

Rocglen 2011 Independent Audit Action Plan

PROJECT APPROVAL 06_0198 NON COMPLIANCES

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
2.1	several non-conformances have been identified relating to air, noise, blasting and water discharge exceedances. Many of these exceedances were during the early stages of operations and Whitehaven has investigated each incident and modified operations accordingly. The key compliance issue relates to the lack of an approved Landscape Management Plan for the site.	Finalise the Landscape Management Plan for the Project and submit to DP&I.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
2.2(b)	Non-compliances identified with statement of commitments.	Refer to Statement of Commitments Non-Compliances.	N/A	N/A
2.2(d)	Non-compliances identified with the conditions of PA 06_0198.	Refer to Non-Compliances within this table.	N/A	N/A
2.7	Works undertaken on a Sunday. Whitehaven investigated and found that a contractor had done some work with a dozer on a Sunday. There is no evidence of any further non-compliances with this condition.	The Project Manager confirmed that shift lengths are set and no staff are permitted to work beyond the approved hours. Whitehaven instructed the contractor that no works were to occur on a Sunday and reinforced that message to all contractors and staff via toolbox talks.	Ongoing	
2.9	Management plans have been submitted progressively and approved by DoPI. However, the Landscape Management Plan has not yet been finalised or submitted and no evidence was sighted to indicate that DoPI had approved a delay to the submission of the plan.	Finalise the Landscape Management Plan for the Project and submit to DP&I.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
2.10	No evidence of an occupation certificate for the demountable toilet block and the demountable training room, although development consent has been obtained.	Obtain an occupation certificate from Gunnedah Shire Council for the facilities.	November 2011	
3.1	During the 2009/2010 reporting period there were instances where the TSS recorded was > 50mg/L and the rainfall recorded over the preceding 5 day period was less than 38.4mm(see EPL condition L3.4).	Continue monitoring and use flocculants where necessary. If wet weather discharges continue to exceed EPL criteria, consider an independent review of the water management system capacities and the ability of the system to cope with the rainfall capacities as stated in the EPL conditions.	Ongoing	
3.7	There have been several noise exceedances since operations commenced in 2008. For example at "Costa Vale" and "Surrey" on the 30/7/2008, 18/8/09 and the 8/09/2009.	The actions taken in investigating exceedances were appropriate. Continue to monitor noise levels in accordance with the approved Noise Monitoring Program.	Ongoing	
3.11	AEMR 2009/2010, section 3.9.2 indicates two blasts exceeded the 115 dBL limit, recording 119.9 dBL at "Costa Vale" on the 24/8/2009 and 116.9 dBL at "Costa Vale" on the 27/8/2009. The blasts do not	DoPI and DECCW were notified and an investigation was carried out by Orica Mining Services. No exceedances have been identified since. Continue monitoring blasts in accordance with the approved Blast Monitoring Program.	Ongoing	

	comply with the allowance of 5% of blasts between 115-120 dBL over a 12 month period.			
3.20	Whitehaven appointed a suitably qualified person to undertake the building condition assessments (Kelley Covey Group Pty Ltd). However there is no evidence that this was notified to or approved by the Director General.	Kelley Covey Group Pty Ltd had been approved by the DoPI to undertake building condition assessments previously for other Whitehaven operations in the Gunnedah area. As the building conditions reports have been completed and issued to landowners, no further action is considered required.	N/A	N/A
3.23	AEMR 2009/2010, section 3.1 details several PM10 exceedances at both "Glenroc" and "Roseberry" properties. There is also no evidence that TSP is monitored or recorded. Whitehaven follows its Air Quality	Continue monitoring in accordance with Air Quality Monitoring Program. Whitehaven has confirmed with DP&I that compliance with TSP criterion can be accessed via the interpolation of PM10 monitoring results.	Ongoing	
3.27(a)	Landscape Management Plan not finalised, pending outcome of proposed regional Biodiversity Offset Strategy. Whitehaven is waiting to receive advice from DECCW as to the determination of the proposal.	Continue negotiations with OEH and DP&I in relation to the Whitehaven Regional Biodiversity Strategy. Once formalised the Landscape Management Plan (Rehabilitation Management Plan in new consent) can be developed.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
3.27(b)	Biodiversity Offset Strategy not finalised.	Continue negotiations with OEH and DP&I in relation to the Whitehaven Regional Biodiversity Strategy. Unless the Director General agrees otherwise, enter into a Biobanking agreement with the Minister for Environment and Heritage, to implement the Biodiversity Offset Strategy described in the EA. .	June 2012 (As per date required in Project Approval 10_0015, received 27/9/11	
3.28	Biodiversity Offset Strategy not finalised.	Continue negotiations with OEH and DP&I in relation to the Whitehaven Regional Biodiversity Strategy. Unless the Director General agrees otherwise, enter into a Biobanking agreement with the Minister for Environment and Heritage, to implement the Biodiversity Offset Strategy described in the EA.	June 2012 (As per date required in Project Approval 10_0015, received 27/9/11	
3.29	The Landscape Management Plan has not been finalised, which will detail the rehabilitation for the site.	Continue negotiations with OEH and DP&I in relation to the Whitehaven Regional Biodiversity Strategy. Once formalised the Landscape Management Plan (Rehabilitation Management Plan in new consent) can be developed.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
3.30	Landscape Management Plan not finalised, pending outcome of proposed regional Biodiversity Offset Strategy. Whitehaven is waiting to receive advice from DECCW as to the determination of the proposal.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11	

			and titled Rehabilitation Management Plan.	
3.31	Landscape Management Plan not finalised, which includes the Rehabilitation and Offset Management Plan.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
3.32	Landscape Management Plan not finalised, which includes the Final Void Management Plan.	Prepare and implement a Final Void Management Plan as a component of the Water Management Plan for the Rocglen site in accordance with conditional requirement of new consent.	February 2012 (As per date required in Project Approval 10_0015, received 27/9/11 and titled Water Management Plan.	
3.33	Landscape Management Plan not finalised, which includes the Mine Closure Plan.	Prepare and implement a Mine Closure Plan as a component of the Landscape Management Plan (termed Rehabilitation Management Plan in the new consent) for the Rocglen site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
3.41(a)	The intersection was not completed within 18 months after the date of approval of PA 06_0198. Email sighted from Constructive Solutions dated 6/5/2011 stating the remaining items to seek final close out for the works which included: resolution of a defect in the concrete slip lane by Kellers, and installation of lighting.	Finalise outstanding works and seek advice from RTA as to their satisfaction of the upgraded intersections.	December 2011	
3.43	Wean road was not sealed and completed within the required time frame (end of March 2009).	All works have now been completed to the satisfaction of GSC, no further action is necessary. However the 200m tar sealing of the northern section of wean road should be verified at the next audit.	N/A	Northern section of wean road is already sealed 200m north of the diversion.
3.44	Road Maintenance Agreement was not finalised by the end of September 2008.	The agreement was finalised in mid 2009 and is now in place and was sighted during the audit. Therefore no further action is considered necessary.	N/A	N/A
3.47(b)	Energy Efficiency Plan not submitted by the end of September 2008.	The Energy Efficiency Plan has been completed and was submitted to DoPI on the 3/7/2009. DoPI approved the plan on the 10/7/2009. Therefore no further action is considered necessary.	N/A	N/A
3.47(c)	No evidence of the monitoring described in Section 8.7 of the	The Greenhouse and Energy Efficiency Plan should be updated to reflect	December 2011	

	Greenhouse and Energy Efficiency Plan for a measure of the energy efficiency performance. Section 8.9 does not specify exactly how greenhouse gas emissions and energy use will be monitored and reported.	current operations (i.e. remove references to reducing electricity usage since electricity is not sourced from the grid but is generated on site). See Environmental Management Plan Recommendations. Rocglen is also being assessed under Energy Efficiency Opportunities with the first public report due by 31 st December 2011.		
3.47(d)	As above.			
3.47(e)	As above.			
5.2	The Environmental Monitoring Program was not submitted by the end of September 2008.	The EMP has been prepared and was approved by DoPI on the 15/07/2009. Therefore no further action is considered necessary.	N/A	N/A
5.3	Exceedances have been reported, however not within the required timeframe. Copies of exceedance/incident notifications sighted.	Implement a process to ensure that notification of exceedances is provided to relevant government agencies within the required timeframe.	Ongoing	
5.4	Exceedances have been reported, however not within the required timeframe. Copies of exceedance/incident notifications sighted.	Implement a process to ensure that notification of exceedances is provided to relevant government agencies within the required timeframe.	Ongoing	
5.6	Independant Environmental Audit not carried out by the end of March 2011. WCMPL letter to DoPI dated 22/03/2011 indicates a request for extension of the due date to October 2011. No evidence available that this letter was approved by DoPI.	Whitehaven advised that a phone call from Collin Phillips from DoPI indicated that the outcomes of the audit would be beneficial prior to the determination of the Rocglen Extension application. Umwelt Pty Ltd was engaged in April 2011, the Audit has now been completed, therefore no further action required. Conduct the next Audit within the required time-frame.	End of March 2013 (As per date required in Project Approval 10_0015, received 27/9/11	

PROJECT APPROVAL 06_0198 STATEMENT OF COMMITMENTS NON COMPLIANCES

Commitment	Evidence	Proposed Actions/Response	Due Date	Progress Update
3.6	Runoff is directed to an oils separator. However the clarified water is diverted to a clean water storage rather than a sediment basin.	Review the operation of the oily water separator and current flow path of clarified water.	November 2011	
4.1	A Rehabilitation Plan has not yet been prepared.	Continue negotiations with OEH and DP&I in relation to the Whitehaven Regional Biodiversity Offset Strategy with a view of preparing a Rehabilitation Management Plan for the Rocglen site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
4.2	Even though rehabilitation has commenced, it is not reviewed against the Rehabilitation and Landscape Management Plan as such a plan has not been developed.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the Rocglen site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled	

			Rehabilitation Management Plan.	
4.3	Rehabilitation and Landscape Management Plan has not been prepared, which includes a Final Void Management Plan.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the Rocglen site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
4.4	Mine Closure Plan has not yet been prepared.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the Rocglen site.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
5.10	Not all maintenance activities are specifically being undertaken within the maintenance workshop. E.g. emergency maintenance of plant and equipment may be undertaken in other areas.	Although not specifically complying, in the auditor's opinion in-pit servicing is a suitable practice for plant breakdowns. Therefore no further action is considered necessary.	N/A	N/A
6.7	No specific details of habitat corridor planning are available.	Details of specific habitat corridor planning should be included in the Landscape Management Plan (termed Rehabilitation Management Plan in new consent).	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
6.17	The Landscape Management Plan has not been prepared and hence no evidence of the incorporation of wildlife corridors into a biodiversity offset strategy is available.	Details of specific habitat corridor planning should be included in the Landscape Management Plan (termed Rehabilitation Management Plan in new consent).	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
6.18	The Landscape Management Plan has not been prepared,	Ensure Flora and Fauna Management Plan is included in the Landscape	February 2012.	

	which includes the Flora and Fauna Management Plan.	Management Plan (termed Rehabilitation Management Plan in new consent).	(As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
6.20	A Vertebrate Pest Control Plan has not been documented. This will form part of the Landscape Management Plan.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the Rocglen site, including a vertebrate pest control program.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
6.24	Fencing not completed around offset area. Details of the offset area and fencing to be included in the Landscape Management Plan.	Complete the fencing of the area of woodland to be retained as an offset. This will be within the Regional Biodiversity Offset area upon registration of the Biobank by OEH.	Upon registration the Biobank site.	
6.25	Establishment of Whitehaven Regional Biodiversity Offset Area not finalised.	Continue negotiations with OEH and DoPI in relation to the Whitehaven Regional Biodiversity Area.	June 2012. (As per date required in Project Approval 10_0015, received 27/9/11	
6.26	No invitation to DWE and DECCW representatives to inspect the root systems of grey box and ironbark vegetation to identify rooting depths.	Invite NOW and OEH representatives to inspect the root systems of grey box and ironbark vegetation to identify rooting depths, particularly in areas adjoining Vickery State Forest.	November 2011	
7.5	Scarred trees on wean road have not been fenced off and signed. This was not completed on purpose in order to avoid drawing attention to the artefacts within the public road reserve.	Liaise with DECCW, DoPI and the Aboriginal stakeholder groups to obtain their concurrence to the approach of not providing fencing or signage so as not to draw attention to the scarred trees on Wean Road.	January 2012	
8.10	There have been several noise exceedances since operations commenced in 2008. For example at "Costa Vale" and "Surrey" on the 30/7/2008, 18/8/09 and the 8/09/2009.	The actions taken in investigating exceedances were appropriate. Continue to monitor noise levels in accordance with the approved Noise Monitoring Program.	Ongoing	
9.13	Two exceedances were recorded in 2009 representing 8.3% of total blasts for that year.	DoPI and DECCW were notified and an investigation was carried out by Orica Mining Services. No exceedances have been identified since. Continue monitoring blasts in accordance with the approved Blast Monitoring Program.	Ongoing	
10.2	No specific evidence in the Surface Water Management Plan relating to control measures to accommodate a range of seasonal conditions.	Monthly environmental inspections are undertaken and additional actions are identified where necessary in relation to erosion and sedimentation issues. The management actions currently in place are considered appropriate.	Ongoing	
10.15	Grass coverage not maintained to >70% over the project Site.	This commitment is considered by Whitehaven to be unrealistic across the entire project site (pit and disturbance areas). Particularly when considering the poor soil resources available and prolonged dry periods experienced in the	Ongoing	

		past that will continue to return in the future. Grass coverage of >70% should be a goal for rehabilitation areas to be reached once permanent perennial cover is established, and this will be dependent on climatic conditions at the time. All reasonable and feasible measures will be taken to obtain >70% groundcover across rehabilitated areas.		
10.18	During the 2009/2010 reporting period there were instances where the TSS recorded was > 50mg/L and the rainfall recorded over the preceding 5 day period was less than 38.4mm(see EPL condition L3.4).	If wet weather discharges continue to exceed EPL criteria, consider an independent review of the water management system capacities and the ability of the system to cope with the rainfall capacities as stated in the EPL conditions.	Ongoing	
10.19	Mine inflows are currently being measured for quality, but not for quantity, apart from volume being pumped to the pit water dam.	Establish monitoring protocols to monitor the quantity and quality of mine inflows, and compare the results to the predictions of RCA (2007).	March 2012	
10.21	The quantity and quality of mine water from the open cut sump is not currently being monitored. However, water in the dedicated mine water dam, which is from the open cut sump is being monitored.	Continue monitoring water from the dedicated mine water dam.	Ongoing	
10.28	The MOP, AEMR and WMP do not include the requirements for remedial action of hydrocarbon spills using the 3-phase approach.	Develop a Hydrocarbon Spill Management Plan which documents the proposed approach to managing hydrocarbon spills.	February 2012	
11.1	More than 6 lighting plants have been used for night time activities. The Project Manager advised up to 8 are used.	Review the use of lighting plants for night time activities to ensure that lighting issues can be managed to avoid impacts to adjacent residents.	Ongoing	
12.7	Instance of complaints made against trucks transporting materials to site from wean road. All earthmoving equipment and construction materials should be transported from site via Hoad Lane and Shannon Harbour Road.	As construction has now been completed, no further action is necessary.	N/A	N/A
12.27	There is no height bar above the light vehicle entrance.	As all heavy vehicles are required to access the site from Bluevale Road and Shannon Harbour Road, this commitment is somewhat redundant. Therefore no further action is considered necessary.	N/A	N/A
12.29	Research and development has not been undertaken to investigate means by which coal trucks and the road surface can be modified to ensure the DECCW sleep criteria can be satisfied. This commitment was made redundant following decision not to seek 24hr trucking of coal from Rocglen.	As 24hr trucking of coal is no longer proposed this commitment remains redundant.	N/A	N/A
12.30	The research and development has not been undertaken in consultation with the residents of "Weroona" and 'Brooklyn". As above this commitment made redundant with decision not to seek 24hr trucking	As 24hr trucking of coal is no longer proposed this commitment remains redundant.	N/A	N/A
13.3	No testing for acid forming rock, in order to determine if acid generation can be neutralised by placing higher alkalinity soils over the surface of the overburden emplacement.	Investigate the need to implement a testing program for acid forming rock such that any acid generation potential can be neutralised as described.	March 2012	
14.18	No documented evidence of each of the GHG measures in section 6.7.2 of Heggies (2007) and their implementation.	Report on the implementation of measures for diesel consumption and on-site processing as part of the AEMR.	Report in next year's AEMR	
15.3	Local induction kits not provided to workers(outside of the district).	Current site personnel are local to the area with no necessity for local induction kits. District information will be supplied to any new personnel from outside the region.	Ongoing	
16.12	A Bushfire Management Plan has not been prepared.	The need for a separate Bushfire Management Plan should be reviewed once	March 2012	

		the Landscape Management Plan (termed Rehabilitation Management Plan in new consent) has been finalised and approved.		
16.13	No evidence sighted that Whitehaven staff regularly liaise with NSW Forests personnel in relation to bushfire hazards.	Commence a program of regular consultation with NSW Forests in relation to bushfire management.	December 2011	
17.1	The following bores are not listed as being monitored in the WMP or AEMR: GW011015 (Glenroc), GW044069 (Yarrari), GW13369 (Brolga).	Review groundwater monitoring locations to ensure the monitoring program includes the registered bores as documented in this commitment (where those bores still exist) or alternative locations at each.	Report in next year's AEMR and update SWMP to reflect current monitoring locations – February 2012	
18.4	The Flora and Fauna Management Plan, Rehabilitation and Landscape Management Plan, Bushfire Management Plan, Final Void Design and Management Plan have not been prepared.	Prepare and implement these plans within a Landscape Management Plan (termed Rehabilitation Management Plan in new approval).	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	
18.5	The Mine Closure Plan has not yet been prepared.	Prepare and implement a Landscape Management Plan (termed Rehabilitation Management Plan in new approval).	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11 and titled Rehabilitation Management Plan.	

PROJECT APPROVAL 06_0198 STATEMENT OF COMMITMENTS, AREAS OF CONCERN

Commitment	Evidence	Proposed Actions/Response	Due Date	Progress Update
3.1	It was noted during the site inspection that a small amount of general waste, including an item of whitegoods had been dumped on the western emplacement.	Reinforce the Whitehaven waste management policies and procedures with staff and contractors.	November 2011	
5.7	Monitoring bores and piezometers are in use around the site. However there is no effective process in place to monitor the alluvial systems to the south of the mine. Particularly considering the two piezometers located to the south between the alluvial system and the mine are dry.	The issue was raised by the OEH officer and is considered a matter of priority. Review the Groundwater Monitoring Program and consider installing new monitoring bores or undertaking remedial works on the existing bores. Review the borehole locations and monitoring frequencies in consultation with NOW. This will be undertaken in conjunction with the revised Water Management Plan as required under PA 10_0015.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11	

5.8, 10.24	Hydrocarbons were generally stored in suitable bunded areas with adequate secondary containment. The main area of concern is associated with the hydrocarbon storage practices observed from the scraper contractor. Particularly the storage of drums within bunding that would not be considered impervious.	Review hydrocarbon and storage practices, including those of the scraper contractor. Take into account the technical considerations in Appendix 2 of the "Storage and Handling Liquids: Environmental Protection, Participants Manual"(DECC, 2007) as a guide).	March 2012	
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ENVIRONMENTAL PROTECTION LICENCE 12870 NON COMPLIANCES

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
L1.1	Section 120 of the Protection of the Environment Act is in relation to 'Prohibition of pollution of waters' and states: (1) A person who pollutes any waters is guilty of an offence (2) In this section: "pollute" waters includes cause or permit any waters to be polluted. There were exceedances of TSS levels in water discharged off site which did not comply with EPL conditions.	Refer to Project Approval condition no. 3-1.	Ongoing	
L3.1	There were exceedances of TSS levels in water discharged off site which did not comply with EPL conditions.	Refer to Project Approval condition no. 3-1.	Ongoing	
L3.4(a)	There were exceedances of TSS levels in water discharged off site which did not comply with EPL conditions.	Refer to Project Approval condition no. 3-1.	Ongoing	
L6.1(a)	There have been several noise exceedances of the 35dB(A) criterion since operations commenced in 2008.	Refer to Project Approval condition no. 3-7.	Ongoing	
L7.1	Two blasts exceeded the 115 dBL limit. The blasts do not comply with the allowance of 5% of blasts between 115-120 dBL over a 12 month period.	Refer to Project Approval condition no. 3-11.	Ongoing	
R2.1	Incidents/exceedances of the performance limits/criteria were not reported to the environmental Line Service 131 555 within 24 hours of detecting the exceedance/Incident.	Implement a process to ensure the notification of exceedances is provided to relevant government agencies within the required timeframe.	Ongoing	
R2.2	Written details provided to the EPA, but not provided within the 7 days from the date on which the incident/exceedance occurred.	Implement a process to ensure the notification of exceedances is provided to relevant government agencies within the required timeframe.	Ongoing	

MINING LEASE 1620 NON COMPLIANCES

Condition	Evidence	Proposed Actions/Response	Due Date	Progress Update
2	Several non-conformances have been identified relating to air, noise, blasting and water discharge exceedances. Many of these exceedances were during the early stages of operations and Whitehaven has investigated each incident and modified operations accordingly. The key compliance issue relates to the lack of an approved Landscape Management Plan for the site.	Finalise the Landscape Management Plan (termed Rehabilitation Management Plan in new consent) for the Project and submit to DP&I.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11)	

5(a)	Review of AEMR's produced to date indicate that the AEMR reports against compliance with the EPL, Project Approval and Mining Lease, but not specifically the MOP.	Commence reporting on compliance with the MOP as part of the next AEMR.	Next year's AEMR	
15(b)	Two blasts exceeded the 115 dBL limit. The blasts do not comply with the allowance of 5% of blasts between 115-120 dBL over a 12 month period.	Refer to Project Approval condition no. 3-11.	Ongoing	
17(a)	No evidence that Whitehaven notified the Regional Hydrogeologist 28 days prior to undertaking exploration drilling.	Undertake the required notification and consider implementing a process (e.g. a checklist) to ensure that notification occurs in the future as required.	Ongoing	
19	Electricity lines were removed when the Belmont house was demolished. Despite consultation with country energy, there is no evidence to suggest that prior written approval of the Director-General was obtained.	Consider implementing a process (e.g. a checklist) to ensure that notification occurs in the future as required.	Ongoing	

ENVIRONMENTAL MANAGEMENT PLANS RECOMMENDATIONS

Finding	Evidence	Recommendation	Due Date	Progress Update
Landscape Management Plan	Major non-compliance for the Rocglen operations is no approved Landscape Management Plan.	Liase with DoPI to obtain approval to submit a staged Plan such that rehabilitation objectives and criteria can be developed for rehabilitation of the existing stages of mining.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11)	
Air Quality Monitoring Program	In 2009 the PM10 monitor was moved from "Surrey" to "Roseberry". The EPL has been amended to reflect the change however the Air Quality Monitoring Program has not been amended.	Update Air Quality Monitoring Program to reflect the changes in monitoring locations.	December 2011. (As per date required in Project Approval 10_0015, received 27/9/11)	
Greenhouse and Energy Efficiency Plan	No specific program to monitor the effectiveness of measures to reduce energy use on site.	Revise to include an effective monitoring program to monitor energy use and a program for using energy monitoring data to identify any further options for reducing energy usage on site.	December 2011. (As per date required in Project Approval 10_0015, received 27/9/11)	
Flora and Fauna Management Plan	Plan has not been prepared.	Include the Flora and Fauna Management Plan within the Landscape Management Plan (termed Rehabilitation Management Plan in new approval).	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11)	
Erosion and Sediment Control Plan	A stand alone Erosion and Sediment Control Plan (ESCP) has not been prepared.	The preparation of an ESCP has been adequately addressed within chapter 4 of the Water Management Plan.	N/A	N/A

Transport/Traffic Management Plan	No copies of traffic management plans to manage traffic during construction activities associated with the coal transport route and Wean Road realignment.	As the road construction works have been completed, it is not possible to verify whether or not such plans were prepared and implemented.	N/A	N/A
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KEY ENVIRONMENTAL ISSUES

Finding	Evidence	Action	Due Date	Progress Update
Contaminated Water Management	Refer to Statement of Commitments Non Compliances, commitment 3.6.	Refer to Statement of Commitments Non Compliances, commitment 3.6.	November 2011	
Surface Water Discharges	Refer to Project Approval Non Compliances, condition no. 3-1.	Refer to project Approval Non Compliances, condition no. 3-1.	Ongoing	
Groundwater Management and Monitoring	Refer to Statement of Commitments Areas of Concern, commitment 5.7.	Refer to Statement of Commitments Areas of Concern, commitment 5.7.	February 2012. (As per date required in Project Approval 10_0015, received 27/9/11)	
Hydrocarbon and Chemical Management	Refer to Statement of Commitments Areas of Concern, commitment 5.8, 10.24.	Refer to Statement of Commitments Areas of Concern, commitment 5.8, 10.24.	March 2012	
Noise	Refer to Project Approval condition no. 3-7.	Refer to Project Approval condition no. 3-7.	Ongoing	
Air Quality	Refer to Project Approval condition no. 3-23.	Refer to Project Approval condition no. 3-23.	Ongoing	
Coal Transport	No issues. Intersection upgrades appropriate, route free of spilt coal, loads covered, road maintenance agreement in place with GSC, no noise exceedances recorded.	Continue with the current practices in use to manage the transport route.	Ongoing	
Waste Management	Refer to Statement of Commitments Areas of Concern, Commitment 3.1.	Refer to Statement of Commitments Areas of Concern, Commitment 3.1.	November 2011	