

Tarrawonga Coal Project - 2014 Independent Environmental Audit - Response to Recommendations

Management Area	IEA Recommendations	Tarrawonga (TCPL) Response and Action	Due Date/Timing
Biodiversity Offsets	Table 5.2 and Table 5.3 in the WBOMP should be revised. These tables set out ecological attributes and the scale of measurement in vegetation condition monitoring plots.	TCPL accept recommendation. Biodiversity Management Plan will be amended to reflect recommendation.	1/04/2015
	The baseline surveys for threatened species in offset areas should be conducted in accordance with the department's Survey Guidelines for Australia's Threatened Birds and the Survey Guidelines for Australia's Threatened Bats. The annual monitoring reports should confirm compliance with the two stated methodologies	TCPL accept recommendation. Baseline threatened species surveys will be undertaken in accordance with, and reported with reference to, the relevant methodologies.	Ongoing
	Given the sensitivity of the surrounding environment at TCPL, a more formal ground disturbance permitting system would be insurance against excessive clearing, unplanned impacts to flora and fauna or accidental disturbance of archaeological deposits.	TCPL accept recommendation. A Land Disturbance Protocol will form part of the sites revised Biodiversity Management Plan.	1/04/2015
	Develop and implement a procedure for checking vehicles for weed vectors and cleaning them if necessary prior to entering the biodiversity offset area.	The revised Biodiversity Management Plan will provide weed management measures specific to the biodiversity offset area.	1/04/2015
Bushfire Management	Conduct fuel load and fire break inspections annually	TCPL accept recommendation. Bushfire Management Plan will be amended to reflect recommendation.	1/04/2015
Heritage	The scar tree preservation procedure in the Heritage Management Plan requires revision to ensure it can be complied with. It is currently too prescriptive and does not allow for flexibility in on ground application.	TCPL accept recommendation. Heritage Management Plan will be amended to reflect recommendation.	1/04/2015
Public Safety	Traffic impacts associated with the Goonbri Road intersections and public road impacts were identified. This realignment has not yet occurred and has been postponed due to the sites financial situation. The residual risk to the public should be reassessed to establish if changes are still required to ensure public safety.	Any residual (existing) risks associated with Goonbri Road intersections and public road impacts are not related to the current Project. Responsibility for assessment of such risk rests with the relevant road authority. No action proposed.	Not Applicable
Rehabilitation	Work be conducted to soften the visual impact of the unrehabilitated southern emplacement, reduce risk of impacts to Goonbri Creek and to lessen the levels of fugitive particulate emissions.	TCPL accept recommendation. A review will be undertaken to determine potential mitigation works for the relevant section of the emplacement.	1/04/2015
	Site observations indicated that rejects are not placed on the pit floor as required by the MOP but are placed at higher elevations, as part of the backfilling process with suitable cover to prevent spon com. There is nothing unacceptable in this approach provided there is adequate separation for the surface of the final landform of the emplacement. To rectify, TCPL should consider changing the wording of the MOP at the next revision.	TCPL accept recommendation. Wording within MOP will be amended.	Upon revision of MOP
	Reference to the use of these protective methods (<i>tree guards and mulching</i>) should be reduced to a contingency should excessive grazing become an issue rather than a requirement.	TCPL accept recommendation. Protective measures will be referenced as contingencies rather than requirements in revisions of Mining Operations Plan and relevant environmental management plans.	Ongoing
	Seed collection should be conducted in the areas immediately surrounding the mine site to collect seed for rehabilitation.	TCPL accept recommendation. Seed collection will be undertaken as described in the sites Biodiversity and Rehabilitation Management Plans.	Ongoing
	No rehabilitation works were observed that did not comply with the rehabilitation management plan. However, revegetation is not of good quality, some trials have been conducted, further trials should be implemented to establish the most appropriate vegetation establishment methodologies.	Rehabilitation and revegetation methods are described in the sites Biodiversity and Rehabilitation Management Plans. These methods will be reviewed with reference to revegetation trials undertaken to date and on site/near by mine field experience.	Ongoing

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	Some topsoil at the site has been stored since the site inception. As soon as there is an opportunity to use this material it should be used. The longer topsoil is stored the less effective it is for vegetation establishment.	Tarrawongas existing topsoil register will be progressively amended to include identification on plan areas to be stripped (including target depths), location/volume/type of soils stored and assignment of stockpiles to rehabilitation areas.	Ongoing
	Topsoil should be characterised prior to stripping to ensure stripping depths are suitable and that similar soil qualities are stored together allowing the application of suitable soil ameliorants when the topsoil is spread.	As above	As above
	Topsoils should be characterised prior to spreading to allow the application of suitable ameliorants (predominantly gypsum and lime).	As above	As above
Water Management	The water in dirty water dams is regularly tested and monitored. When salt levels in these dams exceed acceptable limits; the water will be pumped into PW2 or PW3 and recycled. TCPL does not define "acceptable limits", this should be quantified and included in the Water Management Plan.	TCPL accept recommendation. Water Management Plan will be amended to reflect recommendation	1/04/2015
	Dirty water management needs review in consideration of the water from around the coal loader not going into the dirty water system.	TCPL are currently in discussions with the Department of Planning and Environment and NSW Environment Protection Authority on this matter.	Ongoing
	The groundwater model is overdue for an update and review to be based on monitoring to date.	TCPL accept recommendation. Revision of the groundwater model, including comparison to monitoring results to date, will be undertaken.	30/06/2015
	To obtain groundwater samples that are representative of the water within the aquifer being sampled, groundwater wells should be purged (see Groundwater sampling guidelines, EPA Victoria 2000).	TCPL accept recommendation. Future groundwater monitoring will be undertaken in accordance with the relevant Guidelines.	Ongoing
Management Plans	As a general comment, the management plans do not include enough information on the background data that was used to formulate them. Future revisions should consider ways to present this information to inform the measures described.	TCPL accept recommendation. Future revisions of management plans will include reference to source documents on which they have been developed.	Ongoing
	Some of the management plans cross into areas that are not core to the reason for the management plan. They should instead reference other management plans rather than reproducing slabs of information.	TCPL accept recommendation. Future revisions of management plans will reference rather than reproduce related management plans.	Ongoing
	In a number of cases, non-compliances have resulted from unnecessary wording in management plans (e.g. water samplers are currently required to be "suitably qualified professionals" when in most instances they are technicians without professional qualifications). TCPL should review the findings of the audit and revise wording to ensure compliance in the future.	TCPL accept recommendation. Future revisions of management plans will remove unnecessary wording.	Ongoing
	The management plans all include requirements for review and it is apparent that these occur. The site however needs to document these reviews in order to demonstrate they have occurred particularly when no changes to the management plan eventuate from the review.	TCPL accept recommendation. Management plan reviews will be documented.	Ongoing
Reporting	Life of mine monitoring data is reported in the AEMRs but commentary on trends and changes is not adequate to determine whether the site is trending towards compliance or out of compliance with requirements.	TCPL accept recommendation. AEMR commentary on life of mine monitoring data will be amended to include adequate detail on life of mine data to determine compliance trends	2015 AEMR
	Include a description of the effectiveness of waste minimisation actions in the waste section of the AEMR.	TCPL accept recommendation.	2015 AEMR