.	Deemed as Compliant in current audit period.

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status																																								
Environmental Protection Licence 12870																																													
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.	(a) The auditors observed that in general, the processing, handling, movement and storage of materials and substances used as part of the Rocglen operations were considered to be appropriate. However examples of failure to appropriately store oil and coolant IBCs were observed on-site. IBCs in the workshop area were in a concreted area with a rollover bund. Some IBCs were stored on racking within the bund such that a leak from the container has the potential to project the material outside of the bunded area. (b) Compliance with waste management requirements is addressed in the Planning Approval table, Schedule 3, Condition 32.	NC	Complete IBCs are placed on base of bund.	Deemed as Compliant in current audit period.																																								
M2.3	Water and/ or Land Monitoring Requirements POINT 11,12 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Conductivity</td><td>microsiemens per centimetre</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><tr><td>Total organic carbon</td><td>milligrams per litre</td><td>Special Frequency 1</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Special Frequency 1</td><td>Grab sample</td></tr></table> POINT 13,14,15 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Conductivity</td><td>microsiemens per centimetre</td><td>Special Frequency 2</td><td>In situ</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Special Frequency 2</td><td>In situ</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Special Frequency 1	In situ	Oil and Grease	milligrams per litre	Special Frequency 1	Grab sample	pH	pH	Special Frequency 1	In situ	Total organic carbon	milligrams per litre	Special Frequency 1	Grab sample	Total suspended solids	milligrams per litre	Special Frequency 1	Grab sample	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	pH	pH	Special Frequency 2	In situ	ERM reviewed the monitoring data associated with the water monitoring for the site. Points 11 and 12 were monitored for Conductivity, Oil & Grease, pH, Total Organic Carbon, and Total Suspended Solids at Special Frequency 1, in 2019, 2020, 2021 and 2022. The units of measurement were consistent with those required under this condition. Sampling was predominantly undertaken by ALS, with a minor quantity of sampling events undertaken in-house. Sampling methods were consistent with the requirements of this table for the ALS sampling events, however where sampling was undertaken internally, pH and conductivity were not sampled using in situ methods. For these samples pH and conductivity analyses were undertaken at the laboratory and the holding times of the samples were exceeded according to the laboratory documentation reviewed by ERM. Points 13, 14 and 15 were measured for Conductivity, Oil & Grease, pH, Total Organic Carbon, and Total Suspended Solids, at Special Frequency 2, in 2019, 2020, 2021 and 2022 according to the records observed by ERM. Conductivity and pH were not analysed using in situ methods. Point 16 was measured for Aluminium, Arsenic, Bicarbonate, Chloride, Iron, Manganese, Sodium yearly; and Conductivity, Oil & Grease, pH, TOC and TSS quarterly, in 2019, 2020, 2021 and 2022. Chloride results were not available in the 2019 monitoring data, however, was reported in subsequent monitoring records. Conductivity and pH were not analysed using in situ methods.	NC	Sampling undertaken by competent site personnel will record field pH and conductivity.	Deemed as Compliant in current audit period.
Pollutant	Units of measure	Frequency	Sampling Method																																										
Conductivity	microsiemens per centimetre	Special Frequency 1	In situ																																										
Oil and Grease	milligrams per litre	Special Frequency 1	Grab sample																																										
pH	pH	Special Frequency 1	In situ																																										
Total organic carbon	milligrams per litre	Special Frequency 1	Grab sample																																										
Total suspended solids	milligrams per litre	Special Frequency 1	Grab sample																																										
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																																										
pH	pH	Special Frequency 2	In situ																																										

Item No	Assessment Requirement				Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
	Total organic carbon	milligrams per litre	Special Frequency 2	Grab sample				
	Total suspended solids	milligrams per litre	Special Frequency 2	Grab sample				
	POINT 16							
	Pollutant	Units of measure	Frequency	Sampling Method				
	Aluminium	milligrams per litre	Yearly	Grab sample				
	Arsenic	milligrams per litre	Yearly	Grab sample				
	Bicarbonate	milligrams per litre	Yearly	Grab sample				
	Chloride	milligrams per litre	Yearly	Grab sample				
	Conductivity	microsiemens per centimetre	Quarterly	In situ				
	Iron	milligrams per litre	Yearly	Grab sample				
	Manganese	milligrams per litre	Yearly	Grab sample				
	Oil and Grease	milligrams per litre	Quarterly	Grab sample				
	pH	pH	Quarterly	In situ				
	Sodium	milligrams per litre	Yearly	Grab sample				
	Total organic carbon	milligrams per litre	Quarterly	Grab sample				
	Total suspended solids	milligrams per litre	Quarterly	Grab sample				

Item No	Assessment Requirement	Comment (2022)	Audit Classification (2022)	Response/Action (2022)	2025 Status
Mining Lease 1620					
C7	Disturbed land must be rehabilitated to a sustainable/agreed end land use to the satisfaction of the Director-General.	Rehabilitation has been implemented at the site, generally in accordance with the requirements of the planning documentation approved by the Department. The assessment of rehabilitation conducted during the audit period is provided against Schedule 3, Conditions 34, 35 and 36 of the Planning Approval. The end land use has been agreed by the Department and the site is enacting a rehabilitation program designed to achieve the land use in the CMOP.	NC	Ecologist currently engaged to Identify and evaluate management methods to reduce exotic ground flora. Management methods will be implemented.	Deemed as Compliant in current audit period.
Mining Lease ML 1662					
C7	Any disturbance as a result of activities under this lease must be rehabilitated to the satisfaction of the Director-General.	Rehabilitation has been implemented at the site, generally in accordance with the requirements of the planning documentation approved by the Department. The assessment of rehabilitation conducted during the audit period is provided against Schedule 3, Conditions 34, 35 and 36 of the Planning Approval. The end land use has been agreed by the Department and the site is enacting a rehabilitation program designed to achieve the land use in the CMOP.	NC	Ecologist currently engaged to Identify and evaluate management methods to reduce exotic ground flora. Management methods will be implemented.	Deemed as Compliant in current audit period.

3.2 ENVIRONMENTAL PERFORMANCE

A summary of environmental performance relating to complaints, environmental monitoring, water management, Management Plan adequacy, Environmental Protection Licence compliance, the Mining Leases, and compliance with relevant regulatory instruments is provided over the following sections of this report. Table 3.2 summarises ERM's 2025 Audit findings.

The audit undertook an assessment of the Rocglen Coal mine project's actual and predicted impacts, as documented in the Project Environmental Assessment.

The Project has generally been operating to achieve the predicted impacts as defined within the Project Environmental Assessments and no material issues were noted. A number of incidents and events of non-compliances related to the operations were noted during the audit period as listed in Sections 3.8.

3.3 SUMMARY OF NOTICES, ORDERS, PENALTY NOTICES AND PROSECUTIONS

No notices, orders, penalty notices or prosecutions were noted as being issued for the Rocglen coal mine during the audit period.

3.4 COMPLAINTS SUMMARY

Complaints registers for the auditing period were available online and for review. No complaints were received in the audit period.

3.5 ENVIRONMENTAL MONITORING PERFORMANCE

3.5.1 NOISE

Site management advised that no noise monitoring has been conducted since active mining ceased in 2019. ERM did not observe any noise produced from the Site during the site visit. Management also advised that there has not been any demolition or explosive work during the audit period. Noise produced by the site is limited to vehicle and machine movement.

In 2020 following the cessation of mining activities, Rocglen requested a variation to the EPL from the EPA to remove the requirement for active noise monitoring. The variation to the EPL was approved in 2020 and Rocglen then updated the Noise Management Plan (NMP) to remove the noise monitoring requirements, including real-time monitoring. The amended NMP was submitted to the DPHI and approved in September 2020.

It is noted that the Project Approval has not been modified to reflect the approved changes to the EPL and NMP removing the requirement for real-time monitoring. ERM recommends Rocglen consult with the DPHI regarding the requirement and their expectations under the current Project Approval and determine what is required to bring it into line with the EPL.

3.5.2 AIR QUALITY

ERM reviewed the monitoring data associated with air quality and found that the monitoring locations were monitored during the audit period.

Air quality exceedances identified during the audit period were not attributable to mining operations and air quality issues were generally not identified for the site based on the data available.

The site reported the following exceedances of the HVAS PM10 24-hour limit to the Department during the audit period:

- 23 March 2022;
- 22 April 2022;
- 28 February 2023;
- 26 October 2023;
- 08 December 2023; and
- 07 March 2025.

The causes of the exceedances were attributed to grazing activity, regional bushfires and poor air quality across the region. The Department responded on all occasions acknowledging the exceedances and accepting that site activities were unlikely to be responsible for the elevated results.

With only rehabilitation operations at the site, it is unlikely the site has contributed to poor air quality outcomes and poor management of site operations and air quality issues were generally not identified for the site.

ERM noted, in relation to frequency of monitoring, some data was not captured at the required frequency at Point 17 during the audit period due to system failure. The number of consecutive days without monitoring generally ranges from 1-6, with the exception of a 30-day monitoring outage from 18 April 2023 to 19 May 2023 due to a mass flow controller board failure. A total of 61 days during the audit period were identified when monitoring had not been completed.

The EPA Approved methods for sampling and analysing air emissions stated that all continuous emission monitoring (CEM) methods are allowed for 10% downtime. Within the 2022-2023 audit period, a total of 54 days of data gap was recorded at Point 17 which is a 15% downtime during the reporting period. There is no evidence that the TEOM downtime had an impact on air quality.

ERM considers that Rocglen has implemented best air quality management practice during the audit period.

3.5.3 WATER MANAGEMENT

3.5.3.1 SURFACE WATER

Surface water management comprising water storage dams, sediment basins and clean / dirty surface water drains were noted to be in place and established as per the Water Management Plan. Surface water management is primarily functioning to collect drainage from rehabilitated waste rock dump landforms to manage sediment flows.

One water quality exceedance discharge incident was recorded during the audit period related to an off-site release of surface water. Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge as described in Condition L2.5 of the EPL. On 22 September 2022, Water discharge from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. This exceedance was reported to the DPHI and EPA as per R2 and R3 of the EPL and reported as a non-compliance in the Annual Return and Annual Review of that year. Environmental Advisors advised during interview that the Site team had no access to the Site during the flooding in the wider area. Helicopters were sent to the Site as soon as possible in order to redirect the discharge.

EPA acknowledged that the event was to be reported as a non-compliance, though they considered under the circumstance that Rocglen to have done all they could in the circumstances. No further action was required from the EPA.

3.5.4 WATER ACCESS LICENCES

Rocglen holds two Water Access Licences (WAL) for the project, WAL29461 and WAL36758. Rocglen stated no water has been taken under the two WALs during the audit period as mining operations ceased during 2019. The only water used on site during the period was reported to be for some dust suppression activities for rehabilitation works with water being sourced from internal water dams.

3.5.5 BLASTING

Site management advised that there was no blasting conducted during the audit period, hence no exceedances of the applicable ground vibration and air blast overpressure limits during the audit period.

3.6 REHABILITATION PERFORMANCE

The Mining Amendment (Standard Conditions of Mining Leases – Rehabilitation) Regulation 2021 commenced on 2 July 2021. Transitional arrangements for existing mining leases meant these conditions and new requirements came into force at Rocglen on 2 July 2022, towards the beginning of the audit period. Key requirements involved the preparation of a Rehabilitation Management Plan (RMP) and the preparation and submission of a Rehabilitation Objectives Statement (ROBJ), draft Completion Criteria, a Final Landform and Rehabilitation Plan (FLRP), Forward Programs and Annual Rehabilitation Reports. Rocglen has developed and submitted all required documents during the audit period. Approval has been received for the ROBJ and FLRP and Rocglen are awaiting approval of the submitted draft Completion Criteria. Forward Programs and Annual Rehabilitation Reports were submitted in 2022, 2023 and 2024. The RMP was updated twice during the audit period to include approved rehabilitation objectives and in response to recommendations made following a Targeted Assessment Program (TAP) undertaken by the Resources Regulator in August 2024. A third update to incorporate further recommendations from the TAP was in progress at the time of the audit.

Prior to 2 July 2022, Rocglen operated under the existing Closure Mine Operations Plan (CMOP). The rehabilitation strategy implemented at the beginning of the audit period, whilst operating under the CMOP, aligned with the strategy defined in the current RMP and approved FLRP.

No mining was undertaken during the audit period and all bulk rehabilitation material movements had been completed prior to the audit period. Rehabilitation works during the audit period primarily involved placement of growth media, revegetation works and ongoing rehabilitation monitoring and maintenance. Rehabilitation works were undertaken generally in line with the three Forward Programs submitted during the audit period. At the time of the audit all the rehabilitated domains had progressed to the Ecosystem and Land Use Establishment rehabilitation phase as required by the 2025 Forward Program. This was confirmed by observations made during the site inspection.

The infrastructure area remains in the active phase and is not scheduled to be rehabilitated until 2026.

Rocglen maintains an annual rehabilitation monitoring and maintenance program with rehabilitation monitoring reports having been prepared for each year of the audit period. Rehabilitation monitoring reports address revegetation, weeds, feral fauna and erosion and track progress against the draft completion criteria (as documented in the RMP) was submitted to the Resources Regulator (awaiting approval). Annual monitoring is supported by monthly environmental inspections conducted by WHC personnel. Environmental inspection checklists include prompts for inspecting key rehabilitation aspects such as weed presence and erosion.

Rehabilitation maintenance is managed using the Work Request Management (WoRM) spatial webapp. Maintenance activities scheduled and tracked using the WoRM process include in-fill planting and weed control. Minor erosion was observed on the western slope of the void during the site inspection. WHC advised the area had been recorded and was being monitored through the WoRM process.

A rehabilitation risk assessment was completed during the development of the RMP and was in the process of being reviewed at the time of the audit. Weed management has been identified as the highest rehabilitation risk and is captured in the RMP Trigger Action Response Plan (TARP). Weed control is an ongoing management exercise and includes quarterly reporting from a qualified agronomist familiar with the local conditions and background weed loads. WHC have also commenced a study investigating eradication methods for exotic pasture weeds within the Woodland final land use rehabilitation areas.

ERM considers Rocglen has implemented progressive rehabilitation according to the schedule submitted with the current Forward Program. Ongoing monitoring and maintenance programs are considered appropriate for the Ecosystem and Land Use Establishment rehabilitation phase.

3.7 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 (annually following submission of Annual Reviews, following submission of IEA's and following incidents) during the audit period as part of the site's governance program. In general, Management Plans were considered to be appropriate for the Site's operations at the time of the site visit and were found to be adequately implemented at the site except as where stated in the report.

The findings of the Management Plan review are outlined in Table 3.2 and Appendix A.

3.8 ENVIRONMENT PROTECTION LICENCE

The site operates under Environment Protection Licence (EPL) 12870 issued to Whitehaven Coal Mining Limited for the operation of Rocglen Coal Mine. The site submitted Annual Returns to the EPA, as required for the audit period. Non-compliances with the EPL have been reported in the Annual Returns and are discussed in Table 3.2 and Appendix A.

3.9 COMPLIANCE WITH REGULATORY INSTRUMENTS

A compliance check of the CoA, EPL, Mining Leases conditions as well as management plan review has been completed and is provided in Appendix A. Non-compliances and observations for each component are summarised in Table 3.2.

As discussed in Section 2.3, a qualitative risk assessment was also completed on the findings as follows:

- non-compliance assessed as 'high' have been colour coded red;
- non-compliance assessed as 'moderate' have been colour coded orange; and
- non-compliance assessed as 'low' have been colour coded yellow;

TABLE 3.2 SUMMARY OF 2025 FINDINGS

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action
Minister's Conditions of consent PA10_0015				
Sch.3-C3	The Proponent shall: (a) implement best practice noise management to minimise the operational, low frequency, and road traffic noise generated by the project; (b) minimise the noise impacts of the project during temperature inversions; and (c) regularly assess the real-time noise monitoring and meteorological forecasting data and relocate, modify, and/or stop operations on site to ensure compliance with the relevant conditions of this approval, to the satisfaction of the Secretary.	(c) In 2020 following the cessation of mining activities Rocglen requested a variation to the EPL from the EPA to remove the requirement for active noise monitoring. The variation to the EPL was approved and Rocglen then updated the Noise Management Plan (NMP) to remove the noise monitoring requirements, including real-time monitoring. The amended NMP was submitted to the DPHI and approved in September 2020. It is noted that the Project Approval has not been modified to reflect the approved changes to the EPL and NMP removing the requirement for real-time monitoring.	C (Obs)	ERM recommends Rocglen consult with the DPHI regarding the requirement and their expectations under the current Project Approval and determine what is required to bring it into line with the EPL.
Sch.3-C4	Noise Management Plan The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by the end of December 2011; (b) describe the noise mitigation measures that would be implemented to ensure compliance with the relevant conditions of this approval; (c) describe the measures that would be implemented to ensure the noise impacts generated by project related traffic on the Kamlaroi Highway overpass are minimised as far as practicable; and (d) include a noise monitoring program that: uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the project; and includes a protocol for determining exceedances of the relevant conditions of this approval.	(d) The Noise Management Plan no longer includes a noise monitoring program and monitoring is no longer undertaken. It is noted that the Project Approval has not been modified to reflect the approved changes to the EPL and NMP removing the requirement for real-time monitoring. ERM recommends Rocglen consult with the DPHI regarding the requirement and their expectations under the current Project Approval and determine if a modification to the Project Approval is required to bring it into line with the EPL.	C (Obs) – Duplicate with Sch.3-C3	As per Sch.3-C3
Sch.3-C21	Surface Water Discharges The Proponent shall ensure that all surface water discharges from the site comply with the discharge limits (both volume and quality) set for the project in any EPL.	Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge. On 22 September 2022, Water discharge from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. This exceedance was report to the EPA as per R2 and R3 of the EPL, and reported as a non-compliance in the Annual Return and Annual Review of that year. Environmental Advisors advised during interview that the Site team had no access to the Site during the flooding in the wider area. Helicopters were sent to the Site as soon as possible in order to redirect the discharge. Environmental Advisors advised during interview that the Site team had no access to the Site during the flooding in the wider area. Helicopters were sent to the Site as soon as possible in order to redirect the discharge. EPA acknowledged that the event was to be reported as a non-compliance, though they considered under the circumstance that Rocglen to have done all they could in the circumstances. No further action was required from the EPA.	NC	Historical exceedance with no further action required by the EPA and deemed as no ongoing action required.

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action																								
Sch.5-C1	Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by the end of December 2011; (b) provide the strategic framework for environmental management of the project; (c) identify the statutory approvals 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: keep the local community and relevant agencies informed about the operation and environmental performance of the project; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the project; respond to any non-compliance; respond to emergencies; and (f) include: copies of any strategies, plans and programs approved under the conditions of this approval; and a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	(f) Management plan, strategies and programs are not specifically included as part of the EMS but were provided in accompaniment to the EMS. A monitoring plan is provided in Section 2. ERM noted that figure 2 – Current Monitoring Locations still includes the noise monitoring locations, that the 2020 amendment to the Noise Management Plan removed following the 25-1-2021 variation to the EPL which removed the requirement (M8) to monitor noise at those locations.	C (Obs)	ERM recommends that WHC review and if required update Figure 2 during the next scheduled EMS review.																								
Environmental Protection Licence 12870																												
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.	One exceedance of the total suspended solid (TSS) limit was reported in September 2022 due to extreme weather limiting the access to site such that staff could not prevent the discharge from occurring. Water discharge from LDP11 with TSS exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. EPA was notified as per requirements under this licence with no further action required. See condition L2.4 for details.	NC – Duplicate with L2.4	As per Condition L2.4																								
L2.4	Water and/or Land Concentration Limits POINT 11,12 <table><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><tr><td>Oil and grease</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5 – 8.5</td></tr><tr><td>Total suspended solids</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></table>	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	pH	pH				6.5 – 8.5	Total suspended solids	Milligrams per litre				50	Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge. On 22 September 2022, Water discharge from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. This exceedance was report to the EPA as per R2 and R3 of the EPL, and reported as a non-compliance in the Annual Return and Annual Review of that year. Environmental Advisors advised during interview that the Site team had no access to the Site during the flooding in the wider area. Helicopters were sent to the Site as soon as possible in order to redirect the discharge. EPA acknowledged that the event was to be reported as a non-compliance, though they considered under the circumstance that Rocglen to have done all they could in the circumstances. No further action was required from the EPA.	NC	Historical exceedance with no further action required by the EPA and deemed as no ongoing action required.
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																							
pH	pH				6.5 – 8.5																							
Total suspended solids	Milligrams per litre				50																							
M2.2	Air Monitoring Requirements POINT 4,6 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates – Deposited Matter</td><td>grams per square metre per month</td><td>Continuous</td><td>AM-19</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates – Deposited Matter	grams per square metre per month	Continuous	AM-19	In relation to frequency of monitoring, some data were not captured at the required frequency at Point 17 during the audit period due to system failure. The number of consecutive days without monitoring generally ranges from 1-6, with the exception of a 30-day monitoring outage 18 April 2023 to 19 May 2023 due to mass flow controller board failure, and a total of 61 days during the audit period without monitoring. The EPA Approved methods for sampling and analysing air emissions requires that all continuous emission monitoring (CEM) methods are allowed for 10% downtime. Within the 2022-2023 audit period, a total of 54 days of data gap was recorded at Point 17 which is a 15%	NC	Ensure monitoring downtime due to system or equipment failure is within the required range (10% for continuous emission monitoring methods). Ensure downtime due to equipment failure and/or technical issues is actioned as soon as practicable. All corrective actions taken to																
Pollutant	Units of measure	Frequency	Sampling Method																									
Particulates – Deposited Matter	grams per square metre per month	Continuous	AM-19																									

Item No	Assessment Requirement				Comment	Audit Classification	Response/Action
	POINT 10				downtime during the reporting period. ERM considers this as a non-compliance in the monitoring frequency as required by this condition.		address and resolve the issue should be documented comprehensively
	Pollutant	Units of measure	Frequency	Sampling Method			
	PM10	micrograms per cubic metre	Every 6 days	AM-18			
	POINT 17						
	Pollutant	Units of measure	Frequency	Sampling Method			
	PM10	micrograms per cubic metre	Continuous	AM-22			
Mining Lease ML 1620 - No Non-Compliances noted.							
Mining Lease ML 1662 - No Non-Compliances noted.							
Consolidated Standard Conditions (ML 1620 & 1662) - No Non-Compliances noted.							
Water Access Licences 29461 & 36758 – No Non-Compliances noted.							

4. CONCLUSION

An audit of CoA, Environmental Protection Licence, Mining Leases 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.

Overall, compliance was generally achieved with the audit documents that were reviewed. The number of non-compliances with the statutory conditions and implementation of the management plans is summarised in Table 4.1 below.

TABLE 4.1 SUMMARY OF AUDIT FINDINGS

Review	Non-compliances (NC)	Observations
Statutory Instruments	3 (+ 1 duplicate)	1 Observation
Implementation of Plans	-	1 Observation (+ 1 duplicate)

The assessment determined there were 3 instances of non-compliance (+ 1 duplicate NC) with the CoA during the audit period. 2 Observations (+1 duplicate Obs), opportunities for improvement were also identified.

Note: A duplicate finding is defined as where an incident has led to a non-compliance against more than one condition of the Project approvals.

The Rocglen mine was observed to be largely well managed with appropriate management systems. No additional improvement opportunities were noted during the audit.

An action response table is to be developed by WHC addressing all audit findings and will be submitted separately to this report.



APPENDIX A PROJECT APPROVAL, ENVIRONMENTAL
PROTECTION LICENCE AND MINING
LEASE COMPLIANCE TABLES

Document details	
DOCUMENT TITLE	Table A1 - Project Approval
DOCUMENT SUBTITLE	Compliance with Project Approval 10_0015
PROJECT NUMBER	0776499
Date	06 June 2025
Version	1.2
Author	Andrew Lewis / Andrew Osborn
Client name	Whitehaven Coal

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
1.	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the project.	N/A	Compliance with this condition is detailed throughout this report.	Note	N/A
TERMS OF APPROVAL					
2.	The Proponent shall carry out the project: (a) generally in accordance with the EA; (b) in accordance with the statement of commitments; and (c) in accordance with the conditions of this approval. <i>Notes:</i> <i>The general layout of the project is shown in Appendix 2; and</i> <i>The statement of commitments is reproduced in Appendix 7.</i>	N/A	Compliance with this condition is detailed throughout this report.	Note	N/A
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.	N/A	Noted	Note	N/A
4.	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these documents.	N/A	Compliance with this condition is detailed throughout this report.	Note	N/A
LIMITS ON APPROVAL					
Mining Operations					
5.	The Proponent may carry out mining operations on the site until the end of December 2022. <i>Note: Under this approval, the Proponent is required to rehabilitate the site and carry out additional undertakings to the satisfaction of both the Secretary and DRG. Consequently, this approval will continue to apply in all other respects - other than the right to conduct mining operations - until the rehabilitation of the site and these additional undertakings have been carried out satisfactorily</i>	Environmental Advisor Interviews	Rocglen ceased mining operations in 2019, therefore Rocglen is compliant with this condition.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
Coal Extraction					
6.	The Proponent shall not extract more than 1.5 million tonnes of ROM coal from the site in a calendar year.	- Annual Reviews 2022, 2023 and 2024 - Coal Extraction Records	Coal extraction ceased in 2019, therefore the proponent is considered compliant with this condition.	C	N/A
Coal Transport					
6A.	For the period up until the commissioning of the Kamilaroi Highway overpass, the Proponent: (a) may not transport more than 1.5 million tonnes of ROM coal from the site in any calendar year; (b) shall transport all coal from the site to the Whitehaven CHPP via the approved haulage route; (c) shall, together with the owners of the Tarrawonga and Vickery coal mines, ensure that the cumulative haulage of coal along the approved haulage route does not exceed 4.0 million tonnes per year during calendar years 2017 and 2018; and (d) shall, together with the owners of the Tarrawonga and Vickery coal mines, ensure that the cumulative haulage of coal along the approved haulage route does not exceed 3.5 million tonnes each year during all other calendar years.	- Annual Reviews 2022, 2023 and 2024 - Spreadsheet detailing cumulative haulage across Rocglen, Tarrawonga and Vickery mines	For the reporting period there were no haulage movements for ROM coal as the project ceased production in 2019. Therefore, the proponent is considered compliant with this condition.	C	N/A
6B.	6B For the period following the commissioning of the Kamilaroi Highway overpass, the Proponent: (a) may not transport more than 1.5 million tonnes of ROM coal from the site in any calendar year; (b) shall transport all coal from the site to the Whitehaven CHPP via the approved haulage route and the Kamilaroi Highway overpass; and (c) shall, together with the owners of the Tarrawonga and Vickery coal mines, ensure that the cumulative haulage of coal along the approved haulage route does not exceed 4.5 million tonnes.	NT	The Kamilaroi Highway overpass has not been constructed, therefore this condition was not triggered.	NT	N/A
Coal Rejects					
6C.	The proponent shall not receive more than 700,000 tonnes of coarse and/or fine rejects on the site in any calendar year.	Annual Reviews 2022, 2023 and 2024	For the reporting period there were no haulage movements for the receipt of Coal rejects at Rocglen. Therefore, the proponent is considered compliant with this condition.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
SURRENDER OF EXISTING DEVELOPMENT CONSENT					
7.	By the end of September 2012, or as otherwise agreed by the Secretary, the Proponent shall surrender the existing approval for the Rocglen Coal Mine (06_0198) in accordance with section 75YA of the EP&A Act.	Rocglen IEA 2022	Project Approval MP06_0198 was surrendered during the previous audit period. Therefore, this condition is not triggered for the current audit period.	C	N/A
8.	Prior to the surrender of project approval 06_0198, the conditions of this approval shall prevail to the extent of any inconsistency between the two approvals.	N/A	Noted.	Note	N/A
STRUCTURAL ADEQUACY					
9.	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. Notes: - Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates (where necessary) for the proposed building works; and - Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.	- Environmental Advisor Interviews - Site Observations	No new buildings were constructed during the audit period, therefore this condition has not been triggered.	NT	N/A
DEMOLITION					
10.	The Proponent shall ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	- Environmental Advisor Interviews - Site Observations	No demolition works were conducted during the audit period, therefore this condition has not been triggered.	NT	N/A
11.	The Proponent shall ensure that all the plant and equipment used on site, or to transport coal from the site, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	- Maintenance Spread Sheets 2022-2024 - Site Inspection - Environmental Advisor Interviews	During the site inspection it was observed that plant and equipment were generally maintained in a proper and efficient condition and operated appropriately. There were no examples of failure to maintain equipment identified by ERM. Rocglen utilises the Pulse system to track maintenance by creation of work orders that are tracked in the database and closed out upon completion of the works by verification checklists and other means. Maintenance schedules are put into the system based on manufacturers specifications	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			when the plant/equipment is procured, and ad hoc requirements are entered by site staff as needed. Since 2024, maintenance activities have largely ceased as rehabilitation earthmoving works are primarily complete.		
UPDATED & STAGING STRATEGIES, PLANS OR PROGRAMS					
12.	With the approval of the Secretary, the Proponent may submit any strategies, plans or programs required by this approval on a progressive basis. To ensure the strategies, plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Proponent may prepare any revised strategy, plan or program without undertaking consultation with all parties under the applicable condition of this approval. Notes: - While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times. - If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.	- Management Plan Reviews.xlsx - Management Plans	According to the management plan tracking spreadsheet, the management plans were reviewed during the audit period on the following occasions: - All management plans have been reviewed annually (in March) following the submission of the Annual Reviews. No updates have been triggered due to the reviews within the audit period. - A review of the Water Management Plan (20-10-2022) was triggered following a discharge exceedance in September 2022. As the exceedance was due to staff not being able to access site due to flooding and no action taken by the regulators, no update was deemed required. The Blast and Road Traffic Noise management plans are no longer considered relevant for operations at the site given that blasting and road haulage are no longer undertaken at the mine. They do still go through the same review process following submission of the Annual Reviews.	C	N/A
13.	The Proponent shall continue to implement the existing strategies, plans or programs that apply to any development on site under project approval 06_0198 until they are replaced by an equivalent strategy, plan or program approved under this approval.	Rocglen IEA 2022	MP 06_0198 was surrendered during the previous audit period. Therefore, this condition is not triggered for the current audit period.	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations														
PROTECTION OF PUBLIC INFRASTRUCTURE																			
14.	Unless the Proponent and the applicable authority agree otherwise, the Proponent shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project. <i>Note: This condition does not apply to any damage to roads caused as a result of general road usage.</i>	Environmental Advisor Interviews	No public infrastructure required repairing or was reported as damaged by the project. In addition, no relocation or costs associated with public infrastructure were incurred as a result of the project during the audit period, therefore this requirement has not been triggered.	NT	N/A														
SCHEDULE 3 – ENVIRONMENTAL PERFORMANCE CONDITONS																			
NOISE																			
Noise Criteria																			
1.	The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 1 at any residence on privately-owned land or on more than 25 percent of any privately-owned land. <i>Table 1: Noise criteria dB(A)</i> <table><tr><th rowspan="2">Location</th><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr><tr><th>L_{Aeq} (15 min)</th><th>L_{Aeq} (15 min)</th><th>L_{Aeq} (15 min)</th><th>L_{A1} (1 min)</th></tr><tr><td>All privately-owned land</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> <i>Note: Noise generated by the project is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</i> However, these criteria do not apply if the Proponent has a written agreement with the relevant landowner to exceed the criteria, and the Proponent has advised the Department in writing of the terms of this agreement.	Location	Day	Evening	Night		L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{A1} (1 min)	All privately-owned land	35	35	35	45	- Site observation - Management interview - Noise management plan, July 2020 - Complaints Register (2021-2025)	ERM did not observe any noise produced from the site during site visit. Site management advised that no noise monitoring has been conducted since active mining ceased in 2019. Noise monitoring is reported to be undertaken when a complaint is received related to noise, for which there have been none in the audit period. Management also advised that there have not been any demolition or explosive work during audit period which might create a noise impact. In additional, the Complaints Registers within the audit period showed no complaints. As a result, Rocglen is compliant with this condition.	C	N/A
Location	Day		Evening	Night															
	L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{A1} (1 min)															
All privately-owned land	35	35	35	45															
Road Traffic Noise Criteria																			
2.	The Proponent, together with the owners of the Tarrawonga and Vickery coal mines, shall ensure that the noise generated on public roads by the	Annual Reviews 2022, 2023 and 2024	Bulk haulage of ROM coal from the site ceased in 2019 and this condition is only considered to	C	N/A														

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations						
	project and the other mines, does not exceed the criteria in Table 2 at any existing residence on privately-owned land. <i>Table 2: Road traffic noise criteria dB(A)</i> <table><tr><th>Land</th><th>Day and Evening LAeq (15 hour)</th><th>Night LAeq (9 hour)</th></tr><tr><td>All privately-owned residences</td><td>60</td><td>55</td></tr></table> However, these criteria do not apply if the Proponent has a written agreement with the relevant landowner to exceed the criteria, and the Proponent has advised the Department in writing of the terms of this agreement. <i>Note: Traffic noise generated by the project is to be measured in accordance with the relevant procedures in the NSW Road Noise Policy.</i>	Land	Day and Evening LAeq (15 hour)	Night LAeq (9 hour)	All privately-owned residences	60	55	Road Traffic Noise Management Plan, September 2012	be applicable to the Rocglen Coal Mine up until this point. Therefore, the proponent is considered to be compliant and this condition is not currently considered relevant to the site.		
Land	Day and Evening LAeq (15 hour)	Night LAeq (9 hour)									
All privately-owned residences	60	55									

Operating Conditions

3.	The Proponent shall: (a) implement best practice noise management to minimise the operational, low frequency, and road traffic noise generated by the project; (b) minimise the noise impacts of the project during temperature inversions; and (c) regularly assess the real-time noise monitoring and meteorological forecasting data and relocate, modify, and/or stop operations on site to ensure compliance with the relevant conditions of this approval, to the satisfaction of the Secretary.	- Site Observation - Management Interview - Noise Management Plan, July 2020 - Noise Management Plan DPFI Approval, September 2020. - Complaints Register (2021-2025)	(a) No examples of failure to implement best practice noise management at the site were identified by ERM. The mining and haulage operations have since ceased at the mine and therefore noise no longer represents a risk to surrounding receptors. Noise management measures include: - Operations restricted to day time; - Site personnel required to review site weather conditions and modify or stand down from operational activities if required by mine management; - Equipment regularly serviced; - Mid-high frequency broadband beepers fitted to mobile equipment; - Contractors advised of noise compliance limits prior to commencing; - Road network well maintained to limit vehicle body noise;	C (Obs)	ERM recommends Rocglen consult with the DPFI regarding the requirement and their expectations under the current Project Approval and determine what is required to bring it into line with the EPL.
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			- Earthmoving equipment sound power tested; and - Equipment with lower sound power levels used in preference to more noisy equipment. (b) Temperature inversions are monitored continuously by the on-site weather station and operations are set to be adjusted when required during temperature inversion events. Given that mining and haulage operations are now complete and operations are limited to daytime hours, excessive noise during temperature inversions are unlikely to occur. (c) In 2020 following the cessation of mining activities Rocglen requested a variation to the EPL from the EPA to remove the requirement for active noise monitoring. The variation to the EPL was approved and Rocglen then updated the Noise Management Plan (NMP) to remove the noise monitoring requirements, including real-time monitoring. The amended NMP was submitted to the DPHI and approved in September 2020. It is noted that the Project Approval has not been modified to reflect the approved changes to the EPL and NMP removing the requirement for real-time monitoring.		
Noise Management Plan					
4.	The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by the end of December 2011; (b) describe the noise mitigation measures that would be implemented to ensure compliance with the relevant conditions of this approval;	- Site Observation - Management Interview - Noise Management Plan, July 2020 - Noise Management Plan DPHI Approval, September 2020.	The site operates under a Noise Management Plan, which was updated in 2020 following the cessation of mining activities when Rocglen requested a variation to the EPL from the EPA to remove the requirement for active noise monitoring. The	C (Obs – Duplicate)	As per Sch 3, C3

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(c) describe the measures that would be implemented to ensure the noise impacts generated by project related traffic on the Kamlaroi Highway overpass are minimised as far as practicable; and (d) include a noise monitoring program that: - uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the project; and - includes a protocol for determining exceedances of the relevant conditions of this approval.	- Complaints Register (2021-2025) - Road Traffic Noise Management Plan 18/06/2013 - Traffic Management Plan 04/04/2017 - Management Plan Reviews	variation to the EPL was approved and Rocglen then updated the Noise Management Plan (NMP) to remove the noise monitoring requirements, including real-time monitoring. The amended NMP was submitted to the DPHI and approved in September 2020. (a) This condition was required outside the audit period and is therefore not triggered. (b) The Noise Management Plan includes mitigation measures to ensure compliance with the approval conditions. (c) Kamlaroi Highway overpass has not been constructed and therefore this condition has not been triggered. (d) The Noise Management Plan no longer includes a noise monitoring program and monitoring is no longer undertaken. It is noted that the Project Approval has not been modified to reflect the approved changes to the EPL and NMP removing the requirement for real-time monitoring.		

BLASTING

Blasting Criteria

5.	The Proponent shall ensure that blasting does not cause any exceedance of the criteria in Table 3. <i>Table 3: Blasting criteria</i> <table><tr><th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr><tr><td rowspan="2">Residence on privately-owned land</td><td>115</td><td>5</td><td>5% of the total number of blasts over a period of 12 months</td></tr><tr><td>120</td><td>10</td><td>0%</td></tr></table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land	115	5	5% of the total number of blasts over a period of 12 months	120	10	0%	- Annual Reviews 2022, 2023 and 2024 - Environmental Advisor Interviews	No blasting was undertaken during the audit period as coal production / mining activities ceased in 2019, therefore Rocglen is considered compliant with this condition.	NT	N/A
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance													
Residence on privately-owned land	115	5	5% of the total number of blasts over a period of 12 months													
	120	10	0%													

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	However, these criteria do not apply if the Proponent has a written agreement with the relevant landowner to exceed the criteria, and the Proponent has advised the Department in writing of the terms of this agreement.				
Blasting Hours					
6.	The Proponent shall only carry out blasting on the site between 9 am and 5 pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.	- Annual Reviews 2022, 2023 and 2024 - Environmental Advisor Interviews	No blasting was undertaken during the audit period as coal production / mining activities ceased in 2019, therefore Rocglen is considered compliant with this condition.	C	N/A
Blasting Frequency					
7.	The Proponent shall not carry out more than one blast a day on site, unless an additional blast is required following a blast misfire. <i>Note: A blast may involve a number of explosions within a short period, typically less than two minutes</i>	- Annual Reviews 2022, 2023 and 2024 - Environmental Advisor Interviews	No blasting was undertaken during the audit period as coal production / mining activities ceased in 2019, therefore Rocglen is considered compliant with this condition.	NT	N/A
Property Inspections					
8.	If the Proponent receives a written request from the owner of any privately-owned land within 2 kilometres of the approved open cut mining pit on site, or other landowner nominated by the Secretary, for a property inspection to establish the baseline condition of any buildings and/or structures on their land, or to have a previous property inspection report updated, then within 2 months of receiving this request the Proponent shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: - establish the baseline condition of the buildings and/or structures on the land or update the previous property inspection report; and - identify any measures that should be implemented to minimise the potential blasting impacts of the project on these buildings and/or structures; and (b) give the landowner a copy of the new or updated property inspection report.	Environmental Advisor Interviews	The proponent did not receive any written requests from the owner of any privately owned land within 2 km of the approved open cut mining pit, or other landowner nominated by the Secretary, for a property inspection during the audit period, therefore this condition is not triggered.	NT	N/A
Property Investigations					
9.	If the owner of any privately-owned land claims that the buildings and/or structures on their land have been damaged as a result of blasting on site, then within 2 months of receiving this claim the Proponent shall:	- Environmental Advisor Interviews - Complaint Registers 2022 - 2025	There were no instances identified by ERM of owners of privately-owned land claiming that buildings and/or structures on their land had been damaged	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to investigate the claim; and (b) give the landowner a copy of the property investigation report. If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Proponent shall repair the damages to the satisfaction of the Secretary. a. If the Proponent or landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution.		as a result of blasting on site during the audit period, therefore this requirement was not triggered.		

Operating Conditions

10.	The Proponent shall: (a) implement best practice blasting management to: - protect the safety of people and livestock in the surrounding area; - protect public or private infrastructure/property in the surrounding area; - minimise the dust and fume emissions of the blasting; (b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site, to the satisfaction of the Secretary.	- Environmental Advisor Interviews - Blast Management Plan, June 2018	No blasting was undertaken during the audit period as coal production / mining activities ceased in 2019, therefore Rocglen is considered compliant with this condition.	NT	N/A
11.	The Proponent shall not undertake blasting on-site within 500 metres of: (a) any public road without the approval of Council; or (b) any land outside of the site not owned by the Proponent, unless: - the Proponent has a written agreement with the relevant landowner to allow blasting to be carried out closer to the land, and the Proponent has advised the Secretary in writing of the terms of this agreement; or - the Proponent has: - demonstrated to the satisfaction of the Secretary that the blasting can be carried out closer to the land without compromising the safety of the people or livestock on the land, or damaging the buildings and/or structures on the land; and - updated the Blast Management Plan to include the specific measures that would be implemented while blasting is being carried out within 500 metres of the land.	- Environmental Advisor Interviews - Blast Management Plan, June 2018	No blasting was undertaken during the audit period as coal production / mining activities ceased in 2019, therefore Rocglen is considered compliant with this condition.	C	N/A

Blast Management Plan

12.	The Proponent shall prepare and implement a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by the end of December 2011;	- Blast Management Plan, June 2018 - Management Plan Reviews	Rocglen still have a Blast Management Plan (last updated in June 2018) for the site, even though no blasting occurred during the audit period.	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(b) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval; and (c) include a blast monitoring program to evaluate the performance of the project.		(a) This date was prior to the audit period, therefore this condition has not been triggered. (b) Section 3 of the Blast Management Plan describes the measures implemented to ensure compliance. (c) Section 5 of the Blast Management Plan describes the blast monitoring program, which is checked as part of the blast preparation and monitoring and recorded in the Blast Checklists. Therefore, Rocglen is considered compliant with this condition.		
AIR QUALITY & GREENHOUSE GAS					
Odour					
13.	The Proponent shall ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	- Site observations - Complaints Register 2022 - 2025 - Annual Reviews 2022, 2023 and 2024	The primary source of odour identified at the site was manure, which is used as part of the seeding process. Site management reported that all manure utilised on-site is matured prior to arrival to minimise potential odour. ERM did not observe or identify any offensive odours during the site inspection. No complaints associated with odour were identified for the audit period, therefore Rocglen is considered compliant with this condition.	C	N/A
Greenhouse Gas Emissions					
14.	The Proponent shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	- Air Quality and Greenhouse Gas Management Plan, March 2022 - Management Plan Reviews	The site operates under the Air Quality and Greenhouse Gas Management Plan (last updated in March 2022 and approved in April 2022), which is designed to align with Whitehaven Group’s NGERS reporting requirements. Greenhouse gas generating activities on-site during the audit	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			period were observed to be limited to earthworks associated with rehabilitation of the mine, which were generally observed to be conducted in a manner appropriate for minimising gas emissions from the site. Therefore, Rocglen is compliant with this condition.		

Additional Air Quality Mitigation Upon Request

15.	The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that the particulate emissions generated by the project do not exceed the criteria listed in Tables 4, 5 and 6 at any residence on privately-owned land or on more than 25 percent of any privately owned land. <i>Table 4: Long-term criteria for particulate matter</i> <table><tr><th>Pollutant</th><th>Averaging period</th><th>^dCriterion</th></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>^a90 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>^a30 µg/m³</td></tr></table> <i>Table 5: Short-term criterion for particulate matter</i> <table><tr><th>Pollutant</th><th>Averaging period</th><th>^d Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>24 hour</td><td>^a 50 µg/m³</td></tr></table> <i>Table 6: Long-term criteria for deposited dust</i> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total^f deposited dust level</th></tr><tr><td>^cDeposited dust</td><td>Annual</td><td>^b2 g/m²/month</td><td>^a4 g/m²/month</td></tr></table> Notes: ^aTotal impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to other sources); ^bIncremental impact (i.e. incremental increase in concentrations due to the project on its own); ^cDeposited 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 ^dExcludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents, illegal activities or any other activity agreed to by the Secretary in consultation with the EPA.	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	^a 90 µg/m³	Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m³	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total ^f deposited dust level	^c Deposited dust	Annual	^b 2 g/m²/month	^a 4 g/m²/month	- Annual Reviews 2022, 2023 and 2024 - Letter to DPIE re – HVAS Dust Exceedances – 23/03/2022 - Letter to DPIE re – HVAS Dust Exceedances – 22/04/2022 - Letter to DPIE re – HVAS Dust Exceedances – 28/02/2023 - Letter to DPIE re – HVAS Dust Exceedances – 26/10/2023 - Letter to DPIE re – HVAS Dust Exceedances – 08/12/2023 - Letter to DPIE re – HVAS Dust Exceedances – 07/03/2025	ERM reviewed the monitoring data associated with air quality and found that the points identified in this condition were monitored during the audit period. The units of measurement were in accordance with this condition and the sampling methodology was consistent with those required under this condition. Air quality exceedances identified during the audit period were not attributable to mining operations and air quality issues were generally not identified for the site based on the data available. The site reported the following exceedances of the HVAS PM10 24 hour limit to the Department during the audit period: 23 March 2022; 22 April 2022; 28 February 2023; 26 October 2023; 08 December 2023; and 07 March 2025. The causes of the exceedances were attributed to grazing activity, regional bushfires and poor air quality across the region. The Department responded on all occasions acknowledging the exceedances and accepting that site activities	C	N/A
Pollutant	Averaging period	^d Criterion																										
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m³																										
Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m³																										
Pollutant	Averaging period	^d Criterion																										
Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m³																										
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total ^f deposited dust level																									
^c Deposited dust	Annual	^b 2 g/m²/month	^a 4 g/m²/month																									

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			were unlikely to be responsible for the elevated results. With only rehabilitation operations at the site, it is unlikely the site has contributed to poor air quality outcomes and poor management of site operations and air quality issues were generally not identified for the site.		
Operation Conditions					
16.	The Proponent shall: (a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise odour, fume and dust emissions generated by the project, including those generated by any spontaneous combustion on site, (b) minimise any visible air pollution generated by the project; (c) minimise the surface disturbance on site; and (d) regularly assess the real-time air quality monitoring and meteorological forecasting data, and relocate, modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval, to the satisfaction of the Secretary.	• Environmental Advisor Interviews • Air Quality and Greenhouse Gas Management Plan, March 2022 • Real time dust monitoring – D3 2022, 2023, 2024 and 2025	(a) The AQGG management plan details the mitigation measures employed by the mine during operational activities to minimise odour, fumes and dust emissions. Specific measures are identified for vegetation clearing and soil stripping, drilling and blasting, overburden ripping and placement, coal excavation, crushing and screening, internal transport, external transport and rehabilitation. The identified controls are considered to be appropriate for managing air quality concerns. Operations at site were limited to rehabilitation during the audit period and site observations did not identify issues with generation of odour, fumes and dust from the operations. Complaints associated with odour, fumes and dust were not identified for the site, therefore Rocglen are considered compliant with this condition. (b) ERM did not identify any examples of failure to minimise visible air pollution. Operations are now limited to rehabilitation and visible air pollution has not been identified in the records available to ERM. (c) Surface disturbance was observed to be limited to the ancillary site areas required for	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			site management. Progressive rehabilitation to disturbed surface areas were observed during the site visit and the areas currently subject to disturbance were considered to be appropriate to satisfy the requirements of this condition. (d) ERM reviewed monitoring data from the air quality and meteorological equipment on-site and confirmed that real-time data were available and regularly reviewed. ERM did not identify any non-compliances with this condition.		
Air Quality Criteria					
17.	The Proponent shall prepare and implement an Air Quality & Greenhouse Gas Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by the end of December 2011; (b) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, including a real-time air quality management system that employs reactive and proactive mitigation measures; and (c) include an air quality monitoring program that: - uses a combination of real-time monitors, high volume samplers and dust deposition gauges to evaluate the performance of the project; and - includes a protocol for determining exceedances of the relevant conditions of this approval.	Air Quality and Greenhouse Gas Management Plan, March 2022	The site operates under the Air Quality and Greenhouse Gas Management Plan (last updated in March 2022 and approved in April 2022). (a) this condition was required prior to the audit period and therefore has not been triggered. (b) the plan details measures to be implemented to ensure compliance with the approval, including real-time air quality monitoring and reactive and proactive mitigation measures. A TARP for adverse weather criteria includes investigation alarms set for sustained wind speeds of 6 m/s for six consecutive 5 minute periods and an action alarm for sustained wind speeds of 8 m/s for six consecutive 5 minute periods. Evidence was observed of both reactive and proactive mitigation measures associated with air quality. (c) real time air quality monitoring via a Tapered Element Oscillating Microbalance	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			(TEOM) monitor (PM10) provides dust data. Dust deposition gauges are utilised for the site and ERM observed a sample of the gauges and the results of monitoring, which were generally observed to be appropriate. Methodology for determining exceedances is provided in Section 4 with responses to exceedances provided in Section 5. These are considered to be appropriate for complying with the requirements of the approval. No non-compliances were identified associated with this condition.		

METEOROLOGICAL MONITORING

18.	During the life of the project, the Proponent shall ensure that there is a meteorological station operating in the vicinity of the site that: (a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline; and (b) is capable of continuous real-time measurement of temperature lapse rate in accordance with the NSW Industrial Noise Policy, or as otherwise agreed by the EPA.	• Site observations • Real-time meteorological data • Historical meteorological data spreadsheet • Meteorological station calibration certificates for the period	ERM inspected the weather station during the site inspection. ERM was able to review the real-time meteorological data and records of data obtained by the weather station. (a) the weather station installation certificate was observed, which described the station to have been constructed to operate in compliance with Approved Methods for Sampling of Air Pollutants in New South Wales. The weather station was not able to be inspected directly, however the real-time data provided outputs for the required analytes and examples of failure to measure in accordance with the guideline were not identified. (b) ERM reviewed the stability measurement in the real-time monitoring data, which is equivalent to the required temperature lapse rate designated in the approval. ERM did not identify any	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			examples of non-compliances against this condition.		
AUGER MINING					
19.	The Proponent shall ensure that the auger mining carried out on site: (a) is restricted to the areas approved for auger mining; (b) is designed to remain safe and stable in the long term; and (c) does not result in vertical subsidence of greater than 20 mm.	Environmental Advisor Interviews	Auger mining was not undertaken at any point during the audit period according to site management, therefore this condition has not been triggered.	NT	N/A
SOIL AND WATER					
	<i>Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain water licences for the project.</i>	Water Access Licence 29461 & 36758	Two water licences are held by the site for the project (although Rocglen stated no water had been taken during the audit period), therefore Rocglen is compliant with this condition.	C	N/A
Water Supply					
20.	The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations on site to match its available water supply to the satisfaction of the Secretary.	- Water Access Licence 29461 & 36758 - Water Use Records - Site Observations - Environmental Advisor Interviews	Rocglen maintains two water licences, but reported no water was taken under them for the audit period. The primary source of water consumption for the site during the audit period was reported to be for the water cart for dust suppression when needed. Water for the water cart was sourced from surface water holding dams on site. Therefore, the site has sufficient water for activities required to complete rehabilitation and is compliant with this condition.	C	N/A
Surface Water Discharges					
21.	The Proponent shall ensure that all surface water discharges from the site comply with the discharge limits (both volume and quality) set for the project in any EPL.	- EPL Monthly Monitoring Summary (April 2022 – April 2025) - Wet Weather Discharge Monitoring Spreadsheet - Controlled Discharge Spreadsheet	Monitoring was observed to have been undertaken during discharge events and reported in the Annual Reviews and assessed for compliance in the Annual Returns.	NC	Historical exceedance with no further action required by the EPA and deemed as no ongoing action required.

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		Annual Returns (2021-2022, 2022-2023, 2023-2024)	All discharge sampling appeared to be compliant to the concentration limit outlined in this condition, except for an event on 22 September 2022 and wet weather discharge events outlined below. Wet weather discharges, as specified in L2.5 below, from LDP11 included the following events: 15 May 2022; 5 August 2022; 16 September 2022; 9 October 2022; 21 October 2022; 1 November 2022; 14 November 2022; 3 February 2023; 13 March 2023; 25 March 2023 (two samples were taken); 1 June 2024; 6 August 2024; 2 December 2024; and 29 March 2025. Wet weather discharges from LDP12 during the audit period included the following: 21 October 2022; and 14 November 2022. Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge. On 22 September 2022, Water discharge from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. This exceedance was reported to the EPA as per R2 and R3 of the EPL,		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			and reported as a non-compliance in the Annual Return and Annual Review of that year. EPA acknowledged that the event was to report as a non-compliance and considered Rocglen to have done all they could in the circumstances. No further action was required from the EPA.		

Water Management Plan

22.	The Proponent shall prepare and implement a Water Management Plan for the project to the satisfaction of the Secretary. This plan must be prepared in consultation with the EPA, DoI Lands & Water and DRG by suitably qualified and experienced persons whose appointment has been approved by the Secretary, and submitted to the Secretary for approval by the end of February 2012. In addition to the standard requirements for management plans (see condition 2 of schedule 5), this plan must include: (a) a Site Water Balance that: - includes details of: - sources and security of water supply; - water use on site; - water management on site; - any off-site water transfers; - describes what measures would be implemented to minimise water use on site; and - is to be updated each year during the annual review; (b) a Surface Water Management Plan, that includes: - a detailed description of the water management system on site, including the: - clean water diversion systems; - erosion and sediment controls; and - water storages; - detailed plans, including design objectives and performance criteria, for: - design and management of the final void; - reinstatement of drainage lines on the rehabilitated areas of the site; and - control of any potential water pollution from the rehabilitated areas of the site; - performance criteria for the following, including trigger levels for investigating any potentially adverse impacts: - the water management system; - surface water quality in Driggle Draggie Creek or the unnamed creek to the south of the site; - the health of any riparian vegetation in Driggle Draggie Creek or the unnamed creek to the south of the site; - a program to monitor: - the effectiveness of the water management system;	- Water Management Plan, May 2018 - Management Plans Revisions Spreadsheet - Groundwater Monitoring Data spreadsheet - Annual Reviews 2022, 2023 and 2024	The site operates under a Water Management Plan, last updated in May 2018. A review of the plan was undertaken in October 2022 following a TSS quality exceedance discharge event in September 2022. As the event was deemed to be the result of staff not being able to access site during flooding of the access roads so that they could pump excess water to the pit, the review determined that no further update to the plan was required. The plan's original submission to the Department was required prior to this audit period, therefore the February 2012 deadline was not triggered for this audit. The current version of the plan has been endorsed by the Department and includes the following items: (a) a detailed site water balance – sources and security of water supply is discussed (model inputs) along with the water consumption methods (model outputs) and the measures to manage water on-site and details of any off-site water transfers, in Section 3. (b) a surface water management plan – this includes the water management system, displaying the storage locations, clean water diversion system and	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	- surface water flows and quality in Driggle Draggie Creek and the unnamed creek to the south of the site; - the health of any riparian vegetation in Driggle Draggie Creek or the unnamed creek to the south of the site; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project; (c) a Groundwater Management Plan, which includes: - performance criteria, including trigger levels for investigating any potentially adverse groundwater impacts; - a program to monitor: - groundwater inflows to the mining operations; - the impacts of the project on any alluvial aquifers; - the seepage/leachate from water storages, backfilled voids, and the final void on site; - a program to validate the groundwater model for the project, and calibrate it to site specific conditions; and - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse groundwater impacts.		erosion and sediment controls. The design objectives and performance criteria for the final voice, drainage lines and pollution control are detailed in Section 4. (c) a groundwater management plan – this plan includes baseline data and assessment criteria, a detailed monitoring schedule and response plan for any identified impacts, an annual groundwater model validation program and a plan for and an exceedance response plan. Groundwater monitoring was undertaken across the site at the locations required by the planning documentation. A comparison to trigger values was not provided in the monitoring spreadsheet but was discussed in the Annual Reviews. Quality of groundwater was identified to be generally consistent across the audit period and examples of impacts were not identified.		

BIODIVERSITY

Biodiversity Offset

23.	By the end of June 2012, unless the Secretary agrees otherwise, the Proponent shall enter into a Biobanking agreement with the Minister for Environment and Heritage, in accordance with Part 7A of the <i>Threatened Species Conservation Act 1995</i>, to implement the Biodiversity Offset Strategy described in the EA (for the Whitehaven Regional Biobank Site), and summarised in Table 7; <i>Table 7: Biodiversity Offset Strategy to be implemented at the Whitehaven Regional Biobank Site</i>	- Leard Forest Regional Biodiversity Strategy Stage 2 – Strategy Report 2017 - EPBC Compliance Reports 2022-2025	ERM reviewed the biobanking agreement, which was in place for the duration of the audit period. This agreement was due in 2012, which was outside the audit period and therefore not triggered as part of this audit. The off-set conditions were reviewed and the EPBC Compliance Report concluded that WHC is complying with the off-set obligations.	C	N/A
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Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations			
	<table><tr><th>Total Vegetation Clearing</th><th>Minimum Offset to be provided</th></tr><tr><td>Total of 95.44 ha of vegetation to be cleared</td><td> - Retirement of 4,859 Ecosystem Credits (including 478 Ecosystem Credits for the clearing of 47.9 ha of the BOS area approved under 06_0198); - Conservation of the residual BOS area approved under 06_0198 (60 ha), at the existing location within the Whitehaven Regional Biobank Site; - Conservation of 0.62 ha of White box Grassy Woodland; - Conservation of 231.42 ha of suitable foraging habitat for the Regent Honeyeater and Swift Parrot; and - Restoration of 118.33 ha of derived grassland to woodland. </td></tr></table>	Total Vegetation Clearing	Minimum Offset to be provided	Total of 95.44 ha of vegetation to be cleared	- Retirement of 4,859 Ecosystem Credits (including 478 Ecosystem Credits for the clearing of 47.9 ha of the BOS area approved under 06_0198); - Conservation of the residual BOS area approved under 06_0198 (60 ha), at the existing location within the Whitehaven Regional Biobank Site; - Conservation of 0.62 ha of White box Grassy Woodland; - Conservation of 231.42 ha of suitable foraging habitat for the Regent Honeyeater and Swift Parrot; and - Restoration of 118.33 ha of derived grassland to woodland.				
Total Vegetation Clearing	Minimum Offset to be provided								
Total of 95.44 ha of vegetation to be cleared	- Retirement of 4,859 Ecosystem Credits (including 478 Ecosystem Credits for the clearing of 47.9 ha of the BOS area approved under 06_0198); - Conservation of the residual BOS area approved under 06_0198 (60 ha), at the existing location within the Whitehaven Regional Biobank Site; - Conservation of 0.62 ha of White box Grassy Woodland; - Conservation of 231.42 ha of suitable foraging habitat for the Regent Honeyeater and Swift Parrot; and - Restoration of 118.33 ha of derived grassland to woodland.								
Note: The Whitehaven Regional Biobank Site is shown in Figure 1 in Appendix 4.									

HERITAGE

Heritage Management Plan

24.	The Proponent shall prepare and implement a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with OEH and Aboriginal stakeholders; (b) be submitted to the Secretary for approval by the end of December 2011; (c) describe the measures that would be implemented: - record and salvage the Aboriginal sites within the project disturbance area, including RPS Rocglen IF1, RPS Rocglen AS1 and RPS Rocglen AS2 at locations as shown in Appendix 6 and any potential archaeological deposits; - store the Aboriginal objects salvaged, both during construction and in the long term; - protect, monitor and/or manage the Aboriginal sites on site that are outside the project disturbance area on site, including measures to protect scarred trees (NPWS # 20-4-0194 and # 20-4-0195 at locations as shown in Appendix 6); - manage the discovery of any human remains or previously unidentified Aboriginal objects; - enable Aboriginal stakeholders to get reasonable access to the site during the project; - ensure Aboriginal stakeholders are consulted about the conservation and management of Aboriginal cultural heritage on site; and - ensure workers on site receive suitable heritage inductions, and that suitable records are kept of these inductions.	- Heritage Management Plan, May 2018 - Management Plan Reviews - Site Observations	The site operates under a Heritage Management Plan last updated in May 2018. The plan has been approved by the Department and was prepared in consultation with stakeholders. (a) Stakeholders involved in consultation for preparing the plan are identified in Section 1.1. (b) the current version of the plan was approved by the Department, however the due date for the original plan falls outside of the audit period and has not been triggered. (c) measures are described throughout the management plan in Sections 4 – 7. Storage protocols are described and monitoring methods are included along with management measures in the event that remains or new objects are discovered. Access requirements are stipulated and inductions are undertaken in relation to heritage matters. During the audit site visit, ERM observed the heritage areas to generally be fenced	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			appropriately. Operators were noted to have been trained and familiar, with a demonstrated understanding of the locations of heritage areas. No clearing has reportedly taken place at the site during the audit period. Therefore, Rocglen is considered to be compliant with this condition.		
TRANSPORT					
Road Works					
25.	By the end of December 2012, unless the Secretary agrees otherwise, the proponent shall upgrade and tar seal Wean Road to the satisfaction of Council from the northern end of the existing tar seal to the point of the Gunnedah/Narrabri Shire Council boundary, in general accordance with Council's Rural Local Roads Standard.	NT	This requirements of this condition were not triggered during the audit period.	NT	N/A
Road Maintenance					
26.	During the project, the Proponent shall contribute towards the maintenance of the public roads used by the project, in accordance with the existing road maintenance agreement between the Proponent and Council, as may be modified from time to time through the agreement of both parties. If there is a dispute in relation to this agreement, then either party may refer the matter to the Secretary for resolution.	- Road Maintenance Agreement between WHC and Gunnedah Shire Council, dated August 2009 - Environmental Advisor Interviews	ERM reviewed the agreement. This requirement is only applicable where the roads are in use for the purposes of haulage for the project. Haulage for the site ceased in 2019 and contributions to council for the maintenance of the roads also ceased at this time. Therefore, Rocglen is compliant with this condition.	C	N/A
Traffic Management Plan					
27.	The Proponent shall prepare a Traffic Management Plan for the Project, to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with RMS, Gunnedah Shire Council, and the owners of the Tarrawonga and Vickery coal mines; (b) be submitted to the Secretary for approval by 31 March 2017; (c) include a program for implementing Whitehaven's commitments in the EA;	- Traffic Management Plan, March 2017 - Management Plan Reviews	The site operates under a Traffic Management Plan, last updated in May 2017. (a) The TMP was prepared in consultation with the RMS, Gunnedah Shire Council, Narrabri Shire Council and the owners of Tarrawonga and Vickery mines. (b) The current version of the TMP was approved by the	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(d) include transport protocols that describe control measures for coal haulage: - during school bus hours; - on the Kamilaroi Highway; and - during seasonal and event based peak traffic periods. (e) include a driver's Code of Conduct to include but not limited to: - behavioural safety practises and initiatives used by drivers to implement the transport protocols; - induction process for vehicle operators and regular toolbox meetings; and - complaint resolution and disciplinary procedures; (f) describe measures to minimise dust from roads that may be used for access to the mine site; (g) arrangements to comply with cumulative coal haulage limits from the project and the Tarrawonga and Vickery coal mines; and (h) a monitoring program to audit vehicle movements, including the origin and destination of employees, against predictions in the EA.		Department. The due date stipulated in (b) was not triggered during this audit period. (c) Programs to implement the commitments of Whitehaven are presented throughout the TMP. (d) The TMP includes measures to manage traffic during school bus hours, related to the Kamilaroi Highway and during seasonal and event based peak periods. (e) the drivers code of conduct is presented in Section 3 and includes behavioural practices, an induction process and complaint procedures. (f) Dust minimisation measures are specifically identified in Section 3.3 (g) cumulative tonnage haulage limitations management measures are detailed in Section 3.4. (h) A monitoring program to audit vehicles is described in Section 3.5. Haulage ceased in 2019. Therefore, no examples of failure to comply with the TMP during the audit period identified by ERM. ERM considers Rocglen to be compliant with this condition.		
Operating Conditions					
28.	The Proponent shall ensure all coarse and fine rejects are transported from the Whitehaven CHPP to the site by road, using only the designated transport route shown in Figure 3 of Appendix 2.	- Traffic Management Plan, March 2017 - Environmental Advisor Interviews	The management plan details the approved trucking route. Trucking of rejects ceased in 2020, prior to the current audit period. Therefore, this condition is not triggered.	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
28A.	The Proponent shall maximise the backfilling of haul trucks with coarse and/or fine rejects from the Whitehaven CHPP to minimise the number of heavy vehicles on the designated transport route.	- Traffic Management Plan, March 2017 - Environmental Advisor Interviews	Trucking of rejects ceased in 2020, prior to the current audit period. Therefore, this condition is not triggered.	NT	N/A

Greenhouse Gas Emissions

29.	The Proponent shall only dispatch coal from the site by road or receive coarse and/or fine rejects on the site between the hours of: (a) 7 am to 9.15 pm, Monday to Friday; (b) 7 am to 5.15 pm Saturday; and (c) at no time on Sundays and public holidays.	- Environmental Advisor Interviews - Annual Reviews 2022, 2023 and 2024	Haulage of coal ceased in 2019 and trucking of rejects ceased in 2020, prior to the current audit period. Therefore, this condition is not triggered.	NT	N/A
29A.	The Proponent shall ensure that: (a) trucks travelling to and from the site do not exceed 40 kilometres per hour in the vicinity of the school bus when it is operating near school bus stops along the approved haulage route, unless an alternative protocol is agreed by the Secretary; and (b) spillage from haulage vehicles is minimised and promptly managed.	- Environmental Advisor Interviews - Annual Reviews 2022, 2023 and 2024	Haulage of coal ceased in 2019 and trucking of rejects ceased in 2020, prior to the current audit period. Therefore, this condition is not triggered.	NT	N/A

Monitoring of Coal Transport

30.	The Proponent shall: (a) keep accurate records of the amount of coal transported (on a monthly basis) from the site, as well as the number of coal truck movements generated by the project; and (b) make these records publicly available on its website at the end of each calendar year.	- Environmental Advisor Interviews - Annual Reviews 2022, 2023 and 2024 - Rocglen Website	(a) Haulage of coal ceased in 2019 and trucking of rejects ceased in 2020, prior to the current audit period, therefore amounts are zero. (b) Coal movements (equalling zero) are reported in the Annual Reviews, which are also published on the company website each year.	C	N/A
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VISUAL

Visual Amenity and Lighting

31.	The Proponent shall: The Proponent shall: (a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the project; (b) establish and maintain an effective vegetative screen along the boundary of the site that adjoins public roads; (c) ensure that no outdoor lights shine above the horizontal; and	- Annual Reviews 2022, 2023 and 2024 - Site Observations - Rocglen IEA 2022	Mining operations ceased in 2019, including night works the previous primary source of light. From site observations it was noted that the only lighting still in place is security lighting at the workshop. The 2021 IEA confirmed screening vegetation planting	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(d) ensure that all external lighting associated with the project complies with <i>Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting</i> , or its latest version.		had been carried out and that lighting installed at site that complied with <i>Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting</i> . No non-compliances were identified in relation to this condition.		

WASTE

32.	The Proponent shall: (a) minimise the waste generated by the project; and (b) ensure that the waste generated by the project is appropriately stored, handled and disposed of in a lawful manner.	- Waste Transport Spreadsheet - Monthly Environmental Inspection Records - Site Observations	(a) Waste generated by the site since the site has ceased operations is minimal and is generally limited to waste oil, domestic waste and sewage. Waste was not observed to be generated in quantities exceeding the reasonable expectations of this type of site. Namoi Waste is contracted for all waste management services for the site and ERM reviewed the waste transport spreadsheet associated with waste removal from the site. Excessive waste removal was not identified. (b) ERM reviewed example site inspection records that demonstrated that waste management is audited regularly and continuous improvement is taking place at the site. No non-compliances were identified in relation to this condition.	C	N/A
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BUSHFIRE MANAGEMENT

33.	The Proponent shall: (a) ensure that the project is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service and emergency services as much as possible if there is a fire in the surrounding area.	- Closure Mining Operations Plan (CMOP), March 2019 - Pollution Incident Response Management Plan (PIRMP), August 2018 - Wildfire Management Plan, May 2023	The site previously operated under the CMOP, which included measures to manage the risks associated with bushfires. Bushfire mitigation actions include monitoring, managing fuel loads, fire-breaks maintenance, stocking firefighting equipment and	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		- Rehabilitation Management Plan, January 2025 - Site Observations	securing access points, storage and handling practices, welding procedures and smoking restrictions. The PIRMP will be enacted for emergencies, including bushfires. Rocglen now has a Wildfire Management Plan, prepared by Bushfire Environmental Management Consultancy and last updated in May 2023. Additionally, the RMP includes bushfire mitigation measures. The site maintains a water truck and earth moving equipment to assist with bushfires and regularly liaises with the RFS, including when bushfires are in the area. Water storage is maintained at various locations around the site and LRM Fire and Rescue are maintained on retainer to insist in case of fire. No evidence of non-compliance with this condition was identified.		

REHABILITATION

Rehabilitation Objectives

34.	The Proponent shall rehabilitate the site to the satisfaction of DRG. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the EA (and depicted conceptually in Figure 1 in Appendix 5), and comply with the objectives in Table 8. <i>Table 8: Rehabilitation Objectives</i>	- Rehabilitation Management Plan (RMP) July 2022, Issue 1; Version 3 (last updated January 2025) - Approved Rehabilitation Objective Statement, 13 November 2023 - Annual Rehabilitation Reports 2022, 2023 and 2024 - Forward Programs 2022-2024, 2024-2026 and 2025-2027 - Annual Reviews 2022, 2023 and 2024 - Export spatial data table for Final Landform Rehabilitation Plan (FLRP) - Site Observations	The RMP dated July 2022 Issue 1; V3 (last updated in January 2025) is the current key rehabilitation planning document. The RMP is generally consistent with the rehabilitation strategy described in the EA. The key difference relates to the backfilling and shaping of the void resulting in the removal of the highwall in the final landform. The objectives from PA 10_0015 have been incorporated into the approved Rehabilitation Objectives Statement.	C	N/A
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Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
	<i>Feature</i>	<i>Objective</i>		The final landforms appeared stable (both geotechnical and erosional stability) during the site inspection. A rill/small gully was visible on a northwestern slope of the final void. This area was known to the site team and is being actively monitored. Monitoring involves both visual on ground inspections and LiDAR analysis for changes in surface conditions. Compared with the EA rehabilitation strategy, the as constructed final landform is likely to be more geotechnically stable than the conceptual final landform, that included a highwall, proposed in the EA. Apart from the infrastructure area scheduled for demolition in 2026 all other infrastructure had been removed. All areas, excluding the 2.54 ha of area in which the remaining infrastructure sits, have progressed through Landform establishment and growth medium development during the audit period. Ecosystem and Land Use Establishment continues. The 2.54 ha of grazing final land use is scheduled to transition to Ecosystem and Land Use Establishment in 2026. Other remaining area relates to water management areas (water storage and voids). Monitoring of rehabilitation is undertaken on a scheduled basis and each year of the audit period. Monitoring assesses areas against the draft completion criteria and shows progress in many areas. Areas that are not progressing as intended are subject to intense management intervention such as weed control and infill planting. The area on the northern side of the Northern		
	Mine site (as a whole)	Safe, stable and non-polluting				
	Final void	- Minimise the size and depth of the final void as far as is reasonable and feasible; and - The final void is to be safe, stable and non-polluting				
	Surface infrastructure	To be decommissioned and removed, unless the Secretary agrees otherwise				
	Other land affected by the project	Restore ecosystem function, including maintaining or establishing self-sustaining eco-systems comprised of: - local native plant species; - at least 206 hectares of woodland (see Figure 1 in Appendix 5); and - a landform consistent with the surrounding environment				
	Community	Minimise the adverse socio-economic effects associated with mine closure				

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			Emplacement was observed during the site visit and is currently the target of an infill planting program. A Weed and Pest Management Plan has been prepared and includes monitoring/inspections, agronomist reports and a study looking at eradication of exotic pasture weeds in woodland rehabilitation. The FLRP comprises 212 ha of native ecosystem and 149 ha of Agricultural – Grazing land use. No adverse socio-economic impacts have been identified during the audit period.		

Progressive Rehabilitation

35.	The Proponent shall carry out the rehabilitation of the site progressively, that is, as soon as reasonably practicable following disturbance.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated January 2025) - Final Landform Rehabilitation Plan (FLRP) – represented by Plan 1A and 1B attached to the 2025 - Forward Program and shown on the NSW Seed Map. - Annual Rehabilitation Reports 2022, 2023 and 2024 - Forward Programs 2022-2024, 2024-2026 and 2025-2027 - Annual Reviews 2022, 2023 and 2024 - Site Observations - GOC Annual Rehabilitation Planning Process 2021, Issue 2.	Rehabilitation planning is undertaken in accordance with the Gunnedah Open Cut Annual Rehabilitation Planning process (Version 2). 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. All areas, excluding the 2.54 ha of area in which the remaining infrastructure sits, have progressed through Landform establishment and growth medium development during the audit period and reflect the FLRP. Ecosystem and Land Use Establishment continues. The 2.54 ha of grazing final land use is scheduled to transition to Ecosystem and Land Use Establishment in 2026. Other remaining area relates to water management areas (water storage and voids).	C	N/A
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Rehabilitation Management Plan

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
36.	The Proponent shall prepare and implement a Rehabilitation Management Plan to the satisfaction of DRG. This plan must: (a) be prepared in consultation with the Department, DoI Lands & Water, OEH, Council and the CCC; (b) be submitted to DRG by the end of February 2012; (c) be prepared in accordance with any relevant DRG guideline; (d) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval; (e) address all aspects of rehabilitation including mine closure, final landform, and final land use; and (f) build to the maximum extent practicable on the other management plans required under this approval.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) - Approved Rehabilitation Objectives Statement, November 2023. - Draft Completion Criteria submitted on 16 December 2024 (not yet approved). - Forward Programs 2022-2024, 2024-2026 and 2025-2027 - Annual Rehabilitation Reports 2022, 2023 and 2024 - FLRP and rehabilitation status represented by Plan 1A and 1B attached to the 2025 Forward Program and shown on the NSW Seed Map. - GOC Annual Rehabilitation Planning Process 2021, Issue 2.	RMP dated July 2022 Issue 1; V3 (last updated in January 2025) is the current key rehabilitation planning document. a) Part 4, Section 4.2 of RMP details the consultation and stakeholders that was undertaken during development of the RMP, Rehabilitation Objectives and completion criteria. b) NT - The RMP commenced 29 July 2022. For the audit period prior to this, the CMOP had been in force. Therefore, this condition was not triggered. c) The RMP has been developed. A recommendation from the Resource Regulator's TAP conducted on 27 August 2024 was to update the RMP to align the structure with the form and way guideline, include substrate characterisation processes and include measures/management actions to avoid or minimise impacts of adverse seasonal and or weather conditions. The RMP was updated in January 2025 to address recommendations related to RMP structure. d) Part 6 of the RMP describes the rehabilitation implementation. This is supported by management plans and procedures including the GOC Annual Rehabilitation Planning Process and the Rocglen Water Management Plan. Part 7 of the RMP – Rehabilitation Quality	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			Assurance Process provides for the processes to ensure that rehabilitation is implemented in accordance with the nominated methodologies and identified risks to rehabilitation are being adequately addressed and closed out for relinquishment. e) The RMP addresses address all aspects of rehabilitation including mine closure, final landform and final land use. The final landform is provided in the FLRP and Part 2 of the RMP describes Final and use. f) The RMP was prepared with regard to other management plans required under the approval including the GOC Annual Rehabilitation Planning Process, Water Management Plan and the Aboriginal Cultural Heritage Management Plan.		

SCHEDULE 4 – ADDITIONAL PROCEDURES

NOTIFICATION OF LANDOWNERS/TENANTS

1.	By the end of December 2011, the Proponent shall notify in writing the owners of “Brolga”, “Surrey” and any privately-owned land within 2 kilometres of the proposed footprint of the open-cut pit that they are entitled to ask for an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated.	NT	This requirement was not triggered during the audit period.	NT	N/A
2.	As soon as practicable after obtaining monitoring results showing: (a) an exceedance of the relevant criteria in Schedule 3, the Proponent shall notify the affected landowner and/or tenants in writing of the exceedance, and provide regular monitoring results to each of these	NT	The recorded exceedances against relevant criteria in Schedule 3 were not attributed to site operations, therefore this	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	parties until the project is complying with the relevant criteria again; and (b) an exceedance of the relevant air quality criteria in Schedule 3, the Proponent shall send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and/or existing tenants of the land (including tenants of any mine-owned land).		requirement was not triggered during the audit period.		

INDEPENDENT REVIEW

Landowners

3.	If an owner of privately-owned land considers the project to be exceeding the relevant criteria in Schedule 3, then they may ask the Secretary in writing for an independent review of the impacts of the project on their land. If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary’s decision the Proponent shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: - consult with the landowner to determine his/her concerns; - conduct monitoring to determine whether the project is complying with the relevant criteria in Schedule 3; and - if the project is not complying with these criteria then identify the measures that could be implemented to ensure compliance with the relevant criteria; and (b) give the Secretary and landowner a copy of the independent review.	NT	This requirement was not triggered during the audit period.	NT	N/A
4.	If the independent review determines that the project is complying with the relevant criteria in Schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary. If the independent review determines that the project is not complying with the relevant impact assessment criteria in Schedule 3, then the Proponent shall: (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent person, and conduct further monitoring until the project complies with the relevant criteria; or (b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.	NT	This requirement was not triggered during the audit period.	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT					
Environmental Management Strategy					
1.	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by the end of December 2011; (b) provide the strategic framework for environmental management of the project; (c) identify the statutory approvals 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: - keep the local community and relevant agencies informed about the operation and environmental performance of the project; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the course of the project; - respond to any non-compliance; - respond to emergencies; and (f) include: - copies of any strategies, plans and programs approved under the conditions of this approval; and - a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	- Environmental Management Strategy (EMS), May 2018 - Management Plan Reviews	The site operates under an EMS, approved for use by the Department. The EMS is subject to annual review following submission of the Annual Reviews and if triggered by identified issues. (a) This requirement was not triggered in the current audit period. The existing EMS has been approved by the Department. (b) The document details the overall strategy to manage environmental considerations during the lifetime of the mine. (c) the statutory approvals are detailed in Section 3. (d) Roles, responsibilities, authorities and accountabilities of key personnel are detailed in Section 4. (e) Procedures to inform local communities, manage complaints, resolve disputes and respond to non-compliances and emergencies are detailed in Section 4. (f) Management plan, strategies and programs are not specifically included as part of the EMS but were provided in accompaniment to the EMS. A monitoring plan is provided in Section 2. ERM noted that figure 2 – Current Monitoring Locations still includes the noise monitoring locations, that the 2020 amendment to the Noise Management Plan removed following the 25-1-2021	C (Obs)	ERM recommends that WHC review and if required update Figure 2 during the next scheduled EMS review.

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			variation to the EPL which removed the requirement (M8) to monitor noise at those locations. ERM found the EMS to be generally appropriate for the intended use and generally did not identify failures to adhere to the EMS, therefore Rocglen is considered compliant with this condition.		

Adaptive Management

Management Plan Requirements

2.	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data; (b) a description of: - 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; (c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: - impacts and environmental performance of the project; - effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the project over time; (g) a protocol for managing and reporting any: - incidents; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.	- Air Quality and Greenhouse Gas Management Plan - Rehabilitation Management Plan - Noise Management Plan - Blast Management Plan - Water Management Plan - Heritage Management Plan - Road Traffic Noise Management Plan - Traffic Management Plan - Environmental Management Strategy - Management Plan Master Spreadsheet	The management plans reviewed by ERM were observed to contain detailed baseline data. All management plans were observed to contain the statutory requirements relevant to the topic covered, the limits and performance measurements and the indicators used to judge performance. The Management Plan Review Register sets out the reviews conducted for the management plans. Monitoring and reporting is covered in individual management plans and contingency measures are generally identified for unpredictable impacts. Improvement opportunities are identified as part of the annual reviews and continuous improvement of site management and activities was observed during the site visit. Management plans include protocols for managing incidents, complaints, non-compliances and exceedances. The plans all contain a periodic review protocol which Rocglen enact. Therefore, Rocglen is considered compliant with this condition.	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<i>Note: The Secretary may waive any of these requirements if they are unnecessary or unwarranted for particular management plans.</i>				
Annual Review					
3.	By the end of each December, the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must: (a) 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; (b) 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 - relevant statutory requirements, limits or performance measures/criteria; - monitoring results of previous years; and - relevant predictions in the EA; (c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the project; (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the project.	- Annual Reviews 2022, 2023 and 2024 - Annual Review Submissions	Annual Reviews were reviewed by ERM. The reviews include descriptions of the development including the rehabilitation stages and activities carried out over the preceding 12 months plus a look forward towards the subsequent 12 months. (a) the detailed descriptions are provided in the Annual Reviews. (b) monitoring results and complaints are summarised and discussed in the reviews. (c) non-compliances were identified in the reviews and attributed to causes where possible. Rectification and management measures were also identified where relevant. (d) Each review includes a discussion of the trends identified in the data collected over the preceding 12 months and generally provides a comparison against historical trends. (e) Discrepancies between measured and actual impacts are identified and discussed where applicable. (f) Future measures to target for environmental performance improvements are also discussed in each review.	C	N/A
Review of Strategies, Plans and Programs					
4.	Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 6 below; (c) the submission of an audit report under condition 8 below; and	Management Plan Master Spreadsheet	The register details the reviews conducted against the management plans over time. ERM observed that the plans have been subject to review	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	(d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. <i>Note: This is to ensure 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>		following each of the following annual reviews, IEAs and approval modifications.		

Community Consultative Committee

5.	The Proponent shall operate a Community Consultative Committee (CCC) for the project in general accordance with the <i>Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects</i> (Department of Planning, 2007, or its latest version), and to the satisfaction of the Secretary. <i>Notes:</i> <i>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval; and</i> <i>In accordance with the guideline, the Committee should be comprised of an independent chair and appropriate representation from the Proponent, Council and the local community.</i>	- CCC Meeting Minutes and Environmental monitoring Reports - Annual Reviews 2022, 2023 and 2024	A Community Consultative Committee (CCC) is in place for Rocglen and the meeting minutes are uploaded to the company website each year. The Annual Reviews also summarise CCC actions for the reporting period. The CCC normally meets twice per year in accordance with the guidelines, however following the mine ceasing mining operations the chairperson in 2023 changed the meeting frequency to once per year. It was noted that the CCC meetings occurred as required with Meeting Minutes for the audit period have been uploaded to the company website.	C (Obs)	N/A
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REPORTING

Incident Reporting

6.	As soon as is practicable after the Proponent becomes aware of any incident associated with the project, the Proponent shall notify the Secretary and any other relevant agencies 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.	- Annual Reviews 2022, 2023 and 2024 - Environmental Event Report (TSS), 05 October 2022	Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge. On 22 September 2022, Water discharged from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. The event was reported on 05 October 2022 following receipt of the ALS	NT	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			monitoring results that identified the exceedance. The HVAS exceedances noted in Schedule 3 – Condition 15 were reported to the Department with an explanatory letter attributing exceedances to causes other than site operations, therefore these events are not considered to trigger this condition.		

Regular Reporting

7.	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.	- IEA Report - 2013, 2016, 2019, 2022 - EPBC Compliance Report – 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 - Environmental Management Plans - EPL Monitoring 2013 – 2025 - Annual Reviews 2009 – 2024	All documents mentioned were available on their website.	C	N/A
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AUDITING

Independent Environmental Audit

8.	By the end of March 2013, 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. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and (e) 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. <i>Note: This audit team must be led by a suitably qualified auditor and include experts in any field specified by the Secretary.</i>	- Independent Environmental Audit (IEA) Report 2011, 2013, 2016, 2019, 2022 - IEA Terms of Reference	IEAs have been conducted for the site routinely in accordance with the requirements of this condition and were observed to meet the requirements of this condition.	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
9.	Within six weeks of the completion 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.	Independent Environmental Audit (IEA) Report 2022	The previous IEA was submitted to the Department along with an Audit Action Plan, which was generally implemented during the audit period. ERM notes that the 2022 IEA was submitted within the six week period, with the audit site visit completing on 7-4-22 and the IEA being submitted on 19-5-2022.	C	N/A

ACCESS TO INFORMATION

10.	The Proponent shall: (a) make copies of the following publicly available on its website: - 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, which have been reported in accordance with the 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.	Rocglen Website	The Rocglen website includes the documents in Condition 2 of Schedule 2 (EA, statement of commitments and a copy of this approval). The following were also identified on the website: - All current approvals - Approved strategies, plans and programs - Monitoring results summaries - Complaints register - CCC meeting minutes - Annual reviews, IEAs and other relevant project data ERM noted that the required information that needs to be made publicly available has been uploaded to the company website.	C	N/A
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Document details	
DOCUMENT TITLE	Table A2 - EPL
DOCUMENT SUBTITLE	Compliance with Environment Protection Licence (EPL) 12870
PROJECT NUMBER	0776499
Date	6 June 2025
Version	1.2
Author	Leanne Lee
Client name	Whitehaven Coal

Audit period: 7 April 2022 through 22 May 2025

Item	Assessment Requirement			Reference/ Evidence	Comments	Compliance	Recommendations
1. Administrative Conditions							
A1 What the licence authorises and regulates							
A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of mine related infrastructure.			N/A	Noted.	Note	N/A
A1.2	Scheduled Activity	Fee Based Activity	Scale	• Annual Review 2022, 2023 and 2024	The site has completed mining activities, and therefore tonnage of coal works and mining for coal is no longer relevant. Annual Reviews 2022, 2023 and 2024 reported no haulage movement and no exploration drilling during the reporting period.	C	N/A
	Coal works	Coal works	0 - 2000000 T annual handing capacity				
	Mining for coal	Mining for coal	0 - 500000 T annual production capacity				
A2 Premises or plant to which this licence applies							
A2.1	The licence applies to the following premises: Premises Details ROCGLEN COAL MINE WEAN ROAD GUNNEDAH NSW 2380 THE LAND BOUND WITHIN MINING LEASES ML1662 & ML1620 AS SHOWN ON THE MAP ENTITLED 'FIGURE 1 - ROCGLEN COAL MINE EPL MONITORING SITES' RECEIVED BY THE EPA ON 24 APRIL 2017 (DOC17/291855).			N/A	Noted.	Note	N/A
A3 Information supplied to the EPA							
A3.1.	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.			N/A	Compliance with this is assessed throughout this document.	Note	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																				
2. Discharges to Air and Water and Applications to Land																									
P1 Location of monitoring/discharge points and areas																									
P1.1	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.	N/A	Noted.	Note	N/A																				
P1.2	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><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>4</td><td>Ambient air monitoring</td><td></td><td>Location labelled BD4 (Surrey) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).</td></tr><tr><td>6</td><td>Ambient air monitoring</td><td></td><td>Location labelled BD6 (Roseberry) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).</td></tr><tr><td>10</td><td>Ambient air monitoring</td><td></td><td>PM10 monitoring location on the property 'Roseberry' labelled 'BA2' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).</td></tr><tr><td>17</td><td>Ambient air monitoring</td><td></td><td>Real time air quality monitor located on the property 'Roseberry' labelled 'BR1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).</td></tr></table>	EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	4	Ambient air monitoring		Location labelled BD4 (Surrey) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	6	Ambient air monitoring		Location labelled BD6 (Roseberry) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	10	Ambient air monitoring		PM10 monitoring location on the property 'Roseberry' labelled 'BA2' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	17	Ambient air monitoring		Real time air quality monitor located on the property 'Roseberry' labelled 'BR1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	- EPL Monthly Monitoring Summary (April 2022 – April 2025) - Point 10 HVAS Monitoring Data - Point 17 TEOM PM10 monitoring data (1/4/2022 – 12/05/2025) - Annual Reviews (2022, 2023) - Annual Returns (2021-2022, 2022-2023, 2023-2024)	All points were monitored for ambient air characteristics, including deposited dust monitoring (at Point 4 and 6), PM ₁₀ (at Point 10) and air quality at point 17. The monitoring points at Roseberry were observed by the auditors and were identified to be in a reasonable condition and suitable for the intended purposes. See Section M2.2 for more information.	C	N/A
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																						
4	Ambient air monitoring		Location labelled BD4 (Surrey) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).																						
6	Ambient air monitoring		Location labelled BD6 (Roseberry) as shown on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).																						
10	Ambient air monitoring		PM10 monitoring location on the property 'Roseberry' labelled 'BA2' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).																						
17	Ambient air monitoring		Real time air quality monitor located on the property 'Roseberry' labelled 'BR1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).																						
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><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>11</td><td>Wet Weather Discharge</td><td>Wet Weather Discharge</td><td>Discharge location labelled 'LDP11' on the map entitled</td></tr></table>	EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	11	Wet Weather Discharge	Wet Weather Discharge	Discharge location labelled 'LDP11' on the map entitled	- EPL Monthly Monitoring Summary (April 2022 – April 2025) - Wet Weather Discharge Monitoring Spreadsheet - Annual Returns (2021-2022, 2022-2023, 2023-2024)	There are two Licenced Discharge Points (LDPs) nominated in the current EPL 12870, LDP11 to the south of the site, and LDP12 to the north of the site. Ambient water quality monitoring locations are located as described in the P1.3 table. All points listed are included in the EPL Monitoring Data documents and ERM did not identify evidence of failure to monitor any required	C	N/A												
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																						
11	Wet Weather Discharge	Wet Weather Discharge	Discharge location labelled 'LDP11' on the map entitled																						

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
		Discharge water quality monitoring	Discharge water quality monitoring	'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	- Water Management Plan, May 2018 - Site observations	points, therefore Rocglen is compliant with this condition. See Section M2.2, M2.3, L2.4 and L2.5 for more information.		
12	Wet Weather Discharge	Discharge water quality monitoring	Wet Weather Discharge Discharge water quality monitoring	Discharge location labelled 'LDP12' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).				
13	Ambient water quality monitoring			Monitoring location to the north-west of the mining lease labelled 'Driggle Draggie Creek (DDCK)' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).				
14	Ambient water quality monitoring			Monitoring location to the south of the mining lease labelled 'Unnamed Drainage Channel (UNDC)' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).				
15	Ambient water quality monitoring			Monitoring location on the eastern side of the mining lease labelled 'SD7' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).				
16	Ambient water quality monitoring			Monitoring location labelled 'Void Water Dam' on the map entitled 'Figure 1 -				

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
				Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).				
P1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.				- Site observations - Real time weather data	Meteorological weather station was observed by the auditors and were identified to be in a reasonable condition and suitable for the intended purposes and at the location as specified in the EPL. The real-time data provided outputs for the required analytes and examples of failure to measure in accordance with the guideline were not identified. ERM did not identify any examples of non-compliances against this condition.	C	N/A
	EPA identification no.	Type of Monitoring Point	Location Description					
	W1	Weather Analysis	Weather station as shown on the map entitled 'Rocglen EPL 12870 Weather Station Relocation' received by the EPA on 20 September 2021 (DOC21/914970).					

3. LIMIT CONDITIONS

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 <i>Protection of the Environment Operations Act 1997</i> .	- Annual Returns (2021-2022, 2022-2023, 2023-2024) - EPL Monthly Monitoring Summary (April 2022 – April 2025) - Wet Weather Discharge Monitoring Spreadsheet - Complaints Register (2021-2025)	The site has generally maintained compliance with the monitoring requirements of the EPL throughout the audit period. No complaints were recorded within the audit period (up to 21 May 2025), therefore no complaints associated with the environmental performance of the project were noted for the audit period. One exceedance of the total suspended solid (TSS) limit was reported in September 2022 due to extreme weather limiting the access to site such that staff could not prevent the discharge from occurring. Water discharge from LDP11 with TSS exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. EPA was notified as per requirements under this licence with no further action	NC (duplicate)	See condition L2.4 and L2.5 for details.
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																								
			required. See condition L2.4 for details.																										
L2 Concentration Limits																													
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.	N/A	Noted	Note	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.	N/A	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 tables.	N/A	Noted.	Note	N/A																								
L2.4	Water and/or Land Concentration Limits POINT 11,12 <table><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><tr><td>Oil and grease</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5 – 8.5</td></tr><tr><td>Total suspended solids</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></table>	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	pH	pH				6.5 – 8.5	Total suspended solids	Milligrams per litre				50	- EPL Monthly Monitoring Summary (April 2022 – April 2025) - Wet Weather Discharge Monitoring Spreadsheet - Controlled Discharge Spreadsheet - Annual Returns (2021-2022, 2022-2023, 2023-2024) - Environmental Advisor Interviews	Monitoring was observed to have been undertaken during discharge events and reported in the Annual Reviews and assessed for compliance in the Annual Returns. All discharge sampling appeared to be compliant to the concentration limit outlined in this condition, except for an event on 22 September 2022 and wet weather discharge events outlined below. Wet weather discharges, as specified in L2.5 below, from LDP11 included the following events: 15 May 2022; 5 August 2022; 16 September 2022; 9 October 2022; 21 October 2022; 1 November 2022; 14 November 2022; 3 February 2023; 13 March 2023; 25 March 2023 (two samples were taken); 1 June 2024; 6 August 2024; 2 December 2024; and 29 March 2025.	NC	Historical exceedance with no further action required by the EPA and deemed as no ongoing action required.
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																								
pH	pH				6.5 – 8.5																								
Total suspended solids	Milligrams per litre				50																								

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			Wet weather discharges from LDP12 during the audit period included the following: • 21 October 2022; and • 14 November 2022. Following heavy rain between 15 September and 21 September 2022, 26.6mm of rain was recorded on 22 September 2022, which is below the threshold of 38.4mm for wet water discharge. On 22 September 2022, Water discharge from LDP11 with total suspended solid (TSS) exceeded EPL limit (50mg/l) at 3,480mg/L. TSS exceeded EPL limits and classed as environmental harm. This exceedance was reported to the EPA as per R2 and R3 of the EPL, and reported as a non-compliance in the Annual Return and Annual Review of that year. Environmental Advisors advised during interview that the Site team had no access to the Site during the flooding in the wider area. Helicopters were sent to the Site as soon as possible in order to redirect the discharge. EPA acknowledged that the event was to be reported as a non-compliance, though they considered under the circumstance that Rocglen to have done all they could in the circumstances. No further action was required from the EPA.		
L2.5	The Total Suspended Solids concentration limits specified for Points 11 and 12 may be exceeded for water discharged provided that: (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 (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. 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.	N/A	Noted. See Condition L2.4 for events when L2.5 was applied.	Note	N/A

Item	Assessment Requirement					Reference/ Evidence	Comments	Compliance	Recommendations
L3 Waste									
L3.1	Reject material from the Whitehaven CHPP can be disposed of at the premises in accordance with the Project Approval 10_0015 as modified.					Environmental Advisor Interviews	Site management advised that no reject material was disposed during the 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.					- Site observation - Environmental Advisor Interviews - Noise management plan, July 2020 - Complaints Register (2021-2025)	ERM did not observe any noise produced from the Site during site visit. Site management advised that no noise monitoring has been conducted since active mining ceased in 2019. Noise monitoring is reported to be undertaken when a complaint is received related to noise, for which there have been none in the audit period. Management also advised that there have not been any demolition or explosive work during audit period. In additional, the Complaints Registers within the audit period showed no complaints. As a result, Rocglen is compliant with this condition.	C	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				
L4.2	The noise limits identified in the above table do not apply at privately owned residences that are: a) identified as residences subject to acquisition or noise mitigation on request within the Project Approval; or b) subject to a private agreement, relating to the noise levels, between the licensee and the land owner.					N/A	There are two Whitehaven-owned residences on the opposite side of Wean Road to the mine site. There are no residences subject to acquisition/noise mitigation or private agreement relating to noise levels.	Note	N/A
L4.3	For the purpose of the table above: a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays;					N/A	Noted.	Note	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	b) Evening is defined as the period from 6pm to 10pm; c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.				
L4.4 Determining Compliance					
L4.4	To determine compliance: a) with the Leq(15 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located: i) approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or 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 iii) within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) with the LA1(1 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in the Noise Limits table, the noise measurement equipment must be located: i) at the most affected point at a location where there is no dwelling at the location; or ii) at the most affected point within an area at a location prescribed by part (a) or part (b) of this condition.	- Site observation - Environmental Advisor Interviews - Noise management plan	ERM did not observe any noise produced from the Site during site visit. Site management advised that no noise monitoring has been conducted since active mining ceased in 2019. Noise monitoring is reported to be undertaken when a complaint is received related to noise, for which there have been none in the audit period. Management also advised that there have not been any demolition or explosive work during audit period. As a result, Rocglen is compliant with this condition.	C	N/A
L4.5	The noise limits set out in condition L3.1 and L3.3 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions. For the purposes of this condition: a) Data recorded by the meteorological station identified as EPA Identification Point(s) W1 must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.	- Site observation - Environmental Advisor Interviews - Noise management plan	ERM did not observe any noise produced from the Site during site visit. Site management advised that no noise monitoring has been conducted since active mining ceased in 2019. Management also advised that there have not been any demolition or explosive work during audit period. As a result, Rocglen is compliant with this condition.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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.	N/A	Noted.	Note	N/A
L4.7	The noise limits set by this licence do not apply where a current legally binding agreement exists between the licensee and the occupant of a residential property that: a) agrees to an alternative noise limit for that property; or b) provides an alternative means of compensation to address noise impacts from the premises. A copy of any agreement must be provided to the EPA before the licensee can take advantage of the agreement.	NT	These requirements of this condition were not triggered during the audit period.	NT	N/A

L5 Blasting

L5.1	The airblast overpressure level from blasting operations at the premises must not exceed 115dB (Lin Peak) at any noise sensitive locations 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.	Environmental Advisor Interviews	Site management advised that there was no blasting conducted during the audit period, hence no exceedances of the applicable ground vibration and air blast overpressure limits during the audit period.	NT	N/A
L5.2	The airblast overpressure level from blasting operations at the premises must not exceed 120dB (Lin Peak) at any time at any noise sensitive locations. 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.	N/A	Refer to L5.1	NT	N/A
L5.3	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 5mm/sec at any noise sensitive locations 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.	N/A	Refer to L5.1	NT	N/A
L5.4	The ground vibration peak particle velocity from the blasting operations carried out in or on the premises must not exceed 5mm/sec for more than five per cent of the total number of blasts over each reporting period at monitoring points 31, 32, 33, or 34 as defined in Condition P1.4 of this licence.	N/A	Refer to L5.1	NT	N/A
L5.5	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances:	- Environmental Advisor Interviews - Complaints Register (2021-2025)	Site management advised that there was no blasting conducted during the audit period, hence no blast fume were produced or emitted during the audit period. No complaints related to offensive fumes were recorded during the audit period, therefore ERM	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or 2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.		considers Rocglen compliant with this condition.		
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.	Site observations	(a) The auditors observed that in general, the processing, handling, movement and storage of materials and substances used as part of the Rocglen operations were considered to be appropriate. (b) Compliance with waste management requirements is addressed in the Planning Approval table, Schedule 3, Condition 32.	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.	- Maintenance Spread Sheets 2022-2024 - Site Inspection - Environmental Advisor Interviews	During the site inspection it was observed that plant and equipment were generally maintained in a proper and efficient condition and operated appropriately. There were no examples of failure to maintain equipment identified by ERM. Rocglen utilises the Pulse system to track maintenance by creation of work orders that are tracked in the database and closed out upon completion of the works by verification checklists and other means. Maintenance schedules are put into the system based on manufacturers specifications when the plant/equipment is procured, and ad hoc requirements are entered by site staff as needed. Since 2024, maintenance activities have largely ceased as rehabilitation earthmoving works are primarily complete.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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.	- Environmental Advisor Interviews - Air Quality and Greenhouse Gas Management Plan, March 2022 - Real time dust monitoring – D3 2022, 2023, 2024 and 2025	The AQGG management plan details the mitigation measures employed by the mine during operational activities to minimise odour, fumes and dust emissions. Specific measures are identified for vegetation clearing and soil stripping, drilling and blasting, overburden ripping and placement, coal excavation, crushing and screening, internal transport, external transport and rehabilitation. The identified controls are considered to be appropriate for managing air quality concerns. Operations at site were limited to rehabilitation during the audit period and site observations did not identify issues with generation of odour, fumes and dust from the operations. Complaints associated with odour, fumes and dust were not identified for the site, therefore Rocglen are considered compliant with this condition. ERM did not identify any examples of failure to minimise visible air pollution. Operations are now limited to rehabilitation and visible air pollution has not been identified in the records available to ERM. Surface disturbance was observed to be limited to the ancillary site areas required for site management. Progressive rehabilitation to disturbed surface areas were observed during the site visit and the areas currently subject to disturbance were considered to be appropriate to satisfy the requirements of this condition. ERM reviewed monitoring data from the air quality and meteorological equipment on-site and confirmed that real-time data were available and regularly reviewed. ERM did not identify any non-compliances with this condition.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
O3.2	Trucks transporting coal from the premises must be covered immediately after loading to prevent wind blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks.	- Environmental Advisor Interviews - Complaints Register (2021-2024)	Site management advised that there was no coal production during the audit period and therefore no truck transporting coal from the premise. Complaints from the community related to dust or spillage from trucks were not identified from the audit period.	NT	N/A

O4 Other Operating Conditions

Blast fumes

O4.1	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases (whether visible or invisible, odorous or odourless) from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances: (i) are harmful to (or is likely to be harmful to) a person that is outside the premises from which it is emitted, or (ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.	N/A	Noted. See findings against condition L5.5 for an assessment of compliance.	NT	N/A
O4.2	Pollution Incident Response Management Plan 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.	- Pollution Incident Response Management Plan (dated August 2018) - Environmental Management Strategy (dated August 2018) - Annual Returns (2021-2022, 2022-2023, 2023-2024)	A PIRMP is in place for the site that documents the notification requirements in the event of a pollution event and other incidents. In addition to the PRIMP, the Environmental Management Strategy states that the responses to individual situations are recorded in an Emergency Management Plan for the site which includes both health & safety and environmental considerations. The Site did not record any trigger of the PIRMP during the audit period in the Annual Returns. Therefore, Rocglen is considered compliant with this condition.	C	N/A
O4.3	The licensee must keep the PIRMP on the premises at all times.	Site Observations	The auditors observed a copy of the PIRMP at the premises.	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.	- EPL Monitoring Data - Annual Returns (2021-2022, 2022-2023, 2023-2024) - Wet Weather Monitoring Spreadsheet	Monitoring results required under this licence were recorded and retained in various spreadsheets and PDFs and were generally observable on the Rocglen website, with exceptions identified limited to mistakes in preparing the documents and not failure to obtain the monitoring results. ERM reviewed results related to surface water, ground water, weather and dust monitoring data and did not identify any examples of non-compliance with this condition.	C	N/A
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; 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.	- EPL Monitoring Data - Annual Returns (2021-2022, 2022-2023, 2023-2024) - Environmental Advisor Interviews	All records required for the licence reviewed by ERM were considered to be in compliance with this condition. Records reviewed were found to be in legible PDF format available on the Rocglen website. Records available online dated back to 2012 which is more than 4 years. Site management advised that EPA has not requested to see them.	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: 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.	- Sample of Laboratory Certificates of Analysis - Point 10 BA 2 PM10 on 29 May 2024, - Point 10 BA 2 PM10 on 30 January 2025 - Controlled discharge Monitoring Spreadsheet - Wet Weather discharge Monitoring Spreadsheet	ERM reviewed a sample of Chains of Custody (COCs) from each sampling location. The details required to be collected by this condition were recorded in the COCs. It was noted that the name of the person who collected the sample is not included in the EPL monitoring data report and only in the COCs. The records of details are also included in the Certificates of Analysis.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		- Sample of Chain of Custody - Point BA 2 PM10 on 29 May 2024, - Point BA 2 PM10 on 30 January 2025 - Point 4 BD 4 and Point 6 BD 6 on 6 January 2025 - Point 11 LDP 11 and Point 14 UNDC on 6 August 2024 - Point 12 LDP 12 on 4 April 2023 - Point 13 DDCK and Point 14 UNDC on 14 March 2023 - Point 15 SD 7 and Point 16 VOD on 16 February 2024			

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.	N/A	Noted.	Note	N/A								
M2.2	Air Monitoring Requirements POINT 4,6 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates – Deposited Matter</td><td>grams per square metre per month</td><td>Continuous</td><td>AM-19</td></tr></table> POINT 10	Pollutant	Units of measure	Frequency	Sampling Method	Particulates – Deposited Matter	grams per square metre per month	Continuous	AM-19	- EPL Monthly Monitoring Summary (April 2022 – April 2025) - Point 10 HVAS Monitoring Data - Point 17 TEOM PM10 monitoring data	ERM reviewed the monitoring data associated with air quality and found that the points identified in this condition were monitored during the audit period. The units of measurement were in accordance with this condition and the sampling methodology was consistent with those required under this condition. <u>Point 4 and Point 6</u>	NC	Ensure monitoring downtime due to system or equipment failure is within the required range (10% for continuous emission monitoring methods). When the original equipment is expected to be out of action for a long period of time and if it
Pollutant	Units of measure	Frequency	Sampling Method										
Particulates – Deposited Matter	grams per square metre per month	Continuous	AM-19										

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Pollutant	Units of measure	Frequency	Sampling Method	(1/5/2022 – 12/05/2025) - Annual Reviews (2022, 2023) - Annual Returns (2021-2022, 2022-2023, 2023-2024)	Maximum reading at Point 4 and Point 6 for the month is published on the Rocglen website as part of the monthly EPL monitoring data report. ERM did not identify any non-compliance in the data.		is deemed necessary, suitable replacement equipment will be deployed.
	PM10	micrograms per cubic metre	Every 6 days	AM-18		<u>Point 10 (BA 2 Roseberry) PM10 HVAS</u>		
	POINT 17							
	Pollutant	Units of measure	Frequency	Sampling Method		During the Audit, ERM identified various reporting gaps in the monitoring data published on Rocglen website. Rocglen has updated the published data with correction log as per EPA requirements. In addition, a 10-day monitoring gap between 28/7/2024 and 7/8/2024 was identified. Site management advised that this was due to a power outage on the scheduled sample date on 3/8/2024. A make-up run was completed on 9/8/2024. The Site is considered compliant at this monitoring point during the audit period.		
	PM10	micrograms per cubic metre	Continuous	AM-22		<u>Point 17 (BR 1 Roseberry) PM10 TEOM</u> In relation to frequency of monitoring, some data was not captured at the required frequency at Point 17 during the audit period due to system failure. The number of consecutive days without monitoring generally ranges from 1-6, with the exception of a 30-day monitoring outage from 18 April 2023 to 19 May 2023 due to a mass flow controller board failure. A total of 61 days during the audit period were identified when monitoring had not been completed. The EPA Approved methods for sampling and analysing air emissions stated that all continuous emission monitoring (CEM) methods are allowed for 10% downtime. Within the 2022-2023 audit period, a total of 54 days of data gap was recorded at Point 17 which is a 15% downtime during the reporting period. ERM considers this as a non-compliance in the monitoring		

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations																																																																																				
						frequency as required by this condition.																																																																																						
M2.3	Water and/ or Land Monitoring Requirements POINT 11,12 <table><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 centimetre</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><tr><td>Total organic carbon</td><td>milligrams per litre</td><td>Special Frequency 1</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Special Frequency 1</td><td>Grab sample</td></tr></tbody></table> POINT 13,14,15 <table><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 centimetre</td><td>Special Frequency 2</td><td>In situ</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Special Frequency 2</td><td>In situ</td></tr><tr><td>Total organic carbon</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr></tbody></table> POINT 16 <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Aluminium</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Arsenic</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Bicarbonate</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Chloride</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Conductivity</td><td>microsiemens per centimetre</td><td>Quarterly</td><td>In situ</td></tr><tr><td>Iron</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Manganese</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Quarterly</td><td>Grab sample</td></tr></tbody></table>				Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Special Frequency 1	In situ	Oil and Grease	milligrams per litre	Special Frequency 1	Grab sample	pH	pH	Special Frequency 1	In situ	Total organic carbon	milligrams per litre	Special Frequency 1	Grab sample	Total suspended solids	milligrams per litre	Special Frequency 1	Grab sample	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	pH	pH	Special Frequency 2	In situ	Total organic carbon	milligrams per litre	Special Frequency 2	Grab sample	Total suspended solids	milligrams per litre	Special Frequency 2	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Aluminium	milligrams per litre	Yearly	Grab sample	Arsenic	milligrams per litre	Yearly	Grab sample	Bicarbonate	milligrams per litre	Yearly	Grab sample	Chloride	milligrams per litre	Yearly	Grab sample	Conductivity	microsiemens per centimetre	Quarterly	In situ	Iron	milligrams per litre	Yearly	Grab sample	Manganese	milligrams per litre	Yearly	Grab sample	Oil and Grease	milligrams per litre	Quarterly	Grab sample	EPL Monthly Monitoring Summary (April 2022 – May 2025) Annual Reviews (2022, 2023) Annual Returns (2021-2022, 2022-2023, 2023-2024) Wet Weather Discharge Monitoring Spreadsheet Controlled Discharge Spreadsheet Environmental Advisor Interviews	ERM reviewed the monitoring data associated with the water monitoring for the site, for both controlled discharge and wet weather discharge. In the last audit, a non-compliance was identified regarding the measurement of pH and conductivity under this condition was not measured in-situ. Site management advised that all measurement has been changed to in situ measurement since the last audit. Point 11 and 12 ERM reviewed the records provided by Rocglen. The units of measurement were consistent with those required under this condition. All measurements were reported to be within 12 hours of discharge as required by special frequency 1 under this condition. Condition L2.4 and L2.5 above outlined the compliance status regarding measurement at special frequency 1 and wet weather conditions. Point 13, 14 and 15 Ambient water quality monitoring at Point 13 (DDCK) included the following: 5 August 2022; 16 September 2022; 9 October 2022; 21 October 2022; 1 November 2022; 14 November 2022; and 29 March 2025. Ambient water quality monitoring at Point 14 (UNDC) included the following: 5 August 2022; 16 September 2022; 9 October 2022;	C	N/A
Pollutant	Units of measure	Frequency	Sampling Method																																																																																									
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Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	pH	pH	Quarterly	In situ		21 October 2022; 1 November 2022; 14 November 2022; 6 August 2024; and 29 March 2025. Ambient water quality monitoring at Point 15 (SD7) included the following: 21 October 2022; and 1 November 2022. <u>Point 16</u> Point 16 was measured for Aluminium, Arsenic, Bicarbonate, Chloride, Iron, Manganese, Sodium yearly on: 18 May 2022; 25 May 2023; and 26 June 2024. Conductivity, Oil & Grease, pH, TOC and TSS were measured quarterly, in the following months: 2022 May, August; 2023 February, May, August, November; 2024 February, May, August, November/December; and 2025 February.		
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.				N/A	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 a flow during the quarter) at a time when there is flow and as soon as practicable after each wet weather discharge from points 11 and 12 commences and in any case not more than 12 hours after each discharge commences. Note: Groundwater monitoring is not included in the EPL as this is addressed in the Department of Planning and Environments' project approvals. Groundwater monitoring must be undertaken in accordance with the currently approved water management plan.				N/A	Noted.	Note	N/A
M2.6	At Monitoring Point 16, monitoring is not required when the monitoring site is dry or inadequate water is available to collect a sample.				N/A	Noted.	Note	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																														
M3 Testing methods – concentration limits																																			
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: 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 Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 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".	Air Quality and Greenhouse Gas Management Plan, dated March 2022	The Air Quality & Greenhouse Gas Management Plan stated that monitoring will be undertaken according to the Department of Environment and Conservation NSW Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales 2006 and various Australian Standards: - AS/NZS 3580.1.1–2007; - AS/NZS 3580.9.6–2003; - AS 3580.10.1-2003; - AS 3580.9.8-2001; and - AS/NZS 3580.9.8-2008.	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.	Water Management Plan, May 2018	Monitoring is generally undertaken by ALS. In general, ERM found that the methodology employed was in accordance with the requirements of the approved methods publication.	C	N/A																														
M4 Weather monitoring																																			
M4.1	For each monitoring point specified in the table below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters 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.	N/A	Noted. The site conducts monitoring of the parameters listed in the table.	Note	N/A																														
	POINT W1 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Rainfall</td><td>mm/h</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 minutes</td><td>AM-2 & AM-4</td></tr><tr><td>Wind Direction @ 10 metres</td><td>°</td><td>Continuous</td><td>15 minutes</td><td>AM-2 & AM-4</td></tr><tr><td>Temperature @ 2 metres</td><td>°C</td><td>Continuous</td><td>15 minutes</td><td>AM-4</td></tr><tr><td>Temperature @ 10 metres</td><td>°C</td><td>Continuous</td><td>15 minutes</td><td>AM-4</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Rainfall	mm/h	Continuous	1 hour	AM-4	Wind Speed @ 10 metres	m/s	Continuous	15 minutes	AM-2 & AM-4	Wind Direction @ 10 metres	°	Continuous	15 minutes	AM-2 & AM-4	Temperature @ 2 metres	°C	Continuous	15 minutes	AM-4	Temperature @ 10 metres	°C	Continuous	15 minutes	AM-4	- Weather Station Monitoring Data - Site observations	The weather station was observed by the auditors and was observed to be in a reasonable condition and suitable for the intended purposes. The real-time data provided outputs for the required analytes and examples of failure to measure in accordance with the guideline were not identified. Sampling methods were reportedly in accordance with the methods described in the table. ERM did not identify any examples of non-compliances against this condition.	C	N/A
Parameter	Sampling method	Units of measure	Averaging period	Frequency																															
Rainfall	mm/h	Continuous	1 hour	AM-4																															
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Item	Assessment Requirement					Reference/ Evidence	Comments	Compliance	Recommendations
	Sigma theta @ 10 metres	°	Continuous	15 minutes	AM-2 & AM-4				
	Solar Radiation	W/m2	Continuous	15 minutes	AM-4				
	Additional Requirements: - Siting	-	-	-	AM-1 & AM-4				
M4.2	The meteorological weather station must be maintained so as to be capable of continuously monitoring the parameters specified in this section.					- Weather Station Calibration Reports - Real-time weather monitoring data	The meteorological weather station is subject to routine maintenance and calibration. The continuous data stream was reviewed and examples of failure to monitor continuously during the audit period were not identified. A sample of the calibration report were provided for review: 6-monthly: 18 May 2022; 14 September 2023; and 26 February 2025. 12-monthly: 9 December 2022; and 26 March 2024.	C	N/A

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.					- Community Complaints Register (2022-2025) - Rocglen Website - Annual Returns (2021-2022, 2022-2023, 2023-2024)	Complaints Registers for 2022-2025 are available on the Rocglen Website which showed that no complaints were recorded within this time period.	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;					Community Complaints Register (2022-2025)	Complaints Registers 2022-2025 are available on the Rocglen Website which showed that no complaints were recorded within this time period.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	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.				
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	- Community Complaints Register (2022-2025) - Rocglen Website	The Site retains records of complaints from 2008 on the Rocglen website, which is greater than four years prior to the start of the audit period. Therefore, Rocglen is compliant with this condition.	C	N/A
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Site Environmental Advisor Interviews	According to site management, authorised officers of the EPA did not request to see the complaints record during the audit period, therefore this condition was not triggered.	NT	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.	- Community Complaints Register (2022-2025) - Rocglen website - Annual Returns (2021-2022, 2022-2023, 2023-2024)	Rocglen maintains complaints registers covering the entirety of the audit period. Complaints Registers 2022-2025 are available on the Rocglen Website which showed that no complaints were recorded within this time period.	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.	Rocglen website	The telephone complaints line is listed on the Rocglen website (link: Rocglen Mine – Whitehaven Coal), with a preface of 'Contact us for more information, to provide feedback or to lodge a complaint.'	C	N/A
M6.3	The preceding two conditions do not apply until 60 days after the date of the issue of this licence.	N/A	The licence was issued greater than 3 months prior to the audit period, therefore this condition was not triggered.	NT	N/A

M7 Blasting

M7.1	To determine compliance with condition(s) L5.1, L5.2, L5.3 and L5.4:	Environmental Advisor Interviews	As per L5.1, Site management advised that there was no blasting	NT	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations						
	a) Airblast overpressure and ground vibration levels experienced at the following noise sensitive locations must be measured and recorded for all blasts carried out in or on the premises and electronically recorded at points BB1 and BB3. b) Instrumentation used to measure the airblast overpressure and ground vibration levels must meet the requirements of Australian Standard AS 2187.2-2006. Note: A breach of the licence will still occur where airblast overpressure or ground vibration levels from the blasting operations at the premises exceeds the limit specified in the conditions of this licence at any “noise sensitive locations” other than the locations identified in the above condition.		conducted during the audit period, hence no exceedances of the applicable ground vibration and air blast overpressure limits during the audit period.								
M7.2	For the purpose of condition M7.1, the blast monitoring locations are described as: <table><tr><th>EPA Identification No.</th><th>Description of Location</th></tr><tr><td>BB1</td><td>Property 'Retreat' residence labelled 'BB1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017(DOC17/291855)</td></tr><tr><td>BB3</td><td>Property 'Surrey' residence labelled 'BB3' entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).</td></tr></table>	EPA Identification No.	Description of Location	BB1	Property 'Retreat' residence labelled 'BB1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017(DOC17/291855)	BB3	Property 'Surrey' residence labelled 'BB3' entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).	N/A	Refer to L5.1 and M7.1.	NT	N/A
EPA Identification No.	Description of Location										
BB1	Property 'Retreat' residence labelled 'BB1' on the map entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017(DOC17/291855)										
BB3	Property 'Surrey' residence labelled 'BB3' entitled 'Figure 1 - Rocglen Coal Mine EPL Monitoring Sites' received by the EPA on 24 April 2017 (DOC17/291855).										

6. Reporting Conditions

R1

Annual return documents

R.1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	• Annual Returns (2021-2022, 2022-2023, 2023-2024) • EPA POEO Public Register	The Annual Returns for the audit period were prepared according to the EPA preferred method using the online form. All of the required sections were completed and submitted to the EPA for each year in the audit period.	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. 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.	- Annual Returns (2021-2022, 2022-2023, 2023-2024) - AR submission record on EPA eConnect Platform	The Annual Returns were prepared and submitted to the EPA for each year in the audit period.	C	N/A
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	- Site Environmental Advisor Interviews - NSW EPA POEO Public Register	The licence was not transferred during the audit period, therefore this condition was not triggered.	NT	N/A
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Site Environmental Advisor Interviews	The licence was not surrendered during the audit period, therefore this condition was 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').	- Annual Return submission receipt emails (2022, 2023) - EPA POEO Public Register - Site Environmental Advisor Interviews	Site management advised that the Annual Returns from years 2022, 2023, 2024 were submitted on time via eConnect EPA. Annual Returns are due annually on 28 September. Submission receipt emails and POEO Public Register showed that the 2022, 2023, 2024 were submitted on 14 September 2022, 6 September 2023 and 12 September 2024 respectively.	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 (2020-2021, 2021-2022, 2022-2023, 2023-2024)	Annual Returns (2020-2021, 2021-2022, 2022-2023, 2023-2024) were provided for review	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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 holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Returns (2021-2022, 2022-2023, 2023-2024)	Annual Returns reviewed by ERM from the audit period included a signed Statement of Compliance.	C	N/A

R2**Notification of environmental harm**

	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.	Site Environmental Advisor Interviews	The requirement for incident notification was trigger for the discharge exceedance event on 22 September 2022, outlined in L2.4. All notifications required in R2 and R3 of the EPL were complied with, see details below.	C	N/A
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	- Email receipt from EPA acknowledging the notification made on the phone (dated 5 October 2022) - Email chain between Rocglen and EPA (dated 6-12 October 2022)	ERM reviewed the email receipt from the EPA dated 5 October 2022, stating that Notification to the EPA via the EPA Pollution Notification line was made on the day regarding the discharge exceedances on 22 September 2022. An EPA case officer emailed Rocglen on 6 October requesting written report to be submitted within 7 days as per R2.2, R3.1 and R3.3.	C	N/A
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	- Email chain between Rocglen and EPA (dated 6-12 October 2022) - Email from EPA (dated 13 October 2022)	According to the email chain between Rocglen and EPA, a written report regarding the discharge exceedances on 22 September 2022 was submitted on 11 October 2022, with the supplementary appendix attached on 12 October. EPA replied via email on 13 October 2022 acknowledged receiving the report and advised that the event will need to be reported as a non-compliance however EPA considered that Rocglen to have done all they could in the circumstances.	C	N/A

R3 Written report

R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or	Site Environmental Advisor Interviews	An EPA case officer emailed Rocglen on 6 October 2022 requesting a written report to be submitted within 7 days as per R2.2, R3.1 and	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	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.	Email chain between Rocglen and EPA (dated 6-12 October 2022)	R3.3, regarding the discharge exceedances on 22 September 2022. See Section R2 above for details. Site management reported that no other written requests from the EPA has been received during the audit period.		
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.	Site Environmental Advisor Interviews	Site management reported that the only written request for an event from the EPA was the instance on 6 October 2022 as described above. The Site had not been received other requests during the audit period.	C	N/A
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	- Site Environmental Advisor Interviews - Email chain between Rocglen and EPA (dated 6-12 October 2022)	An EPA case officer emailed Rocglen on 6 October requesting written report to be submitted within 7 days as per R2.2, R3.1 and R3.3, regarding the discharge exceedances on 22 September 2022. See Section R2 above for details. WHC submitted the 7 day report included the required information. Site management reported that no other written requests from the EPA has been received during the audit period.	C	N/A
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.	Site Environmental Advisor Interviews	Site management reported that written requests for further details from the EPA had not been received during the audit period.	NT	N/A
R4					
Other reporting conditions					
R4.1	The licensee must report any exceedance of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	Environmental Advisor Interviews	As per L5.1, Site management advised that there was no blasting conducted during the audit period, hence no exceedances in blasting limit during the audit period.	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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.	Site observations	A copy of the licence is kept on the premises and is available on the company website.	C	N/A
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interview with site management	Site management advised that EPA officer visited the site on 14 December 2022. The officer asked to see it the licence and it was provided.	C	N/A
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	- Site observations - Rocglen Website	The EPL is available from the Rocglen website and is stored in hard copy at the site.	C	N/A

Document details	
DOCUMENT TITLE	Table A3a – Mining Lease 1620
DOCUMENT SUBTITLE	Compliance with Mining Lease 1620
PROJECT NUMBER	0776499
Date	6 June 2025
Version	1.2
Author	Leanne Lee, Andrew Lewis
Client name	Whitehaven Coal

Note:

- Assessment period against original conditions is 7 April 2022 to 1 July 2022.

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Mining Lease Conditions					
Notice to Landholders					
1.	Within a period of three months from the date of grant/renewal of this lease or within such further time as the Minister may allow, the lease holder must serve on each landholder of the land a notice in writing indicating that this lease has been granted/renewed and whether the lease includes the surface. An adequate plan and description of the lease area must accompany the notice. If there are ten or more landholders affected, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this lease has been granted/renewed; state whether the lease includes the surface and must contain an adequate plan and description of the lease area.	Environmental Advisor Interviews	This condition was not triggered during the audit period.	NT	N/A
Environmental Harm					
2.	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 development.	N/A	Noted. Compliance with this condition is assessed throughout this report.	Note	N/A
Mining Operations Plan					
3.	(a) Mining operations must not be carried out otherwise than in accordance with: a Mining Operations Plan (MOP) which has been approved by the Director-General of the Department of Primary Industries. (b) The MOP must: i) identify areas that will be disturbed by mining operations; ii) detail the staging of specific mining operations; iii) identify how the mine will be managed to allow mine closure; iv) identify how mining operations will be carried out on site in order to prevent and or minimise harm to the environment; v) reflect the conditions under: - the <i>Environmental Planning and Assessment Act 1979</i> - the <i>Protection of the Environment Operations Act 1997</i> - and any other approvals relevant to the development including the conditions of this lease; and vi) have regard to any relevant guidelines adopted by the Director-General. (c) The titleholder may apply to the Director-General to amend an approved MOP at any time. (d) It is not a breach of this condition if: i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the <i>Mining Act 1992</i>,	Closure Mining Operations Plan (CMOP), March 2019	Mining (rehabilitation) operations were carried out for the period the original ML was active (7 April 2022 to 1 July 2022) during the audit in accordance with the Closure Mining Operations Plan (CMOP), which was approved by the Department. a) The CMOP: i) Identifies areas that will be disturbed by mining operations, as sighted in Section 2.3 of the CMOP; ii) detail the staging of specific mining operations, as sighted in Section 2.3 of the CMOP; iii) identify how the mine will be managed to allow mine closure, as sighted in Sections 5, 7, 8 and 9 of the CMOP; iv) identifies how mining operations will be carried out on site in order to prevent and	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	the <i>Environmental Planning and Assessment Act 1979</i>, <i>Protection of the Environment Operations Act 1997</i> or the <i>Occupational Health and Safety Act 2000</i>; and ii) the Director-General had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out. (e) A MOP ceases to have affect 7 years after date of approval of other such period as identified by the Director-General. An approved amendment to the MOP under condition 5 does not constitute an approval for the purpose of this paragraph unless otherwise identified by the Director-General.		or minimise harm to the environment, as sighted in Section 3 of the CMOP; v) reflects the conditions under: - the <i>Environmental Planning and Assessment Act 1979</i> - the <i>Protection of the Environment Operations Act 1997</i> - and any other approvals relevant to the development including the conditions of this lease; - as seen in Sections 1.4 and 4.1 of the CMOP; and vi) has regard to any relevant guidelines adopted by the Director-General, as sighted in Section 1.4 of the CMOP. (c) Noted. (d) Noted. (e) Noted. Active mining operations ceased in 2019 and records available to ERM indicate that subsequent rehabilitation activities during the period were generally carried out in accordance with the CMOP. Therefore, ERM considers Rocglen compliant with this condition.		

Environmental Management Report

4.	The lease holder must lodge Environmental Management Reports (EMR) with the Director-General annually or at dates otherwise directed by the Director-General.	Annual Reviews 2022	Rocglen has lodged Annual Reviews with the Department each year during the audit period. The Annual Reviews include reports related to compliance with the CMOP, rehabilitation progress and compliance against regulatory instruments. Dedicated assessment against the EPL requirements is also included in the Annual Returns. Annual Reviews were submitted to the relevant agencies for the periods covered by the audit.	C	N/A
5.	The EMR must: i) report against compliance with the MOP; ii) report on progress in respect of rehabilitation completion criteria; iii) report on the extent of compliance with regulatory	Annual Reviews 2022	The Annual Reviews include reports related to compliance with the CMOP, rehabilitation progress and compliance against regulatory instruments and have regard to relevant guidelines.	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	requirements; and iv) have regard to any relevant guidelines adopted by the Director-General;		Dedicated assessment against the EPL requirements is also included in the Annual Returns. Annual Reviews were submitted to the relevant agencies for the periods covered by the audit.		

Additional Environmental Reports

6.	Additional environmental reports may be required from time to time as directed in writing by the Director-General and must be lodged as instructed.	Environmental Advisor Interviews	Rocglen site management stated they have not been directed by the Director-General in the period the original ML was in force during the audit period to provide additional reports. Therefore, this condition is not triggered for the period.	NT	N/A
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Rehabilitation

7.	Disturbed land must be rehabilitated to a sustainable/agreed end land use to the satisfaction of the Director-General.	- Closure Mining Operations Plan (CMOP) March 2019, Version 3.1 - Annual Review 2022 - GOC Annual Rehabilitation Planning Process 2021, Issue 2 - Rehabilitation Management Plan 2013, Issue 1 Rev 1, April	Mining operations and bulk rehabilitation material movements has ceased prior to the audit period. Conditions in Mining Lease 1620 were in force from the commencement of the audit period until 1 July 2022. Rehabilitation works on ML 1620 were undertaken during this limited period in the void and Western Overburden Emplacement and included growth media placement, revegetation and existing rehabilitation monitoring and maintenance. Rehabilitation works completed during this limited period align with the final land use in the CMOP and the current approved Final Landform and Rehabilitation Plan.	C	N/A
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Subsidence Management

8. (a)	The lease holder shall prepare a Subsidence Management Plan prior to commencing any underground mining operations which will potentially lead to subsidence of the land surface.	N/A	The requirements of this condition were not triggered during the audit period.	NT	N/A
8. (b)	Underground mining operations which will potentially lead to subsidence include secondary extraction panels such as longwalls or miniwalls, associated first workings (gateroads, installation roads and associated main headings, etc), and pillar extractions, and are otherwise defined by the Applications for Subsidence Management Approvals guidelines (EDG17)	N/A	The requirements of this condition were not triggered during the audit period.	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
8. (c)	The lease holder must not commence or undertake underground mining operations that will potentially lead to subsidence other than in accordance with a Subsidence Management Plan approved by the Director-General, an approval under the Goa/ Mine Health & Safety Act 2002, or the document New Subsidence Management Plan Approval Process - Transitional Provisions (EDP09).	N/A	The requirements of this condition were not triggered during the audit period.	NT	N/A
8. (d)	Subsidence Management Plans are to be prepared in accordance with the Guideline for Applications for Subsidence Management Approvals.	N/A	The requirements of this condition were not triggered during the audit period.	NT	N/A
8. (e)	Subsidence Management Plans as approved shall form part of the Mining Operations Plan required under Condition 3 and will be subject to the Environmental Management Report process as set out under Condition 4. The SMP is also subject to the requirements for subsidence monitoring and reporting set out in the document New Approval Process for Management of Coal Mining Subsidence - Policy.	N/A	The requirements of this condition were not triggered during the audit period.	NT	N/A

Working Requirement

9.	The lease holder must: (a) ensure that at least fifteen (15) competent people are efficiently employed on the lease area on each week day except Sunday or any week day that is a public holiday, OR (b) expend on operations carried out in the course of prospecting or mining the lease area, an amount of not less than \$262,500 per annum whilst the lease is in force. The Minister may at any time or times, by instrument in writing served on the lease holder, increase or decrease the expenditure required or the number of people to be employed.	- Site Financial Records - Site observations	Less than 15 competent people may operate the Rocglen Mine on any given day, however the site spends more than the minimum required amount per annum (\$262,500) as sighted on site financial records. Therefore, Rocglen is compliant with this condition. Site management also advised that the Minister did not instruct the site to change the expenditure required or the number of people to be employed during the audit period.	C	N/A
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Control of Operations

10.	(a) If an Environmental Officer of the Department believes that the lease holder is not complying with any provision of the Act or any condition of this lease relating to the working of the lease, he may direct the lease holder to: - i) cease working the lease; or ii) cease that part of the operation not complying with the Act or conditions; until in the opinion of the Environmental Officer the situation is rectified. (b) The lease holder must comply with any direction given. The Director-General may confirm, vary or revoke any such direction.	Environmental Advisor Interviews	Site management stated no directions from an Environmental Officer has been received in the period, therefore the requirements of this condition were not triggered during the audit period.	NT	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(c) A direction referred to in this condition may be served on the Mine Manager.				

Reports

11.	The lease holder must provide an exploration report, within a period of twenty-eight days after each anniversary of the date this lease has effect or at such other date as the Director-General may stipulate, of each year. The report must be to the satisfaction of the Director-General and contain the following: (a) Full particulars, including results, interpretation and conclusions, of all exploration conducted during the twelve months period; (b) Details of expenditure incurred in conducting that exploration; (c) A summary of all geological findings acquired through mining or development evaluation activities; (d) Particulars of exploration proposed to be conducted in the next twelve months period; All plans, maps, sections and other data necessary to satisfactorily interpret the report.	• Mining Lease 1620 Annual Report (Part A and Part B) (Dated 21 June 2022)	The Mining lease was made on 10 June 2008 and the Annual Report was dated 21 June 2022 (reporting period = 10 June 2021 to 09 June 2022), which is within 28 days of the anniversary date. a. Annual Report of the ML reported that there were no field exploration activities during the audit period. Conceptual level investigation was conducted with results and conclusion listed in the report. b. No exploration was conducted in the reporting period. Nil Activity report. c. The geological findings of the lease area were reported in the Annual Report d. Annual report stated that no proposed exploration activities were to be conducted in the next twelve months period from the date of the report.	NT	N/A
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Licence to Use Reports

12.	(a) The lease holder grants to the Minister, by way of a non-exclusive licence, the right in copyright to publish, print, adapt and reproduce all exploration reports lodged in any form and for the full duration of copyright. (b) The non-exclusive licence will operate as a consent for the purposes of section 365 of the Mining Act 1992.	N/A	Noted.	Note	N/A
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Confidentiality

13.	(a) All exploration reports submitted in accordance with the conditions of this lease will be kept confidential while the lease is in force, except in cases where: (i) The lease holder has agreed that specified reports may be made non-confidential.	N/A	Noted.	Note	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(ii) Reports deal with exploration conducted exclusively on areas that have ceased to be part of the lease. (b) Confidentiality will be continued beyond the termination of a lease where an application for a flow-on title was lodged during the currency of the lease. The confidentiality will last until that flow-on title of any subsequent flow-on title, has terminated. (c) The Director-General may extend the period of confidentiality.				

Terms of the non-exclusive licence

14.	The terms of the non-exclusive copyright licence granted under condition 12 are: (a) the Minister may sub-licence others to publish, print, adapt and reproduce but not on-licence reports. (b) the Minister and any sub-licensee will acknowledge the lease holder's and any identifiable consultant's ownership of copyright in any reproduction of the reports, including storage of reports onto an electronic database. (c) the lease holder does not warrant ownership of all copyright works in any report and, the lease holder will use best endeavours to identify those parts of the report for which the lease holder owns the copyright. (d) there is no royalty payable by the Minister for the licence. if the lease holder has reasonable grounds to believe that the Minister has exercised his rights under the non-exclusive copyright licence in a manner which adversely affects the operations of the lease holder, that licence is revocable on the giving of a period of not less than three months notice.	N/A	Noted.	Note	N/A
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Blasting

Ground Vibration

15. (a)	The lease holder must ensure that the ground vibration peak particle velocity generated by any blasting within the lease area does not exceed 10 mm/second and does not exceed 5 mm/second in more than 5% of the total number of blasts over a period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Department of Environment and Climate Change.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no blasting activities have occurred since 2019.	NT	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Blast Overpressure					
15. (b)	The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (linear) and does not exceed 115 dB (linear) in more than 5% of the total number of blasts over a period of 12 months, at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment and Climate Change.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no blasting activities have occurred since 2019.	NT	N/A
Safety					
16.	Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be filled in or otherwise rendered safe to a standard acceptable to the Director-General.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no drilling activities have occurred since 2019. All drill holes have been closed and only water bores with minimal risks are still in place. Access is restricted to site, fenced and locked gates with stock not allowed on site.	C	N/A
Exploratory Drilling					
17.	(a) At least twenty eight days prior to commencement of drilling operations the lease holder must notify the relevant Department of Water and Energy Regional Hydrologist of the intention to drill exploratory drill holes together with information on the location of the proposed holes. (b) If the lease holder drills exploratory drill holes he must satisfy the Director-General that:- (i) all cored holes are accurately surveyed and permanently marked in accordance with Departmental guidelines so that their location can be easily established; (ii) all holes cored or otherwise are sealed to prevent the collapse of the surrounding surface; (iii) all drill holes are permanently sealed with cement plugs to prevent surface discharge of groundwaters; (iv) if any drill hole meets natural or noxious gases it is plugged or sealed to prevent their escape; (v) if any drill hole meets an artesian or sub-artesian flow it is effectively sealed to prevent contamination of aquifers. (vi) once any drill hole ceases to be used the hole must be sealed in accordance with Departmental guidelines. Alternatively, the hole must be sealed as instructed by the Director-General.	Environmental Advisor Interviews	No exploration activities were conducted during the audit period, therefore the requirements of this condition were not triggered.	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	once any drill hole ceases to be used the land and its immediate vicinity is left in as clean, tidy and stable condition.				
Prevention of soil erosion and pollution					
18.	Operations must be carried out in a manner that does not cause or aggravate air pollution, water pollution (including sedimentation) or soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan. For the purpose of this condition, water shall be taken to include any watercourse, waterbody or groundwaters. The lease holder must observe and perform any instructions given by the Director-General in this regard.	Annual Review 2022	Compliance against this condition is discussed in the EPL audit table, Planning Approval audit table, and throughout the review of the Management Plans.	C	N/A
Transmission lines, Communication lines and Pipelines					
19.	Operations must not interfere with or impair the stability or efficiency of any transmission line, communication line, pipeline or any other utility on the lease area without the prior written approval of the Director-General and subject to any conditions he may stipulate.	Environmental Advisor Interviews	According to site management, operations during the audit period did not interfere with any transmission line, communication line, pipeline or any other utility on the lease area, therefore Rocglen is compliant with this condition.	C	N/A
Fences, Gates					
20.	(a) Activities on the lease must not interfere with or damage fences without the prior written approval of the owner thereof or the Minister and subject to any conditions the Minister may stipulate. (b) Gates within the lease area must be closed or left open in accordance with the requirements of the landholder.	Environmental Advisor Interviews	According to site management, operations during the audit period did not cause damage to any fence. ERM did not identify any examples of gates being managed inappropriately, therefore Rocglen is compliant with this condition.	C	N/A
Roads and Tracks					
21. (a)	Operations must not affect any road unless in accordance with an accepted Mining Operations Plan or with the prior written approval of the Director-General and subject to any conditions he may stipulate.	Environmental Advisor Interviews	Site management stated no roads were impacted during the audit period and ERM did not identify any road impacts, therefore the requirements of this condition were not triggered.	NT	N/A
21. (b)	The lease holder must pay to the designated authority in control of the road (generally the local council or the Roads and Traffic Authority) the cost incurred in fixing any damage to roads caused by operations carried out under the lease, less any amount paid or payable from the Mine Subsidence Compensation Fund.	- Road Maintenance Agreement between WHC and Gunnedah Shire Council, dated August 2009 - Environmental Advisor Interviews	Site management stated that as per the agreement, that no payments have been required during the audit period as no coal and rejects haulage has occurred in the period.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
22.	Access tracks must be kept to a minimum and be positioned so that they do not cause any unnecessary damage to the land. Temporary access tracks must be ripped, topsoiled and revegetated as soon as possible after they are no longer required for mining operations. The design and construction of access tracks must be in accordance with specifications fixed by the Department of Environment and Climate Change.	- Environmental Advisor Interviews - Site observations	Access tracks were generally observed to be limited to those required to undertake rehabilitation and monitoring operations at the site. The former access track for trucks has been closed off during the previous audit period and no evidence of non-compliance against this condition was identified.	C	N/A

Trees and Timber

23. (a)	The lease holder must not fell trees, strip bark or cut timber on the lease without the consent of the landholder who is entitled to the use of the timber, or if such a landholder refuses consent or attaches unreasonable conditions to the consent, without the approval of a warden.	- Environmental Advisor Interviews - Site observations	Site management reported that the site did not undertake any activities involving felling trees, stripping bark or cutting timber during the audit period. ERM did not observe any evidence of such activities, therefore Rocglen is compliant with this condition.	C	N/A
23. (b)	The lease holder must not cut, destroy, ringbark or remove any timber or other vegetative cover on the lease area except such as directly obstructs or prevents the carrying on of operations. Ant clearing not authorised under the Mining Act 1992 must comply with the provisions of the <i>Native Vegetation Act 2003</i> .	- Environmental Advisor Interviews - Site observations	Site management reported that the site did not undertake any activities involving cutting, destroying, ring barking or removing timber or other vegetative cover on the lease area separate to that which was required for conducting operations during the audit period. ERM did not observe any evidence of such activities, therefore Rocglen is compliant with this condition.	C	N/A
23. (c)	The lease holder must obtain all necessary approvals or licences before using timber from any Crown land within the lease area.	Environmental Advisor Interviews	Site management reported timber was not utilised from any Crown land within the lease area during the audit period, therefore the requirements of this condition were not triggered.	NT	N/A

Resource Recovery

25.	(a) Notwithstanding any description of mining methods and their sequence or of proposed resource recovery contained within the Mining Operations Plan, if at any time the Director-General is of the opinion that minerals which the lease entitles the lease holder to mine and which are economically recoverable at the time are not being recovered from the lease area, or that any such minerals which are being recovered are not being recovered to the extent which should be economically possible or which for environmental reasons are necessary to be recovered, he may give notice in writing to the lease holder requiring the holder to recover such minerals.	Environmental Advisor Interviews	Site management reported no notice related to the recovery of resources was received during the audit period, therefore the requirements of this condition were not triggered.	NT	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(b) The notice shall specify the minerals to be recovered and the extent to which they are to be recovered, or the objectives in regard to resource recovery, but shall not specify the processes the lease holder shall use to achieve the specified recovery. (c) The lease holder must, when requested by the Director-General, provide such information as the Director-General may specify about the recovery of the mineral resources of the lease area. (d) The Director-General shall issue no such notice unless the matter has firstly been thoroughly discussed with and a report to the Director-General has incorporated the views of the lease holder. (e) The lease holder may object to the requirements of any notice issued under this condition and on receipt of such an objection the Minister shall refer it to a Warden for inquiry and report under Section 334 of the <i>Mining Act, 1992</i>. (f) After considering the Warden's report the Minister shall decide whether to withdraw, modify or maintain the requirements specified in the original notice and shall give the lease holder written notice of the decision. The lease holder must comply with the requirements of this notice.				

Indemnity

26.	The lease holder must indemnify and keep indemnified the Crown from and against all actions, suits, claims and demands of whatsoever nature and all costs, charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of any accident or injury to any person or property which may arise out of the construction, maintenance or working of any workings now existing or to be made by the lease holder within the lease area or in connection with any of the operations notwithstanding that all other conditions of this lease shall in all respects have been observed by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licensed or compelled to do.	N/A	Noted.	Note	N/A
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Security

27.	(a) A security in the sum of \$100,000 must be given and maintained with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of obligations under this lease. If the lease holder fails to fulfil any one or more of such obligations the said sum may be applied at the discretion of the Minister towards the cost of fulfilling such obligations. For the purpose of this clause the lease holder shall be deemed to have failed to fulfil the obligations of this lease if the lease holder fails to comply with any condition or	- Draft Security Deed - Department of Regional NSW Title Summary Report, dated 22-05-2025	ERM reviewed the draft security deed from the period the ML original conditions was in force, which included an amount of \$100,000. ERM also reviewed the Department of Regional NSW Title Summary report dated 22-05-2025 and noted the required security amount for the period the ML original conditions were in force was up to date.	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	provision hereof, any provision of the Act or regulations made thereunder or any condition or direction imposed or given pursuant to a condition or provision hereof or of any provision of the Act or regulations made thereunder. (b) The lease holder must provide the security required by sub-clause (a) in one of the following forms: (i) cash, (ii) a security certificate in a form approved by the Minister and issued by an authorise deposit-taking institution.				

Document details	
DOCUMENT TITLE	Table A3b – Mining Lease 1662
DOCUMENT SUBTITLE	Compliance with Mining Lease 1662
PROJECT NUMBER	0776499
Date	6 June 2025
Version	1.2
Author	Leanne Lee, Andrew Lewis
Client name	Whitehaven Coal

Note:

- Assessment period against original conditions is 7 April 2022 to 1 July 2022.

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Mining Lease Conditions					
Notice to Landholders					
1.	Within a period of three months from the date of grant/renewal of this lease or within such further time as the Minister may allow, the lease holder must serve on each landholder of the land a notice in writing indicating that this lease has been granted/renewed and whether the lease includes the surface. An adequate plan and description of the lease area must accompany the notice. If there are ten or more landholders affected, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this lease has been granted/renewed; state whether the lease includes the surface and must contain an adequate plan and description of the lease area.	Environmental Advisor Interviews	This condition was not triggered during the audit period.	NT	N/A
Environmental Harm					
2.	(a) The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease. (b) For the purposes of this condition: (i) environment means components of the earth, including: - land, air and water, and - any layer of the atmosphere, and - any organic or inorganic matter and any living organism, and - human-made or modified structures and area, and includes interacting natural ecosystems that include components referred to in paragraphs (A)-(C). (ii) harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution, contributes to the extinction or degradation of any threatened species, populations or ecological communities and their habitats and causes impacts to places, objects and features of significance to Aboriginal people.	N/A	Noted. Compliance with this condition is assessed throughout this report.	Note	N/A
Mining Operations Plan					
3.	(a) Mining operations must not be carried out otherwise than in accordance with a Mining Operations Plan (MOP) which has been	Closure Mining Operations Plan (CMOP)	Mining (rehabilitation) operations were carried out for the period the original ML	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	approved by the Director-General. (b) The MOP must: (i) identify areas that will be disturbed by mining operations; (ii) detail the staging of specific mining operations; (iii) identify how the mine will be managed to allow mine closure; (iv) identify how mining operations will be carried out in order to prevent and or minimise harm to the environment; (v) reflect the conditions under: • the <i>Environmental Planning and Assessment Act 1979</i> • the <i>Protection of the Environment Operations Act 1997</i> • and any other approvals relevant to the development including the conditions of this lease; and • have regard to any relevant guidelines adopted by the Director-General. (c) The leaseholder may apply to the Director-General to amend an approved MOP at any time. (d) It is not a breach of this condition if: i) the operations constituting the breach were necessary to comply with a lawful order or direction given under the <i>Mining Act 1992</i>, the <i>Environmental Planning and Assessment Act 1979</i>, <i>Protection of the Environment Operations Act 1997</i>, <i>Mine Health and Safety Act 2004</i> / <i>Coal Mine Health and Safety Act 2002</i> and <i>Mine Health and Safety Regulation 2007</i> / <i>Coal Mine Health and Safety Regulation 2006</i> or the <i>Occupational Health and Safety Act 2000</i>; and ii) the Director-General had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out. (e) A MOP ceases to have affect 7 years after date of approval of other such period as identified by the Director-General.		was active (7 April 2022 to 1 July 2022) during the audit in accordance with the Closure Mining Operations Plan (CMOP), which was approved by the Department. a) The CMOP: i) Identifies areas that will be disturbed by mining operations, as sighted in Section 2.3 of the CMOP; ii) detail the staging of specific mining operations, as sighted in Section 2.3 of the CMOP; iii) identify how the mine will be managed to allow mine closure, as sighted in Sections 5, 7, 8 and 9 of the CMOP; iv) identifies how mining operations will be carried out on site in order to prevent and or minimise harm to the environment, as sighted in Section 3 of the CMOP; v) reflects the conditions under: - the <i>Environmental Planning and Assessment Act 1979</i> - the <i>Protection of the Environment Operations Act 1997</i> - and any other approvals relevant to the development including the conditions of this lease; - as seen in Sections 1.4 and 4.1 of the CMOP; and vi) has regard to any relevant guidelines adopted by the Director-General, as sighted in Section 1.4 of the CMOP. (c) Noted. (d) Noted. (e) Noted. Active mining operations ceased in 2019 and records available to ERM indicate that subsequent rehabilitation activities during the period were generally carried out in accordance with the CMOP. Therefore, ERM considers Rocglen compliant with this condition.		

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Environmental Management Report					
4.	a) The lease holder must lodge Environmental Management Reports (EMR) with the Director-General annually or at dates otherwise directed by the Director-General. (b) The EMR must: - report against compliance with the MOP; - report on progress in respect of rehabilitation completion criteria; - report on the extent of compliance with regulatory requirements; and - have regard to any relevant guidelines adopted by the Director-General;	Annual Reviews 2022	Rocglen has lodged Annual Reviews with the Department each year during the audit period. The Annual Reviews include reports related to compliance with the CMOP, rehabilitation progress and compliance against regulatory instruments. Dedicated assessment against the EPL requirements is also included in the Annual Returns. Annual Reviews were submitted to the relevant agencies for the periods covered by the audit. The Annual Reviews include reports related to compliance with the CMOP, rehabilitation progress and compliance against regulatory instruments and have regard to relevant guidelines.	C	N/A
5.	(a) The lease holder must report any environmental incidents. The report must: - be prepared according to any relevant Departmental guidelines; - be submitted within 24 hours of the environmental incident occurring; (b) For the purposes of this condition, environmental incident includes: - any incident causing or threatening material harm to the environment - any breach of Conditions 1 to 9 and 11 to 24; - any breach of environment protection legislation; or, - a serious complaint from landholders or the public. (c) For the purposes of this condition, harm to the environment is material if: - it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or - it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, where loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.	Annual Reviews 2022	Compliance with this condition is detailed against Schedule 5, Condition 6 of the Planning Approval table.	C	N/A
Additional Environmental Reports					
6.	Additional environmental reports may be required from time to time as directed in writing by the Director-General and must be lodged as instructed.	Environmental Advisor Interviews	Rocglen site management stated they have not been directed by the Director-General in the period the original ML was in force during the audit period to provide	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			additional reports. Therefore, this condition is not triggered for the period.		
Rehabilitation					
7.	Any disturbance as a result of activities under this lease must be rehabilitated to the satisfaction of the Director-General.	- Closure Mining Operations Plan (CMOP) 2019, Version 3.1 - Annual Review 2022 - GOC Annual Rehabilitation Planning Process 2021, Issue 2 - Rehabilitation Management Plan 2013, Issue 1 Rev 1, April	Mining operations and bulk rehabilitation material movements has ceased prior to the audit period. Conditions in Mining Lease 1662 were in force from the commencement of the audit period until 1 July 2022. Rehabilitation works on ML 1662 undertaken during this limited period were limited to rehabilitation monitoring and maintenance associated with the Norther Overburden Emplacement. The Northern Overburden Emplacement aligns with the final land use in the CMOP and the current approved Final Landform and Rehabilitation Plan with work continuing to advance revegetation towards draft completion criteria.	C	N/A
Blasting					
Ground Vibration					
10. (a)	The lease holder must ensure that the ground vibration peak particle velocity generated by any blasting within the lease area does not exceed 10 mm/second and does not exceed 5 mm/second in more than 5% of the total number of blasts over a period of 12 months at any dwelling or occupied premises as the case may be, unless determined otherwise by the Department of Environment and Climate Change.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no blasting activities have occurred since 2019.	C	N/A
Blast Overpressure					
10. (b)	The lease holder must ensure that the blast overpressure noise level generated by any blasting within the lease area does not exceed 120 dB (linear) and does not exceed 115 dB (linear) in more than 5% of the total number of blasts over a period of 12 months, at any dwelling or occupied premises, as the case may be, unless determined otherwise by the Department of Environment, Climate Change and Water.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no blasting activities have occurred since 2019.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Safety					
11.	Operations must be carried out in a manner that ensures the safety of persons or stock in the vicinity of the operations. All drill holes shafts and excavations must be appropriately protected, to the satisfaction of the Director-General, to ensure that access to them by persons and stock is restricted. Abandoned shafts and excavations opened up or used by the lease holder must be notified in writing to the Department and filled in or otherwise rendered safe to a standard acceptable to the Director-General.	Environmental Advisor Interviews	Site management stated that mining operations ceased in 2019 and therefore, no drilling activities have occurred since 2019. All drill holes have been closed and only water bores with minimal risks are still in place. Access is restricted to site, fenced and locked gates with stock not allowed on site.	C	N/A
Prevention of soil erosion and pollution					
12.	Prospecting operations must be carried out in a manner that does not cause or aggravate air pollution, water (including groundwater) pollution, soil contamination or erosion, unless otherwise authorised by a relevant approval, and in accordance with an accepted Mining Operations Plan.	N/A	Prospecting was not undertaken during the audit period, therefore the requirements of this condition were not triggered.	NT	N/A
Transmission lines, Communication lines and Pipelines					
13.	Operations must not interfere with or impair the stability or efficiency of any transmission line, communication line, pipeline or any other utility on the lease area without the prior written approval of the Director-General and subject to any conditions stipulated.	Environmental Advisor Interviews	According to site management, operations during the audit period did not interfere with any transmission line, communication line, pipeline or any other utility on the lease area, therefore Rocglen is compliant with this condition.	C	N/A
Roads and Tracks					
14. (a)	The lease holder must pay to the relevant roads authority in control of the road or track the reasonable costs incurred by the roads authority in making good any damage to roads or trucks caused by operations carried out under this lease less any amount paid or payable from the Mine Subsidence Compensation Fund.	- Road Maintenance Agreement between WHC and Gunnedah Shire Council, dated 5-8-2009 - Environmental Advisor Interviews	Site management stated that as per the agreement, that no payments have been required during the audit period as no coal and rejects haulage has occurred in the period.	C	N/A
14. (b)	During wet weather the use of any road or track must be restricted so as to prevent damage to the road or track.	- Environmental Advisor Interviews - Site observations	Evidence of use of tracks during wet weather causing damage to the tracks was not observed during the audit period, therefore Rocglen are compliant with this condition.	C	N/A
14. (c)	Existing access tracks should be used for all operations where reasonably practicable. New access tracks must be kept to a minimum and be positioned in order to minimise damage to the land, watercourses or vegetation.	- Environmental Advisor Interviews - Site observations	Access tracks were observed to be limited to those required to undertake existing operations (rehabilitation and monitoring) at the site. The former access track for trucks has been closed off during the	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			audit period and no evidence of non-compliance against this condition was identified.		
14. (d)	Temporary access tracks must be rehabilitated and revegetated to the satisfaction of the Director-General as soon as reasonably practicable after they are no longer required under this lease.	- Environmental Advisor Interviews - Site observations - CMOP	The results of decommissioning of access tracks, as reported in the CMOP was sighted. Access tracks used to create the final landform are planned to be decommissioned and rehabilitated. This requirement is currently in progress according to the CMOP. ERM did not observe any evidence of failure to rehabilitate access tracks, therefore Rocglen is compliant with this condition.	C	N/A

Trees and Vegetation

15. (a)	The lease holder must not fell trees, strip bark or cut timber on any land subject of this lease without the consent of the landholder who is entitled to the use of the timber.	- Environmental Advisor Interviews - Site observations	Site management reported that the site did not undertake any activities involving felling trees, stripping bark or cutting timber during the audit period. ERM did not observe any evidence of such activities, therefore Rocglen is compliant with this condition.	C	N/A
15. (b)	The lease holder contact Forests NSW and obtain any required permit, licence or approval before taking timber from any Crown land within the lease area. <i>Note: Any clearing not authorised under the Act must comply with the requirements of the Native Vegetation Act 2003. Any clearing or taking of timber on Crown land is subject to the requirements of the Forestry Act 1916.</i>	Environmental Advisor Interviews	Site management reported timber was not utilised from any Crown land within the lease area during the audit period, therefore the requirements of this condition were not triggered.	NT	N/A

Indemnity

18.	The lease holder must indemnify and keep indemnified the Crown from and against all actions, suits, claims and demands of whatsoever nature and all costs, charges and expenses which may be brought against the lease holder or which the lease holder may incur in respect of any accident or injury to any person or property which may arise out of the construction, maintenance or working of any workings now existing or to be made by the lease holder within the lease area or in connection with any of the operations notwithstanding that all other conditions of this lease shall in all respects have been observed by the lease holder or that any such accident or injury shall arise from any act or thing which the lease holder may be licensed or compelled to do.	N/A	Noted.	Note	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Single Security (extended)					
21.	The single security given and maintained with the Minister by the lease holder for the purpose of ensuring the fulfilment by the lease holder of obligations under Mining Lease No. 1620 (Act 1992) is extended to apply to this lease.	- Draft Security Deed - Department of Regional NSW Title Summary Report, dated 22-05-2025	ERM reviewed the draft security deed from the period the ML original conditions was in force, which included an amount of \$100,000. ERM also reviewed the Department of Regional NSW Title Summary report dated 22-05-2025 and noted the required security amount for the period the ML original conditions were in force was up to date.	C	N/A
Cooperation Agreement					
24.	The lease holder must make every reasonable attempt, and be able to demonstrate their attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as: - access arrangements - operational interaction procedures - dispute resolution - information exchange - well location - timing of drilling - potential resource extraction conflicts and - rehabilitation issues.	- NSW Department of Mining, Exploration and GeoScience MinView mapping - WHC Santos Overlapping Tenements Cooperations Agreement Meeting Minutes4 August 2023	Overlap with Title PEL1, Australian Coalbed Methane Pty Limited and Santos QNT PTY LTD as the holders. WHC advised that discussions on a draft agreement with Santos are ongoing between the parties.	C	N/A
	<i>Note: <u>Exploration Reports (Geological and Geophysical)</u></i> <i>The lease holder must lodge reports to the satisfaction of the Director-General in accordance with section 163C of the Mining Act 1992 and in accordance with clause 57 of the Mining Regulation 2010.</i> <i>Reports must be prepared in accordance with <u>Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales</u> (Department of Trade and Investment; Regional Infrastructure and Services 2010).</i>	- Environmental Advisor Interviews - Rocglen IEA 2022	ML 1662 was granted of ancillary mining activities. The requirement to lodge Annual Reports for Mining Leases for ancillary mining activities was removed by Gazette notice dated 18 November 2021.	NT	N/A

Document details	
DOCUMENT TITLE	Table A3c – Consolidated Standard Conditions
DOCUMENT SUBTITLE	Compliance with Mining Lease 1662, 1620
PROJECT NUMBER	0776499
Date	06 June 2025
Version	1.2
Author	Andrew Lewis, Andrew Osborn
Client name	Whitehaven Coal

Note: Compliance table period from 2 July 2022 to 22 May 2025

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
SCHEDULE B – Standard Conditions					
Division 1 - Protection of the environment and rehabilitation					
4	Must prevent or minimise harm to environment (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. (2) In this clause— harm to the environment has the same meaning as in the Protection of the Environment Operations Act 1997.	This audit	Refer to the findings of this audit.	C	N/A
5	Rehabilitation to occur as soon as reasonably practicable after disturbance 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.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) - Forward Programs 2022-2024, 2024-2026, 2025-2027 - Annual Rehabilitation Reports 2022, 2023, 2024 - Annual Reviews 2022, 2023, 2024 - Site Observations - Final Landform Rehabilitation Plan (FLRP) and rehabilitation status represented by Plan 1A and 1B attached to the 2025 Forward Program and shown on the NSW Seed Map	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. All areas, excluding the 2.54 ha of area in which the remaining infrastructure sits, have progressed through Landform establishment and growth medium development during the audit period. Ecosystem and Land Use Establishment continues. The 2.54 ha of grazing final land use is scheduled to transition to Ecosystem and Land Use Establishment in 2026. Other remaining area relates to water management areas (water storage and voids).	C	N/A
6	Rehabilitation must achieve final land use (1) The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area. (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). (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). Note— Clause 7 requires a rehabilitation risk assessment to be conducted whenever a hazard is identified under this subclause.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) - Forward Programs 2022-2024, 2024-2026, 2025-2027 - Annual Rehabilitation Reports 2022, 2023, 2024 - Annual Reviews 2022, 2023, 2024 - Site Observations - FLRP and rehabilitation status represented by Plan 1A and 1B attached to the 2025 Forward Program and shown on the NSW Seed Map	(1) Rehabilitation observed during the site visit being undertaken in accordance with the RMP to achieve the submitted FLRP. (2) PA 10_0015 (3) Risk assessment completed in 2021 during development of the RMP. Risk assessment in process of being updated at the time of audit in response to both an internally identified need and subsequent recommendation from the Resources Regulator's Targeted Assessment Program (TAP) conducted on 27 August 2024.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(4) In this clause— final land use for the mining area means the final landform and land uses to be achieved for the mining area— (a) as set out in the rehabilitation objectives statement and rehabilitation completion criteria statement, and (b) for a large mine—as spatially depicted in the final landform and rehabilitation plan, and (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. planning approval means— (a) a development consent within the meaning of the <i>Environmental Planning and Assessment Act 1979</i>, or (b) an approval under that Act, Division 5.1.		(4) Note.		

Division 2 - Risk assessment

7	Rehabilitation risk assessment (1) The holder of a mining lease must conduct a risk assessment (a rehabilitation risk assessment) that— (a) identifies, assesses and evaluates the risks that need to be addressed to achieve the following in relation to the mining lease— i. the rehabilitation objectives, ii. the rehabilitation completion criteria, iii. for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan, and (b) identifies the measures that need to be implemented to eliminate, minimise or mitigate the risks. (2) The holder of the mining lease must implement the measures identified. (3) The holder of a mining lease must conduct a rehabilitation risk assessment— (a) for a large mine—before preparing a rehabilitation management plan, and (b) for a small mine—before preparing the rehabilitation outcome documents for the mine, and (c) whenever a hazard is identified under clause 6(3)—as soon as reasonably practicable after it is identified, and	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) - Monthly Environmental Inspection Checklist record 10 Jan 2025 - Agronomist reports Quarterly (6 March 2025) - Work Request Management (WoRM) spatial webapp for management of rehabilitation maintenance work	(1) Risk assessment completed in 2021 during development of the RMP and documented in Part 3 of the RMP. Risk assessment in process of being updated at the time of audit in response to both an internally identified need and subsequent recommendation from the Resources Regulator's Targeted Assessment Program (TAP) conducted on 27 August 2024. Updates primarily relate to refinement of controls used to manage risks. No new significant risks had been identified at time of audit. (2) Weed infestation was the only risk rated higher than moderate. Exotic Plant Cover (Weeds) are included in the RMP TARP with triggers and responses prescribed for increase in weeds. A Weed and Pest Management Plan has been prepared and includes monitoring/inspections, agronomist reports and a study looking at eradication of exotic pasture weeds in woodland rehabilitation. Rehabilitation maintenance is managed	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(d) whenever given a written direction to do so by the Secretary.		(3) a) Risk assessment completed in 2021 during preparation of RMP. b) NT c) NT d) NT – noting the TAP (27 August 2024) recommended updating risk assessment. This is not a written direction. RCM was at the time of the audit in the process of undertaken the update to the risk assessment.		

Division 3 - Rehabilitation documents

8	Application of Division This Division does not apply to a mining lease unless— (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 (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.	• Security deposit calculations	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.	C	N/A
9	General requirements for documents A document required to be prepared under this Division must— (a) be in a form approved by the Secretary, and Note— The approved forms are available on the Department's website. (b) include any matter required to be included by the form, and (c) if required to be given to the Secretary—be given in a way approved by the Secretary.	• Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) • Approved Rehabilitation Objectives Statement November 2023. • Email submission receipt dated 13 November 2023. • Email submission receipt dated 28 February 2025 for Forward Program 2025-2027 • Forward Programs 2022-2024 and 2024-2026 – time stamped submission date in report. • Email submission receipt dated 24 March 2025 for Annual Rehabilitation Report 2024. • Annual Rehabilitation Reports 2022, 2023, 2024 – time stamped submission date in report • Draft Completion Criteria submitted on 16 December 2024 (not yet approved). • FLRP assessed and approved on 13 November 2023	All documents sighted as evidence were in the approved form, submitted in the approved way and appeared to include all required matters.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
10	Rehabilitation management plans for large mines (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— (a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area, (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, (c) a summary of rehabilitation risk assessments conducted by the holder, (d) the risk control measures identified in the rehabilitation risk assessments, (e) the rehabilitation outcome documents for the mining lease, (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. (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. (3) A rehabilitation management plan is not required to be given to the Secretary for approval. (4) The holder of the mining lease— (a) must implement the matters set out in the rehabilitation management plan, and (b) if the forward program specifies timeframes for the implementation of the matters—must implement the matters within those timeframes.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025) - Approved Rehabilitation Objectives Statement November 2023. - Draft Completion Criteria submitted on 16 December 2024 (not yet approved). - Forward Programs 2022-2024, 2024-2026, 2025-2027 - Annual Rehabilitation Reports 2022, 2023, 2024 - Site Observations	(1) The RMP has been developed and addresses items (a) – (f). A recommendation from the Resource Regulator's TAP conducted on 27 August 2024 was to update the RMP to align the structure with the form and way guideline, include substrate characterisation processes and include measures/management actions to avoid or minimise impacts of adverse seasonal and or weather conditions. The RMP was updated in January 2025 to address the structure recommendation. The RMP was undergoing review and update at time of audit to address remaining TAP recommendations. (2) Draft completion criteria have been submitted but not yet approved. Draft completion criteria included as Table 4-1 of RMP. (3) Noted. (4) 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.	C	N/A
11	Amendment of rehabilitation management plans The holder of a mining lease must amend the rehabilitation management plan for the mining lease as follows— (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, (b) as a consequence of an amendment made under clause 14 to a rehabilitation outcome document—within 30 days after the amendment is made, (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	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 – Part 11 (last updated in January 2025) - Approved Rehabilitation Objectives Statement November 2023	The RMP has been updated twice since development (a) The RMP was updated in Nov 2023 to incorporate the approved Rehabilitation Objectives. (b) NT. (c) NT – noting the current risk assessment update process may trigger this clause. (d) NT – noting the TAP (27 August 2024) recommended updating RMP. This is not a written direction.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	risk assessment is conducted, (d) whenever given a written direction to do so by the Secretary—in accordance with the direction.				
12	Rehabilitation outcome documents (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— (a) the rehabilitation objectives statement, which sets out the rehabilitation objectives required to achieve the final land use for the mining area, (b) the rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives, (c) for a large mine, the final landform and rehabilitation plan, showing a spatial depiction of the final land use. (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.	- Approved Rehabilitation Objectives Statement November 2023 - Email submission receipt dated 13 November 2023 - Draft Completion Criteria submitted on 16 December 2024 (not yet approved) - FLRP assessed and approved on 13 November 2023 - FLRP – represented by Plan 1A and 1B attached to the 2025 Forward Program and shown on the NSW Seed Map	(1) (a) The approved Rehabilitation Objectives Statement was submitted 13 November 2023. (b) the draft rehabilitation completion criteria were submitted in the approved form on 16 December 2024. These have not yet been approved. (c) The FLRP was assessed and approved on 13 November 2023 (2) The FLRP is consistent with the conditions of PA 10_0015.	C	N/A
13	Forward program and annual rehabilitation report (1) The holder of a mining lease must prepare a program (a forward program) for the mining lease that includes the following— (a) a schedule of mining activities for the mining area for the next 3 years, (b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years, (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. (2) The holder of a mining lease must prepare a report (an annual rehabilitation report) for the mining lease that includes— (a) a description of the rehabilitation undertaken over the annual reporting period, (b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period, (c) a report demonstrating progress made towards the	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 – Part 11 (last updated in January 2025) - Forward Programs 2022-2024, 2024-2026, 2025-2027 - Annual Rehabilitation Reports 2022, 2023, 2024 - Rehabilitation Monitoring Reports 2022, 2023, 2024	(1) (a) NT – no active mining was undertaken during the audit period. (b) A summary of the spatial progression of rehabilitation is provided as both tables and figures. (c) No active mining during the audit period. Therefore, all activity is focused toward rehabilitation. (2) (a) Annual reports include a description of rehabilitation undertaken during the reporting period. (b) Annual reports include progress made the rehabilitation phases (c)(I, ii, iii) Annual reports refer to supporting rehabilitation monitoring reports that demonstrate progress towards rehabilitation objectives, draft completion criteria and the FLPR. (3) Draft completion criteria have not been approved. The proposed	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	achievement of the following— - the objectives set out in the rehabilitation objectives statement, - the criteria set out in the rehabilitation completion criteria statement, - for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan. (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. (4) The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary. (5) In this clause— annual reporting period means each period of 12 months commencing on— - the date on which the mining lease is granted, or - if the Secretary approves another date in relation to the mining lease—the other date.		completion criteria in the 2019 CMOP are being relied upon. (4) Forward Programs and Annual Reports are submitted in the approved form and way during the audit period. (5) Noted.		
14	Amendment of rehabilitation outcome documents and forward program (1) This clause applies to— - a rehabilitation outcome document if it has been approved by the Secretary, and - a forward program if it has been given to the Secretary. (2) The holder of a mining lease must not amend a document to which this clause applies that relates to the mining lease unless— - the Secretary gives the holder a written direction to do so, or - the Secretary, on written application by the holder, gives a written approval of the amendment. (3) The holder of the mining lease must amend the document in accordance with the Secretary's direction or approval. (4) Nothing in this clause prevents the holder of a mining lease preparing a draft amendment for submission to the Secretary for approval.	- Rehabilitation Management Plan July 2022, Issue 1; Version 3 – Part 11 (last updated in January 2025) - Approved Rehabilitation Objectives Statement November 2023. - Draft Completion Criteria submitted on 16 December 2024 (not yet approved). - Forward Programs 2022-2024, 2024-2026, 2025-2027	(a) Noted –Draft rehabilitation completion criteria were submitted in the approved form on 16 December 2024. These have not yet been approved. (b) Noted. (1) (a)&(b) NT. (2) NT as no direction from the Secretary has been issued in the audit period. (3) Noted.	C	N/A
15	Times at which documents must be prepared and given	Rehabilitation Management Plan July 2022, Issue 1; Version 3 (last updated in January 2025)	(a) The RMP was published on 29 July 2022. (b) The approved Rehabilitation	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(1) The holder of a mining lease must do the following before the end of the initial period— (a) prepare a rehabilitation management plan, and (b) prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and (c) prepare a forward program and give it to the Secretary. (2) The holder of the mining lease must prepare a forward program and annual rehabilitation report and give them to the Secretary before— (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 (b) a later date approved by the Secretary. (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 when the forward program is required to be given to the Secretary. (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— (a) 60 days after a development consent is modified following an application referred to in clause 20(1)(b), or (b) a later date approved by the Secretary. (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). (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. (7) The holder of the mining lease must comply with the direction. (8) In this clause— initial period means the period commencing when the mining lease is granted and ending— (a) 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or (b) if this Division applies to the mining lease because of an	- Approved Rehabilitation Objectives Statement November 2023 and email submission receipt dated 13 November 2023. - Draft Completion Criteria submitted on 16 December 2024 (not yet approved). - FLRP assessed and approved on 13 November 2023. - Forward Programs 2022-2024, 2024-2026, 2025-2027 – time stamped submission date in report. - Annual Rehabilitation Reports 2022, 2023, 2024 – time stamped submission date in report except for 2023. Report submitted 9 March 2023 with email receipt acknowledgement received 18 May 2023.	Objectives Statement was submitted 13 November 2023. Draft Rehabilitation Completion Criteria were submitted on 16 December 2024. (c) The Forward Program 2022-2024 was prepared and submitted on 9 March 2023. (1) Forward Programs have been submitted on 9 March 2023, 29 February 2024 and 28 February 2025. Annual Rehabilitation Reports have been submitted on 9 March 2023, 11 March 2024 and 24 March 2025. (2) The draft Rehabilitation Completion Criteria were submitted on 16 December 2024. (3) NT. (4) NT. (5) NT. (6) Noted. (7) Noted.		

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	increase in the required security deposit— i. when the surface of the mining area is disturbed by activities under the mining lease, or ii. at a later date approved by the Secretary.				
16	Certain documents to be publicly available (1) This clause applies to the following documents— (a) a rehabilitation management plan, (b) a forward program, (c) an annual rehabilitation report. (2) The holder of a mining lease must make a document to which this clause applies publicly available by— (a) publishing it on its website in a prominent position, or (b) if the holder does not have a website— providing a copy of it to a person— i. on the written request of a person, and ii. without charge, and iii. within 14 days after the request is received. (3) If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published— (a) for a rehabilitation management plan—within 14 days after it is prepared or amended, or (b) for a forward program or an annual rehabilitation report— within 14 days after it is given to the Secretary or amended, (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.	Rocglen Mine - Whitehaven Coal	(1) Noted (2) Forward Program, Site Rehabilitation Management Plan and annual rehabilitation reports are publicly available on the WHC website. (3, 4) Noted	C	N/A

Division 4 - Records, reporting and notification

17	Records demonstrating compliance 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. Note— (a) The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they	- Annual Reviews 2022, 2023 and 2024 - CMO Compliance Management Software - Environmental Advisor Interviews - Internal Records	Internal CMO compliance management software is used for creating and maintaining records of actions to demonstrate compliance. Compliance status of Project Approval and EPL is reported through Annual Reviews and Annual Returns. The auditor reviewed the CMO compliance management action	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	must be retained.		records that demonstrate compliance during the audit.		
18	Report on non-compliance (1) The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with— (a) a condition of the mining lease, or Note— The Act, section 364A contains provisions relating to the use and disclosure of information provided under this condition. (b) a requirement of the Act or this Regulation relating to activities under the mining lease. (2) The holder of the mining lease must provide the report within 7 days after becoming aware of the non-compliance. (3) The holder of the mining lease must ensure the report— (a) identifies the condition of the mining lease, or the requirement of the Act or this Regulation, to which the non-compliance relates, and (b) describes the non-compliance and specifies the date or dates on which, or the period during which, the non-compliance occurred, and (c) describes the causes or likely causes of the non-compliance, and (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.	Environmental Advisor Interviews	Site personnel stated no non-compliances during the audit period for the MLs with Standard Conditions was in force. ERM did not identify any non-compliances with conditions of the MLs against the Standard Conditions during the audit period.	C	N/A
19	Nominated contact person (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. 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. (2) The holder of the mining lease must give written notice to the Secretary of— (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	Nomination of Contact Person reference number	Contact person is – Daryl Robinson, nomination reference NCP0001194	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	Regulation, and (b) any change in nomination or in the nominated person's contact details—within 28 days after the change occurs. (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.				

Division 5 - Applications relating to development consent

20	Additional requirements—application for or to modify development consent (1) The holder of a mining lease must give written notice to the Secretary within 10 days after— (a) making an application for development consent that relates to the mining area, or (b) making an application for modification of a development consent— i. under the <i>Environmental Planning and Assessment Act 1979</i>, section 4.55(2), and 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. (2) This clause does not apply if the development is State significant development.	Environmental Advisor Interviews	Site management reported that no modifications to the development consent were undertaken during the audit period. ERM notes the last modification to the development consent was carried out in October 2018, therefore this condition is not triggered for the period.	NT	N/A
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General Conditions

1	Notice to Landholders (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: i. that this mining lease has been granted or renewed; and ii. whether the lease includes the surface. The notice must include a plan identifying the lease area and each landholder and individual land parcel within the lease area. (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.	Environmental Advisor Interviews	Site Management stated that no renewal of the MLs was conducted during the audit period, therefore this condition is NT for the period.	C	N/A
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No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
2	Group Security The security deposit to be provided and maintained for this mining lease is part of a group security deposit. The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining leases covered by the group security deposit, including obligations under each mining lease that may arise in the future. The amount of the security deposit to be provided as a group security deposit has been assessed at \$ \$30,508,000. The leases covered by the group security include ML 1620 and: ML 1662.	Department of Regional NSW Title Summary Report, dated 22-05-2025	ERM reviewed the Department of Regional NSW Title Summary report dated 22-05-2025 and noted current group security required is up to date.	C	N/A
3	Cooperation Agreement 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: - access arrangements - operational interaction procedures - dispute resolution - information exchange - well location - timing of drilling - potential resource extraction conflicts; and - rehabilitation issues.	- Environmental Advisor Interviews - NSW Department of Mining, Exploration and GeoScience MinView mapping - WHC Santos Overlapping Tenements Cooperations Agreement Meeting Minutes4 August 2023	A review of MinView confirmed that AUSTRALIAN COALBED METHANE PTY LIMITED; SANTOS QNT PTY.LTD. titles overlaps part of Rocglen. Rocglen advised that discussions on a draft agreement with Santos are ongoing between the parties.	C	N/A
4. (only ML 1620)	Assessable Prospecting Operations (a) The lease holder must not carry out any assessable prospecting operation on land over which this lease has been granted unless: - 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. (b) The Minister may require the lease holder to provide such information as required to assist the Minister to consider an application for approval. (c) An approval granted by the Minister under this condition may be granted subject to terms.	Environmental Advisor Interviews	Site management stated that an assessable prospecting operations have been conducted during the audit period, therefore this condition is not triggered for period.	C	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	(d) The lease holder must comply with the approval granted to the holder under this condition.				

Special Conditions - NIL

Exploration Reporting

(only ML 1620)	Note: Exploration Reports (Geological and Geophysical) 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. 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.	Group Annual Exploration Reports, 2022, 2023 and 2024	ERM reviewed the submitted exploration reports for 2022 – 2024 for ML1620. Note: ML 1662 was granted for ancillary mining activities. The requirement to lodge Annual Reports for Mining Leases for ancillary mining activities was removed by Gazette notice dated 18 November 2021. Therefore, Annual Reports are not required for this tenement.	C	N/A
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Document details	
DOCUMENT TITLE	Table A4a – Water License 29461
DOCUMENT SUBTITLE	Compliance with Water License 29461
PROJECT NUMBER	0776499
Date	06 June 2025
Version	1.2
Author	Andrew Lewis
Client name	Whitehaven Coal

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Plan Conditions					
Take of Water					
MW0716-00001	The maximum volume of water that may be taken under this licence in any water year must not exceed a volume equal to: (A) The sum of water allocations accrued to the water allocation account for this licence from available water determinations in that year; plus (B) The water allocations carried over from the water year prior to that water year; plus (C) The new amount of any water allocation assigned to or from the water allocation account for this licence under section 71T of the ACT; plus Any water allocation re-credited to the water allocation account for this licence in accordance with section 76 of the act in that water year.	- Water Usage Records - Environmental Advisor Interviews	Rocglen stated no water has been taken under Water Access Licence (WAL) 29461 during the audit period. A review of water usage records confirms this.	C	N/A
	Share components (units or ML) 700.00	- Water Usage Records - Environmental Advisor Interviews	Rocglen stated no water has been taken under Water Access Licence (WAL) 29461 during the audit period. A review of water usage records confirms this.	C	N/A
MW0631-00001	Water must not be taken under this access licence otherwise that in compliance with the conditions of the nominated water supply work approval	Noted	Compliance with this condition is assessed throughout this table.	Note	N/A
Monitoring and recording					
MW0635-00001	The licence holder must record the following in the logbook: (i) (vii) the volume of water taken in any water year from 1 July 2011, by comparison to the maximum volume of water permitted to be taken in that water year.	- Water Usage Records - Environmental Advisor Interviews	The site records the volume of water taken in each water year in a spreadsheet. The spreadsheet includes a comparison to the maximum volume of water permitted to be taken in that water year, therefore Rocglen are compliant with this condition.	NT	N/A
MW0633-00001	The licence holder must record the following in the logbook: (i) Each date and period of time during which water is taken under this licence; (ii) The volume of water taken on that date; (iii) The water supply work approval number of the water supply work used to take the water on that date; The purpose or purposed for which the water taken on that date.	- Water Usage Records - Environmental Advisor Interviews	Water was not extracted from the production bore associated with this license during the audit period, therefore this condition has not been triggered.	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
MW0639-00001	When directed by the Minister by notice in writing, the licence holder of an access licence that nominates only a metered water supply work a data logger must keep a logbook in accordance with any requirement that are specified in the notice.	Environmental Advisor Interviews	The site was not subject to a direction by the minister during the audit period, therefore this condition was not triggered.	NT	N/A
MW0636-00001	The license holder must produce the logbook to the minister for inspection when requested.	Environmental Advisor Interviews	The site was not requested to produce the logbook by the minister during the audit period, therefore this condition was not triggered.	NT	N/A
MW0632-00001	The licence holder must keep a log book except where the access licence nominated only a metered work with a data logger. A “logbook” means a written record, keep in hard copy or electronic form, which accurately records all information required to be kept for this licence.	Water Usage Records	The site records the usage of water for each year in a spreadsheet that tracks water inputs and outputs and calculates water take, which accurately records the information required by this licence.	C	N/A
MW0637-00001	The licence holder must retain the information required to be recorded in the logbook for 5 years from the date to which that information relates.	Water Usage Records	The site records were observed to extend to greater than 5 years prior to the commencement of the audit period.	C	N/A

Reporting

MW0831-00001	The licence holder must notify the Minister, in writing, immediately upon becoming aware of a breach of any conditions of this licence. Note: a notification does not authorise a breach, or continuing breach, of a condition of this licence.	- Water Usage Records - Environmental Advisor Interviews	The site did not breach the licence conditions during the audit period, therefore this condition was not triggered.	NT	N/A
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Additional Conditions

MW0717-00001	The maximum water allocation that may be carried over in the water allocation account for this access licence from one water year to the next is either: (a) 25% of the access licence share component for access licence with share components expressed as ML/year; or i. 0.25 ML per unit share of access licence share component for access licences with share components expressed as a number of unit shares.	N/A	Noted.	Note	N/A
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Document details	
DOCUMENT TITLE	Table A4b – Water License 36758
DOCUMENT SUBTITLE	Compliance with Water License 36758
PROJECT NUMBER	0776499
Date	06 June 2025
Version	1.2
Author	Andrew Lewis
Client name	Whitehaven Coal

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
Plan Conditions					
Take of Water					
MW0716-00001	The maximum volume of water that may be taken under this licence in any water year must not exceed a volume equal to: (A) The sum of water allocations accrued to the water allocation account for this licence from available water determinations in that year; plus (B) The water allocations carried over from the water year prior to that water year; plus (C) The new amount of any water allocation assigned to or from the water allocation account for this licence under section 71T of the ACT; plus Any water allocation re-credited to the water allocation account for this licence in accordance with section 76 of the act in that water year.	- Water Usage Records - Environmental Advisor Interviews	Rocglen stated no water has been taken under Water Access Licence (WAL) 36758 during the audit period. A review of water usage records confirms this.	C	N/A
	Share components (units or ML) 700.00	- Water Usage Records - Environmental Advisor Interviews	Rocglen stated no water has been taken under Water Access Licence (WAL) 36758 during the audit period. A review of water usage records confirms this.	C	N/A
MW0631-00001	Water must not be taken under this access licence otherwise that in compliance with the conditions of the nominated water supply work approval	Noted	Compliance with this condition is assessed throughout this table.	Note	N/A
Monitoring and recording					
MW0635-00001	The licence holder must record the following in the logbook: (i) (vii) the volume of water taken in any water year from 1 July 2011, by comparison to the maximum volume of water permitted to be taken in that water year.	- Water Usage Records - Environmental Advisor Interviews	The site records the volume of water taken in each water year in a spreadsheet. The spreadsheet includes a comparison to the maximum volume of water permitted to be taken in that water year, therefore Rocglen are compliant with this condition.	NT	N/A
MW0633-00001	The licence holder must record the following in the logbook: (i) Each date and period of time during which water is taken under this licence; (ii) The volume of water taken on that date; (iii) The water supply work approval number of the water supply work used to take the water on that date; The purpose or purposed for which the water taken on that date.	- Water Usage Records - Environmental Advisor Interviews	Water was not extracted from the production bore associated with this license during the audit period, therefore this condition has not been triggered.	NT	N/A

No.	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
MW0639-00001	When directed by the Minister by notice in writing, the licence holder of an access licence that nominates only a metered water supply work a data logger must keep a logbook in accordance with any requirement that are specified in the notice.	Environmental Advisor Interviews	The site was not subject to a direction by the minister during the audit period, therefore this condition was not triggered.	NT	N/A
MW0636-00001	The license holder must produce the logbook to the minister for inspection when requested.	Environmental Advisor Interviews	The site was not requested to produce the logbook by the minister during the audit period, therefore this condition was not triggered.	NT	N/A
MW0632-00001	The licence holder must keep a log book except where the access licence nominated only a metered work with a data logger. A “logbook” means a written record, keep in hard copy or electronic form, which accurately records all information required to be kept for this licence.	Water Usage Records	The site records the usage of water for each year in a spreadsheet that tracks water inputs and outputs and calculates water take, which accurately records the information required by this licence.	C	N/A
MW0637-00001	The licence holder must retain the information required to be recorded in the logbook for 5 years from the date to which that information relates.	Water Usage Records	The site records were observed to extend to greater than 5 years prior to the commencement of the audit period.	C	N/A

Reporting

MW0831-00001	The licence holder must notify the Minister, in writing, immediately upon becoming aware of a breach of any conditions of this licence. Note: a notification does not authorise a breach, or continuing breach, of a condition of this licence.	- Water Usage Records - Environmental Advisor Interviews	The site did not breach the licence conditions during the audit period, therefore this condition was not triggered.	NT	N/A
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Additional Conditions

MW0717-00001	The maximum water allocation that may be carried over in the water allocation account for this access licence from one water year to the next is either: (a) 25% of the access licence share component for access licence with share components expressed as ML/year; or i. 0.25 ML per unit share of access licence share component for access licences with share components expressed as a number of unit shares.	N/A	Noted.	Note	N/A
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APPENDIX B DEPARTMENTAL CORRESPONDANCE

NSW Planning ref: MP10_0015-PA-19

Daryl Robinson
Mine Rehabilitation & Closure Superintendent
Whitehaven Coal Mining Limited
PO BOX 600
GUNNEDAH NSW 2380
18/03/2025

Sent via the Major Projects Portal only

Subject: Rocglen Coal Mine - 2025 audit team endorsement request

Dear Mr Robinson

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Rocglen Coal Mine, submitted as required by Schedule 5, Condition 8 of MP10_0015 as modified (the consent) to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 17 March 2025.

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

Consequently, in accordance with Schedule 5, Condition 8 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), I, as nominee of the Planning Secretary, endorse the following independent audit team:

- Mr Andrew Lewis – Lead Auditor
- Ms Leanne Lee – Support Auditor
- Mr Andrew Osborn – Rehabilitation Specialist

Please note:

- This correspondence is appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The Lead Auditor and Rehabilitation Specialist must attend the site inspection day/s.

- Any change to auditor or auditor roles must be approved by the Planning Secretary.
- The audit period is to be considered the day after the last site inspection day 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 blue ink, appearing to be "L. Gothard".

Laura Gothard
A/Team Leader
Compliance

As nominee of the Planning Secretary



APPENDIX C CORRESPONDANCE

From: [Andrew Lewis](#)
Sent on: Friday, 2 May 2025 10:45:35 AM
To: admin@gunnedahnewsagency.com.au
Subject: WHC Rocglen Mine IEA 2025 ToR for CCC Consultation
Attachments: WHC Rocglen IEA 2025 ToR.docx (256.97 KB)

To John Sturgess ,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the Community Consultative Committee. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

I can be contacted at the details outlined below to discuss further.

Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



From: [Andrew Lewis](#)
Sent on: Friday, 2 May 2025 10:34:57 AM
To: compliance@planning.nsw.gov.au
Subject: WHC Rocglen Mine IEA 2025 ToR for DPHI Consultation
Attachments: WHC Rocglen IEA 2025 ToR.docx (256.97 KB)

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the Department of Planning, Health and Infrastructure. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

Also, if there are other relevant agencies that you would like us to consult with, please notify us of which agencies.

I can be contacted at the details outlined below to discuss further.

Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



From: [Andrew Lewis](#)
Sent on: Friday, 2 May 2025 10:38:42 AM
To: info@epa.nsw.gov.au
Subject: WHC Rocglen Mine IEA 2025 ToR for EPA Consultation
Attachments: WHC Rocglen IEA 2025 ToR.docx (256.97 KB)

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the EPA. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

I can be contacted at the details outlined below to discuss further.

Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



From: [Andrew Lewis](#)
Sent on: Friday, 2 May 2025 10:43:24 AM
To: council@gunnedah.nsw.gov.au
Subject: WHC Rocglen Mine IEA 2025 ToR for Gunnedah Shire Council Consultation
Attachments: WHC Rocglen IEA 2025 ToR.docx (256.97 KB)

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the Gunnedah Shire Council. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

I can be contacted at the details outlined below to discuss further.

Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



From: [Andrew Lewis](#)
Sent on: Friday, 2 May 2025 10:40:44 AM
To: nswresourcesregulator@service-now.com
Subject: WHC Rocglen Mine IEA 2025 ToR for NSWRR Consultation
Attachments: WHC Rocglen IEA 2025 ToR.docx (256.97 KB)

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the NSWRR. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

I can be contacted at the details outlined below to discuss further.

Kind regards,



Sustainability is our business

Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



From: [Joel Curran](#)
To: [Andrew Lewis](#)
Subject: RE: WHC Rocglen Mine IEA 2025 ToR for DPHI Consultation
Date: Friday, 2 May 2025 1:35:34 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

EXTERNAL MESSAGE

Hi Andrew

Thank you for reaching out to NSW Planning regarding the scope of the upcoming Rocglen Coal Mine IEA.

I would like to see a focus on the current monitoring requirements from the consent/management plans versus what is actually being carried out. Additionally a focus on rehabilitation progress against the targets in the Rehabilitation Management Plan and the Rehabilitation Objectives in the consent.

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: andrew.lewis@erm.com <andrew.lewis@erm.com>
Sent: Friday, 2 May 2025 10:35 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: WHC Rocglen Mine IEA 2025 ToR for DPHI Consultation

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the Department of Planning, Health and Infrastructure. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

Also, if there are other relevant agencies that you would like us to consult with, please notify us of which agencies.

I can be contacted at the details outlined below to discuss further.

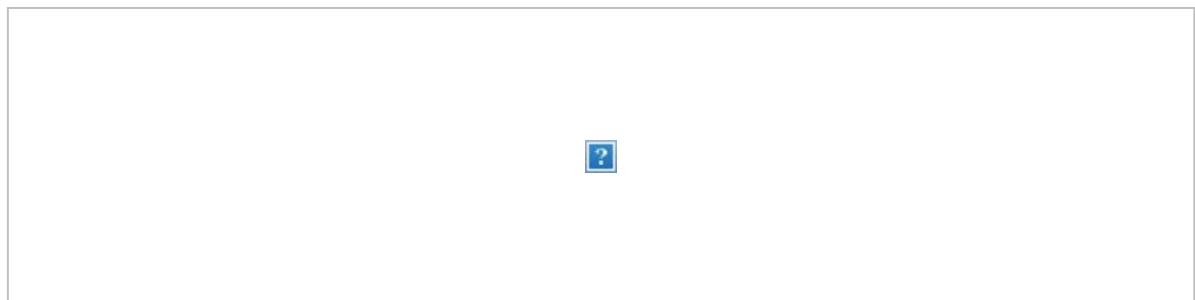
Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



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From: [Hudson - Wade](#)
To: [Andrew Lewis](#)
Subject: RE: WHC Rocglen Mine IEA 2025 ToR for Gunnedah Shire Council Consultation
Date: Thursday, 8 May 2025 8:13:56 AM
Attachments: [image003.jpg](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)

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

EXTERNAL MESSAGE

Hi Andrew,

Thank you for your time on the phone today.

On review of the Audit Terms of Reference – April 2025 forwarded to Council, Council does not raise any concerns around the parameters of the audit.

If you require anything further, please contact me or one of my planning team.

Kind Regards

Wade Hudson Manager Development Assessment
Gunnedah Shire Council

T +61 2 6740 2100 **E** wadehudson@infogunnedah.com.au
PO Box 63 (63 Elgin Street), GUNNEDAH NSW 2380
www.gunnedah.nsw.gov.au or www.facebook.com/gunnedahshire

I acknowledge the Kamilaroi Aboriginal Nation as the traditional custodians of the land on which I live, work and play. I pay my respect to Elders past and present.

From: Andrew Lewis <andrew.lewis@erm.com>
Sent: Friday, May 2, 2025 10:43 AM
To: Council Email <council@gunnedah.nsw.gov.au>
Subject: WHC Rocglen Mine IEA 2025 ToR for Gunnedah Shire Council Consultation

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the Gunnedah Shire Council. 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, and also introduces the

approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

I can be contacted at the details outlined below to discuss further.

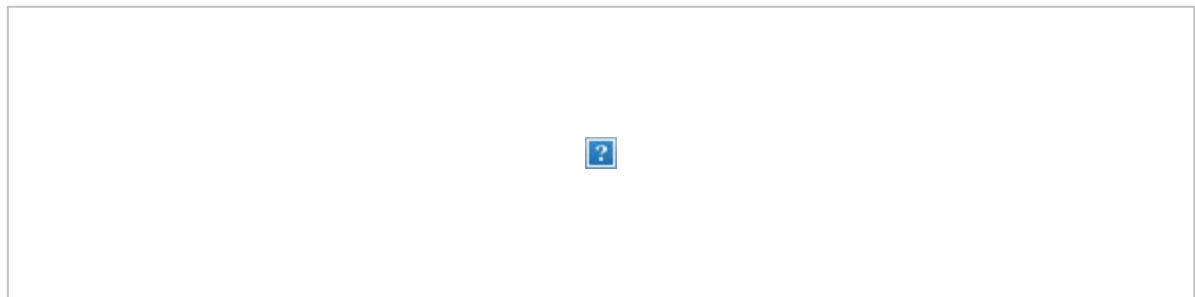
Kind regards,



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

erm.com



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From: [Lindsay Fulloon](#)
To: [Andrew Lewis](#)
Subject: FW: WHC Rocglen Mine IEA 2025 ToR for EPA Consultation [ref:!00D7F06iTix.!500Mn0qFT0f:ref]
Date: Tuesday, 13 May 2025 4:21:43 PM
Attachments: [image001.png](#)
[image002.png](#)
[image001.png](#)
[image002.jpg](#)
[WHC Rocglen IEA 2025 ToR.docx](#)
[image001.png](#)
[image002.png](#)

EXTERNAL MESSAGE

Hi Andrew

Thank you for the opportunity to raise any issues, but at our last inspection of the site in August last year, there were no significant concerns noted.

Kind regards

Lindsay Fulloon

Manager Operations

NSW Environment Protection Authority

D: 02 6773 7016 M: 0419 418 577

NSW EPA logo



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land, waters and sky where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

I am based on Anaiwan Land.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

----- Forwarded Message -----

From: [andrew.lewis@erm.com]

Sent: 02/05/2025 10:38

To: info@epa.nsw.gov.au

Subject: WHC Rocglen Mine IEA 2025 ToR for EPA Consultation

To whom it may concern,

ERM (Andrew Lewis - Lead Auditor, Leanne Lee - Support Auditor and Andrew Osborn – Rehabilitation expert) are currently preparing for the Independent Environmental Audit (IEA) on the Conditions of Approval issued to Whitehaven Coal Limited (Rocglen Mine) Project Application No 10_0015.

One of the requirements of the audit is that it is to be undertaken in consultation with the EPA. 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, and also introduces the approved team of suitably qualified, experienced and independent experts who will be undertaking the audit. The site inspection will be undertaken on 21-22 May 2025, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised by 16 May 2025.

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Kind regards,

ERM



Andrew Lewis
Managing Consultant

Brisbane
+61 448166325

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ref:!00D7F06iTix.!500Mn0qFT0f:ref

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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



APPENDIX D AUDITOR DECLARATIONS

Independent Audit Report Declaration Form

Independent Audit Report Declaration Form	
Project Name	Whitehaven Rocglen Coal Mine IEA 2025
Consent Number	PA 10_0015
Description of Project	Open cut mine
Project Address	Ween Rd, Gunnedah NSW 2380
Proponent	Whitehaven Coal
Title of Audit	Rocglen Mine Independent Environmental Audit 2025
Date	26 June 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my 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 Auditor	Andrew Lewis
Signature	
Qualification	BSc – Environmental Science
Company	Environmental Resources Management - ERM
Company Address	Level 9, 260 Queen St, Brisbane, QLD 4000

Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

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- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
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Name of Auditor	Andrew Osborn
Signature	
Qualification	B. ApSci. Horticulture; Grad. Dip. Environmental Management
Company	Environmental Resources Management - ERM
Company Address	Level 9, 260 Queen St, Brisbane, QLD 4000

Independent Audit Report Declaration Form

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Name of Auditor	Leanne Lee
Signature	
Qualification	Bachelor of Advanced Science (Honours) – UNSW
Company	Environmental Resources Management - ERM
Company Address	Level 9, 260 Queen St, Brisbane, QLD 4000

Independent Audit Report Declaration Form

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Name of Auditor	Oliver Moore
Signature	
Qualification	MSc – Environmental Technology
Company	Environmental Resources Management - ERM
Company Address	Level 9, 260 Queen St, Brisbane, QLD 4000



APPENDIX E PHOTOLOG

CLIENT: Whitehaven Coal

SITE LOCATION: Rocglen Mine

PROJECT NO.: 0776499



PHOTO 1

Office, mechanical workshop area



PHOTO 2

Chemical Storage area

CLIENT: Whitehaven Coal

SITE LOCATION: Rocglen Mine

PROJECT NO.: 0776499



PHOTO 3
Mechanical workshop drainage sump



PHOTO 4
Sediment dam



PHOTO 5
Rehabilitated area – Waste rock dump



PHOTO 6
Rehabilitated area – Final void

CLIENT: Whitehaven Coal

SITE LOCATION: Rocglen Mine

PROJECT NO.: 0776499



PHOTO 7

Rehabilitated area – Final void



PHOTO 8

Rehabilitated area – Waste rock dump

CLIENT: Whitehaven Coal

SITE LOCATION: Rocglen Mine

PROJECT NO.: 0776499



PHOTO 9

Rehabilitated area – Northern waste rock dump at weather station



PHOTO 10

Weather station

CLIENT: Whitehaven Coal

SITE LOCATION: Rocglen Mine

PROJECT NO.: 0776499



PHOTO 11

Offsite environmental monitoring location at Rosbury



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India	Taiwan
Indonesia	Tanzania
Ireland	Thailand
Italy	UAE
Japan	UK
Kazakhstan	US
Kenya	Vietnam
Malaysia	
Mexico	
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