

# WAMBO COAL ENVIRONMENTAL MANAGEMENT STRATEGY

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### **Document Control**

Document No.	WA-ENV-MNP-501		
Title	Environmental Management Strategy		
General Description	Outlines the strategic context of environmental management at Wambo Coal Mine as well as statutory obligations, the management of environmental performance, strategies to manage external relations and the accountabilities of key personnel.		
Document Owner	Manager: Environment & Community		

#### Revisions

Rev No	Date	Description	Ву	Checked	Signature
0	10/12/04	Original Draft	JT	TS	
1	04/04/05	Update for DA305-7-2003	Hansen Consulting	JT	
2	Dec 05	Update due to changes in management structure	JT	JT	
3	Jan 09	Review	SJB	SB	
4	July 17	Update	ND	SP	
5	March 18	Revised following DPIE comments	ND		
6	Sept 2020	Revised following approval of DA305- 7-2003 (Mod 16) and DA177-8-2004 (Mod 3) - for Phase 2 operations	ND	PJ	
7	Nov 2020	Revised to address comments from DPIE	ND	PJ	



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# 1.0 Introduction

#### 1.1 Background

The Wambo Coal Mine (Wambo) is situated approximately 15 kilometres west of Singleton, near the village of Warkworth, New South Wales (NSW) (**Figure 1**). Wambo is owned and operated by Wambo Coal Pty Limited (WCPL), a subsidiary of Peabody Energy Australia Pty Limited (Peabody).

Several open cut and underground mine operations have been conducted at Wambo since mining operations commenced in 1969. Mining under the current Development Consent (DA305-7-2003) commenced in 2004 and permits both open cut, underground operations and associated activities to be conducted. The latest modification to DA305-7-2003 (Mod 16), approved by the Independent Planning Commission of NSW on 29 August 2019, requires development at Wambo to be undertaken in the following stages:

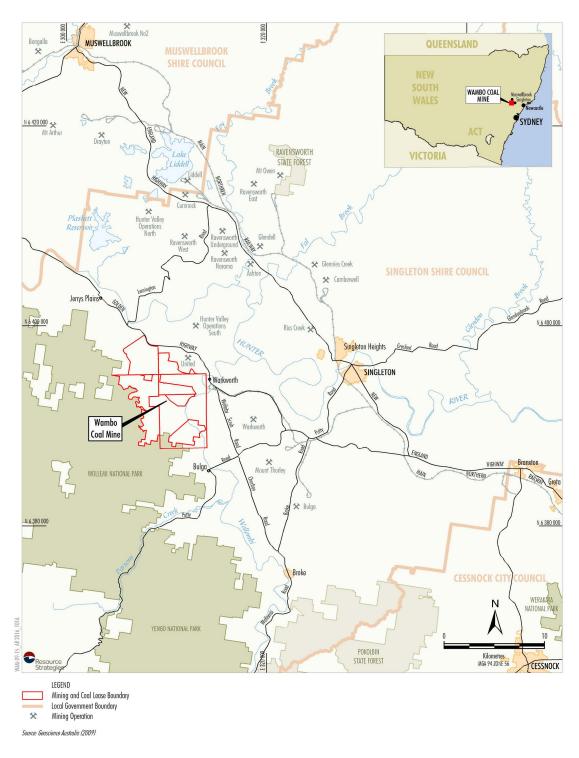
- Phase 1 open cut mining operations at Wambo open cut mine, underground mining operations at Wambo underground mine and the operation of Wambo mine infrastructure (including minor upgrades to this infrastructure) within the green operational area identified in Figure 1 of Appendix 2 (of DA305-7-2003)
- Phase 2 underground mining operations at Wambo underground mine, the operation of Wambo mine infrastructure within the green operational area identified in Figure 2 of Appendix 2 (of DA305-7-2003) and associated surface development.
- Phase 3 following the cessation of underground mining operations that includes mine closure.

The operation of WCPL's rail and coal loading infrastructure is undertaken in accordance with DA177-8-2004. The latest modification to DA177-8-2004 (Modification 3) was approved by the Independent Planning Commission of NSW on 29 August 2019.

This Environmental Management Strategy has been updated for the commencement of Phase 2 operations (refer to **Figure 2**). which are scheduled to commence 1 December 2020.

The approved run-of-mine (ROM) coal production rate is 14.7 million tonnes per annum (Mtpa) and all product coal is transported from Wambo by rail. A summary of the approved Wambo Coal Mine is provided in **Table 1**.

# **Peabody**





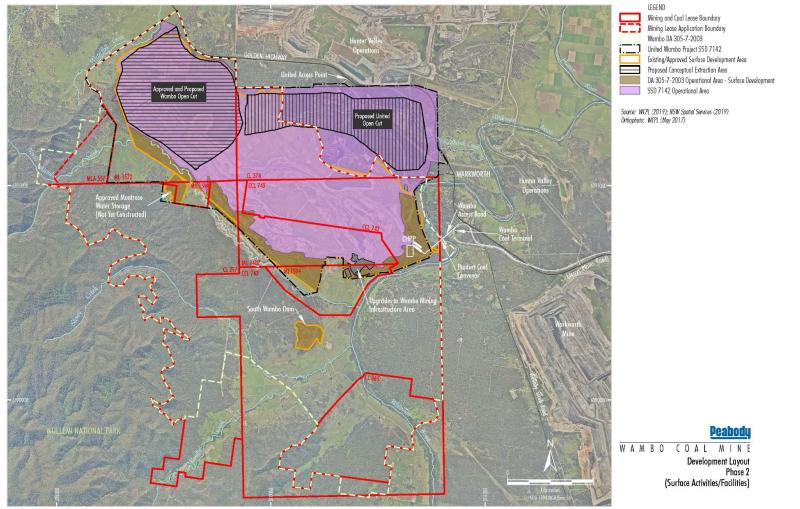
# **Peabody**

Table 1: Summary of the Approved Wambo Coal Mine				
Component	Approved WCPL <sup>1</sup>			
Life of Mine	• 38 years (until 31 August 2042).			
Open Cut Mining	Open cut mining operations only during Phase 1 activities.			
	<ul> <li>A maximum of 8 Mt of ROM coal may be extracted from Wambo Open Cut in an any calendar year (during Phase 1)</li> </ul>			
	An estimated total open cut ROM coal reserve of 98 Mt.			
Underground Mining	Underground mining of up to 9.75 Mtpa of ROM coal in any calendar year.			
	Underground ROM coal reserves are estimated at 161.3 Mt.			
Subsidence commitments and management.	• The subsidence impact performance measures listed in Conditions B1 and B4, Schedule 2, Part B of the Development Consent (DA 305-7-2003).			
ROM Coal Production Rate	• Up to 14.7 Mtpa of ROM coal from the Wambo Mining Complex and United Wambo open cut coal may be processed at the Wambo CHPP in any calendar year.			
Total ROM Coal Mined	• 259.3 Mt.			
Waste Rock Management	<ul> <li>Waste rock deposited in open cut voids and in waste rock emplacements adjacent open cut operations.</li> </ul>			
Total Waste Rock	640 million bank cubic metres.			
Coal Washing	CHPP capable of processing approximately 1,800 tonnes per hour.			
Product Coal	Production of up to 11.3 Mtpa of thermal coal predominantly for export.			
Coal Handling and Preparation Plant Reject Management	<ul> <li>Coarse rejects and tailings would be incorporated, encapsulated and/or capped within open cut voids (that would comprise part of United's operations during Phase 2).</li> </ul>			
Coal Transportation	Carried out until 31 August 2042.			
Total CHPP Rejects	Approximately 40.3 Mt of coarse rejects and approximately 24.5 Mt of tailings.			
Water Supply	<ul> <li>Make-up water demand to be met from runoff recovered from tailings storage areas, operational areas, dewatering, licensed extraction from Wollombi Brook and Hunter River.</li> </ul>			
Surface Facilities	Construction of surface facilities within the approved surface development area.			
Mining Tenements	<ul> <li>CL 365, CL 374, CL 397, CCL 743, ML 1402, ML 1572, ML 1594, ML1806, , Authorisation (A) 444 and Exploration Licence(EL) 7211.</li> </ul>			

#### Table 1: Summary of the Approved Wambo Coal Mine

Note: <sup>1</sup> Development Consents DA305-7-2003 and DA177-8-2004 (as modified August 2019)





WAM-09-15 Approved Wambo Coal Mine 203A 28/11/2019

Figure 2: Development Layout for Wambo Coal Phase 2 Operations

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#### 1.2 Purpose

The purpose of this Environmental Management Strategy (EMS) is to:

- Provide the overall framework for environmental management for all mining and surface activities at Wambo;
- Identify the statutory requirements that apply to Wambo;
- Identify the key environmental issues to be managed by WCPL;
- Describe the procedures that would be implemented to:
  - keep the local community and relevant agencies informed about the operation and environmental performance of the development;
  - o receive, record, handle and respond to complaints;
  - o resolve any disputes that may arise during the course of the development;
  - o respond to any non-compliance or incident; and
  - respond to emergencies;
- Describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management at Wambo: and
- Describe the review and continual improvement process.

#### 1.3 Scope

This EMS applies to all activities undertaken within WCPL's mining authorisations and approved mining areas.

This EMS forms part of WCPL's Environmental Management System (refer **Appendix A** for list of other EMS documents) and provides the overarching strategy for environmental management at Wambo.

#### **1.4 Stakeholder Consultation**

The EMS (Revision 3) was approved by the then NSW Department of Planning and Environment (DP&E) (now the NSW Department of Planning, Industry and Environment (DPIE)) in January 2009.

Revision 4 of the EMS included legislative changes, reference to recent consent modifications and a document map of management plans, procedures, forms and protocols. A copy of Revision 4 was provided to DPIE in July 2017.

Comments from DPIE were received in February 2018. Revision 5 addressed these comments and was approved by DPIE on 26 March 2018. A copy of the regulatory correspondence is presented in **Appendix B**.

The current version, Revision 7, updated for Phase 2 operations at Wambo, was approved 16 November 2020.



# 2.0 Environmental Vision, Policy and Commitment

The Peabody Environment Policy (see **Appendix C**) applies to the Wambo underground mine, coal handling preparation plant and the rail line. The Policy is endorsed by the Peabody President and Chief Executive Officer and has the support and commitment of senior management.

The Environment & Community Policy is displayed at prominent points around the operation, such that all employees, contractors and visitors have access to the Policy. The WCPL site induction includes reference to the Wambo Environment & Community Policy.



# 3.0 Environmental Planning

An environmental aspect refers to an element of an organisation's activities, products or services that can have a beneficial or adverse impact on the environment. An environmental impact refers to the change that takes place in the environment as a result of the aspect.

Wambo regularly reviews the site's Register of Environmental Aspects, Impacts and Risks (Risk Register). The Risk Register documents the company's environmental risk assessment outcomes and assists in developing action plans to manage mining related impacts.

In addition to the Risk Register, WCPL regularly reviews its environment and community performance. Reviews consider the following factors:

- Outcomes from Risk Register updates;
- Outcomes from monitoring and review activities;
- Results of internal and external inspections, assessments and audit reports addressing: operational, specialist, functional, management system, legal compliance and stakeholder requirements; or other external commitments;
- Health, safety, environment and community incident reports and investigation findings;
- Performance data, trends and reports including the extent to which targets and objectives have been met;
- Inputs and views of external stakeholders, including complaints;
- Status of corrective and preventative actions; and
- Feedback from regulators and the community.

#### 3.1 Statutory Requirements

This EMS has been prepared to address the relevant Development Approval (DA) conditions within DA305-7-2003 (as modified) where they relate to the EMS (**Appendix D**), principles of ISO14001 Environmental Management Systems, relevant Australian Standards (AS) and all relevant legislation.

The key environmental legislation that applies to this EMS and other documents within the WCPL Environmental Management System (refer **Appendix A**) includes:

- Biodiversity Conservation Act 2016;
- Biosecurity Act 2015;
- Contaminated Land Management Act 1997;
- Dangerous Goods Act 1975;
- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Environmental Protection and Biodiversity Conservation Act 1999;
- Explosives Act 2003;
- Explosives Regulation 2013;



- Fisheries Management Act 1994;
- Heritage Act 1977;
- Hunter Regional Environment Plan 1996;
- Local Government Act 1993;
- Mining Act 1992;
- National Parks and Wildlife Act 1974;
- Native Vegetation Act 2003;
- Native Title Act 1993;
- NSW Work Health Safety Act 2011;
- NSW Work Health Safety Regulation 2011;
- Pesticides Act 1999;
- Protection of the Environment Operations Act 1997 (POEO Act);
- Rivers and Foreshores Improvement Act 1948;
- Rural Fires Act 1997;
- Rural Lands Protection Act 1998;
- Singleton Local Environment Plan 1996;
- Threatened Species Conservation Act 1995;
- Water Act 1912;
- Water Management Act 2000; and
- Waste Avoidance and Recovery Act 2001.

A register of legal and other requirements is maintained as part of the EMS.

#### 3.2 Objectives and Targets

As outlined in **Section 3.0**, WCPL undertakes regular review of environmental and community performance. When establishing environmental objectives and targets WCPL considers:

- Significant environmental aspects (impacts to the environment from our activities);
- Legal and other requirements (relevant environmental legislation);
- Technological improvements;
- Business, operational and financial considerations; and
- The views of our stakeholders.

Objectives and targets are progressively achieved through effective implementation of environmental management plans and environmental documentation as outlined in **Appendix A**. Objectives and targets are reviewed annually as a minimum standard and are updated in accordance with changing legislation, operational practices, industry standards and corporate directives.

Performance against objectives and targets is reported each year in the Annual Review (Section 4.3.2).



#### 3.3 Environmental Management and Controls

Management plans, strategies, protocols and procedures are prepared as required by project approval conditions, the Risk Register and the outcome of site specific risk assessments. A description of the document types and their purpose within the EMS is outlined in **Table 2**. The documents listed are dynamic in nature and are revised regularly to reflect changes in operational practices, legislative requirements and industry best practice.

Table 2: EMS Documents

Document Type	Purpose
Policy	Expresses the overarching goals of the WCPL environmental management strategy
Strategy	Outlines the framework for environmental management at WCPL
Management Plans	Describe the objectives and means to achieve the desired outcome
Procedures / Protocols	Describe a sequence of steps, tasks and activities that when undertaken produces a desired outcome or objective
Monitoring Programs	Details the type of monitoring and frequency that monitoring will be undertaken and the relevant criteria that may apply
Other Documents	Provide additional tools in the form of checklists, registers, forms etc.

Some of the key management documents at WCPL include:

- Environmental Management Strategy;
- Pollution Incident Response Management Plan;
- Biodiversity Management Plan;
- Noise Management Plan;
- Air Quality and Greenhouse Gas Management Plan;
- Water Management Plan;
- Traffic Management Plan; and
- Rehabilitation Management Plan.

An EMS document map for environmental documentation at WCPL is included in **Appendix A**.

#### 3.4 Management of Cumulative Impacts

WCPL recognises that nearby residents may not only be impacted by activities at Wambo Mine, but also as a result of activities at a number of other surrounding mines. This is known as cumulative impact.

Cumulative impact protocols are detailed in the Air Quality and Greenhouse Gas Management Plan and Noise Management Plan.



## 4.0 Implementation and Operation

#### 4.1 Structure and Responsibility

Environment and community management is regarded as part of the responsibilities of all employees and contractors at Wambo. Employees and contractors are made aware of their responsibilities in the Site Induction. Specific accountabilities are dependent upon the nature of the work being undertaken.

Everyone is responsible for:

- Complying with relevant legislation;
- Complying with the EMS as it applies to their work; and
- Taking actions to mitigate environmental impacts.

More specific roles and responsibilities are outlined in environmental management plans, procedures, protocols and standards. Key personnel and their relevant environment and community management roles and responsibilities are outlined in **Table 3**.

	Table 3: Environmental Management Roles and Responsibilities
Role	Responsibility
General Manager	<ul> <li>Provide adequate resources for environmental management including: qualified personnel, adequate financial resources and training as required for all employees;</li> <li>Involve the Environment &amp; Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment; and</li> <li>Ensure any proposed works associated with the operation, have the necessary approval, prior to the commencement of works.</li> </ul>
Manager: Environment	Develop, implement and maintain the WCPL EMS;
and Community	Liaise with government and community stakeholders regarding environment and community matters;
	<ul> <li>Disseminate information concerning environmental legislation relevant to the operation of the mine;</li> </ul>
	<ul> <li>Conduct environmental risk assessments and develop management protocols for proposed works associated with existing operations and any new or altered works;</li> </ul>
	• Facilitate the audit and inspection schedule as outlined in Table 5;
	<ul> <li>Oversee the assessment by external experts for activities associated with the operation, which may have an impact on the environment;</li> </ul>
	<ul> <li>Ensure that statutory reporting is completed and submitted in a timely manner;</li> </ul>
	<ul> <li>Approve environmental training packages and ensure that they are delivered and that adequate records are kept;</li> </ul>
	<ul> <li>Provide environmental assistance and advice on legislative and approval requirements for any proposed works; and</li> </ul>
	<ul> <li>Implement corrective actions arising from environmental incidents and audits.</li> </ul>
Environment and Community Advisors	<ul> <li>Maintain a working knowledge of this EMS and be aware of all environmental legislative requirements and community responsibilities associated with their respective operation;</li> </ul>
	• Develop and deliver necessary environmental management/awareness
	training to all personnel at their respective operation;
	<ul> <li>Coordinate the activities of specialist sub-consultants and project personnel for environmental assessment/monitoring/auditing responsibilities;</li> </ul>
	<ul> <li>Prepare statutory environmental reports so compliance with the approvals associated with their respective operation;</li> </ul>
	• Develop, implement and maintain environmental management plans and
	procedures, which includes facilitating the commitments outlined in the Environment & Community Policy with the assistance of the Operations and



Role	Responsibility
	Senior Management Team;
	<ul> <li>Maintain central environmental information files;</li> </ul>
	• Oversee the preparation of annual statutory reports of compliance and
	related reports;
	<ul> <li>In association with the Operations Managers, develop and deliver necessary training including induction of all personnel with respect to environmental matters;</li> </ul>
	<ul> <li>Liaise with neighbouring mine site personnel on environmental matters common to both sites;</li> </ul>
	<ul> <li>Co-ordinate monthly environmental monitoring and forward the results and</li> </ul>
	any recommendations to the relevant site personnel to initiate remedial action where required;
	<ul> <li>Co-ordinate monthly inspections and forward the results of the inspection and any recommendations to the relevant site personnel to initiate remedial action;</li> </ul>
	<ul> <li>Review and endorse all corrective actions arising from environmental incidents;</li> </ul>
	<ul> <li>Keep the WCPL website up to date with required approvals, plans and monitoring information; and</li> </ul>
	<ul> <li>Provide environmental assistance/advice as required.</li> </ul>
Technical Services	Maintain a working knowledge of this EMS;
Manager, Mining Manager, Maintenance	<ul> <li>Be aware of the environmental legislative requirements and community responsibilities associated with their respective operation;</li> </ul>
Manager	<ul> <li>Facilitate that operations under his/her control are undertaken in accordance with this EMS and in particular, in accordance with relevant environmental management plans, procedures and standards;</li> </ul>
	<ul> <li>Provide resources for appropriate training to all site employees regarding their environmental and community roles and functions;</li> </ul>
	<ul> <li>Implement corrective actions arising from environmental incidents and audits:</li> </ul>
	<ul> <li>Allow adequate provision in the annual capital budget for undertaking required environmental capital works;</li> </ul>
	<ul> <li>Involve the Manager: Environment and Community in the assessment of any proposed works associated with the operation that may have an impact on the environment;</li> </ul>
	Maintain a high level of environmental performance at the site; and
	<ul> <li>Report any pollution control incidents and/or community complaints to the Environment and Community Department as soon as practicable.</li> </ul>
All employees and	• Undertake the site Induction and participate in relevant environmental
contractors	training;
	<ul> <li>Undertake work activities in accordance with the requirements of the site induction and the relevant components of the EMS; and</li> </ul>
	<ul> <li>Report all environmental incidents to the Environmental personnel or their immediate supervisor.</li> </ul>

#### 4.2 Training Awareness and Competence

Environmental management requirements and responsibilities are contained within Wambo's Environmental Policy, the site induction program and supply contracts, to ensure that employees and contractors are aware of their obligations before commencing work on site at Wambo.

The site induction program at Wambo includes the following environmental management components:

- Peabody Environmental Policy (Appendix C);
- Legislative and other requirements;
- Overview of environmental management plans and procedures;



- Incident response / reporting procedures and contacts; and
- Key environmental management considerations for relevant working area/vicinity.

The Environment and Community Department also delivers targeted training packages and toolbox talks relating to specific environmental issues. Examples of targeted training include surface disturbance procedures in relation to exploration or spill response training.

Training may include an assessment of competence with regard to environmental awareness.

All environmental training packages are approved by the Manager: Environment and Community. Training records are managed by the Environment and Community Department.

#### 4.3 Communication

#### 4.3.1 Internal Reporting

A number of avenues are available to the Environment and Community team to provide effective communication of environmental information within the organisation. These include:

- Management meetings;
- Displays on noticeboards, including display of the Wambo Environment Policy;
- Environmental awareness training;
- Circulation of written reports/memos;
- Toolbox talks; and
- Newsletters.

The Manager: Environment & Community (or delegate) reports on a regular basis to the Senior Management Team detailing:

- Non-compliances with legal and / or other requirements;
- Complaints;
- Environmental incidents;
- Pending/upcoming approvals; and
- Other significant environmental issues.

#### 4.3.2 External Reporting

A number of approvals and licences held by WCPL require external reporting. In addition, Wambo maintains active communication with the local and surrounding communities through newsletters and the CCC. Wambo provides monthly monitoring data, a summary of community complaints and key reports on the WCPL website.

A summary of external reporting is shown in Table 4.



Table 4: Summary of External Reporting				
Report / Format	Requirement	Distribution		
Annual Reviews (formerly Annual Environmental Management Reports)	DA305-7-2003 (as modified), DA 177-8-2004 (as modified) and Mining Leases	DPIE,), DPIE – Resources Regulator (RR). Environment Protection Authority (EPA), CCC and copies to other regulators as requested		
National Pollutant Inventory (NPI)	National Environment Protection Measure	NSW Office of Environment and Heritage (OEH)		
National Greenhouse and Energy Reporting (NGERS)	National Greenhouse and Energy Report Act 2007	Commonwealth Department of Energy and Environment (DoEE)		
Hunter River Salinity Trading Scheme Return	Environment Protection Licence (EPL) 529	EPA		
EPL Annual Return and Statement of Compliance	EPL 529	EPA		
Summary reports/ Specific briefings / Presentations / Newsletters	DA305-7-2003 (as modified) and DA 177-8-2004 (as modified)	CCC and the wider community		
Monitoring Data and Reports	DA305-7-2003 (as modified) and DA 177-8-2004 (as modified)	Publicly accessible at https://www.peabodyenergy.com/Operations/Au stralia-Mining/New-South-Wales-Mining/Wambo- Approvals,-Plans-Reports		
EPBC Compliance Report	DA305-7-2003 (as modified)	DPIE and DoEE		
Subsidence Management Status Reports and Six Monthly Reports required by Extraction Plans	Each Longwall panel	RR and DPIE		

#### 4.3.3 Incident Notification

An 'incident' is a set of circumstances that causes or threatens to cause material harm to the environment; and/or breaches or exceeds the limits or performance measures/criteria in DA305-7-2003, DA177-8-2004 and/or EPL 529.

All reportable incidents will be reported via the EPA's Environmental Line on 131 555 by the E&C Manager or their delegate in accordance with WCPL's Pollution Incident Response Management Plan (PIRMP).

In accordance with the PIRMP, WCPL must notify all relevant authorities (including EPA, DPIE and other relevant authorities) of incidents causing or threatening material harm to the environment *immediately* after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the POEO Act.

The notification must be in writing to compliance@planning.nsw.gov.au and identify the development (i.e. Wambo Coal Mine, DA305-7-2003) and set out the location and nature of the incident.

Within 7 days of the date of the incident, WCPL will provide the Secretary and any relevant agencies with a detailed report on the incident to include:

- The cause, time and duration of the event;
- Where possible the type, volume and concentration of every pollutant discharged as • a result of the event;



- The name, address and business hours telephone number of employees or agents of the licensee who witnessed the event;
- The name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- Action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- Implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary;
- Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- Any other relevant matters.

#### 4.3.4 Non-Compliance Notification

Condition D9 of DA305-7-2003 requires WCPL to notify DPIE of any non-compliance within 7 days of becoming aware of the non-compliance. The notification must be in writing to <u>compliance@planning.nsw.gov.au</u> and identify the development (i.e. Wambo Coal Mine, DA305-7-2003), set out the condition of the consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

A non-compliance which has been notified as an incident (refer **Section 4.3.3**) does not need to also be notified as a non-compliance.

#### 4.3.5 Complaints

A 24 hour Complaint Hotline has been established for community complaints. Community complaints received by WCPL are recorded within the Community Complaints Register. The E&C Manager, or delegate will investigate the complaint. Follow up may include contacting the complainant within 24 hours to discuss the complaint.

A review of the effectiveness of the corrective or preventative actions will be conducted within a month of the complaint and the relevant work procedures updated if required.

Preliminary investigations will commence as soon as practicable upon receipt of a complaint to establish if WCPL is responsible. All efforts will be made to determine the likely causes contributing to the complainant's concerns using information such as the climatic conditions at the time of complaint, the nature of activities taking place and recent monitoring results.

A record of the complaint will be kept which will include the following:

- The date and time of the complaint;
- The method by which the complaint was made;
- Any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- The nature of the complaint;
- The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- If no action was taken by the licensee, the reasons why no action was taken.



WCPL will retain a copy of the Community Complaints Register for at least four years. The E&C Manager will ensure the Community Complaints Register is posted on the WCPL website.

#### 4.3.6 Dispute Resolution

WCPL will endeavour to resolve any issue raised with the community through open discussion in accordance with the complaints procedure as described in **Section 4.3.4**.

Where community issues cannot be resolved internally, then WCPL may refer the matter to the Planning Secretary for resolution.

#### 4.3.7 Website Updates

A comprehensive summary of monitoring results will be made publicly available at WCPL website:

https://www.peabodyenergy.com/Operations/Australia-Mining/New-South-Wales-Mining/Wambo-Approvals,-Plans-Reports

As required by Schedule 2, Condition D15 of DA305-7-2003, information on the website will be updated regularly. Information made available on the website will include:

- the documents listed in condition A2(c) of DA305-7-2003;
- all current statutory approvals for the development;
- all approved strategies, plans and programs required under the conditions of this consent;
- detailed plans for the Phases of the development;
- minutes of CCC meetings;
- regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;
- a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- a summary of the current phase and progress of the development;
- contact details to enquire about the development or to make a complaint;
- a complaints register, updated monthly;
- the Annual Reviews of the development;
- audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; and
- any other matter required by the Planning Secretary.



#### 4.4 Documentation and Document Control

WCPL will ensure that EMS documentation is maintained, up to date and readily available to all authorised personnel. The following procedures ensure document control:

- Copies of the EMS documents are kept on-site with WCPL electronic Controlled Documents, once printed the document is considered "uncontrolled";
- The document will be reviewed, and if necessary revised, to ensure that it remains accurate and in accordance with all relevant standards;
- WCPL personnel will be notified of revisions to the EMS; and
- The EMS will be clearly dated.

A copy of the current EMS is maintained on the WCPL website, located at: <u>https://www.peabodyenergy.com/Operations/Australia-Mining/New-South-Wales-Mining/Wambo-Approvals,-Plans-Reports</u>

#### 4.5 Emergency Preparedness and Response

A pollution incident, as defined by the POEO Act, means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

Environmental emergency and incident response has been incorporated into specific environmental management documents (**Appendix A**) and the WCPL Pollution Incident Response Management Plan (PIRMP). Specifically, the PIRMP provides information regarding procedures for:

- The identification of a pollution incident;
- Notification of pollution incidents in certain circumstances;
- Responses to pollution incidents by WCPL including all of its employees and contractors;
- Training in the content of the PIRMP is conducted in accordance with the Wambo Coal Training and Competence Management Plan. Training records are kept in accordance with WCPL's training record management system; and
- Any changes to emergency procedures are documented and communicated to relevant personnel.

All personnel and contractors receive emergency preparedness and response training during the site induction. WCPL maintain dedicated emergency response teams.



# 5.0 Monitoring Review and Corrective Action

#### 5.1 Environmental Monitoring

Environmental monitoring is undertaken to monitor the performance of the operation against licence and consent requirements. Figures showing the locations of this monitoring are provided in **Appendix E.** 

Records of environmental monitoring are maintained on the WCPL website, are regularly presented to the CCC and are reported in various internal and external reporting avenues as outlined in **Table 4**.

Regular monitoring is integral to the successful implementation of the EMS. The measurement and evaluation of monitoring results against relevant performance criteria and standards enables non-compliances to be identified and brings to attention areas that may require further attention.

The procedures for environmental monitoring are outlined in specific environmental management documents (**Appendix A**).

Suitably qualified and skilled personnel undertake Wambo's environmental monitoring using industry accepted techniques with equipment calibrated to relevant AS. Analysis of samples is undertaken at National Association of Testing Authorities (NATA) certified laboratories.

#### 5.2 Audits and Inspections

Audits and inspections are conducted as outlined below in Table 5.

Detail	Audit / Inspection	Frequency	Responsibility	Report to
Internal	Site Inspections	As required	Environmental Advisor	Manager: Environment & Community and Senior Management Team
	Peabody Compliance Audit	Annually (other than every third year)	Manager: Environment & Community (or delegate)	Senior Management Team
External	Independent Environmental Audit	Every Three Years	Manager: Environment & Community (or delegate)	WCPL General Manager, DPIE
	Regulator Inspections	Annually or as notified	Manager: Environment & Community (or delegate)	WCPL General Manager
	EPBC Act Approval 2003-1138 - Independent Compliance Audit	Every five years	Manager: Environment & Community (or delegate)	WCPL General Manager, DPIE, DoEE

#### Table 5: Audit and Inspection Schedule

#### 5.2.1 Site Inspections

Regular environmental site inspections are undertaken and include general housekeeping, biodiversity, subsidence and rehabilitation. Operational personnel are active participants in these inspections to increase awareness and ownership of environmental issues. The inspections assist in maintaining on-site compliance and are used in conjunction with environmental monitoring and incident/complaint reporting procedures.



Any non-compliance is recorded and the cause investigated. Corrective and/or preventative actions are recommended and the effectiveness of the action is assessed at the next site inspection.

#### 5.2.2 Internal Audits

Environmental management on site is routinely audited, with management plans and procedures periodically reviewed. Peabody conducts targeted environmental audits in years other than when the Independent Environmental Audit is conducted (see **Section 5.2.3**).

#### 5.2.3 External Audits

As required by Schedule 2, Condition D11 of DA305-7-2003 and DA177-8-2004, an independent environmental audit is conducted every three years. The endorsement of the independent auditor and scope of the audit will be sought, from the Secretary of DPIE, prior to the audit's commencement.

The results of external audits, and WCPL's response to any audit recommendations, are provided to DPIE and published on the WCPL website.

#### 5.2.4 Regulator Inspections

Annual inspections are generally undertaken by the RR, following submission of the Annual Review. The focus of the inspection is generally guided by the site's performance against the performance measures reported in the Annual Review, including rehabilitation. The RR may be accompanied by representatives from DPIE.

Other regulator inspections may be conducted from time to time, or following specific issues identified at the operation.

#### 5.3 Corrective and Preventative Action

Corrective and preventative actions resulting from monitoring or inspections and audits will be implemented through the development of an action plan, administered through the onsite database system. The plan will provide details on the action required, time frame and responsibilities for completing the action.

The implementation of the corrective and preventative actions will be reviewed internally and specific procedures developed for addressing non-compliances with the EMS or supporting documents.

#### 5.4 Records

All records are to be legible, readily retrievable, and protected against damage and will be retained on site for a minimum of four years.

In accordance with the EPA's *Requirements for publishing pollution monitoring data* (EPA, 2013), monitoring data will remain on the WCPL website for a period of four years.

#### 5.5 Adaptive Management

WCPL will assess and manage project-related risks to prevent exceedances of the criteria and relevant performance measures.

If an exceedance or breach of the criteria or performance measures occurs, WCPL will:



If an exceedance or breach of the criteria or performance measures occurs, WCPL will:

- Take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;
- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the DPIE describing those options and any preferred remediation measures or other course of action; and
- Implement remediation measures as directed by the Secretary of DPIE.

In accordance with the requirements of DA 305-7-2003 (Condition D4), specific management plans and environmental documentation (**Appendix A**) contain adaptive management procedures.



## 6.0 Review and Improvement

In accordance with DA305-7-2003 (Condition D6), the EMS will be reviewed, and if necessary revised, within 3 months of:

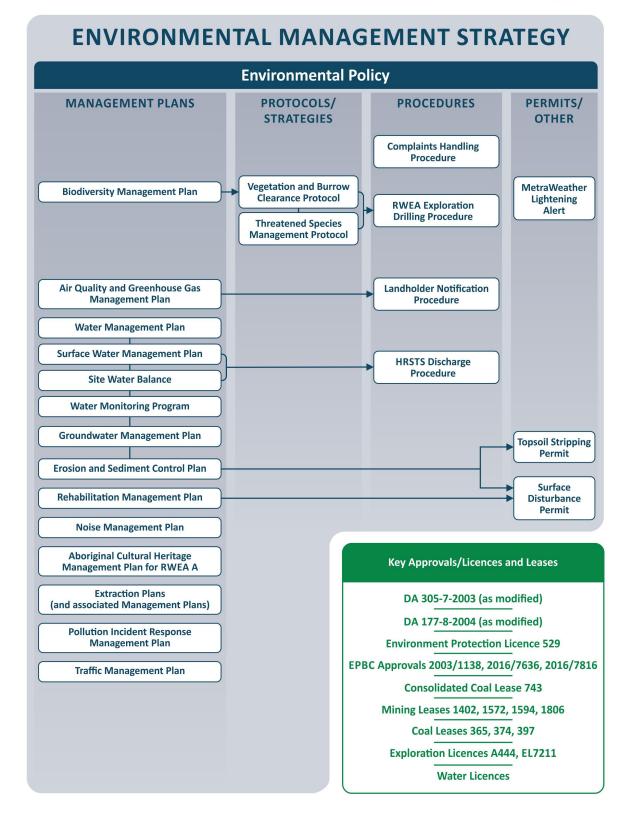
- The submission of an Annual Review;
- The submission of an Independent Environmental Audit;
- The submission of an incident report; or
- The approval of any modification to the conditions of consent.

Where revisions are required, the revised document will be submitted to the Planning Secretary for approval within six weeks of the review.



**APPENDIX A: EMS Document Map** 







**APPENDIX B: Evidence of Consultation** 



Nicole Dobbins Senior Environmental Advisor Peabody Australia PMB 1 Singleton, NSW, 2330

16/11/2020

Dear Ms Dobbins

#### Wambo Underground Mine (DA 305-7-2003) Wambo Mine Environmental Management Strategy

I refer to the Wambo Mine Environmental Management Strategy (the plan), submitted in accordance with condition D1 of Schedule 2 of the project approval for the Wambo Underground Mine (DA 305-7-2003).

The Department has carefully reviewed the plan and is satisfied that it adequately addresses the requirements of the relevant conditions of the project approval.

Accordingly, the Planning Secretary approves the plan (Revision 7, dated November 2020). Please ensure that the approved plan is placed on the project website at your earliest convenience.

If you wish to discuss the matter further, please contact Sarah Clibborn on 88376095 or via email at <u>sarah.clibborn@planning.nsw.gov.au</u>.

Yours sincerely

Matthew Sprott Director Resource Assessments (Coal & Quarries)

as nominee of the Planning Secretary



DPIE Comments on Mine Environmental Management Strategy –5 November 2020				
DPIE Comment	WCPL Response			
In the final paragraph of section 1.1, it is stated that Phase 2 of operations is due to commence on 1 November 2020. Please amend to 1 December 2020.	The date for the commencement of Phase 2 has been amended to 1 December 2020			
In section 4.3.5, the second sentence of the first paragraph is worded awkwardly "which will include, and where possible, contacting the complainant". Please amend.	Amended			
In section 4.3.7, regarding website updates, it is stated that "WCPL will also ensure that any information relevant to air quality and greenhouse gas management is uploaded to the website". Is this in response to a specific request? Or is it a copy and paste from the AQGGMP?	Section 4.3.7 re worded.			
There are two instances throughout the EMS where the term "non-conformance" is used instead of "non-compliance". Please amend to be consistent with the remainder of the EMS.	Non-conformance changed to non-compliance			
The table in Appendix D states that information regarding complaints management can be found in section 4.3.4. This reference should be section 4.3.5. Please amend.	Amended			
The table in Appendix D, in regard to condition D1(d), states that information regarding non- compliances and incidents can be found in section 4.3.3. This is correct for incidents, but not non-compliances. Please add a reference to section 4.3.4.	Reference to Section 4.3.4 added			
Section 5.2.3 states that external compliance audits are conducted in accordance with "the relevant conditions of DA305-7-2003 and DA177-8-2004". Please include the full reference for these conditions.	Reference to Schedule 2, Condition D11 of DA305-7-2003 and DA177-8-2004 has been added to Section 5.2.3			
The wording of the conditions listed in the table in Appendix D is not consistent with the latest versions of DA305-7-2003 and DA177-8-2004. Please amend.	Minor amendments to Appendix D			
Condition D15 is not satisfied. The list of information in section 4.3.7 that will be/has been made available on the website is not consistent with the requirements of this condition. Please amend.	Section 4.3.7 has been revised to list all information and documents required by Condition D15. Documents listed in D15 (i) to (xiii) are available on the WCPL website.			





 Planning Services

 Resource Assessments

 Contact:
 Philip Nevill

 Phone:
 (02) 82751036

 Email:
 Philip.nevill@planning.nsw.gov.au

Mr Peter Jaeger Environment and Community Manager Wambo Coal Pty Ltd PMB 1 Singleton NSW 2330

Dear Mr Jaeger

#### Wambo Coal Mine (DA 305-7-2003 & DA 177-8-2004) Erosion and Sediment Control Plan and Environmental Management Strategy

The Department has reviewed the revised Environmental Management Strategy and Erosion and Sediment Control Plan for the Wambo Mining Complex which have been prepared in accordance with the Wambo Mine Development Consent (DA 305-07-2003) and Wambo Rail Development Consent (DA 177-8-2004).

The Department is satisfied that the Environmental Management Strategy (Revision 5) meets the requirements of condition 1 of Schedule 6 of DA 305-7-2003 and condition 2 of Schedule 6 of DA 177-8-2004. Consequently, the Secretary approves this strategy.

The Department considers that the Erosion and Sediment Control Plan (Revision 9) dated March 2018 does not adequately address the requirements of condition 32 of Schedule 4 of DA 305-7-2003 and condition 17(a) of Schedule 4 of DA 177-8-2004. The Department's comments are enclosed in **Attachment A**.

The Department requests that the Erosion and Sediment Control Plan is re-submitted once the comments have been addressed, by no later than **27 April 2018**.

If you wish to discuss this matter further, please contact Philip Nevill at the details listed above.

Yours sincerely

How on Cheed

Howard Reed 26 · 3 · 18 Director Resource Assessments as the Secretary's nominee

Department of Planning and Environment 320 Pitt Street Sydney NSW 2000 | GPO Box 39 Sydney NSW 2001 | T 1300 305 695 | www.planning.nsw.gov.au



#### Dobbins, Nicole

#### Subject:

FW: Wambo Coal - Environmental Management Strategy Update

From : Philip Nevill [mailto:Philip.Nevill@planning.nsw.gov.au] Sent: Thursday, 15 February 2018 11:21 AM To: Jaeger, Peter F Cc: Megan Dawson; Melanie Hollis Subject: RE: Wambo Coal - Environmental Management Strategy Update

Hi Peter,

Apologies for the delay in providing a response to the earlier email (below).

The Department has reviewed the EMS (Revision 4) and provides its comments below:

<ul> <li>Wambo Coal Mine (DA 305-7-2003) - Environmental</li> <li>Management Strategy Condition 1, Schedule 6:</li> <li>a. identify the statutory requirements that apply to the development</li> </ul>	The condition is partially satisfied in Section 3.1 of the EMS. Please review the referenced legislation and amend accordingly. Legislation to be included: NSW Work Health Safety Act 2011 Work Health and Safety Regulation 2011 Explosives Act 2003 Explosives Regulation 2013
General comment	The information in Table 1 requires updating e.g. the life of mine. Dates to differentiate the cessation of the open cut and underground operations should also be updated. Please check that all the information in Table 1 is up to date.

Please review the EMS and make any changes as required.

The MOD 17 Management Plans are due in March 2018. Please confirm if the updated EMS will be resubmitted before March or at the same time as the other plans.

1

If you would like to discuss the matter further, please contact me on the details below.

**Kind Regards** 

#### Philip Nevill

Environmental Assessment Officer Resource Assessments | Planning Services 320 Pitt Street | GPO Box 39 | Sydney NSW 2001 T 02 82751036 E philip.nevill@planning.nsw.gov.au







# **APPENDIX C: Peabody – Mission, Values and Strategy Statement**



#### **Peabody Environmental Policy**

We are the world's leading pure-play coal company, producing thermal and metallurgical coal. Throughout the life cycle of our operations we take responsibility for the environment, benefit our communities and restore the land for generations that follow.

Globally, Peabody supports the current technology to deploy high-efficiency, low-emissions (HELE) power stations and investment in next-generation carbon capture and storage (CCS) technologies over time to transition to the ultimate goal of near-zero emissions from coal-fueled power.

The following governing principles apply to our employees, contractors, visitors and vendors at our sites and support Peabody's alignment with Sustainable Development practices:

- Management has the overall accountability for environmental management and for regular review of environmental performance;
- Progressively rehabilitate/reclaim, monitor and maintain areas disturbed by mining to ensure the post-mine land use, landform and environmental outcomes are achieved;
- Identify, monitor and manage risks and opportunities during all mining life cycle phases and continuously improve environmental stewardship;
- Appropriate environmental objectives are developed, and applicable performance indicators are publicly reported;
- Any employee has the authority to stop and challenge activities that could result in unauthorized environmental impact;
- Comply with applicable environmental standards, rules and procedures, relevant jurisdictional laws and regulations;
- Engage with interested and affected stakeholders;
- Efficient use and responsible procurement of resources is undertaken;
- Conservation of energy and reduction in greenhouse gas intensity at our operations through energy efficiency and other leading practices.



**APPENDIX D: EMS Development Approval Conditions** 



Approval	Reference	Condition	Section
DA 305-7- 2003	Condition D1 <sup>1</sup>	<b>Environmental Management Strategy</b> The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	
		a) provide the strategic framework for environmental management of the development;	1.2
		b) identify the statutory requirements that apply to the development;	3.1 and this table
		c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	4.1
		<ul> <li>d) set out the procedures to be implemented to:         <ul> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> </ul> </li> </ul>	4.3
		receive, record, handle and respond to complaints;	4.3.5
		<ul> <li>resolve any disputes that may arise during the course of the development;</li> </ul>	4.3.6
		<ul> <li>respond to any non-compliance and any incident;</li> </ul>	4.3.3 and 4.3.4
		respond to emergencies; and	4.5
		<ul> <li>e) include:</li> <li>references to any strategies, plans and programs approved under the conditions of this consent; and</li> </ul>	Appendix A
		• a clear plan depicting all the monitoring to be carried out under the conditions of this consent.	Appendix E
	Condition D2	The Applicant must not commence Phase 2 until the Environmental Management Strategy is approved by the Planning Secretary.	Noted
	Condition D3 <sup>2</sup>	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	Noted
	Condition D4 <sup>3</sup>	Adaptive Management The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Any exceedance of these criteria or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.	5.5
		<ul><li>Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity:</li><li>(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;</li><li>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the</li></ul>	



Approval	Reference	Condition	Section
		Department describing those options and any preferred remediation measures or other course of action; and (c) implement reasonable remediation measures as directed by the Planning Secretary.	
	Condition D5	<ul> <li>(c) Implement Plans requirements</li> <li>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant: <ul> <li>a) summary of relevant background or baseline data;</li> <li>b) details of: <ul> <li>the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>any relevant limits or performance measures and criteria; and</li> <li>the specific indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>c) any relevant commitments or recommendations identified in the documents listed in condition A2(c);</li> <li>d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>e) impacts and environmental performance of the development;</li> <li>e) effectiveness of the management measures set out pursuant to paragraph (d);</li> <li>f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>g) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>h) a protocol for managing and reporting any:</li> <li>incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;</li> <li>complaint; or</li> <li>failure to comply with other statutory requirements; and</li> </ul> </li> <li>i) a protocol for periodic review of the plan.</li> </ul> <li>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</li>	Refer to specific Management Plans as outlined in Appendix A
	Condition D6 <sup>4</sup>	Revision of Strategies, Plans and Programs Within three months of:	6.0
		<ul> <li>a) the submission of an incident report under condition D8;</li> <li>b) the submission of an Annual Review under condition D10;</li> <li>c) the submission of an Independent Environmental Audit under condition D11; or</li> </ul>	



Reference	Condition	Section
	d) the approval of any modification (excluding Modification 16) of the conditions of this consent, the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	
Condition D7 <sup>5</sup>	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	6.0
	Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	
Condition D8 <sup>6</sup>	<b>Incident Notification</b> The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing to <u>compliance@planning.nsw.gov.au</u> and identify the development (including the development application number and name) and set out the location and nature of the incident.	4.3.3
Condition D9 <sup>7</sup>	<b>Non-Compliance Notification</b> Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing to <u>compliance@planning.nsw.gov.au</u> and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	4.3.4
	Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	
Condition D10 <sup>8</sup>	<ul> <li>Annual Review</li> <li>By the end of March each year or other timeframe agreed by the Planning Secretary, a report must be submitted to the Department reviewing the environmental performance of the development, to the satisfaction of the Planning Secretary. This review must: <ul> <li>a) describe the development (including any rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</li> <li>b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, including a comparison of these results against the: <ul> <li>relevant statutory requirements, limits or performance measures/criteria;</li> <li>requirements of any plan or program required under this consent;</li> </ul> </li> </ul></li></ul>	4.3.2
	Condition D7 <sup>5</sup> Condition D8 <sup>6</sup> Condition D9 <sup>7</sup>	d)       the approval of any modification (excluding Modification 16) of the conditions of this consent, the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.         Condition D75       If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.         Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.         Condition D8 <sup>6</sup> Incident Notification         D8 <sup>6</sup> Incident Notification         D8 <sup>6</sup> Non-Compliance Notification         D97       Non-compliance, the outification must be in writing to compliance(Replanning, nsw.gov.au and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance.         Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compli



Approval	Reference	Condition	Section
		<ul> <li>relevant predictions in the documents listed in condition A2(c);</li> <li>identify any non-compliance or incident which occurred in the previous calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;</li> <li>evaluate and report on:         <ul> <li>the effectiveness of the noise and air quality management systems; and</li> <li>compliance with the performance measures, criteria and operating conditions in this consent;</li> </ul> </li> <li>identify any trends in the monitoring data over the life of the development;</li> <li>identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</li> <li>g) describe what measures will be implemented over the next calendar year to improve the environmental performance of the development.</li> </ul>	
	Condition D11 <sup>9</sup>	<ul> <li>Independent Environmental Audit</li> <li>By the end of October 2020, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: <ul> <li>a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;</li> <li>b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary;</li> <li>c) be carried out in consultation with the relevant agencies and the CCC;</li> <li>d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals);</li> <li>e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent; and</li> <li>g) be conducted and reported to the satisfaction of the Planning Secretary</li> </ul> </li> </ul>	5.2.3
	Condition D12 <sup>9</sup>	Within three months of commencing an Independent Environmental Audit, or other timeframe agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be	5.2.3



Approval	Reference	Condition	Section
		implemented to the satisfaction of the Planning Secretary.	
	Condition	Monitoring and Environmental Audits	Noted
	D13 <sup>10</sup>	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether	
		directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an	
		environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of	
		incident notification, reporting and response, non-compliance notification, compliance report and independent	
		audit. For the purposes of this condition, as set out in the EP&A Act, "monitoring" means monitoring of the development to provide data on compliance with the consent or on the environmental impact of the	
		development, and an "environmental audit" means a periodic or particular documented evaluation of the	
		development to provide information on compliance with the consent or the environmental management or	
		impact of the development.	
	Condition	Access to Information	4.3.7
	D15 <sup>11</sup>	Within three months of the determination of Modification 16, until the completion of all rehabilitation required	
		under this consent, the Applicant must:	
		a) make the following information and documents (as they are obtained, approved or as otherwise	
		stipulated within the conditions of this consent) publicly available on its website:	
		i. the documents listed in condition A2(c);	
		ii. all current statutory approvals for the development;	
		iii. all approved strategies, plans and programs required under the conditions of this consent;	
		<ul><li>iv. detailed plans for the Phases of the development;</li><li>v. minutes of CCC meetings;</li></ul>	
		vi. regular reporting on the environmental performance of the development in accordance with the	
		reporting requirements in any plans or programs approved under the conditions of this consent;	
		vii. a comprehensive summary of the monitoring results of the development, reported in accordance	
		with the specifications in any conditions of this consent, or any approved plans and programs;	
		viii. a summary of the current phase and progress of the development;	
		ix. contact details to enquire about the development or to make a complaint;	
		x. a complaints register, updated monthly;	
		xi. the Annual Reviews of the development;	
		xii. audit reports prepared as part of any Independent Environmental Audit of the development and	
		the Applicant's response to the recommendations in any audit report; and	
		xiii. any other matter required by the Planning Secretary; and	
		xiv. keep such information up to date, to the satisfaction of the Planning Secretary.	

## Notes:

1. Also Condition D3 of DA177-8-2004

## **Peabody**

Section

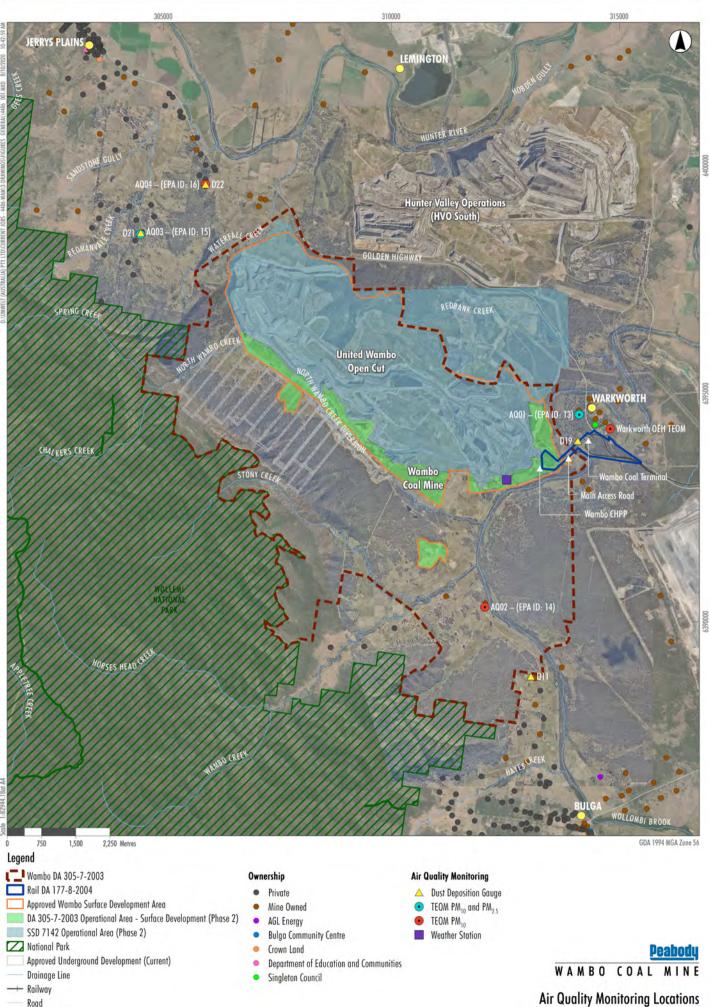
## Approval Reference Condition

- 2. Also Condition D4 of DA177-8-2004
- 3. Also Condition D5 of DA177-8-2004
- 4. Also Condition D6 of DA177-8-2004
- 5. Also Condition D7 of DA177-8-2004
- 6. Also Condition D8 of DA177-8-2004
- 7. Also Condition D9 of DA177-8-2004
- 8. Also Condition D10 of DA177-8-2004
- 9. Also Conditions D11 and D12 of DA177-8-2004
- 10. Also Condition D13 of DA177-8-2004
- 11. Also Condition D15 of DA177-8-2004

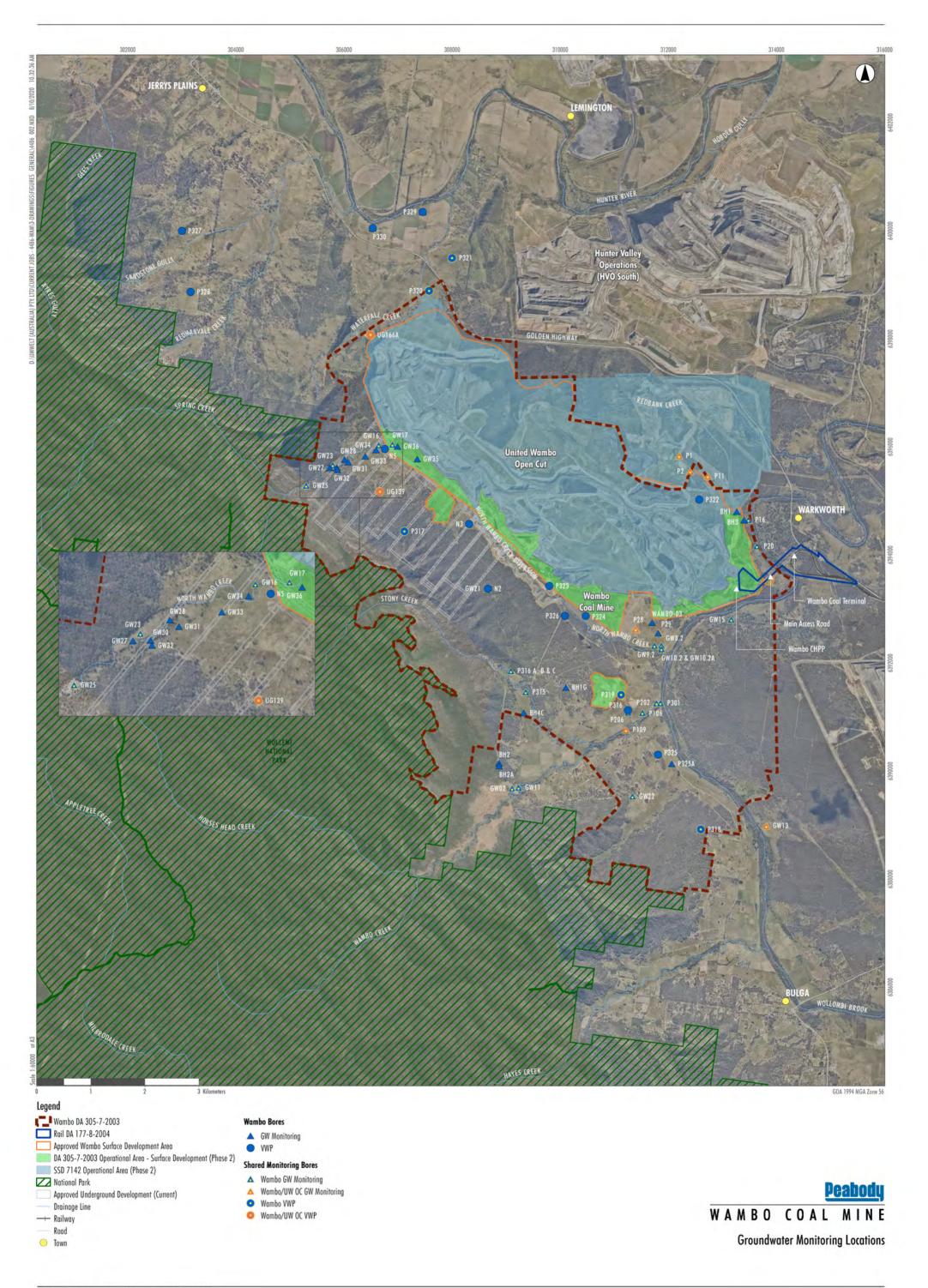


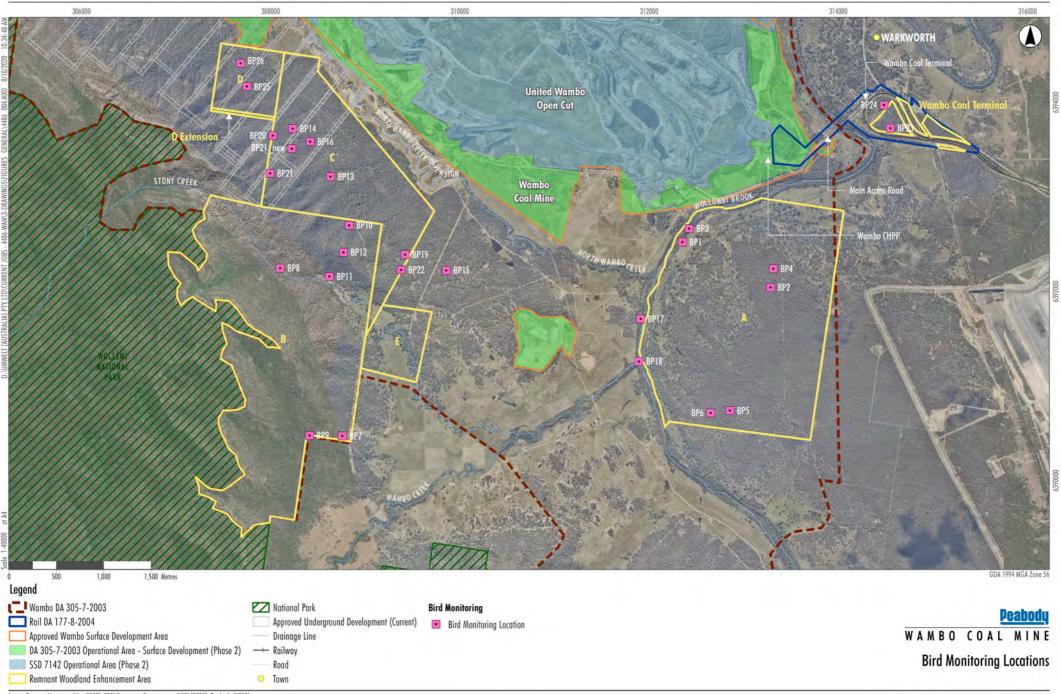
**APPENDIX E: Monitoring Location Plans** 

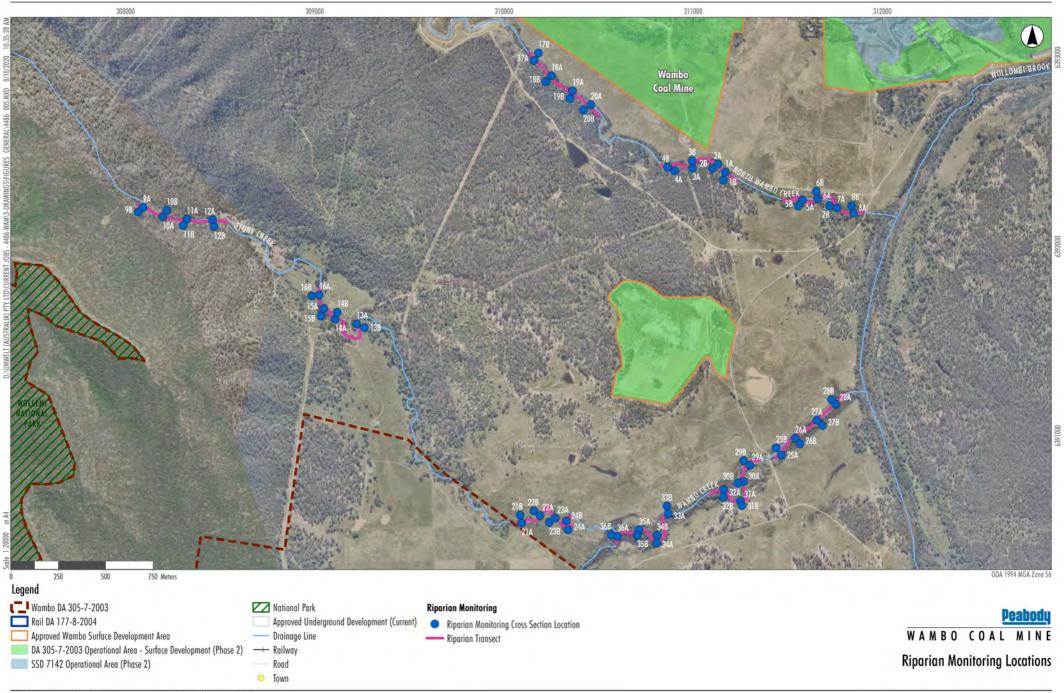


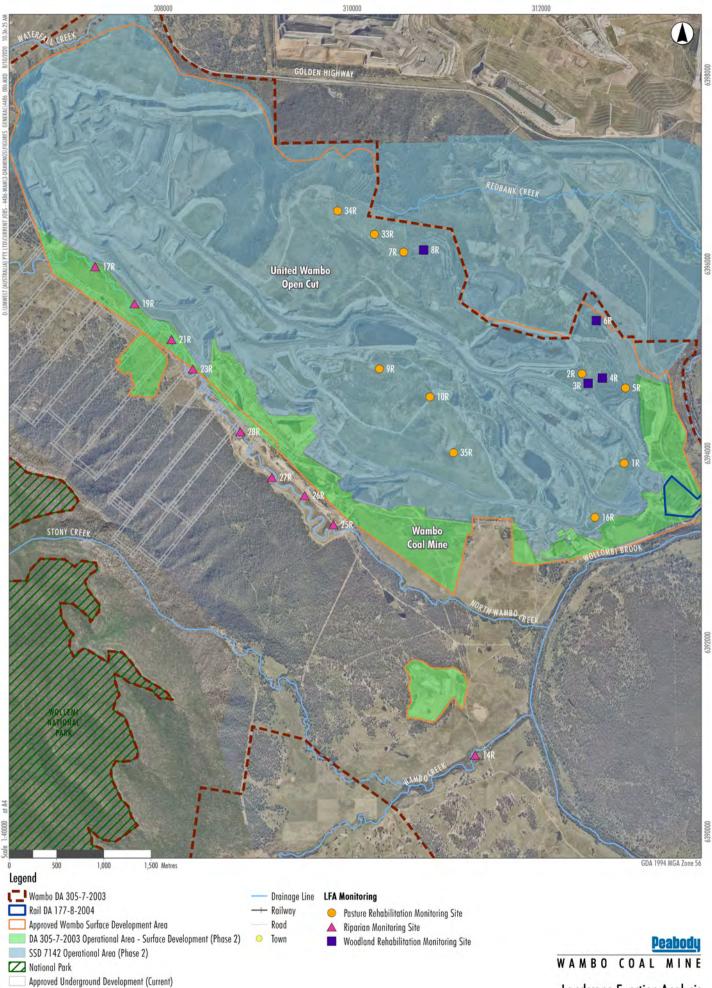


Road Town

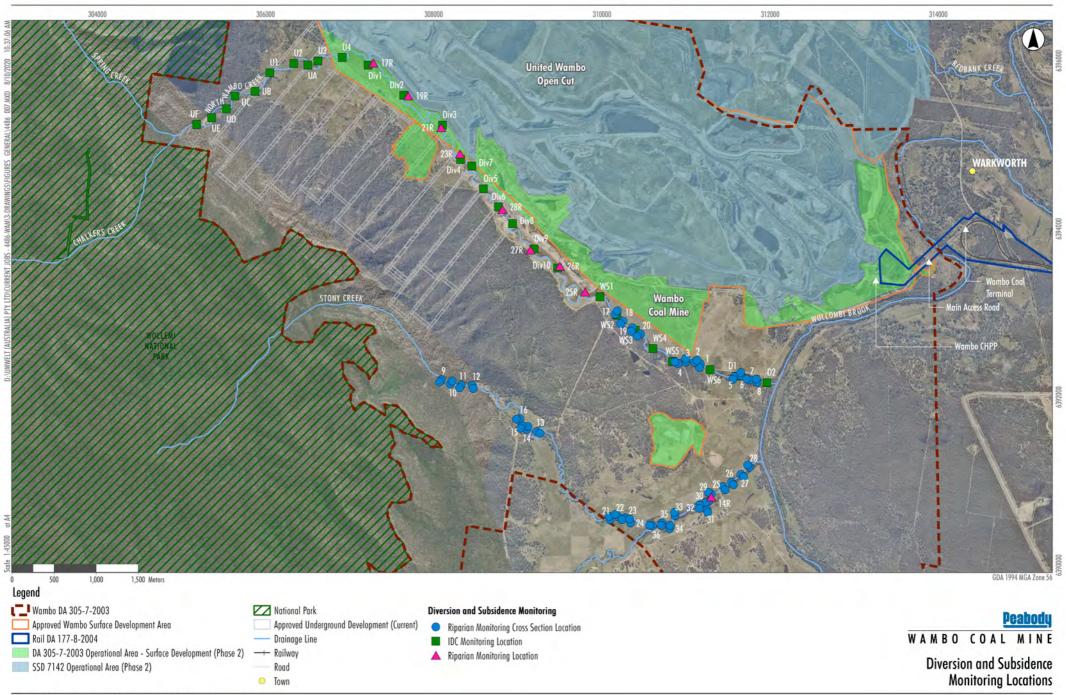


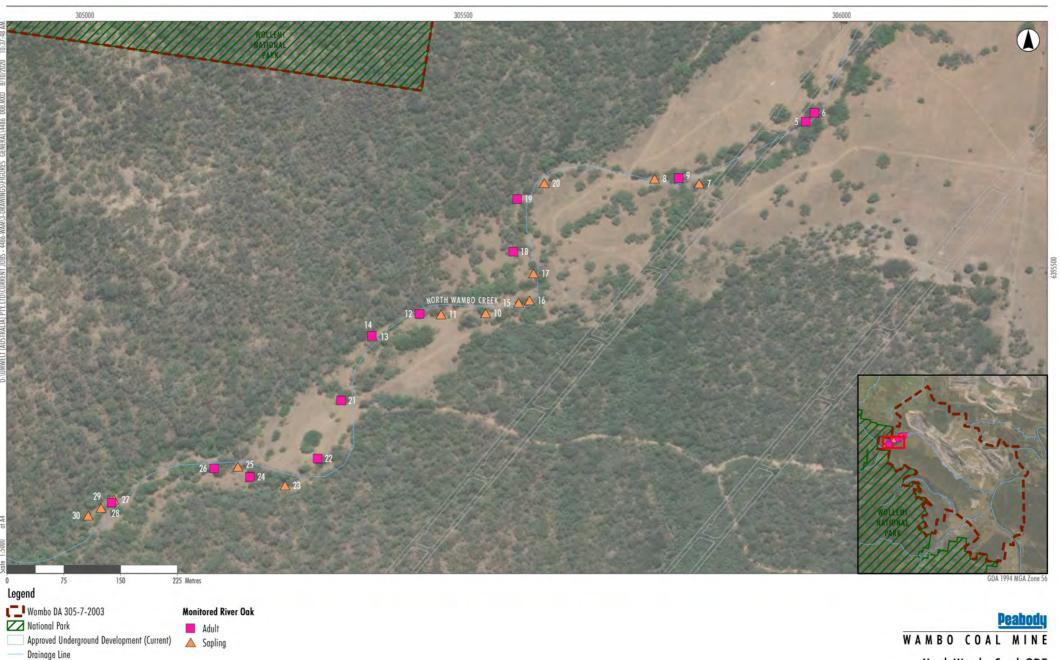




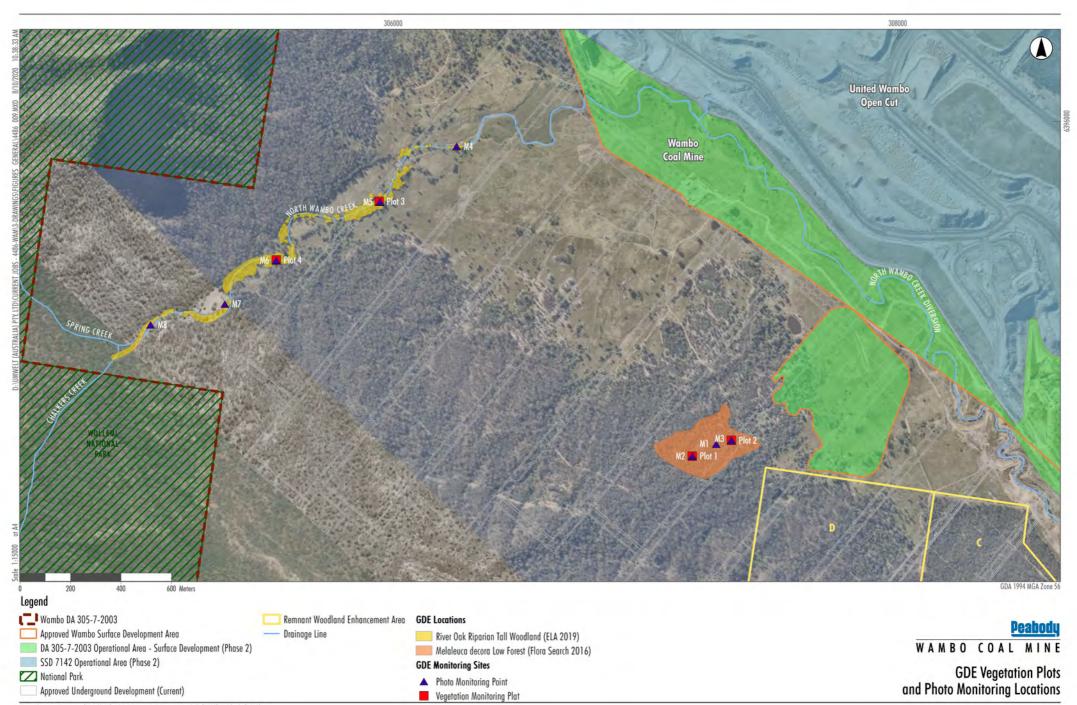


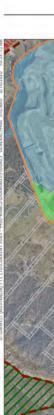
Landscape Function Analysis Monitoring Locations

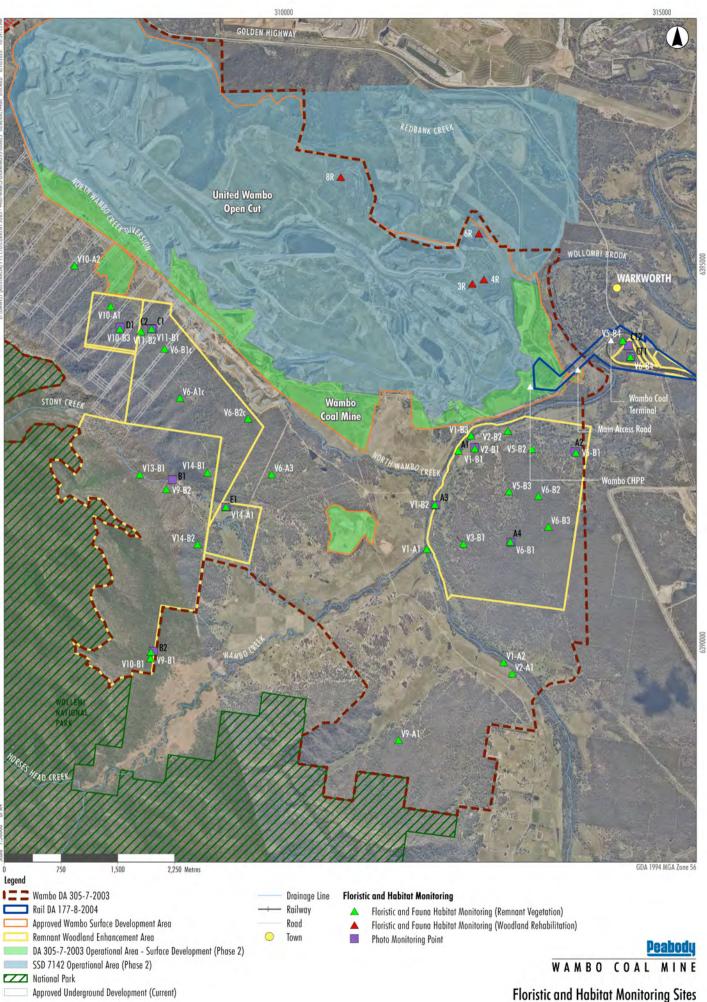


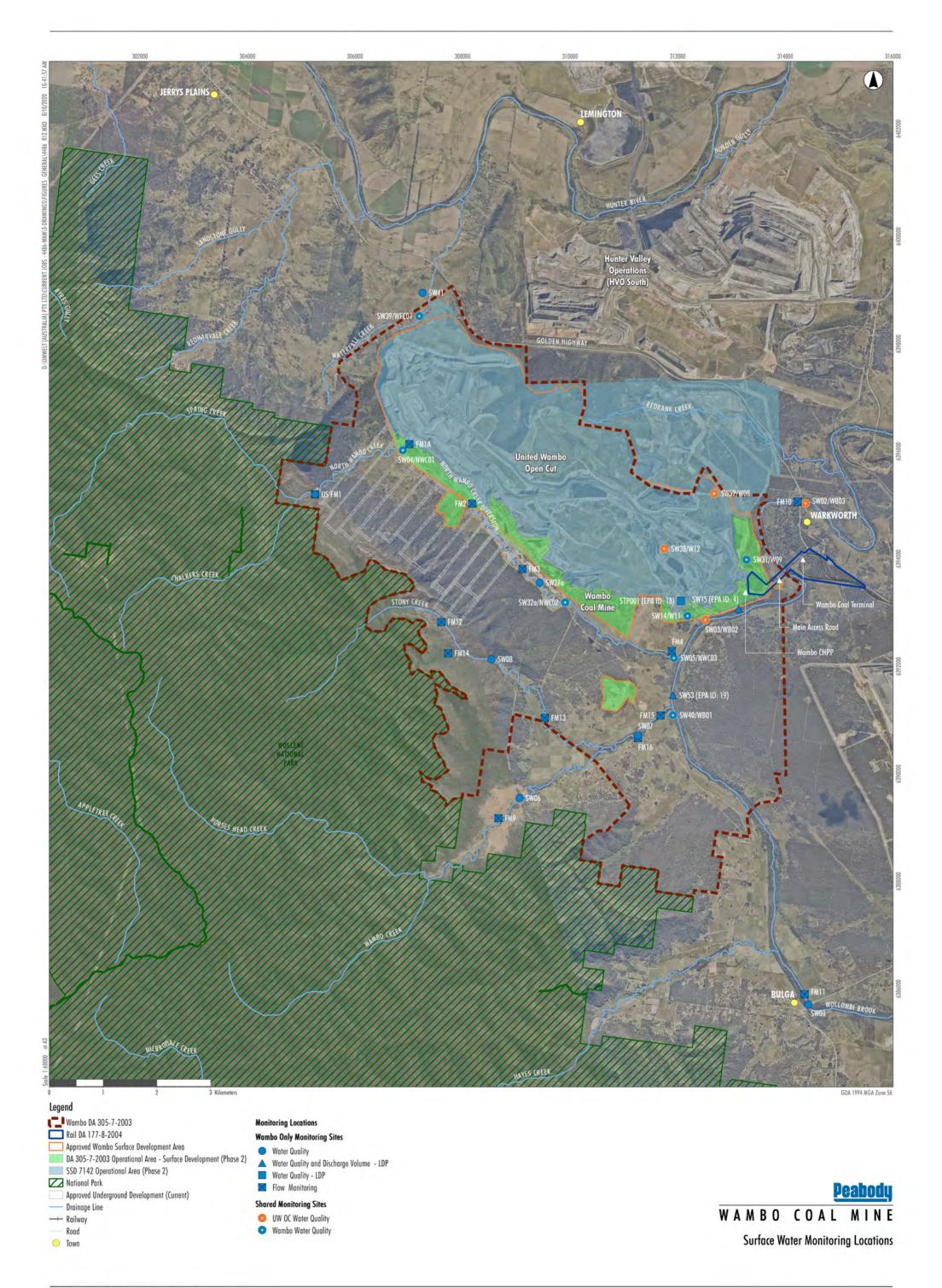


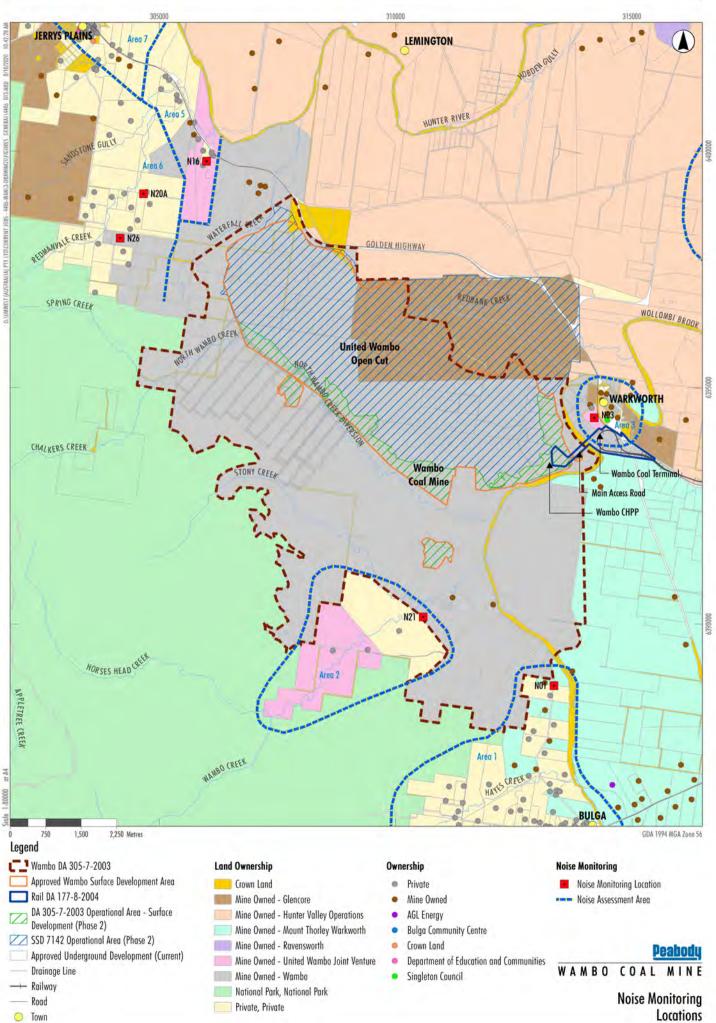
North Wambo Creek GDE River Oak Monitoring Locations











Data source: DFSI (2020), Peabody (2020)