



1st November 2019

Mr James Epstein
Senior Compliance Officer
Department of Planning, Industry and Environment- Planning & Assessment
Via email: compliance@planning.nsw.gov.au

Dear James,

Re: Sunnyside Independent Environmental Audit and Response to Recommendations

As per Schedule 5, Condition 7 of PA 06_0308 (MOD 3), and letter dated 12th July 2019 Ref PA 06_0308, the Independent Environmental Audit (IEA) report and Response to Audit Recommendations (RAR) for Sunnyside Mine is attached for the Departments review and consideration.

Should you have any queries in relation to the attached please contact the undersigned.

Yours sincerely,

Andrew Raal
Environment Officer

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Attachment A – Independent Environmental Audit Report for Sunnyside Coal Mine (please refer to attached report)

Attachment B - Sunnyside Coal Mine Response to IEA Recommendations

| Summary of Previous Recommendations (2016) Status | | | | |
|---|--|----------------------|--|-------------------|
| Condition / Plan | IEA Recommendation (2019 comment) | Audit Classification | SCM Response | IEA Action Timing |
| <i>Minister's Conditions of Approval PA 06_0308</i> | | | | |
| 3.2.7 | Water Management Plan to be updated in accordance with Schedule 5 Condition 5. | ANC | Triggers for groundwater levels changes are currently in the WMP. Groundwater Quality trigger will be added to the WMP during subsequent revisions of the document. | 31 Jan 2020 |
| 5.5A | Develop document and record tracking system. | ANC | A site register for MP updates is used for tracking document reviews. The Land and Rehabilitation Management Plan, which is embedded in the Closure MOP will be added to the register. | 31 Jan 2020 |

| Condition / Plan | IEA Recommendation 2019 | Audit Classification | SCM Response | IEA Action Timing |
|---|---|----------------------|---|-------------------|
| <i>Minister's Conditions of Approval PA 06_0308</i> | | | | |
| 5.5A | Ensure that a review of management plans is undertaken to ensure alignment with the latest MOD and that this review and future reviews consider the Rehabilitation and Landscape Management Plan. | ANC | A site register for MP updates is used for tracking document reviews. The Land and Rehabilitation Management Plan, which is embedded in the Closure MOP will be added to the register. | 31 Jan 2020 |
| 5.10 | Ensure monthly EPL monitoring data is included within the Published Monthly EPL monitoring data published on the website. Ensure complaints are updated on the website on a monthly basis. Where no complaints are received, upload a complaint register stipulating this. | ANC | Noted and updated on the website. No formal complaints received in 2019 to date, blank complaints register has been uploaded to website. | 31 Jan 2020 |
| <i>Statement of Commitments</i> | | | | |
| 5.3 | In the next modification of the CoA, request an update the SoC to remove timing requirement for removal of industrial waste. | ANC | Current volumes of industrial waste generated on site does not justify a fortnightly collection. Any future updates to the CoA will include the removal of fortnightly collection of industrial waste. | Ongoing |
| 9.16 | Where mature vegetation clearing activities are conducted, ensure records of vegetation clearance permits are maintained. | NC | A permit to disturb process is in place and areas inspected prior to clearing. Site permit to disturb will be amended to include a check box for potential trees with habitat e.g. hollows or nest sites. | 31 Jan 2020 |

| Condition / Plan | IEA Recommendation 2019 | Audit Classification | SCM Response | IEA Action Timing |
|---|---|----------------------|--|---|
| | | | Procedure for relocation of nest sites and trees with hollows will be formalised by end January 2019. | |
| 9.17 | Where vegetation disturbance is to occur, ensure associated permit, inspection and control measures are in place to manage the potential identification and relocation of nesting and roosting hollows, as well as nests. | NC | A permit to disturb process is in place and areas inspected prior to clearing. Site permit to disturb will be amended to include a check box for potential trees with habitat e.g. hollows or nest sites. Procedure for relocation of nest sites and trees with hollows will be formalised by end January 2019. | 31 Jan 2020 |
| 12.5 | Ensure that training provided to all staff and contractors, is appropriately detailed that it supports the commitment to “help raise awareness and ameliorate any impact on heritage sites” | Obs NC | Site induction was updated to raise awareness of heritage issues. Registered heritage sites are outside or operational areas and are within koala managed zone. An environmental briefing on site heritage issues will be developed and presented to the workforce in a toolbox talk. | 27 Dec 2019 |
| 16.2 | Develop formal induction kit for new non-local employees, where applicable. | ANC | Due to the closure status of the project and the short duration of remaining works required, only short term contracts will be available, or personal will be brought in on an as needs bases from other nearby WHC operations. | 31 Jan 2020 |
| <i>Environmental Protection Licence 12957</i> | | | | |
| M1.3 | Ensure SLR and all contractors undertaking monitoring include all details required by this condition (i.e. name of sampler) | ANC | All noise monitoring reports going forward will include monitoring personnel’s details. | Closed |
| M5.2 | Maintain a log of all complaints with contact details. Maintain the log in a centralised location so information is available. | ANC | ‘CMO’ compliance and document management system has been implemented for the site and includes a community complaint record keeping. Community complaint that occurred during the audit period have been entered into CMO system. | Closed |
| <i>624 Mining Lease 1624</i> | | | | |
| 3b | Ensure that when the MOP is next updated this inconsistency is removed. | ANC | Inconsistency in document has been noted. Survey controls and site personal are currently working to the 5m capping layer for carbonaceous material. Future update of the MOP/rehabilitation plan will remove any ambiguity in depth of carb capping material requirements. | To be included in the next MOP amendment. |

| Condition / Plan | IEA Recommendation 2019 | Audit Classification | SCM Response | IEA Action Timing |
|---|--|----------------------|---|-------------------|
| <i>Blast Management Plan</i> | | | | |
| 3.17B | SCM should ensure that management plans are provided to all relevant authorities for consultation and evidence of this is maintained by the site. It should be noted that blasting at SCM is now complete, as the site is now in closure. | ANC | Noted. Records of any future consultation relating to MP's will be saved to maintained servers and in CMO where applicable. | Closed |
| <i>Air Quality Management Plan</i> | | | | |
| 3.19A | SCM should ensure that management plans are provided to relevant authorities for consultation and evidence of this is maintained by the site. | ANC | Noted. Records of any future consultation relating to MP's will be saved to maintained servers and in CMO where applicable. | Closed |
| <i>Water Management Plan</i> | | | | |
| 3.22 | Ensure that a review of the WMP, as per the requirements of the Department, is undertaken. | ANC | WMP was reviewed after the submission and approval of Sunnyside Annual Review, which was also within 3 months of the approval of the WMP (Jan 2019). | Closed |
| 3.2.7 | Review and update the WMP to establish groundwater trigger levels, benchmarks and contingency criteria are established. It should be noted that coal mining at SCM is now complete and therefore interaction with the groundwater due to this activity has now ceased. | NC | Triggers for groundwater levels changes are currently in the WMP. Groundwater Quality trigger will be added to the WMP | 31 Jan 2020 |
| <i>Rehabilitation and Landscape Management Plan</i> | | | | |
| 3.30 | SCM should ensure that management plans are provided to relevant authorities for consultation and evidence of this is maintained by the site. | ANC | Noted. Records of any future consultation relating to MP's will be saved to maintained servers and in CMO where applicable. Rehabilitation and Landscape Management Plans were updated as part of the Closure MOP update, which was undertaken in conjunction with MOD 3 (DPIE, PA 06_0308), as it included final void landform change. | Closed |
| <i>Aboriginal Cultural Heritage Management Plan</i> | | | | |
| 3.33 | SCM should ensure that management plans are provided to relevant authorities for consultation and evidence of this is maintained by the site. | ANC | Noted. Records of any future consultation relating to MP's will be saved to maintained servers and in CMO where applicable. | Closed |