

Werris Creek Coal - Independent Environmental Audit Action Plan

Schedule and Condition Number	Condition	Compliance Status	Evidence	Recommendation	Werris Creek Coal Response
Project Approval – PA 10-0059					
Schedule 2 Condition 12	<p>Operation of Plant and Equipment</p> <p>The Proponent shall ensure that all the plant and equipment used on site, or to transport coal from the site, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	Non-Compliant (Low Risk)	<p>Findings from Inspection and Review of Records:</p> <p>Requested maintenance records were sighted at WCC. Including blasting services, water pumps and level sensors. Based on the inspection and review of records plant and equipment on site generally operated in a competent manner.</p> <p>Findings from EPA:</p> <p>The EPA noted that the licensee was not maintaining two sedimentation dams at the site in a proper and efficient condition, and the licensee's maintenance system was found to be not effective in ensuring maintenance issues are addressed.</p> <p>The works associated with upgrading SB18 was shown to SLR during the field inspection. There is still some additional works required for SB17.</p>	Additional maintenance works are required for SB17, with WCC committing to this by 30 September 2017.	Completed
Schedule 3 Condition 4	<p>Operating Conditions</p>	Administrative Non-compliance	<p>(a) Reviewed <i>Noise Management Plan</i>. Evidence of decreased noise complaints over the audit period over successive Annual Review periods.</p> <p>(b) Noise Control Operators (NCOs) in operation during night-time period, evidence of revised operations during night-time period when noise issues identified.</p> <p>c) See section 8.5 & 10.1 of <i>Noise Management Plan</i>.</p> <p>(d) Evidence of best practice through monitoring, NCO's and implementation of changes to operations based on NCO's monitoring and measurements. However, there is no evidence of reporting the progress towards the achievement of the long term noise goals in the annual review. No trending information is provided to show the long term noise levels of the project. Only exceedances of the approved are reported.</p> <p>(e) This audit. Separate Noise Report has been prepared as part of this audit.</p> <p>OCE Shift change diary detailing noise levels, shut downs etc.</p>	<p>(d) it is recommended that the future Annual Reviews should present trended noise data to show how WCC is progressing towards the long term noise goal of 35 dBA. The current versions only state where noise criteria have been exceeded.</p> <p>It should be noted that the 2016 Annual Review was amended to reflect some commentary on historical trends in relation to the long term goal of 35 dBA. Inclusions reviewed and approved by DPE.</p>	Completed

Schedule and Condition Number	Condition	Compliance Status	Evidence	Recommendation	Werris Creek Coal Response
Schedule 3 Condition 23	<p>Water Management Plan</p> <p>(b) a Surface Water Management Plan, that includes:</p> <ul style="list-style-type: none"> • detailed baseline data of the surface water flows and quality in the waterbodies that could be affected by the project; • a detailed description of the water management system on site, including the: <ul style="list-style-type: none"> - clean water diversion systems; - erosion and sediment controls; and - water storages; • a plan for identifying, extracting, handling, and the long-term storage of potentially acid forming material on site; • detailed plans, including design objectives and performance criteria, for: <ul style="list-style-type: none"> - design and management of the final void; - reinstatement of drainage lines on the rehabilitated areas of the site; and - control of any potential water pollution from the rehabilitated areas of the site; - a program to monitor the effectiveness of the water management system; • a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project; 	Non-Compliant (Low Risk)	<p><u>Plan Preparation:</u></p> <ul style="list-style-type: none"> • Baseline - Section 4 • Section 8.1 and 8.2 outline water management system. • Storage of water - Section 8.2, including details about void water storage dams. • Water objectives and criteria - Section 7. • Drainage management in rehabilitation outlined in Section 8.3.4. • Monitoring outlined in Section 9. • Contingency Plan - Section 14. <p><u>Implementation:</u></p> <p>At the Training Load Out (TLO) there was one culvert (part of dirty water management system) that was blocked. During heavy rainfall this may cause disruptions at site as water may not be able to reach the main sediment dam at the TLO. Based on evidence provided from WCC this has since been cleaned out, with no further recommendation required post audit.</p> <p>There were 2 government audits during the IEA audit period (EPA audit and multi agency audit). The key aspects of these audits are outlined within Section 5 of the main report. Some of these non - compliances related to implementing this management plan, including:</p> <ul style="list-style-type: none"> • At time of inspection dam heights above designed capacity; • Lack of implementing a pre-start checklist; • Lack of calculations for sediment dams within the <i>Water Management Plan</i>; and • Sediment dams not fully compliant with the Blue Book designs. 	<p>There have been audits from the EPA and DPE, with outcomes and proposed actions currently being finalised. Implement the agreed outcomes from this audit (See Section 5 of main report for additional details).</p> <p>Additional details relating to trends in water monitoring data is to be outlined in the future Annual Reviews.</p>	<p>Outcomes from the multi-agency audit to be implemented as per Action Plans previously submitted to the relevant Departments.</p> <p>Additional details relating to water monitoring trends included within the updated and approved Annual Review 2016. Completed.</p>
Schedule 3 Condition 43	<p>43. The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of DRE. This plan must:</p> <p>(a) be prepared in consultation with the Department, DPI Water, OEH, Council and the CCC;</p> <p>(b) be submitted to DRE by the end of April 2012</p> <p>(c) be prepared in accordance with any relevant DRE guideline;</p> <p>(d) describe how the rehabilitation of the site would be integrated with the implementation of the biodiversity offset strategy;</p> <p>(e) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, and triggering remedial action (if necessary);</p> <p>(f) describe the measures that would be implemented to ensure compliance with the conditions of this approval, and address all aspect of rehabilitation including mine closure, final landform, and final land use;</p> <p>(g) include a program to monitor and report on the effectiveness of the measures, and progress against the detailed performance and completion criteria; and</p> <p>(h) build to the maximum extent practicable on the other management plans required under this approval.</p>	Administrative Non - compliance	<p>a) Consultation for most recent <i>MOP/Rehabilitation Management Plan</i> outlined within Section 1.5.2. Although there are some discussions relating to consultations regarding 'proposed modifications at Werris Creek' there is no evidence that these agencies were specifically sent a copy of the new MOP for comment (MOP dated December 2015). Therefore non - compliant with this condition.</p> <p>b) Completed. New MOP submitted during audit period in December 2015.</p> <p>c) Prepared in accordance with the MOP Guideline.</p> <p>d) Table 4.2 covers this in sufficient detail.</p> <p>e) Criteria outlined in Section 6.</p> <p>f) Section 7 of the MOP outlines Rehabilitation Implementation. Covered within multiple sections of the MOP.</p> <p>g) Criteria outlined in Section 6 and 8. Reporting is within the 'Rehabilitation Monitoring Reports' and there is a basic summary within the Annual Reviews. The monitoring program for rehabilitation and offset areas reviews some of the key criteria which are outlined in the MOP.</p> <p>h) Section 1.3 references management plans at WCC.</p>	<p>For the next MOP update, send the key sections of the MOP document to these agencies for review/comment.</p>	Noted

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Schedule 5 Condition 3	<p>Annual Review</p> <p>By the end of March each year, the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the:</p> <ul style="list-style-type: none"> • relevant statutory requirements, limits or performance measures/criteria; • monitoring results of previous years; and • relevant predictions in the EA; <p>(c) identify any non - compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.</p>	Administrative Non - compliance	<p>The 2016, 2015-16 and 2014 - 15 Annual Reviews have been reviewed for this audit.</p> <p>a) Outlined in Annual Reviews. Including Section 4 and 8 of 2016 Annual Review.</p> <p>b) Monitoring results have been reviewed for key aspects and is outlined within Section 6 of the 2016 Annual Review.</p> <p>c) Section 1 of Annual Review outlines the Statement of Compliance.</p> <p>d) NC. Annual Reviews from 2014-15 under the previous guidelines had trends for water and air. The most recent Annual Reviews from 2015 and 2016 have minimal information relating to trends or how the site performed against previous years.</p> <p>e) There is little information relating performance against predictions (EA predictions).</p> <p>f) Proposed improvements are outlined in Annual Reviews.</p> <p>There is minimal information relating to trends in the Annual Reviews.</p>	<p>Additional information relating to trends should be outlined in the Annual Review. This may include aspects such as water, noise and air.</p> <p>Comparison of monitoring results against EA predictions.</p> <p>Additional information relating to groundwater quality.</p>	The Werris Creek Coal Annual Review 2016 has been updated to reflect these recommendations and subsequently approved. Completed.
Schedule 5 Condition 4	<p>Revision of Strategies, Plans and Programs</p> <p>Within 3 months of:</p> <p>(a) the submission of an annual review under condition 3 above;</p> <p>(b) the submission of an incident report under condition 6 below;</p> <p>(c) the submission of an audit under condition 8 below; or</p> <p>(d) any modification to the conditions of this approval (unless the conditions require otherwise),</p> <p>the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions of any plan then within four weeks of the review the revised document must be submitted to the Secretary and any other relevant agencies for approval.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	Administrative Non - compliance	Plans have not been reviewed and revised as required annually. There are a series of plans currently sitting with DPE. Some plans were also not updated within three months of the 2014 independent environmental audit.	<p>Continue to liaise with DPE to discuss the status of the revised management plans. Undertake management plan 'review' as per the required condition.</p> <p>In the Annual Review state whether management plans need to be revised and reasons for revisions. Resubmission of management plans to DPE.</p>	<p>Noted</p> <p>Included in the Annual Review 2016. Completed.</p>
Environment Protection Licence – EPL 12290					
O1.1	<p>Activities must be carried out in a competent manner</p> <p>Licensed activities must be carried out in a competent manner. This includes:</p>	Non-Compliant (Low Risk)	<p><u>Waste:</u></p> <p>Site inspection and a review of documentation indicates that the site has generally been operating as per the required statutory conditions, with no evidence of material harm as defined under the POEO Act.</p>	Continue to implement agreed actions relating to water management.	Noted

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	a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.		<p>Waste management managed as per the internal <i>Waste Management Plan</i>. Waste management has improved in the audit period with a greater emphasis on recycling. From site inspection evidence of storage of hydrocarbons and chemicals within bunded areas.</p> <p><u>Water Management:</u> Water levels in all Void Water Dams were low at the site of the audit by SLR. However the multi agency audit noted that there the site had not been 'minimising water levels in the wastewater holding dams to prevent uncontrolled discharge'.</p> <p>Since the EPA and multi agency audit the site has completed several updates including:</p> <ul style="list-style-type: none"> Bathometric survey - completed May 2017; Review of Void Water Dams volume spreadsheet; and Further development of strategy for alternative water use/augmented storage arrangements. 		
O2.1	<p>Maintenance of plant and equipment All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.</p>	Non-Compliant (Low Risk)	<p><u>Findings from Inspection and Review of Records:</u> Requested maintenance records were sighted at WCC. Including blasting services, water pumps and level sensors. Plant and equipment on site generally operated in a competent manner.</p> <p><u>Findings from EPA:</u> The EPA noted that 'the licensee was not maintaining two sedimentation dams at the site in a proper and efficient condition, and the licensee's maintenance system was found to be not effective in ensuring maintenance issues are addressed'.</p> <p>The works associated with upgrading SB18 was shown to SLR during the field inspection. There is still some additional works required for SB17.</p>	Additional maintenance works are required for SB17, with WCC committing to this by 30 September 2017.	Completed
O4.2	<p>Blast Fume Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases (whether visible or invisible, odorous or odourless) from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances:</p> <p>(i) are harmful to (or is likely to be harmful to) a person that is outside the premises from which it is emitted, or (ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.</p>	Non-Compliant (Low Risk)	<p>Blast fume management is required in blast design at the site.</p> <p>There was one blast related non-compliance (Condition 4 – O1.1 of EPL 12290) during the period on the 2nd July 2014 generating fume that travelled off the mine site but did not result in any offsite impacts. WCC fired a production blast #45 on Wednesday 2nd July 2014 at 1:05pm (S15_B12- B16_330_EXT) with the fume cloud generated travelling north-north west above the ground surface, across Escott Road (a closed, private road owned by WCC) and off the Mine site at 1:25pm, at a height of approximately 50m above the ground surface. The blast fume cloud dispersed at 1:41pm over the "Cintra" property owned by WCC. WCC was not able to establish whether there was a definitive cause, however the "Incident Investigation Report into the Blast Related Fume Incident" prepared by Safety Wise Solutions Pty Ltd (the Investigation Report) identified some contributing factors.</p>	No further action	
O4.3	Pollution Incident Response Management Plan	Administrative Non - compliance	<p>A PIRMP has been prepared. The website version has no figure, with this noted by the audit team.</p> <p>Not all sediment dams are in the PIRMP figure that was provided. Void Water Dams have been included in the figure.</p>	No further action	

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	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions, fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.		Since this was noted during the audit the PIRMP (internal and website versions) were updated by WCC. No further recommendations.														
M2.2	Air Monitoring Requirements Point 28, 29, 30 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td>micrograms per cubic metre</td> <td>Every 6 days</td> <td>AM-18</td> </tr> <tr> <td>Solid Particles</td> <td>grams per square metre per month</td> <td>Continuous</td> <td>AM-19</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Every 6 days	AM-18	Solid Particles	grams per square metre per month	Continuous	AM-19	Non-Compliant (Low Risk)	M2.2 requires monitoring of PM10 concentrations every 6 days at "R98" ("Kyooma"). Due to a power loss, this monitoring was not undertaken on the 28th July, 3rd and 9th of August 2015 - outlined in the 2015-16 EPL Annual Return. TEOM suffered a series of faults in March 2015.	No further action	
Pollutant	Units of measure	Frequency	Sampling Method														
PM10	micrograms per cubic metre	Every 6 days	AM-18														
Solid Particles	grams per square metre per month	Continuous	AM-19														
M3.2	Testing Methods Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Non-Compliant (Low Risk)	The EPA audit found there to be a potential discrepancy relating to monitoring as per the Approved Methods Publication for analysing water samples. The EPA and WCC are still liaising regarding this finding.	Continue to liaise with the EPA regarding this aspect and implement any actions if required.	Noted												
M8.1	Blasting POINTS: Within 30 metres of the residences at the locations marked as "R98" ("Kyooma"), "R11" ("Glenara") and "R62" (43 Kurrara Street, Werris Creek) on Appendix 3 of Project Approval 10_0059 and within 30 metres of the location marked as "R92" in Figure 4A.5 of Environmental Assessment for Werris Creek Coal Mine, Life of Mine Project, dated December 2010 and prepared by R.W. Corkery and Co. Pty Limited. <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Blast Noise</td> <td>dB (Lin Peak)</td> <td>Every Blast</td> <td>Type 1 Noise/Blast Logger</td> </tr> <tr> <td>Blast Vibration</td> <td>mm/s</td> <td>Every Blast</td> <td>Geophone Logger or similar</td> </tr> </tbody> </table>	Parameter	Units of Measure	Frequency	Sampling Method	Blast Noise	dB (Lin Peak)	Every Blast	Type 1 Noise/Blast Logger	Blast Vibration	mm/s	Every Blast	Geophone Logger or similar	Non-Compliant (Low Risk)	On 3/3/ 2016 - Glenara blast monitor did not record blast vibration and air overpressure. 2015-16 Annual Review stated: Loss of communications due to changes in mobile network in local area and subsequent corruption of memory card. WCC have stated that a review of other blast monitors and past performance suggests it is highly unlikely criteria would have been exceeded. Blast monitor upgraded with 4metre directional antenna and key electronics replaced. No further recommendations.	No further action	
Parameter	Units of Measure	Frequency	Sampling Method														
Blast Noise	dB (Lin Peak)	Every Blast	Type 1 Noise/Blast Logger														
Blast Vibration	mm/s	Every Blast	Geophone Logger or similar														
E1.1	E1 Three Yearly Independent Noise Audit E1.1 The licensee must provide the EPA with a copy of any Noise Audit and Independent Environmental Audit Report required by condition 4 of Schedule 3 and conditions 8 and 9 of Schedule 5 of the Werris Creek Mine Extension Project Approval (No. 10_0059). If the Noise Audit and Independent Environmental Audit Report do not incorporate the following information or assessments, then the licensee must also provide a separate report to the EPA that incorporates the following: The reports required by this condition must be submitted to the EPA's Armidale office within 6 weeks of the 30 June 2014, and every three years thereafter.	Administrative Non - compliance	This was completed in 2014 and 2017. 2014 met this requirement. 2017 report prepared to meet these requirements. However no evidence has been able to be provided of submission of the Three Yearly Noise Audit within 6 weeks of 30 June 2014.	Liaison with the EPA regarding the future submissions of the Three Yearly Noise Audit.	Noted												
EA Statement of Commitments																	
3.1	Surface Water Construct and maintain surface water management infrastructure of the Mine in accordance with an approved Site Water Management Plan.	Non-Compliant (Low Risk)	During the site inspection, void water dams were well below freeboard and there only minor aspects noted by the SLR audit team. However the audits from the EPA and multi agency audit noted some mitigation measures from the <i>Water Management Plan</i> were not fully implemented.	Continue to implement agreed actions from the EPA and multi agency audit relating to water management.	Noted												

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3.2	Surface Water Implement impact mitigation measures in accordance with an approved Site Water Management Plan.	Non-Compliant (Low Risk)	During the site inspection, void water dams were well below freeboard and there only minor aspects noted by the SLR audit team. SLR were provided evidence through photos on 13 July 2017 outlining this culvert had been cleaned out. The audits from the EPA and multi agency audit noted some mitigation measures from the <i>Water Management Plan</i> were not fully implemented. It should be noted that the <i>Water Management Plan</i> has been updated and approved since the findings of the multi-agency audit.	Continue to implement agreed actions from the EPA and multi agency audit relating to water management.	Noted
3.4	Surface Water Operate void water dams with sufficient freeboard to prevent discharge during high rainfall events.	Non-Compliant (Low Risk)	During the site inspection by SLR, void water dams were well below freeboard. However the audits from the EPA and multi agency audit noted some mitigation measures from the <i>Water Management Plan</i> were not fully implemented.	Continue to implement agreed actions from the EPA and multi agency audit relating to water management.	Noted
Mining Leases ML1671, ML1672, ML1563					
Nil – non compliances					
Water Access Licences – WAL 29506 and WAL 32224					
Nil – non compliances					

SLR Recommendations – Included 10/11/2017

Condition	Aspect	Recommendation	Werris Creek Coal Response	Intended Timeframe
Schedule 3 Condition 13	Blast Management	Provide copies of consultation for the 2017 <i>Blast Management Plan</i> as an appendix. Include further details in the document about the outcomes of consultation.	Consultation required under Schedule 3, Condition 13, will remain on file and will not be included as copies within the Management Plan. The outcomes of subsequent consultation will be included within the Plan.	Not Applicable
Schedule 3 Condition 14	Odour Management	Continue to adopt odour management measures relating to spontaneous combustion to mitigate the potential for odour migration offsite. Continue to perform detailed analysis of any odour complaints to confirm whether the mine is the likely source.	Noted.	Ongoing
Schedule 3 Condition 20	Meteorology	Meteorology has not been reported since the 2014-2015 Annual Review. Some details to be included as this relates to water management and air quality.	The content within the approved Annual Review documents has been produced in accordance with the DP&E Annual Review Guideline (October 2015). Additional reporting will only be included in subsequent Annual Reviews by exception.	Not Applicable
Schedule 3 Condition 22 Statement of Commitments 2.2 – regarding Groundwater Monitoring	Groundwater	Additional details relating to trends in water monitoring data is to be outlined in the future Annual Reviews.	Included in the updated and approved Annual Review 2016.	Completed.
		Additional information relating to groundwater quality.	The revised and approved 2016 Annual Review adequately address reporting on groundwater quality.	Completed
		Table 15 in the 2016 Annual Review lists the monitoring bores, sampling frequency and proposed monitoring parameters. This section of the Annual Review outlines that six monthly monitoring is required, however it does not state that this is only for MW1, 2, 3, 4, 5 and 6 as per the <i>Water Management Plan</i> . Update Table 15 in future Annual Reviews to illustrate only some monitoring locations are monitored six monthly.	To be included within the 2017 Annual Review where applicable.	31 March 2018
		In terms of the Ramboll 2016 Groundwater Report - the report does not address or mention water quality or change (if any) of water quality over time.	To be included within the 2017 Groundwater Review	30 June 2018
		Appendix A of the Ramboll 2016 Groundwater Report shows several bores in the Werrie Creek Basalt with trends above the trigger level, however these are not discussed. Monitoring bores are MW3, MW4b, MW5, and MW8 (control), MW14, MW17b, MW19b, MW20 and MW27. An explanation should be given for not discussing these results.	The document contains specific content outlining monitoring wells within the Werrie Basalt and the consistent trending against the background monitoring well MW8. While not all of the 42 wells monitored are discussed within the report, commentary relevant to the comparison against background well MW8 is prevalent. This is also supported within the conclusions of the report, "Observations in near-mine wells show water level fluctuations consistent with background monitoring wells providing evidence that mine operations are not causing widespread impacts on groundwater".	
			Where relevant, WCC will consider the inclusion of further discussion of all wells triggered during the reporting period in subsequent reports.	Not Applicable
P1.1 of EPL	Surface Water	In Section 7 of the <i>Water Management Plan</i> which is being updated, include a new column outlining the EPA Identification number.	Noted. To be included in the next update of the document.	Not Applicable
L4.5 of EPL	Noise	Greater discussion of trends against previous periods in future Annual Reviews.	The content within the approved Annual Review documents has been produced in accordance with the DP&E Annual Review Guideline (October 2015). Additional reporting will only be included in subsequent Annual Reviews by exception.	Not Applicable

M9.1 of EPL	Noise	<p>Monitoring results for R57 should be included in the EPL monitoring data presented on the website.</p> <p>Given that ongoing, nightly real-time noise monitoring is undertaken by dedicated noise control officers (NCOs) and assessed on an ongoing basis with operations being modified to reduce noise levels to within the applicable noise criteria, it is recommended that consideration could be given to reducing the frequency of attended noise monitoring to quarterly.</p> <p>It is unclear to the auditor as to why the EPL requires 60 minute noise monitoring surveys to assess compliance with the criteria which is LAeq15minute.</p>	<p>Noted and agreed.</p> <p>WCC agrees with this recommendation and will consider applying for modification to EPL 12290.</p>	<p>November 2017 EPL publication.</p> <p>Ongoing.</p>
M4.1 of EPL	Meteorology	<p>Meteorology has not been reported since the 2014-2015 Annual Review. Some details to be included as this relates to water management and air quality. General trends of data.</p>	<p>The content within the approved Annual Review documents has been produced in accordance with the DP&E Annual Review Guideline (October 2015). Additional reporting will only be included in subsequent Annual Reviews by exception.</p>	Not applicable
Schedule 3 Condition 24	Biodiversity	<p>Additional detail is required for the monitoring and management of the offset areas in the Annual Review (little detail in recent Annual Reviews). This should include a summary of results and trends and reference publically available documentation (including referencing the specialist reports).</p> <p>Monitoring results (methodology outlined in Section 9.2 of the <i>Biodiversity Offset Area Management Plan</i>) should be referenced.</p> <p>Send the OEH a final copy of the <i>Biodiversity Offset Area Management Plan</i> for their records.</p>	<p>The content within the approved Annual Review documents has been produced in accordance with the DP&E Annual Review Guideline (October 2015). Additional reporting will only be included in subsequent Annual Reviews by exception.</p> <p>To be updated in subsequent reviews of the Plan.</p> <p>Schedule 3, Condition 24 does not pertain to the Biodiversity Offset Area Management Plan.</p>	Not applicable
Schedule 3 Condition 28	Biodiversity	<p>There appears to be a lag in monitoring compared to reporting. For monitoring that is undertaken in Spring of each year, a report should be prepared prior to the next submission of the Annual Review.</p>	<p>Whilst monitoring was undertaken, a lag in the provision of the monitoring report by the consultant occurred. This has been rectified for the 2017 period.</p>	Completed.
Condition 7 of ML1672	Weed Management	<p>There were a couple of small areas where weeds are dominant. These areas are already known. Continue to implement the strategy to remove these weeds from site and complete additional rehabilitation once weeds are removed.</p>	<p>Noted. Weed management is an ongoing process at WCC and control will continue.</p>	Not applicable
Condition 4 of ML1671 and 1672	Rehabilitation and Disturbance	<p>State how the site performed in terms of disturbance and rehabilitation against goals in the MOP. Some quantitative data should be provided. eg. Rehabilitation completed during the year, compared to the predicted rehabilitation in the MOP.</p>	<p>Provision of this information has been, and will be, included within current and subsequent Annual Review documents.</p>	Not applicable
Condition 20 of ML 1671 and 1672 Condition 25 of ML1563	Rehabilitation Security	<p>There is now a requirement to update all Rehabilitation Cost Estimates for sites and send to the DRG by end of December 2017. This should be completed in the next few months.</p>	<p>WCC's understanding is that the Rehabilitation Cost Estimates are only required to be updated upon the submission of an amended and/or updated Mining Operations Plan.</p>	Not applicable
Based on audit feedback from DPE (email dated 8 June 2017)	Spontaneous Combustion	<p>There is little detail relating to spontaneous combustion within the Annual Review. In future Annual Reviews there should be some information relating to whether there have been any spontaneous combustion and mitigation measures.</p>	<p>The content within the approved Annual Review documents has been produced in accordance with the DP&E Annual Review Guideline (October 2015). Additional reporting will only be included in subsequent Annual Reviews by exception.</p>	Not applicable
Schedule 5 Condition 1	Environmental Management Strategy	<p>Due to the time the document has been unapproved we recommend the Environmental Management Strategy document should be updated and resubmitted. Undertake liaison with the DPE.</p>	<p>WCC will continue to await response from the Department of Planning and Environment on the submitted document.</p>	Not applicable