

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

DEVELOPMENT CONSENT DA 172-7-2004 NON COMPLIANCES – Total Number 7

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Schedule 4 (Condition 7)	Ensure noise generated does not exceed criteria at any residence on privately-owned land.	<p>On 27 October 2010, one exceedance of noise limits occurred at the private property 'Glenara' due to a significant change in weather conditions. DP&I, OEH and property owners were notified of exceedance. No complaints were received.</p> <p>Two exceedances occurred during the 2008-2009 reporting period. These are as follows:</p> <ul style="list-style-type: none"> - 44 dB(A) at Cintra property on 30 June 2008 at 3:29 pm; and - 36dB(A) at Mountain View property on 15 September 2008 at 10:05 pm. <p>One monitored exceedance occurred on 15 October 2009 at the Marengo property. This exceedance occurred at 8:02 am and the noise emanating from WCC was measured to be 40 dB(A)_{L_{Aeq}(15minute)}, whereas the criteria in Condition 7 specifies 35L_{Aeq} (15minute). Cintra was subsequently purchased by WCC on 31 March 2010, and Marengo on 17 May 2010.</p>	The results of noise monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>Since Whitehaven Coal took management control of WCC in late 2007, substantial improvements have been made to operational noise performance. This continued with WCC voluntarily implementing continuous (real time) noise monitoring in March 2010 and developing a procedure for the feedback to personnel on offsite noise levels and how to react to unacceptable levels.</p> <p>As part of the WCC Life of Mine Project, Whitehaven Coal outlined a number of additional commitments such as all off highway trucks will have noise attenuation packages fitted and dozers will be required to implement first gear reverse policy to lower noise emissions.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Noise Management Plan outlining the measures to be implemented to ensure that noise levels are within the compliance criteria.</p>
Schedule 4 (Condition 28)	Except under EPL, shall comply with s120 POEO Act (note: s120 makes it an offence to pollute any waters).	<p>On 16 November 2010, a wet weather discharge event resulted in an exceedance of pH criteria, resulting in a contravention of Section 120 Protection of the Environment Operations Act 1997.</p> <p>Two wet weather discharge events in the 2008-2009 reporting period resulted in exceedances of the Total Suspended Solids criteria (69 mg/L at point 12 on one occasion, and 154 mg/L at point 10, and 68 mg/L at point 12 on another occasion). Since this incident the EPL has been amended to allow Total Suspended Solids criteria to exceed 50mg/L after 39.2mm of rain over 5 days.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>In early 2009 the EPL 12290 was modified to allow exceedances of TSS criteria following 39.2mm of rain over 5 days. Under the new conditions in EPL 12290, the two weather discharge events in 2008-2009 period would not have been non-compliant.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.</p>
Schedule 4 (Condition 29)	Except under EPL, ensure discharges from licensed discharge points comply with limits in Table 13.	<p>On 16 November 2010, a wet weather discharge event resulted in an exceedance of pH criteria. Subsequent monitoring of Quipolly Creek indicated that this discharge did not impact on the water quality of the creek.</p> <p>Two wet weather discharge events in the 2008-2009 reporting period resulted in exceedances of the Total Suspended Solids criteria (69 mg/L at point 12 on one occasion, and 154 mg/L at point 10, and 68 mg/L at point 12 on another occasion). Since this incident the EPL has been amended to allow Total Suspended Solids criteria to exceed 50mg/L after 39.2mm of rain over 5 days.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>In early 2009 the EPL 12290 was modified to allow exceedances of TSS criteria following 39.2mm of rain over 5 days. Under the new conditions in EPL 12290, the two weather discharge events in 2008-2009 period would not have been non-compliant.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.</p>

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Schedule 4 (Condition 39)	Before 30 June 2010, must implement suitable arrangements for long term security of the offsets in the BOS to D-G's satisfaction (either through Deed of Agreement with Minister, rezoning land under LEP, caveats on title under Conveyancing Act 1919).	Long term security of the Biodiversity Offset Areas has not been finalised. On 18 June 2010, WCC did submit a proposed caveat to DP&I (the due date for the security to be finalised being 30 June 2010). However, the proposed caveat was rejected by DP&I. WCC are still engaged in negotiations with DP&I to finalise the security of this land. WCC have shown best endeavours to achieve this timeframe in relation to the long term security issue.	It is recommended that WCC follows up with DP&I to bring these negotiations to a close.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will implement suitable arrangements for the long term security of the Life of Mine BOS (incorporating the BOS outlined in ELA (2010) Biodiversity Offset Strategy and Management Plan for WCC).
Schedule 6 (Condition 1f)	Environmental Management Strategy (EMS) must be updated following each Independent Environmental Audit.	WCC's Environmental Management Strategy (EMS) has not been updated subsequent to the last IEA undertaken in 2008.	It is recommended that WCC ensures this review and update (if required) of the EMS is actually undertaken following the current audit.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a revised EMS.
Schedule 6 (Condition 2)	Three months after completing Independent Environmental Audit, must review and revise (if necessary) the EMS to D-G's satisfaction.	WCC's Environmental Management Strategy (EMS) has not been reviewed subsequent to the last IEA undertaken in 2008.	It is recommended that WCC ensures this review and update (if required) of the EMS is actually undertaken following the current audit.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a revised EMS.
Schedule 6 (Condition 7)	The Community Consultative Committee shall meet at least four times/year, or as determined by D-G.	During the 2009-2010 reporting period, only three Community Consultative Committee meetings were held, whereas the required number is four per annum.	None.	Whitehaven Coal are committed to holding regular WCC CCC meetings in accordance with Project Approval 10_0059. Next meeting is 24 th November 2011 and will be the fourth meeting in 2011.

DEVELOPMENT CONSENT DA 172-7-2004 RECOMMENDATIONS (Does not include Non Compliance Recommendations) – Total Number 1

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Schedule 4 (Condition 59a)	It is recommended that a waste register be maintained recording types and quantities of wastes, and the final destinations for those wastes after being removed offsite by contractors.	Whitehaven Coal will comply with the Waste Management requirements outlined in Project Approval 10_0059 when approved; including waste registers by March 2012.

STATEMENT OF ENVIRONMENTAL EFFECTS (R.W. Corkery & Co Pty Limited, 2009) NON COMPLIANCE – Total Number 1

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 2.11.7	The biodiversity offset would be secured in the long term by notation on title, and the offset areas managed in accordance with a management plan to be developed in consultation with the OEH and DP&I.	Long term security of the Biodiversity Offset Areas has not been finalised. On 18 June 2010, WCC did submit a proposed caveat to DP&I (the due date for the security to be finalised being 30 June 2010). However, this proposed caveat was rejected by DP&I. WCC are still engaged in negotiations with DP&I to finalise the security of this land. WCC have shown best endeavours to achieve this timeframe in relation to the long term security issue.	It is recommended that WCC follows up with DP&I to bring these negotiations to a close.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will implement suitable arrangements for the long term security of the Life of Mine BOS (incorporating the BOS outlined in ELA (2010) Biodiversity Offset Strategy and Management Plan for WCC).

STATEMENT OF ENVIRONMENTAL EFFECTS (R.W. Corkery & Co Pty Limited, 2009) RECOMMENDATIONS (Does not include Non Compliance Recommendations) – Total Number 2

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 2.5.4.4, 2.11.6 & 4.9.5	It is recommended that the soil stockpile inventory be revised and updated to better reflect the location of different soil types as there are two very different topsoil types/qualities stripped at the site.	Whitehaven Coal already maintains a soil register identifying topsoil and subsoil stockpiles. There is no additional benefit to separating different types of topsoil as existing stockpiles already contain a mixture of different topsoil types. Also stockpiling different topsoil types will not make any difference to the final land use as 95% of rehabilitation is to a Woodland Ecological Community land use regardless of the soil type. However, Whitehaven Coal will preferentially use the more productive soils on areas that are to be rehabilitated to higher land capabilities (Class III).

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 4.2.4.1	It is recommended that the gravel at the refuelling point be recontoured to improve the capture and filtering of hydrocarbon spills and dirty water into the oil/water separators and containment areas.	Whitehaven Coal will regrade the Workshop Fuel Farm Fill Point with additional gravel by December 2011.

ENVIRONMENTAL PROTECTION LICENCE NON COMPLIANCES – Total Number 6

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
L1.1	Must comply with s120 POEO Act in relation to pollution of waters except as otherwise provided for in the EPL.	<p>On 16 November 2010, a licensed water discharge event resulted in an exceedance of pH criteria, resulting in a contravention of Section 120 Protection of the Environment Operations Act 1997.</p> <p>Two wet weather discharge events in the 2008-2009 reporting period resulted in exceedances of the Total Suspended Solids criteria (69 mg/L at point 12 on one occasion, and 154 mg/L at point 10, and 68 mg/L at point 12 on another occasion). Since this incident the EPL has been amended to allow Total Suspended Solids criteria to exceed 50mg/L after 39.2mm of rain over 5 days.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>In early 2009 the EPL 12290 was modified to allow exceedances of TSS criteria following 39.2mm of rain over 5 days. Under the new conditions in EPL 12290, the two weather discharge events in 2008-2009 period would not have been non-compliant.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.</p>
L3.1	Must not exceed concentrations of discharged pollutants at monitoring/discharge points specified in Tables of EPL.	<p>On 16 November 2010, a licensed water discharge event resulted in an exceedance of pH criteria, resulting in a contravention of Section 120 Protection of the Environment Operations Act 1997.</p> <p>Two wet weather discharge events in the 2008-2009 reporting period resulted in exceedances of the Total Suspended Solids criteria (69 mg/L at point 12 on one occasion, and 154 mg/L at point 10, and 68 mg/L at point 12 on another occasion).</p> <p>Since this incident the EPL has been amended to allow Total Suspended Solids criteria to exceed 50mg/L after 39.2mm of rain over 5 days.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>In early 2009 the EPL 12290 was modified to allow exceedances of TSS criteria following 39.2mm of rain over 5 days. Under the new conditions in EPL 12290, the two weather discharge events in 2008-2009 period would not have been non-compliant.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.</p>
L3.2	Specified percentage of pH samples must be within the specified ranges in Table of EPL.	<p>On 16 November 2010, a licensed water discharge event resulted in an exceedance of pH criteria. Subsequent monitoring of Quipolly Creek indicated that this discharge did not impact on the water quality of the creek.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.
L3.4	<p>Total Suspended Solids concentration limits specified for Points 10, 12 and 14 may be exceeded for water discharged from sediment basins provided that:</p> <p>Discharge occurs solely as a result of rainfall measured at the premises exceeding 39.2mm over five consecutive days prior to discharge.</p> <p>All practical measures implemented to dewater sediment dams within 5 days of this rainfall so that they have sufficient capacity to store run off from a 39.2mm, 5 day rainfall event.</p>	<p>Two wet weather discharge events in the 2008-2009 reporting period resulted in exceedances of the Total Suspended Solids criteria (69 mg/L at point 12 on one occasion, and 154 mg/L at point 10, and 68 mg/L at point 12 on another occasion).</p> <p>Since this incident the EPL has been amended to allow the Total Suspended Solids criteria to exceed 50mg/L after 39.2mm of rain over 5 days.</p>	The results of water monitoring should be closely monitored and operations adjusted as required to reduce impacts.	<p>In early 2009 the EPL 12290 was modified to allow exceedances of TSS criteria following 39.2mm of rain over 5 days. Under the new conditions in EPL 12290, the two weather discharge events in 2008-2009 period would not have been non-compliant.</p> <p>In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the measures to be implemented to ensure discharge water quality remains within compliance criteria.</p>

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
L6.1	Noise from premises not exceed: An LA1(1minute) noise emission criterion of 45 dB(A) at night. At all other times (including the night), an LAeq(15minute) noise emission criterion of 35 dB(A), except as expressly provided by this licence.	On 27 October 2010, one exceedance of noise limits occurred at the private property 'Glenara' due to a significant change in weather conditions. DP&I, OEH and property owners notified of exceedance. No complaints were received. Two monitored exceedances occurred during the 2008-2009 reporting period. These are as follows: - 44 dB(A) at Cintra property on 30 June 2008 at 3:29 pm; and - 36dB(A) at Mountain View property on 15 September 2008 at 10:05 pm. One monitored exceedance occurred on 15 October 2009 at the Marengo property. This exceedance occurred at 8:02 am and the noise emanating from WCC was measured to be 40 dB(A) _{LAeq(15minute)} , whereas the criteria in Condition 7 specifies 35 _{LAeq(15minute)} . Cintra was subsequently purchased by WCC on 31 March 2010, and Marengo on 17 May 2010.	The results of noise monitoring should be closely monitored and operations adjusted as required to reduce impacts.	Since Whitehaven Coal took management control of WCC in late 2007, substantial improvements have been made to operational noise performance. This continued with WCC voluntarily implementing continuous (real time) noise monitoring in March 2010 and developing a procedure for the feedback to personnel on offsite noise levels and how to react to unacceptable levels. As part of the WCC Life of Mine Project, Whitehaven Coal outlined a number of additional commitments such as all off highway trucks will have noise attenuation packages fitted and dozers will be required to implement first gear reverse policy to lower noise emissions. In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Noise Management Plan outlining the measures to be implemented to ensure that noise levels are within the compliance criteria.
M2.1	For each monitoring/discharge point or utilisation area on Page 19 EPL, must monitor concentration of each pollutant specified, in manner specified.	During the 2009-2010 reporting period, not all monitoring for PM10, water quality following overflow and groundwater quality was undertaken due to a dispute with a property owner, and that an Environmental Officer was not employed at the site at the relevant time, and that there was a change of consultants undertaking monitoring at this time. During the 2008-2009 reporting period, surface water discharged from monitoring point 12 and was contained within the project related property of 'Eurunderee.' Sampling for Special Frequency 2 was not followed for monitoring points 23, 24, 25 and 26 as discharge did not leave the Eurunderee property. Also during the 2008-2009 period, monitoring for point 16 was only carried out three times out of the required four times for the reporting period.	None.	Whitehaven Coal is committed to ensuring that all monitoring is conducted at the required frequency as specified in the relevant management plans required by Project Approval 10_0059.

ABORIGINAL AND CULTURAL HERITAGE MANAGEMENT PLAN NON COMPLIANCE – Total Number 1

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 3.4	Poster identifying the types of cultural heritage material that may be located on the site during mining operations as well as basic actions / responses has been prepared by WCC's consultant archaeologist. Copies are exhibited within employee lunch rooms.	These posters are not currently displayed.	It is recommended that posters identifying the types of cultural heritage material that may be located on the site during mining operations as well as basic actions/responses or similar be displayed in staff lunchrooms.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Aboriginal Cultural Heritage Management Plan outlining the measures to be implemented to educate WCC employees and contractors on cultural heritage.

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

ABORIGINAL AND CULTURAL HERITAGE MANAGEMENT PLAN RECOMMENDATION (Does not include Non Compliance Recommendations) – Total Number 1

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 2.5	It is recommended that WCC follow up on this request from the Taylor family regarding the Wollemi Pines.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Aboriginal Cultural Heritage Management Plan in consultation with indigenous stakeholders including any reasonable requirements associated with the relocation of the "Narrawolga" Axe Grinding Grooves.

BUSHFIRE MANAGEMENT PLAN NON COMPLIANCE – Total Number 1

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 2.5	This Plan will be reviewed annually with any substantial amendments to procedures agreed with the Rural Fire Service and Liverpool Plains Shire Council prior to implementation.	During the audit period, the Bushfire Management Plan was not reviewed.	It is recommended that the Plan be reviewed sometime in the near future.	Whitehaven Coal will comply with the Bushfire Management requirements outlined in Project Approval 10_0059 when approved.

AIR QUALITY MONITORING PROGRAM NON COMPLIANCE – Total Number 1

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 2.0	Will determine compliance with limitations set out in Conditions of Consent, DA-172-7-2004 and maintain monitoring requirements of the EPL-12290.	During the 2009-2010 reporting period, not all monitoring for PM ₁₀ , was undertaken as per EPL 12290 Condition M2.1. This was due to the fact that there was a dispute with a property owner in relation to access, an Environmental Officer was not employed at the site for approximately three months, and there was a change of consultants undertaking the monitoring at this time.	None.	Whitehaven Coal is committed to ensuring that all monitoring is conducted at the required frequency as specified in the Air Quality & Greenhouse Gas Management Plan required by Project Approval 10_0059 when approved.

SITE WATER MANAGEMENT PLAN NON COMPLIANCES – Total Number 3

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 7.2.2	All monitoring results are compared to baseline monitoring data which was obtained at the commencement of operations. Groundwater levels will be assessed to the nearest 0.01m and all monitoring locations surveyed to AHD so relative levels can be determined.	Not all groundwater monitoring was undertaken at MW3 and MW5 (as is required by Table 13 in the SWMP) during the 2009-2010 reporting period, as the site was without an Environmental Officer for approximately three months, there was a dispute with a property owner over access, and a change of monitoring consultants also took place at this time.	None.	Whitehaven Coal is committed to ensuring that all monitoring is conducted at the required frequency as specified in the Site Water Management Plan required by Project Approval 10_0059 when approved.
Section 7.2.2	Table 13 SWMP identifies the monitoring point locations, frequency and the parameters of monitoring. Table 14 SWMP describes the unit of measure and sampling method for each parameter listed.	These are the procedures followed as per the monitoring results contained in Appendix 4 of AEMR 2008-2009, 2009-2010 and 2010-2011. During the 2009-2010 reporting period, not all monitoring for water quality following overflow and groundwater quality was undertaken due to a dispute with a property owner over access, and that an Environmental Officer was not employed at the site at the relevant time, and that there was a change of consultants undertaking monitoring at this time.	None.	Whitehaven Coal is committed to ensuring that all monitoring is conducted at the required frequency as specified in the Site Water Management Plan required by Project Approval 10_0059 when approved.

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 9.0	The Environmental Officer at Werris Creek Coal Mine is responsible for the implementation of this SWMP. When the Environmental Officer is absent, WCC would nominate alternative personnel.	The Environmental Officer is generally responsible for this. During the audit period, there was a period of three months when the WCC site did not have an Environmental Officer. During this time the Project Manager was responsible for implementing the SWMP. During the 2009-2010 reporting period, not all monitoring for water quality following overflow and groundwater quality was undertaken due to a dispute with a property owner over access, and that an Environmental Officer was not employed at the site at the relevant time, and that there was a change of consultants undertaking monitoring at this time.	None.	Whitehaven Coal is committed to ensuring that all monitoring is conducted at the required frequency as specified in the Site Water Management Plan required by Project Approval 10_0059 when approved.

SITE WATER MANAGEMENT PLAN RECOMMENDATION (Does not include Non Compliance Recommendations) – Total Number 1

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 6.3	References are made to baseline data being collected, and to trigger values being established, however the baseline data is not clearly compared against new monitoring data. It is recommended that this comparison to baseline data is clarified.	In accordance with the timeframe outlined in Project Approval 10_0059, Whitehaven Coal will prepare a Site Water Management Plan outlining the baseline data and established trigger values to be used for comparison with new monitoring data.

WASTE MANAGEMENT PLAN NON COMPLIANCE – Total Number 1

Condition	Clause	Audit Finding	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 6.0	Waste management data has been documented and is reported in each Annual Environmental Management Report (AEMR). The information includes the quantities and type of waste removed off site for recycling or disposal, the contractor engaged to remove the wastes, and the final destination for all waste products. Details will also be provided on the success of the WMP implemented and any areas that require improvements, included and highlighted.	Waste management data has been reported in Sections 2.6 of AEMRs 2008-2009, 2009-2010, and 2010-2011. However, this information does not contain quantities and types of waste removed offsite for recycling or disposal, and the final destination for all waste products.	It is recommended that a waste register be maintained recording types and quantities of wastes, and the final destinations for those wastes after being removed offsite by contractors.	Whitehaven Coal will comply with the Waste Management requirements outlined in Project Approval 10_0059 when approved; including waste registers by March 2012.

WASTE MANAGEMENT PLAN RECOMMENDATION (Does not include Non Compliance Recommendations) – Total Number 2

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 5.3 & 5.5	It is recommended that a waste register be maintained recording types and quantities of wastes, and the final destinations for those wastes after being removed offsite by contractors.	Whitehaven Coal will comply with the Waste Management requirements outlined in Project Approval 10_0059 when approved; including waste registers by March 2012.
Section 5.1	It is recommended that clearer written instructions be erected onsite to provide guidance on how wastes are separated and recycled.	Whitehaven Coal will comply with the Waste Management requirements outlined in Project Approval 10_0059 when approved; including signage by March 2012.

Werris Creek Coal (WCC) Independent Environmental Audit Action Plan v1 2011

LANDSCAPE MANAGEMENT PLAN RECOMMENDATION (Does not include Non Compliance Recommendations) – Total Number 1

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Section 5.1.3	It is recommended that the soil stockpile inventory be revised and updated to better reflect the location of different soil types as there are two very different topsoil types/qualities stripped at the site.	Whitehaven Coal already maintains a soil register identifying topsoil and subsoil stockpiles. There is no additional benefit to separating different types of topsoil as existing stockpiles already contain a mixture of different topsoil types. Also stockpiling different topsoil types will not make any difference to the final land use as 95% of rehabilitation is to a Woodland Ecological Community land use regardless of the soil type. However, Whitehaven Coal will preferentially use the more productive soils on areas that are to be rehabilitated to higher land capabilities (Class III).

NOISE MANAGEMENT PROTOCOL AND PROGRAM RECOMMENDATION (Does not include Non Compliance Recommendations) – Total Number 1

Condition	AECOM Audit Team Recommendation	Whitehaven Response and Due Date
Pages 12 to 14	It is recommended that in future, the Spectrum Acoustics reports contain an introductory section clearly outlining the methodology, criteria and equipment employed as part of this monitoring at WCC.	Whitehaven Coal will engage Spectrum Acoustics to amend the Monthly Attended Noise Monitoring Report by November 2011.