

**Attachment B – Response to IEA Recommendations**

<b>Summary of Previous Recommendations (2016) Status</b>				
<b>Condition / Plan</b>	<b>IEA Recommendation (2019 comment)</b>	<b>Audit Classification*</b>	<b>IEA Action Timing</b>	<b>RCM Response</b>
<i>Minister's Conditions of Approval PA 10_0015</i>				
2.7	<i>Assessment of additional PA 06_198 conditions has been completed in lieu of this approval being surrendered. Consider formally completing the surrender of PA 06_0198.</i>	ANC	Not applicable	No further action required. WHC has undertaken all measures to surrender that are within its management control; progression of process is dependent upon Council as a landholder.
3.5	<i>No further actions recommended. Tracking of overpressure readings is now compared to a rolling 12 months to prevent further oversights. The auditor considers this to be an ANC given this was reported elsewhere and no environmental harm generated.</i>	ANC	Complete	Noted.
<i>Statement of Commitments</i>				
g	<i>Consider diverting water to the newly constructed eastern channel in the northern emplacement area to prevent further scouring alongside this channel. In addition, consider installing a batter shoot where water is ponding in the recently repaired tunnel erosion area or complete works to divert water to the rock lined drain on the western face of the northern emplacement area.</i>	Observation (Non-compliant)	Not applicable	Sediment controls are currently installed. Additional remediation work will occur during the transition to closure as defined in the Closure MOP.
i	<i>Monitoring of groundwater levels was not completed initially monthly for the first 12 months of the Project. No further actions are recommended. This is considered a legacy ANC.</i>	ANC	Not applicable	Noted.
e	<i>Consider installing bund along Wean Rd to provide a visual screen. Vegetation will be established during pending closure planning.</i>	Observation (Non-compliant)	31 December 2019	Consideration and commitment for screening of Wean Road by bund and vegetation was included in the recently (April 2019) submitted closure MOP. Tube stock has been ordered for infill planting along the Wean road screen area.

Summary of Previous Recommendations (2016) Status				
Condition / Plan	IEA Recommendation (2019 comment)	Audit Classification*	IEA Action Timing	RCM Response
				Infill planting is scheduled to be completed by 30 August 2019.
b	<i>Consider including date/timeline of response to any complaints so that assessment against this commitment can be completed.</i>	ANC	Complete	Template updated to account for additional detail of timing within response.
<i>ML1620</i>				
15	<i>Refer Condition L5.1 EPL 12870</i>	NC	Not applicable	RCM consider this is a legacy finding and no further action is required.
<i>Environmental Protection Licence 12870</i>				
M2.2	<i>Two sampling events were missed for the HVAS – no further actions are proposed.  This is considered to be a Legacy NC.</i>	NC	Not applicable	Noted. Monitoring continues to be undertaken as required by the licence. Auditor notes this is a legacy finding.
<i>Water Access Licence 29461</i>				
MW0633-00001, MW0632-00001	<i>Consider amending the existing Water Meter Reading Excel spreadsheet to include all requirements.</i>	ANC	Complete	RCM disagree with the recommendation. The Excel spreadsheet is considered appropriate as a logbook and addresses the required condition. No further action is proposed.
MW0635-00001	<i>Consider amending the existing Water Meter Reading Excel spreadsheet to include volume of water extracted against the maximum volume allowed.  Legacy condition, however the observation remains.</i>	Observation – (NC)	Complete	Refer to above. RCM disagree with the recommendation. The Excel spreadsheet is considered appropriate as a logbook and addresses the required condition. No further action is proposed.
<i>Mining Operation Plan</i>				
MOP	<i>Consider installing bund along Wean Rd to provide a visual screen. Vegetation will be established during pending closure planning.</i>	Observation (NC)	31 December 2019	Refer response in Statement of Commitments above.
<i>Rehabilitation Management Plan</i>				
RMP	<i>Consider diverting water to the newly constructed eastern channel in the northern emplacement area to</i>	Observation (NC)	Ongoing	Erosion management structures are in place. Remediation of the site will occur as part of closure work on site.

Summary of Previous Recommendations (2016) Status				
Condition / Plan	IEA Recommendation (2019 comment)	Audit Classification*	IEA Action Timing	RCM Response
	<i>prevent further scouring alongside this channel. In addition, consider installing a batter shoot where water is ponding in the recently repaired tunnel erosion area or complete works to divert water to the rock lined drain on the western face of the northern emplacement area.</i>			
RMP	<i>Complete development of plans and issue as soon as practicable.</i>	ANC	Complete	RCM have completed and addressed this condition, A Closure MOP has been submitted and is pending approval.
<i>Water Management Plan</i>				
WMP	<i>Sediment dam &amp; site monitoring undertaken with wide suite against ANZECC guidelines  Unnamed drainage channel and Driggle Draggie Creek sampled for wet weather discharges analytes only (pH, TSS, TOC, and EC). No further testing or comparison to the ANZECC guidelines listed in Table 7 has occurred</i>	NC	31 <sup>st</sup> July 2019	The creek is ephemeral. Water quality sampling results have not indicated impact from site activities.  The WMP will be updated by 31 <sup>st</sup> July 2019, and reviewed as part of transition into closure and final landform is established. Assessment of the creek systems has occurred as part of another proposed project.
WMP	<i>Consider the review of the creek monitoring program and action accordingly.</i>	NC	31 July 2019	Refer above. Update and Review of the WMP and monitoring program will occur, noting the site is transitioning to closure status.
WMP	<i>Investigation needs to be completed on groundwater results to confirm if trigger levels for investigation have been reached in MP6 and MP7 (as a minimum).</i>	Observation - NC	31 July 2019	RCM note these bores are located in close also proximity to the operation on mine owned land and note drought conditions during the audit period. Monitoring of level and quality is completed. Review will occur during review of WMP.
WMP	<i>Review of results indicate some triggers may have been reached – refer above.</i>	NC – duplicated in this plan	31 July 2019	Please refer to the response above. RCM also note recent drought conditions and pending closure of the operation.

Independent Environmental Audit - 2019				
Condition / Plan	IEA Recommendation	Audit Classification	IEA Action Timing	Response
<i>Minister's Conditions of Approval PA 10_0015 MOD 4</i>				
2.7 & 2.8	<i>Assessment of additional PA 06_198 conditions has been completed in lieu of this approval being surrendered. The surrender of PA06_0198 is dependent upon consent of the owners of the land covered by the PA, the achievement of which is affected by ongoing discussion between WHC/GSC regarding transfer of ownership of a section of Wean Road.</i>	ANC	Not applicable	No further action required. Rocglen Coal Mine (RCM) completed all available actions prior to the audit period. RCM has undertaken all measures to surrender that are within its management control; progression of process is dependent upon another landholder.
3.1	<i>No further action required. Attended monitoring exceedance description in September 2016, March and May 2017.</i>	NC	Not applicable	Noted.
3.2	<i>Ongoing monitoring. Monitoring was completed in 2016 and 2018 confirming compliance during the audit period.</i>	ANC	Ongoing	Attended road traffic noise monitoring continues to be undertaken in conjunction with Tarrawonga Coal Mine.
3.5	<i>Whitehaven Coal Mining Ltd were prosecuted in relation to a blast resulting in a fume event in August 2016. At the time of the IEA, legal proceedings were still in progress. Regulatory action has been completed and there are no outstanding actions.</i>	NC	Complete	Noted.
3.13	<i>Refer section 3.3. WHC and EPA were in correspondence about final outcome from blast fume incident at time of audit.</i>  <i>Previous recommendation for inclusion of presence/absence of odour within the monthly inspection list has not been incorporated.</i>	NC	Complete	No odour was identified during the site inspection and no complaints were received during the prior year related to odour. A Spontaneous Combustion Principle Hazard Management Plan is in place that guides controls required.
3.24 c)	<i>The auditor recommends WHC upgrade fencing to enhance protection, monitoring and management of scarred trees (NPWS # 20-4-0194 and # 20-4-0195).</i>	Observation - NC	Complete	Loose fence wires have been restrained and reflective indicators reinstated.
3.31 b)	<i>Consider improvement of screening along Wean Road in the update to the Closure MOP.</i>	Observation - NC	31 December 2019	Commitment for improvement of screening of Wean Road by bund and vegetation was included in the recently

Independent Environmental Audit - 2019				
Condition / Plan	IEA Recommendation	Audit Classification	IEA Action Timing	Response
				submitted closure MOP. Infill planting of tube stock will be undertaken by 30 August 2019.
3.34	<i>Prepare a replanting plan to address rehabilitation failure.</i>	Observation - NC	Ongoing	Rehabilitation sign off has not been formally sought from the relevant approval agency. Planting has occurred and will continue to occur to achieve the objectives of the Closure MOP to enable progression towards relinquishment.
3.35	<i>The Proponent shall carry out the rehabilitation of the site progressively, that is, as soon as reasonably practicable following disturbance. Refer Schedule 3 Condition 34</i>	Observation - NC	Ongoing	Rehabilitation timelines are defined in the recent RCM Closure MOP. The mine will transition into closure and final rehabilitation phases from July 2019 onwards as per the implementation of the Closure MOP.
<b>Statement of Commitments</b>				
g	<i>Consider including in an existing procedure (if appropriate) or developing a new procedure to ensure stockpiles are inspected and treated for weeds prior to re spreading/reuse on site.</i>	Observation - ANC	Complete	Site is inspected quarterly by a consultant for the presence of weeds. This informs targeted weed control management. Inspection for weeds on topsoil stockpiles will be included in the quarterly inspection
i, c & g	<i>Subsoil stockpile on eastern side appears to require improved erosion and sediment controls to prevent sediment laden runoff discharges from site. Explore whether improvement to Dam B inlet and outlet location is possible.</i>	NC	31 December 2019	Sediment control works are installed. Remediation works will be addressed as part of closure work.
g & m	<i>Repair the breach in the perimeter bund. Review ESCP and basin design in the northern emplacement area to ensure optimum arrangement.</i>	Observation - NC	Ongoing	The perimeter bund has been rectified. Closure works including landform design and drainage will occur as per the Closure MOP.
v	<i>Prepare a replanting plan to address rehabilitation failure.</i>	Observation - NC	Ongoing	Refer above response to 3.34, tube stock planting methodology is currently under review and will be completed by 30 August 2019. Rehabilitation and planting schedule will be in accordance to the closure MOP.

Independent Environmental Audit - 2019				
Condition / Plan	IEA Recommendation	Audit Classification	IEA Action Timing	Response
b	<i>Provide criteria levels within the existing familiarisation process.</i>	ANC	31 July 2019	Environmental requirements are presented in the general induction process. Additional noise management items will be presented in a toolbox talk by 31 July 2019. It is noted transition to closure work and cessation of night time operations is scheduled to occur by 30 June 2019.
b	<i>Consider including date/timeline of response to any complaints so that assessment against this commitment can be completed.</i>	ANC	Complete	Complete. Details including time and date of response and when complainant was contacted, has been added to the internal complaints form.
j	<i>Ensure that the inlet and outlet for Dam B are appropriately located to ensure retention time to allow sediment capture.</i>	Observation - NC	2020	Sediment control works are installed. Remediation works will be addressed as part of closure work.
i	<i>Monitoring of groundwater levels was not completed initially on a monthly basis for the first 12 months of the Project. No further actions are recommended as this is considered a legacy ANC.</i>	ANC	N/A	Legacy ANC. No further action required.
b & e	<i>The auditor recommends WHC upgrade fencing to enhance protection, monitoring and management of scarred trees (NPWS # 20-4-0194 and # 20-4-0195).</i>	Observation - NC	Complete	Loose fence wires have been restrained and reflective indicators reinstated.
a and e	<i>Consider installing visual screen along Wean Rd.</i>	NC	31 December 2019	Refer response to 3.31 above. Commitment for improvement of screening of Wean Road by bund and vegetation was included in the submitted closure MOP. Tube stock has been ordered and will be planted by 30 August 2019.
<i>Environmental Protection Licence 12870</i>				
A3.1	<i>Works and activities generally carried out in accordance with the EPL, though non-compliances were identified as described throughout this table. As outlined against non-compliances and observations</i>	NC	N/A	Addressed in this response Table.
P1.1	<i>Ensure HVAS monitoring continues at required frequency and duration.</i>	NC	N/A - Ongoing monitoring	Due to power failure, a short run on HVAS was recorded. Monitoring will continue as required.

Independent Environmental Audit - 2019				
Condition / Plan	IEA Recommendation	Audit Classification	IEA Action Timing	Response
L4.1	<i>Continue monitoring as per requirements - exceedances were predominately at night. Night works will likely cease upon completion of mining activities in very near future (mid 2019) and works will focus rehabilitation to be undertaken during daytime period only</i>	NC	N/A - Ongoing monitoring	Operational activities will be reduced from approximately July 2019 onwards. Monitoring will occur as per the relevant licence condition.  An amendment to the licence to reflect the activities will be applied in due course.
L5.1	<i>No further action required. (Duplicated with MCoA 3.5 and ML 1620 [15(b)])</i>	NC	N/A	Noted
O4.1	<i>Whitehaven Coal Mining Ltd were prosecuted in relation to a blast resulting in a fume event in August 2016. At the time of the IEA, legal proceedings were still in progress. Regulatory action has been completed and there are no outstanding actions.</i>	NC	N/A - Complete	Refer previous response above.
M3.2	<i>No further action required.</i>	ANC	N/A	Noted
M2.4 & M2.5	<i>Implement any additional mitigation measures to allow for less than 12 hour response time</i>	NC	Complete & ongoing	Weather is monitored daily including forecasts. Site personnel are made available to undertake site inspection and sampling for any likely overflow event.
<i>Water Access Licence 36758</i>				
MW0633-00001	<i>Modelling to be used to determine 'take' by groundwater inflow</i>	ANC	Complete	A detailed groundwater model has been developed and will be reviewed annually as part of the required annual site water balance.  Groundwater take (30ML) was reported in the 2018 Annual Review. Previous years noted as zero.
MW0637-00001	<i>Volume of infiltration can be kept for 5 years.</i>	ANC	Complete	Annual modelled groundwater has been undertaken.
<i>Water Access Licence 29461</i>				

Independent Environmental Audit - 2019				
Condition / Plan	IEA Recommendation	Audit Classification	IEA Action Timing	Response
MW0635-00001	<i>Update spreadsheet to include groundwater inflow</i>	ANC	Complete	Excel spreadsheet is considered appropriate as a logbook and inflow can be determined from the model. No further action proposed.
MW0633-00001	<i>Complete purpose component of the spreadsheet.</i>	ANC	Complete	Purpose column has been added to the workbook against each licence.
MW0632-00001	<i>Consider amending the existing Water Meter Reading Excel spreadsheet to include all logbook requirements.</i>	ANC	Complete	Refer above.
MW0637-00001	<i>Consider including logbook requirements and record keeping requirements of the WAL into the Water Management Plan</i>	Observation - NC	Not applicable	WMP approved by the regulatory agency. Transitioning into closure and remediation of the site. Excel spreadsheet considered appropriate.
<i>Mining Operations Plan</i>				
MOP	<i>Consider installing visual screen along Wean Rd.</i>	NC	31 December 2019	Refer response to 3.31 and SOC above. Commitment for improvement of screening of Wean Road by bund and vegetation was included in the submitted closure MOP. Tube stock has been ordered as noted above and infill planting will be undertaken by 30 August 2019.
<i>ML1620</i>				
b	<i>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.</i>	NC	Complete	Refer response above. Duplicated with MCoA 3.5 and EPL L5.1



**2019 Audit Findings**

Condition/Plan	IEA Proposed Audit Action		IEA Action Plan Timing	Status Update
<i>Blast Management Plan</i>				
BMP	<i>WHC received a Show Cause on 5th July 2016 in relation to a non-compliance of this condition due to an exceedance of airblast overpressure recorded at EPL/PA ID BB3 "Roseberry".</i>	NC	Complete	Complete. Duplicated with MCoA 3.5, EPL L5.1 and ML1620 (15(b))
BMP	<i>RCM will notify DPE and EPA of any blasting related non-compliances or exceedances as soon as practicable after RCM becomes aware of the issue.</i>	NC	Complete	As above. Noted. Duplicated with MCoA 3.5, EPL L5.1 and ML1620
<i>Rehabilitation Management Plan</i>				
RMP	<i>Repair the breach in the perimeter bund. Review ESCP and basin design in the northern emplacement area to ensure optimum arrangement.</i>	Observation - NC	Ongoing	The perimeter bund has been rectified. Closure works including landform design and drainage will occur as per the Closure MOP.
RMP	<i>Consider including in an existing procedure (if appropriate) or developing a new procedure to ensure stockpiles are inspected and treated for weeds prior to re spreading/reuse on site.</i>	Observation - ANC	Complete	As noted in response to equivalent recommendation in Statement of Commitments above.
RMP	<i>No further action required. AEMR 2017 indicates flora and fauna monitoring was conducted in 2017.</i>  <i>Table in RMP indicates monitoring to be completed every two years – review of AEMRs indicates Eco Logical Report completed 2015 is the first report since the</i>	NC	N/A	Legacy finding. Flora and fauna monitoring has been completed during each year of the audit period.

**2019 Audit Findings**

Condition/Plan	IEA Proposed Audit Action		IEA Action Plan Timing	Status Update
	<i>report was completed for the Project Extension in 2010.</i>			
<i>Traffic Noise Management Plan</i>				
TMP	<i>Consider reviewing the reporting frequency to align with the CCC meeting frequency</i>	ANC	Complete	Monitoring results are provided publically on the Rocglen Coal website within EPL monthly reporting. A note will be provided during the next CCC meeting advising that results are available on a monthly basis on the website. Additional three monthly circulation to the CCC is not considered to be required given the site is transitioning into closure status.
<i>Water Management Plan</i>				
WMP	<i>Subsoil stockpile on eastern side appears to require improved erosion and sediment controls to prevent sediment laden runoff discharges from site. Explore whether improvement to Dam B inlet and outlet location is possible.</i>	NC	31 December 2019	Duplicated in Statement of Commitments (SoC). Please refer response above in SoC section.
WMP	<i>Consider the review of the water monitoring program and confirm the required analytical program and action accordingly.</i>	NC	31 July 2019	The creek is ephemeral. Routine sampling has not been undertaken due to drought conditions. Sampling results have not indicated impact from site activities.  The WMP and monitoring program will be updated (31 July 2019), and reviewed as part of transition into closure.
WMP	<i>Consider the review of the creek monitoring program and action accordingly.</i>	NC	31 July 2019	As above.
WMP	<i>If no discharge then consider adding results to surface water sampling sheet to remove confusion. In addition consider adding the rainfall reviewed the prior 5 days and note the activities on site that may impact water quality, such as earthworks/ground disturbance.</i>	ANC	31 July 2019	The creek is ephemeral. Routine sampling has not been undertaken due to drought conditions. Sampling results have not indicated impact from site activities.  The WMP and monitoring program will be updated (31 July 2019), and reviewed as part of transition into closure.

**2019 Audit Findings**

Condition/Plan	IEA Proposed Audit Action		IEA Action Plan Timing	Status Update
WMP	<i>Consider the review and check of data to confirm if trigger values have been reached for some parameters and action accordingly. Perhaps include comparison to triggers in table and or graphs to easily identify exceedances of trigger levels.</i>	NC	29 November 2019	The monitoring points referenced are on mine owned land in close proximity to the operation. These will be reviewed annually as part of mine water balance. It is noted the operation is transitioning into closure.