

NSW Planning ref: SSD-10418-PA-47

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27/06/2025

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Sent via the Major Projects Portal only

Subject: Mount Pleasant Optimisation Project - Independent Environmental Audit 2024

Dear Mr Lauritzen

I refer to the Independent Environmental Audit (IEA) report and Response to Audit Recommendations (RAR) for the period 9 March 2023 to 14 November 2024, submitted as required by Condition D 3 of development consent SSD-10418 as modified (the consent) to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 12 February 2025.

NSW Planning considers the IEA report to generally satisfy the reporting requirements of the consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Please make publicly available a copy of the IEA Report on the company/project website.

Please note that NSW Planning's acceptance of this IEA report is not an endorsement of the compliance status of the project.

Non-compliances identified in the IEA will be assessed in accordance with the NSW Planning Compliance Policy. Further correspondence may be sent in relation to the identified non-compliances.

Please include a status update for all actions provided in the RAR in the next Annual Review, until all actions are completed.

Should you wish to discuss the matter further, please contact me on 02 65753401 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters  
Team Leader  
Compliance

As nominee of the Planning Secretary

# INDEPENDENT ENVIRONMENTAL AUDIT 2024


## Mount Pleasant Operations



Mount Pleasant Operations  
11 February 2025

MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024

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## LIMITATIONS OF REPORT

In preparing this IEA report, RPS has assessed all activities appropriate and necessary to evaluate the environmental status of the site and operations undertaken within the audit period. RPS has addressed all technical matters which might reasonably be considered to be relevant to such an assessment conducted to standards which apply in NSW. Based on observations of the site, interviews with appropriate staff and a review of available documentation, it is RPS's opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, RPS can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues. The conclusions presented in this report are professional opinions based solely upon RPS's visual observations of the site and the immediate site vicinity, and review of available documentation, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

Opinions presented in this report apply to the site's conditions and features as they existed at the time of RPS' site inspections 12 – 14 November 2024, and those areas accessible. They necessarily cannot apply to conditions and features which RPS is unaware of and has not had the opportunity to evaluate.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any circumstances constitute a breach of relevant legislation.

# 1 INTRODUCTION

## 1.1 Background

RPS AAP Consulting (RPS) was commissioned by Mount Pleasant Operations (MPO) to conduct an Independent Environmental Audit (IEA) of the Mount Pleasant coal mine. This IEA includes the first assessment of compliance against Development Consent State Significant Development (SSD) 10418 and final assessment of operational compliance against Development Application (DA) 92/97.

'Mount Pleasant Operations Independent Environmental Audit 2023' (EMM, 2023) (Previous IEA) was last performed in 2023 and covered DA92/97, EPL 20850 and the relevant mining leases.

This IEA period covers the last day of the previous IEA to the last day of site inspection for this IEA (9 March 2023 – 14 November 2024).

SSD 10418 approves mining operations (the removal, transportation and emplacement of overburden and extraction, processing, handling and storage and transportation of coal carried out on the site), rehabilitation and closure of the Development (Mount Pleasant Optimisation Project) commenced under SSD 10418 on 12 February 2024.

During the audit period, MPO operated under both SSD 10418 and DA 92/97 simultaneously, as DA 92/97 has not yet been surrendered.

This IEA consisted of a desktop review of documentation, interviews with MPO staff and a site inspection generally in accordance with the itinerary presented in **Appendix A**. All members of the audit team attended site, with the exception of the groundwater specialist.

The IEA was conducted by Dianne Munro (Lead Auditor – Exemplar Global Certified Auditor 107622) and Luke Wiggins (Audit Assistant) from RPS.

The audit team also consisted of the following specialists in accordance with SSD 10418 and DPHI request and approval (see **Appendix B**):

- Jane Barnett (Zephyr Environmental) – Air Quality;
- Tara Boreham (RPS) – Ecology;
- Dale Redwood (Muller Acoustics) – Noise and Blasting; and
- Tim Wilkinson (Engeny) – Groundwater.

See **Appendix B** for the Independent Audit Certification Form for the audit team.

The IEA was conducted generally consistent with 'ISO 19011 - Guidelines for Auditing Management Systems' and the 'Independent Audit Post Approval Requirements May 2020' (Audit Guidelines) (DPE, 2020).

Key documents reviewed during the IEA included:

- SSD 10418;
- DA 92/97 (as modified);
- Environment Impact Statement (EIS) and supporting documents, as relevant;
- Environmental Management Plans (EMPs) as listed in **Section 2.2**;
- Mount Pleasant Operations Annual Review 2023;
- Environmental Protection Licence (EPL);
- Standard conditions for Mining Leases (MLs) under the *Mining Regulation 2016* Schedule 8A (MR).

The Annual Review for 2024 was not available to consider as the reporting period had not yet fallen due at the time of the audit. . The site inspection was conducted from 12 November – 14 November by Dianne Munro and Luke Wiggins with assistance from specialists throughout. Observations from the site inspection and site interviews were noted in conjunction with evidence in **Appendix C** which includes individual

compliance tables for SSD 10418, DA 92/97, EPL, and ML/MR. Each table presents the relevant conditions and describes evidence in support of the status (compliant, not compliant or not triggered).

The weather conditions varied across the three day site inspection. Day 1 (12 November) was 18 degrees and overcast with drizzling rain and a minor earthquake in the afternoon. This day consisted of document review only. Site inspections occurred across Day 2 (13 November) with clear, hot weather through the morning and a storm coming over after 4pm and Day 3 (14 November) which was clear, sunny and around 22 degrees.

Opening and closeout meetings held with key MPO staff in attendance which generally included an overview of the audit process, compliance issues and observations. Staff who provided specific input to the audit are listed below, with attendees to opening and closing meeting listed in **Appendix A**:

- Andrew Reid (AR) – MACH Environmental Superintendent (operations) (former);
- Lisa Richards (LR) - MACH Environment and Community Manager (post-site inspection);
- Nina Rotton (NR) – MACH Environmental Advisor;
- Paul O'Loughlin (PO) – MACH Technical Services Manager
- Rich Ali – Land and Property Team;
- Brodie Morrison (BM) – Thiess Environmental Advisor;
- Peter York (PY) – Thiess Environmental Superintendent;
- Craig Hawkins (CH) – MACH Project Lead;
- Michael Redman – MACH General Manager Operations; and
- Ngaire Baker (NB) – MACH External Communications Manager.

Specialists did not attend opening and closing meetings because they were not on site at that time. Specialists attended site on Day 2 and the morning of Day 3.

## **1.2 Activities Within the Audit Period**

MPO is working towards approval of all environmental management plans to commence the additional mining activities approved by SSD 10418.

During the audit period, construction and mining have not extended past Castlerock Road to the north of the current pit. The Northern Link Road (NLR) construction has not commenced.

Extraction did not exceed 10.5 Mtpa in the audit period.

### **1.2.1 Construction**

During the audit period, MPO undertook the following construction activities on site:

- Completion of the Hunter River Pump Station relocation approved as part of MOD 4 of DA 92/97 followed by the decommissioning of the original Hunter River Pumping Station;
- Completion of the Fines Emplacement Area (FEA) Stage 2 Lift Project to increase the capacity for fines deposition. Seven lift stages have been approved to occur following the audit period. An operational audit of the operation of Stage 2 was undertaken by Dam Safety;
- Ongoing progressive rehabilitation of temporary construction areas and finished mining areas (**Plate 39**);
- Completion of bathhouse facilities expansion at the Infrastructure Area;
- Ongoing expansion works to the infrastructure area to increase support offices and meeting areas;
- Commissioning of High Wall Dam 2 and decommissioning of High Wall Dam 1;
- Pumping infrastructure upgrades to enable out of pit pumping following significant rainfall events in 2022;

- 
- Completion of offsite water discharge equipment in accordance with amendments made to EPL 20850;
- Erosion and sedimentation control, bund management and concreting at the CHPP;
- Modification of curtains at 'ROM 2';
- Northern toe drain extension in progress;
- Commencement of workshop facility upgrades including new maintenance bays to support the mobile equipment fleet. The old workshop will be repurposed after the audit period; and
- Completion of sitewide civil works and earthworks including maintenance and repair at the mine infrastructure area (MIA), Environmental Dam Mine Infrastructure Area (EDMIA), Mine Water Dam (MWD) Clean Water Diversion Drains and Sediment Dam (SD) 1 – 4 access roads.

## **1.2.2 Mining**

During the audit period, MPO undertook the following mining activities on site:

- Continuation of steady-state coal extraction with the development of the open cut footprint progressing to the west;
- Coal mining has occurred in all three areas of the pit (south, central and north);
- Continuation of mining coal to the west of the open cut following pre-strip and blasting activities;
- Ongoing modifications to the Coal Handling and Preparation Plant (CHPP) including upgrade of the Run of Mine (ROM) dump hopper dust suppression system; and
- Ongoing progressive rehabilitation of the Eastern Out of Pit Overburden Emplacement Area (including 'natural landform' profiling of areas in accordance with geomorphic design principles (including macro and micro relief);
- A total of 10.5 Mt of ROM coal was produced from 1 January 2023 to 31 December 2023;
- A total of 10.3 Mt of ROM coal was produced from 1 January 2024 to 26 November 2024;
- New rehabilitation and maintenance activities;
- Progressive rehabilitation has occurred on the faces of the mine where mining activities have been completed (currently the eastern face. The focus of this area is an open woodland final land use on eastern face towards Muswellbrook. The design of the rehabilitation areas is part of Thiess' role at MPO. Over 1,000 habitat features have been placed in rehabilitation areas across the 40 ha (approximately) of rehabilitation in the audit period. Rock drains in these areas are currently being constructed and weed management is constantly taking place, with a full time labourer on site, performing weeds targeted by drone weed mapping; and
- Mining operations have recently reached notification zone under Mining Lease requirements for blasting within 500 m of dams (within 500 m of Mine water dam and Environmental Dam 3).

## **1.3 Environmental Performance**

A review of the 'Mount Pleasant Optimisation Project Environmental Impact Statement (MACH Energy, 2021) (EIS) was conducted and the predictions of environmental impacts were compared to the current environmental performance of MPO.

Development has commenced under the EIS. Various key construction and operational activities have not commenced under the EIS (increased production above 10.5 Mtpa, mining north of Castlerock Road and construction of Northern Link Road). The magnitude of relevant environmental impacts were therefore within that predicted in the EIS..



## 1.3.1 Groundwater

### 1.3.1.1 EIS Predictions

Groundwater impacts are described and predicted in Section 7.8 of the EIS. The maximum predicted inflow for MPO is approximately 300 ML and is only marginally higher than the maximum predicted inflow of the MPO approved by DA 92/97 (270 ML in the 2024-25 water year).

As per the recently approved site water balance at section 7.1.1 in the WMP, the Maximum predicted inflow for the project is approximately 303ML to occur in 2034-35 water year, current hard rock water licence holdings are 730ML.

The two water licences held in the Sydney Basin – Nth Coast Groundwater Source, totalling 730ML is well in excess of the maximum predicted inflow of 303ML.

The calculation and assessment of the GW take for the 2024 period and the Water Balance review has not yet been finalised for the 2024 period.

### 1.3.1.2 Results

Overall, MPO was considered to have a negligible impact on groundwater quality in the natural groundwater system. Review of groundwater monitoring data throughout the audit period and the Annual Review 2023 suggested MPO has thus far had negligible impacts on groundwater.

## 1.3.2 Surface Water

### 1.3.2.1 EIS Predictions

Surface water impacts are described and predicted in Section 7.9 of the EIS.

Section 7.9.3 of the EIS predicts overflow from the sediment dams would occur during high rainfall events only. During these periods, the concentration of environmentally significant constituents in the sediment dams is likely to be low as inflow from catchment surface runoff would predominate over baseflow.

### 1.3.2.2 Results

No overflow from sediment dams has occurred during the audit period.

Total suspended solids and other key surface water monitoring parameters were generally within the predicted levels and stayed relatively consistent throughout the audit period, with no other exceedances triggered.

A minor electrical conductivity exceedance occurred at monitoring site W16. This monitoring point is upstream of MPO and therefore would not be related to operations. A recommendation has been included at Table 6 to investigate and further understand this phenomenon.

An on-site interview was conducted on Day 2 with Craig Hawkins (Project Lead). CH is the Project Lead for water management at MPO.

MPO uses a 'Licensed Water Usage' Excel spreadsheet tracker and the Water NSW website (IWAS – Internet Water Access System) to manage extraction from the Hunter River. MPO has 2 key Water Access Licences (WALs) for general security and four key WALs for high security.

As water is consumed and ordered the tracking spreadsheet is updated against all WALs. This is validated each year against the Water NSW IWAS. The tracker spreadsheet is then updated with carryover (water that is not consumed in the previous year). Orders on IWAS are typically placed for the coming 14 days, then water is released. Short term transfers get loaded into general security licences on IWAS.

Auditors reviewed 'Licensed Water Usage' tracking spreadsheet with CH showing first pumping campaign for 2024/25 year – order of 116.1 ML was made and 4.3 ML was used. Water order receipts are filed internally in a folder with the 'Licensed Water Usage' spreadsheet.

With the Stage 2 tailings dam lift recently completed, CH will manage the Stage 3 tailings lift and Dirty Water 1 – interim discharge pipeline, which diverts around Bengalla Mine to the west. This discharge pipeline is required until BMC constructs the discharge dam for MPO approved under SSD6300. This project is at 100% design and a tender has gone out to contractors. No discharges have occurred in the audit period but mock discharges have been conducted for training and testing purposes. The mine water releases dam joins up with interim discharge pipeline. CH highlighted no groundwater bores are currently being used for projects but some groundwater bores have been replaced and new ones inserted north under drilling program, with 11 new bores in total.

CH highlighted MPO aims to only store what is needed in on site dams due to their high evaporation rate. Dam inspections occur daily. De-silting occurred in 2023 based on capacity of dams at inspections. A campaign for SD1 desilting occurred after some water was redirected into it from a road. Drone surveys are used to assess baseline dam sediment and daily inspections check for current sedimentation and spill risk.

The sewage treatment plant to the south handles all sewage for the site. A new sewage treatment plant is being planned to handle increased workers when coal mining activities increase but has not been constructed yet. Some old, decommissioned Coal Handling and Preparation Plant (CHPP) septic tanks were stored in a laydown area and are planned to be disposed of at next audit (see **Plate 30**).

### **1.3.3 Noise**

#### **1.3.3.1 EIS Predictions**

The noise impacts of MPO are described and predicted in Section 7.3. Condition C1 describes 15 properties with a right to acquisition upon request based on noise, and condition C2 describes 14 properties with a right to mitigation upon request due the EIS prediction exceedances of relevant criteria (receivers where exceedances predicted).

Eight receivers in the Blairmore Lane area north of Kayuga were predicted to have a negligible increase in predicted noise levels above current criteria. One privately-owned property (property 143e) was predicted to experience exceedances of the relevant VLAMP noise criteria on greater than 25% of land on the property.

#### **1.3.3.2 Results**

Auditors reviewed monthly noise monitoring reports by Spectrum Acoustics for each month in the audit period and the Annual Review 2023. No noise exceedances above relevant criteria occurred in the audit period at receivers where exceedances were not predicted.

### **1.3.4 Air Quality**

#### **1.3.4.1 EIS Predictions**

The air quality impacts of MPO are described in section 7.7. Condition C1 describes 14 properties with acquisition rights for air quality.

In the EIS, six Project scenarios were assessed for potential air quality impacts. Scenario 1 is the most relevant scenario being nominally 2026, representative of mining activity continuing close to Muswellbrook, with a ROM coal extraction rate of 10.5 Mtpa as per the approved operations.

Exceedances of the Project-only 24-hour average PM 10 criterion (50 µg/m³) were predicted at eight proximal privately-owned receivers; 143b, 147, 153a, 154, 154b, 156a, 157a and 159. No exceedances of the Project-only 24-hour average PM 2.5 criterion (25 µg/m³) were predicted at any privately-owned receivers.

#### **1.3.4.2 Results**

No exceedances of PM 10 nor PM 2.5 above relevant criteria occurred in the audit period at receivers where exceedances were not predicted.

### 1.3.5 Blasting

#### 1.3.5.1 EIS Predictions

Section 7.6 of the EIS describes and predicts blasting impacts of MPO. The relevant blasting criteria is outlined in Table 2 of SSD 10418. Section 7.6.2 of the EIS states blasting would range up to a Maximum Instantaneous Charge (MIC) of approximately 1,600 kg with up to two blasts per day, a maximum average of eight blasts per week, only occurring between 9.00 am and 5.00 pm Monday to Saturday.

With the proposed MIC, air blast overpressure and vibration exceedances were predicted at privately owned residences. To meet relevant blasting criteria, MPO proposed to reduce the MIC as needed in the following conditions:

- 2,260 m of private receivers;
- 330 m of public infrastructure; and
- 1,010 m of historic heritage sites.

With these restrictions in place, the predicted blasting exceedances were reduced to zero.

#### 1.3.5.2 Results

Reviewed blasting data for the audit period. No air blast overpressure or vibration exceedances have occurred in the audit period.

### 1.3.6 Amenity Management

MPOCAT is an online tool, developed in house to link environmental monitoring and responses. MPOCAT pulls in environmental data from monitoring stations, shows a dashboard with a traffic light system for monitoring values to prompt reactive actions and sends out automatic text message notifications to the relevant staff mobiles. The tool also features an exceedance timer.

MPOCAT was developed to adequately manage operational shutdown for adverse environmental conditions. When PM10 hits 44 micrograms, instructions will be issued for operational shutdown until air quality is back at a safe level. A GPS fleet management system where each machine is fitted with a GPS and can be monitored in the control room identifies any machines in operation during shutdown period, or that could be contributing to elevated PM10 values. Airen Consulting provides meteorological forecasting with dust and noise risk predictions for locations around site. Todorovski Consulting also provides meteorological forecasting with dust and noise risk.

Supplementary to MPOCAT, MPO uses a WhatsApp group chat, in which staff members send noise and dust alerts (as well as other environmental and safety alerts) between Open Cut Examiners (OCEs). Photographs are also uploaded showing pit condition, any spontaneous combustion incidents, complaints and other issues. Recordings are uploaded to help manage and respond to complaints.

MPO is proactively using additional temporary noise monitors which are not required under management plans but assist in managing impacts and achieving an optimal result for the community.

### 1.3.7 Internal Incidents

Auditors undertook a high level review of MPO's internal incidents in the audit period.

MPO presented investigation reports for 42 potential incidents in the audit period (of which 22 were complaints and addressed in **Section 1.3.8**).

Of the 20 potential incidents recorded in the audit period (excluding complaint investigations), two were related to noise, three were related to dust, three surface water, two groundwater, two to data / administrative, three blasting and five to other (seismic activity, oil spill, unauthorised land disturbance, HVAS monitor going down and late reporting). All are described in **Appendix C**.

None of the incidents recorded were considered reportable incidents. All incidents were recorded and investigated.

### **1.3.8 Community Engagement and Complaints**

A Teams interview with Ngaire Baker (External Communications Manager) occurred after the site inspection on 26 November 2024 to discuss community and complaints management due to time constraints and availability while on site. A summary of the interview is below.

Complaints are received via hotline, a direct call to NB or email. MPO operates a community complaints hotline, run through a call centre with a separate number specifically for blasting. If a call comes through after 5 pm, it is directed to the call centre, otherwise NB answers. A number of people get email and SMS notification and generally immediately acknowledge, typically responding within 24 hours, as this is an MPO commitment. Thiess responds with technical detail to assist with responding to the complaint, then NB calls the complainant back to provide detail. NB noted complaints are decreasing over time and this general trend was confirmed by a review of Consultation Manager statistics for the site.

Consultation Manager was reviewed by auditors with AR and NB. All correspondence is filed in Consultation Manager. NR showed auditors a full walkthrough of the complaints response system from receiving the complaint, which in this case was lodged by the complainant to the EPA, the investigation, including screenshots from OCE WhatsApp group chat, logging in Consultation Manager and response to the EPA. Detail filed with complaints includes the complainant, the category (e.g. dust, noise, etc.), a description of the complaint and investigation made and the receiver number linked to consent (if applicable).

MPO also showed an example of a noise complaint investigation where two noise complaints were lodged from the same person on 7 April 2024. The complainant reported continuous rumbling noises and loud booming noises at 10:37 pm from MPO. This was investigated. OCE asked the excavator operator to ensure the bucket is lowered into trucks and silent horns were being used. Meteorological data was considered. This was not considered a non-compliance or incident. An investigation report was also reviewed which showed correspondence from the EPA dated 16 April 2024 stating further investigation was not required as the complainant had acquisition rights at their property.

Auditors reviewed a year to date summary of complaints generated by Consultation Manager, broken down into complaint types with visual graphs. Noise complaints were the most prominent in 2023 and 2024 with a total of 44 with 36 from a single complainant.. A total of 56 complaints were made in 2024 compared to 45 in 2023.

MPO has a community Sponsorship Fund which provides grants to eligible charities in the local community. There is a focus on community sponsorship in Muswellbrook; then Aberdeen and Denman with priorities being education, health, children, and sport.

NB highlighted some achievements and best practice initiatives for community engagement including:

- Aboriginal Community Development Fund (ACDF) as part of a Native Title Agreement with the Wanaruah People, focusing on projects that benefit Upper Hunter Valley Aboriginal communities;
- 'Cultural Spectacular' celebratory event in September attracted 5,000 people. MAC, Bengalla and AGL also attended;
- NB was judge at NAIDOC business awards;
- St Heliers inmates to work at MPO on 'work release';
- Cert 4 Minerals Processing Apprenticeships are run at the CHPP with an Aboriginal community focus. Protech trains two apprentices per year with Sedgman;
- 'Dreampath' initiative has been developed, sponsored by ACDF. 40 Aboriginal people working as operators and are trained to Cert 4 in mining and surface operations. The initiative received an award at NSW Minerals Council Community Award; and
- SMS for blast notifications go to 58 people in a 2 hour window.

**Figure 1-1** is a screenshot of the complaints summary for the audit period (9 March 2023 – 15 November 2024) in Consultation Manager (note there are two categories for air quality).

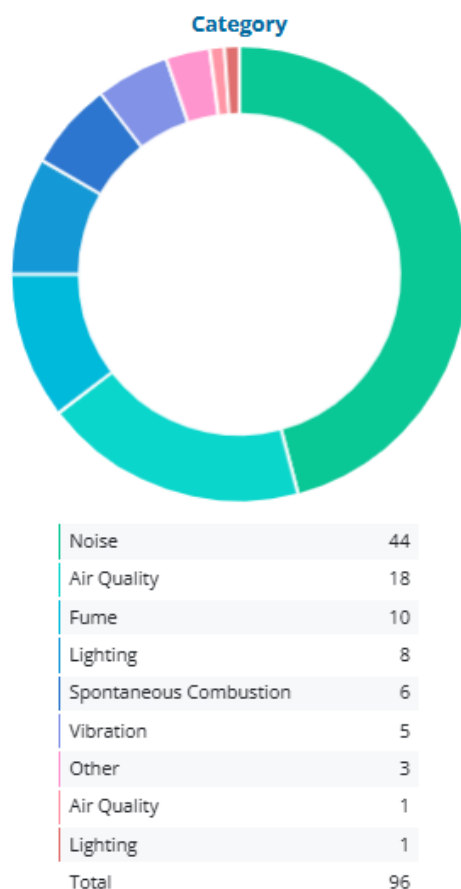


Figure 1-1 Consultation Manager Complaints Summary for the audit period

## 1.4 Previous IEA Recommendations' Status

The status of the previous audit recommendations were considered in this IEA. **Table 7** includes recommendations made in the 2023 IEA (EMM, 2023) and the status of each. The 'Ref' column corresponds to the recommendation references in the 2023 IEA.

Any outstanding items are included in Table 1.

Table 1 2023 IEA Recommendations and 2024 Status

Ref	2020 Audit Recommendation	2023 Status (MACH response)
REC 22	Noise Compliance Assessment Reports are to be prepared by an appropriately qualified acoustic consultant.	Complete Confirmed the monthly noise compliance assessment reports are submitted through the EPAs eConnect portal during the annual return submission. Reports are completed by an appropriately qualified acoustic consultant (Spectrum Acoustics for the audit period) for each month in accordance with Condition L3.2, L3.4, M10.2 and R5.2 of the EPL 20850.
REC 21	The 2021 met data spreadsheet should be amended if there is not actually a TEOM on-site. The monitoring equipment should be clear in all spreadsheets going forward.	Complete MACH Energy acknowledges the recommendation and noted this in an internal spreadsheet for management purposes. MACH energy completed an update of the met data spreadsheet to remove reference to TEOM. Auditors reviewed spreadsheets 'Mach Energy MTP02 data' and 'Mach Energy MTP04 data'.



**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**

Ref	2020 Audit Recommendation	2023 Status (MACH response)
REC 20	Complete quarterly faecal and pH monitoring in line with the obligations of the EPL Condition M2.3.	<p>Complete</p> <p>Quarterly faecal and pH monitoring is scheduled for every January, March, July and October. Samples are collected from CHPP STP (monitoring point 14) and MIA STP (Monitoring Point 15).</p> <p>In Q4 2021 the CHPP STP experiences issues with the membrane filter and as a result all effluent was removed from site. As a result, the Q4 2021 sample was not able to be retrieved.</p>
REC 19	Include the waste management requirements of EPL 20850 Condition O6.1 in the Thiess Mount Pleasant Handling and Disposal of Waste Procedure.	<p><b>Ongoing</b></p> <p>This recommendation will be addressed with the next version of the Thiess Mount Pleasant Handling and Disposal of Waste Procedure.</p>
REC 18	MPO to test PIRMP at least once prior to January 2024 and annually thereafter.	<p>Complete</p> <p>The PIRMP is scheduled to be tested in the December 2023 and annually thereafter.</p> <p>Record of testing showed:</p> <ul style="list-style-type: none"> <li>- 24/03/2017 (desktop);</li> <li>- 20/11/2017 (desktop);</li> <li>- 02/06/18 (notification);</li> <li>- 02/10/19 (Practical);</li> <li>- 30/06/20 (Practical);</li> <li>- 02/12/20 (Training);</li> <li>- 13/10/21 (desktop);</li> <li>- 19/01/23 (desktop);</li> <li>- 13/06/24 (Practical) and;</li> <li>08/07/24 (Practical), PIRMP last test major practical scenario dam safety.</li> </ul>
REC 17	Site personnel to ensure that water sprays on materials/when loading or unloading materials are being applied per the AQGHGMP to minimise dust during tipping as far as possible. The measures in the AQGHGMP relating to this should be reviewed for effectiveness.	<p>Ongoing – see recommendation in Table 6.</p> <p>MPO advised: at the time of the observation, wheel generated dust emissions were not considered excessive. However, the observed emissions were in the 'Dust emissions are increasing, and operators should consider if further action to reduce dust is required' category, as per EPA's Dust Assessment Handbook.</p> <p>It is noted that the Dust Assessment Handbook includes a number of factors to consider when assessing if operational changes to haul roads are required, namely; weather conditions, location, proximity to site boundary, proximity to sensitive receptors, duration of emissions and occupational safety.</p> <p>The operations were within the pit and a significant distance from the site boundary and sensitive receptors. Light winds were present, generally from the south-west (i.e. not towards key closest receptors). As such, in-pit dust emissions would be considered unlikely to lead to off-site impacts.</p> <p>Further, no real time dust alarms were triggered at the time of the observations. Notwithstanding, the operational team instructed water carts to carry out dust suppression throughout the pit.</p> <p>The daily dust risk forecast is provided to the Open Cut Examiner via email each morning to assist with operational planning and to inform the operations team of the dust risk for the day. Supervisors, OCEs, and the environment team also conduct regular checks on dust levels throughout MPO, and operators are proactive in responding to and communicating elevating dust levels.</p> <p>Mount Pleasant Operation has multiple cameras within site, including those that cover the mining and coal handling prep plant area. MACH Energy have commissioned modifications to the ROM Bin opening to improve dust capture and suppression. Modifications include extending the opening structure to deploy additional spray bars.</p>

**MOUNT PLEASANT OPERATIONS  
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Ref	2020 Audit Recommendation	2023 Status (MACH response)
		The structure will also suspend rubber belting from the roof to reduce the gap from a loaded truck. This structure has been erected with final completion as of August 2023.
REC 16	Use 'Consultation Manager' internal system to track all complaints and manage follow up.	Complete Auditors reviewed Consultation Manager database during site inspection, confirming effective use.
REC 15	Review measures in the Blast Management Plan and the AQGHGMP for effectiveness and ensure these are being implemented on site.	Complete The Blast MP and AQGGMP were revised and submitted in 2024. No non-compliances resulted from blasting in the audit period.
REC 14	Ensure the blast monitoring locations are regularly reviewed and represent closest privately owned receivers.	Complete A variation of EPL Licence 20850 was received on the 28 February 2023. This variation included the removal of Monitoring Point 12 (BVOA) as no residences are located near this monitor. "
REC 13	Implement diligent noise management practises to avoid exceedances of the noise criteria.	Complete MACH Energy implemented additional mobile noise monitors to further assess noise levels throughout MPO's Noise Assessment Groups. A real time noise assessment tool 'MPOCAT' is implemented at MPO and was reviewed by auditors. Weekly review of all noise alarms by a specialist noise consultant is undertaken to identify noise emanating from MPO. MPO implements three additional attended noise monitoring events following an exceedance of noise criteria. MPO utilises this information to further interrogate noise sources and avoid exceedances of the noise criteria as evidenced by review of internal filing of complaints and investigations.
REC 12	Show EPL Point 14 and 15 on a figure in Water Management Plan.	Complete PL Point 15 is included in the figure. Note Point 14 does not exist and has been removed from the WMP, currently being removed from the EPL"
REC 11	Address erosion issues within the rehabilitation areas which were observed during the site visit.	Complete Reviewed 2024 'Rehabilitation Erosion Quantification Assessment' (WSP, 2024). Key findings as outlined in exec summary are that most of the older rehabilitation areas are performing better than in the previous year due to robust vegetation cover. The best performing sites have a downward trend in erosion. See response at condition B87. A maintenance regime is in place to review and maintain erosive areas.
REC 10	Update RMP to make reference to the Annual Rehabilitation and Forward Work Program to address the requirement of the RMP to an include indicative schedule.	Complete RMP was updated to Version 2 and this recommendation is addressed in Section 6.1.
REC 9	Update Table 2-1 of the RMP to include Schedule 3, Condition 54 of DA 92/97.	<b>Ongoing</b> Reviewed RMP Version 2, no references to Condition 54 are made.ad
REC 8	Ensure all chemicals/hydrocarbons are appropriately stored in bunded areas.	<b>Ongoing</b> MACH Energy have commissioned a capital expenditure project to upgrade the MIA infrastructure. This will be completed in early 2025. The new design will address issues with chemical and hydrocarbon storage by increasing bunded storage areas.
REC 7	Adopt appropriate noise criteria for any out-of-hours construction work. Appropriate criteria are generally identical to usual MPO noise criteria unless alternative criteria are agreed with EPA/DPE.	Complete. All construction works associated with MOD 4 have now been completed. Any requirements to complete out-of-hours-work will be reviewed as required in accordance with Mt Pleasant Operation Out-Of- Hours-Works Protocol.

## MOUNT PLEASANT OPERATIONS INDEPENDENT ENVIRONMENTAL AUDIT 2024

Ref	2020 Audit Recommendation	2023 Status (MACH response)
REC 6	It was noted during the site visit that weed management activities had fallen behind over the past 12 months due to difficulties in engaging contractors. This is a known issue. Thiess have appointed a full-time contractor and are hoping to undertake additional work to get weed management back on track.	Complete. MACH Energy has engaged a full time weed management resource through the mining service provider Thiess. This includes a full-time contractor and vehicle equipped with spray unit to address weeds within the operations and rehabilitation areas.
REC 5	Ensure corrective actions as per the investigations of incident events are implemented.	Complete. Auditors reviewed internal filing of incidents. Although no reportable incidents occurred in the audit period, incidents were documented.
REC 4	MACH Energy should ensure that temperature lapse data is collected, stored and presented for audit purposes.	Complete Inversion data is now live in SPIRE and stored in PIAtmospheric. Temperature data available in Airodis and stored indefinitely. Added to SPIRE in 2024. MPO meteorological stations capture two values of temperature, the difference between these produces a Sigma / inversion output value, this is stored indefinitely through SPIRE. Viewed screenshots of data in SPIRE and Airodis.
REC 3	MACH Energy should ensure that odour and fume management conditions per Section 9.5 of the AQGHGMP are reviewed for effectiveness, updated where necessary and are being implemented effectively following staff education and training.	Complete Reviewed AQGGMP 2024 for SSD 10418. This is addressed in Section 7.5.
REC 2	Complaints registers and Annual Reviews should be consistent in stating odour complaints (e.g. 2022 Annual Reviews mentions three odour complaints but these are not listed as 'odour' in the 2022 complaints register but rather, refer to spontaneous combustion and the 'nature of complaint' is 'other').	Complete Reviewed complaints in consultation manager. Odour is a category.
REC 1	A Class 1 calibrator must be used with a Class 1 sound level meter for noise monitoring. Ensure all calibration certificates are included in consultants' reports.	Complete MACH Energy acknowledges the recommendation and notes that calibration of monitoring equipment is undertaken in accordance with relevant operating manuals and applicable Australian Standards. MPO will ensure all calibration certificates are included in consultants' reports. Auditors reviewed Monthly Noise Monitoring Report for September 2024 by Spectrum Acoustics. Calibration certificate was included as Appendix C.

## 1.5 Findings Overview

A high level of compliance was observed during this IEA. Environmental staff at MPO were largely aware of the limited non-compliances and issues arising from the audit with key issues being self-reported, although no 'reportable incidents' occurred.

In most cases, remedial actions had been identified and undertaken by MPO. MPO is aware of its responsibilities and limitations under SSD 10418, which commenced 12 February 2024, and is taking appropriate action to prepare to increase mining activities under the new consent.

The key activities under the consent which cannot be undertaken until the new relevant environmental management plans are approved are mining north of Castlerock Road and increasing coal extraction to 21 Mtpa. These actions have not yet been undertaken.

While preparing to increase mining activity, MPO has undertaken construction of new facilities, including a Mine Infrastructure Area (MIA) extension with new areas added to the administration / office buildings and a large new workshop. The existing workshop is planned to be repurposed once the new workshop is complete.

MPO presented a generally well maintained site with evidence of water carts and sprays in operation, although some dust (considered normal for generally dry conditions) was observed during dumping. Auditors noted opportunities for improvement regarding storage of equipment and hydrocarbons.

The new workshop area and administration building extension were under construction at the time of the site inspection. These sites were tidy and well managed; however the old workshop area requires organisation, upon commissioning of the new facility. Some hydrocarbon containers were un-bundled and some waste observed to be inappropriately sorted. Storage of equipment in organised covered areas should also be considered for the laydown area near the CHPP.

Rehabilitation is progressing and generally in accordance with the rehabilitation documents including the Rehabilitation Management Plan. The rehabilitation on the eastern face was observed to be progressing well and generally in line with the final land use. Some weeds were observed in the rehabilitation areas; however MPO is aware and making concerted efforts with drone surveys and targeted spraying by a full time labourer. A feral boar was observed on site during site inspection. It was noted by Thiess and MACH environmental staff that targeted baiting programs have been employed and successful in reducing numbers of feral animals on site.

There were no exceedances attributable to MPO in relation to air quality, noise or blasting during the audit period. MPO's noise and dust management tool MPOCAT was comprehensive and works with a GPS system to allow MPO to quickly track any machinery that may be contributing to an exceedance. The use of a WhatsApp group between OCEs and key staff members is proactive and useful for quickly responding to environmental issues and providing evidence if required by a regulator. The key non-compliance noted was in relation to Conditions B55 and B56 of SSD 10418, where an area was prematurely disturbed.

Spill kits, segregated waste bins, skips and fire hydrants are readily available around the site. MPO advises that no reportable incidents occurred in the audit period. MPO's complaint response system is adequate and responsive.

Site record keeping in the form of tracking spreadsheets, registers and software is thorough and accurate. Management plans both in place and in draft form for SSD 10418 were reviewed with few areas for improvement identified.

This IEA has concluded that a high standard of environmental management is being applied at MPO.

## **1.6 Report Structure**

This IEA report is structured as follows:

- **Section 1** provides an introduction, describes the requirement for the IEA, activities conducted during the audit period and provides a guide to the structure;
- **Section 2** provides a description and layout of the site and a summary of environmental approvals and management documents;
- **Section 3** outlines the requirements for this IEA, where each has been addressed and details regulatory consultation;
- **Section 4** lists any non-compliances identified and recommendations to ameliorate;
- **Section 5** provides a list of recommendations for continuous improvement; and
- **Section 6** provides the status of the previous audit recommendations.

## 2 SITE DESCRIPTION

### 2.1 Development Consent

The Mount Pleasant Operations Continuation Project as described in the Mount Pleasant Optimisation Project – Environmental Impact Statement (EIS) (MACH Energy, 2021), consists of the following:

- Increased open cut extraction within the MLs obtained in support of the Mount Pleasant Operation to allow mining of additional coal reserves, including lower coal seams in northern section of pit;
- A staged increase in extraction, handling and processing of ROM coal up to 21 Mtpa (i.e. progressive increase in ROM coal mining rate from 10.5 Mtpa over the life of the development);
- Staged upgrades to the existing CHPP and coal handling infrastructure to facilitate the handling and processing of additional coal;
- A staged increase in rail transport, up to approximately 17 Mtpa of product coal, to domestic and export customers;
- Upgrades to workshops, electricity distribution and other ancillary infrastructure;
- Existing infrastructure relocations to facilitate mining (e.g. Castlerock Road, powerlines and water pipelines);
- Construction and operation of new water management and water storage infrastructure in support of the mine;
- Construction of CHPP reject dewatering facilities to allow co-disposal of fine rejects with waste rock as part of ROM waste rock operations;
- Development of an integrated waste rock emplacement landform that incorporates geomorphic drainage design principles for hydrological stability, and varying topographic relief to be more natural in exterior appearance;
- Construction and operation of new ancillary infrastructure in support of mining;
- Extension of the time limit on mining operations to 22 December 2048;
- An increase in the operational workforce to an average of approximately 600 people, with a peak operational workforce of approximately 830 people;
- Ongoing exploration activities; and
- Other associated infrastructure, plant, equipment and activities.

**Figure 2-1** shows the general layout of Mount Pleasant Operations as approved in SSD-10418.

### 2.2 Management Plans, Programs and Strategies

SSD 10418 requires the preparation of a series of management plans as such all are recently updated, with comment from relevant regulators recently provided.

At the time of the audit, MPO had submitted the SSD management plans but not received comments or approval. These management plans have been approved after the audit period ended. In other cases, the time requirement to submit the plans (12 months from commencement) had not yet been reached. In these cases, the management plans relevant to DA 92/97 were reviewed as relevant.

**Table 2** shows the management plans and strategies relevant to this IEA.



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**Figure 2-1     Mount Pleasant Operations Project Layout (Mach Energy, 2021)**

## MOUNT PLEASANT OPERATIONS INDEPENDENT ENVIRONMENTAL AUDIT 2024

A brief discussion on each management plan is provided below and with detail in **Appendix C..**

**Table 2 Management Plans Status**

Plan / Strategy	Applicable Approval	Status
Environment Management Strategy	SSD 10418	Approved 7 January 2024
Water Management Plan	SSD 10418	Approved 2 August 2024
Biodiversity Management Plan	DA 92/97	Approved 31 October 2023
Biodiversity Management Plan	SSD 10418	Approved 5 November 2024
Noise Management Plan	DA 92/97	Approved 21 October 2022
Noise Management Plan	SSD 10418	Approved 26 November 2024
Traffic Management Plan	SSD 10418	Approved 17 September 2024
Historic Heritage Management Plan	SSD 10418	Approved 17 September 2024
Air Quality and Greenhouse Gas Management Plan	DA 92/97	Approved 24 May 2019
Air Quality and Greenhouse Gas Management Plan	SSD 10418	Submitted August 2024
Aboriginal Cultural Heritage Management Plan	SSD 10418	Approved 16 October 2024
Blast Management Plan	DA 92/97	Approved 14 April 2020
Visual Impact Management Plan	DA 92/97	Approved 15 March 2024
Visual Impact Management Plan	SSD 10418	Submitted 28 November 2024
Rehabilitation Management Plan	DA 92/97	Approved 1 August 2022
Rehabilitation Management Plan	SSD 10418	Rehabilitation outcome documents submitted Q4, 2024. This RMP to be submitted upon approval.
Bushfire Management Plan	DA 92/97	Approved September 2020. Will be resubmitted under SSD 10418 requirements after
Rehabilitation Strategy	DA 92/97	Approved 18 March 2024

### 2.2.1 Environmental Management Strategy

The Environmental Management Strategy (EMS) 2024 was reviewed as part of this audit. No recommendations were provided.

### 2.2.2 Water Management Plan

The Water Management Plan (WMP) 2024 was reviewed as part of this audit. One non-compliance was related to the WMP. Refer to Table 5 for recommendations.

### 2.2.3 Biodiversity Management Plan

The Biodiversity Management Plan (BMP) 2024 was reviewed as part of this audit. Two non-compliances were related to the BMP. Refer to conditions B55 and B56 of the audit table in Appendix C for recommendations.

### 2.2.4 Noise Management Plan

The Noise Management Plan (NMP) 2024 was reviewed as part of this audit. One non-compliance was related to the NMP. No recommendations were necessary. Refer to Conditions B9 – B11 in the audit table in Appendix C.

### **2.2.5 Traffic Management Plan**

The Traffic Management Plan (TMP) 2024 was reviewed as part of this audit. No recommendations were provided. Refer to Conditions B99 – B102 in the audit table in Appendix C

### **2.2.6 Historic Heritage Management Plan**

The Historic Heritage Management Plan (HHMP) 2024 was reviewed as part of this audit. No recommendations were provided. Refer to Conditions B73 – B75 in the audit table in Appendix C.

### **2.2.7 Air Quality and Greenhouse Gas Management Plan**

The Air Quality and Greenhouse Gas Management Plan (AQGGMP) 2024 was reviewed as part of this audit. Six non-compliances were related to air quality. No amendments to the AQGGMP were suggested, rather the mitigation measures included should be followed more closely.

### **2.2.8 Aboriginal Cultural Heritage Management Plan**

The Aboriginal Cultural Heritage Management Plan (ACHMP) 2024 was reviewed as part of this audit. No recommendations were provided.

#### **2.2.8.1 Blast Management Plan**

The Blast Management Plan 2020 was reviewed as part of this audit as the updated Blast Management Plan for SSD 10418 had not yet been approved. One continuous improvement recommendation was made. Refer to conditions B22 and B24 of the audit table in Appendix C.

### **2.2.9 Visual Impact Management Plan**

The Visual Impact Management Plan (VIMP) 2024 was reviewed as part of this audit. No recommendations were provided.

### **2.2.10 Rehabilitation Management Plan**

The Rehabilitation Management Plan (RMP) 2022 and draft RMP 2024 were reviewed as part of this audit. No recommendations were provided.

### **2.2.11 Bushfire Management Plan**

The Bushfire Management Plan 2022 was reviewed as part of this audit. No recommendations were provided.

### **2.2.12 Rehabilitation Strategy**

The Rehabilitation Strategy 2024 was reviewed as part of this audit. No recommendations were provided.

## 3 IEA REQUIREMENTS

### 3.1 Development Consent

This IEA report has been prepared pursuant to SSD 10418 (as modified) and Independent Audit Post Approval Requirements (DPE, 2020) (discussed in **Section 3.2**).

Requirements for independent auditing under Conditions D13 and D14 of SSD 10418 are listed in **Table 3** which also lists where each is addressed in this document.

**Table 3 SSD 10418 Independent Environmental Audit Requirements**

Description	Section
<b>SSD 10418 Conditions D13 and D14</b>	
D13. Within one year of commencement of development under this consent, 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:	<b>12 February 2025 This IEA</b>
a) Be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;	<b>Section 1.1 Appendix B Appendix C</b>
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;	<b>Section 1.1 Appendix B</b>
c) Be carried out in consultation with the relevant agencies and the CCC;	<b>Section 3.3 Appendix E</b>
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);	<b>Section 1.3 Appendix C</b>
e) Review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent;	<b>Section 2.2 Appendix C</b>
f) Recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent: and	<b>Section 4 Appendix C</b>
g) Be conducted and reported to the satisfaction of the Planning Secretary.	<b>Section 3</b>
D14. Within three months of commissioning an Independent Environmental Audit, the Applicant must submit a copy of the audit report to the 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 these recommendations as required. The recommendations must be implemented.	<b>Responsibility of MPO</b>

### 3.2 Independent Audit Post Approval Requirements

This IEA report has been prepared in accordance with the Independent Audit Post Approval Requirements (DPE, 2020) (PAR). Compliance descriptors are in line with those required by the IEA PAR being compliant, not triggered or not compliant.

**Appendix F** lists key requirements and sections of the Post Approval Requirements and indicates where each is addressed in this report.

### 3.3 Agency Consultation

The following agencies were approached directly by RPS on 11 October 2024 via email to request input as part of the scoping phase of this IEA (see **Appendix E**).

- Department of Planning, Housing and Infrastructure (DPHI);
- Environmental Protection Agency (EPA);
- Biodiversity Conservation and Science (BCS);
- Mount Pleasant Operations Community Consultative Committee (CCC);
- Mining, Exploration and Geoscience (MEG);
- Muswellbrook Shire Council (MSC);
- NSW Resources Regulator (RR); and
- DPIE Water / DCCEEW Water.

Where specific issues were raised during consultation, these are listed in **Table 4** along with a section on where each has been addressed in this IEA report.

**Table 4 Agency Requirements and Where Addressed**

Date	Feedback	Response	Section
<b>Resources Regulator</b>			
23/10/24	The independent environmental audit is required to assess compliance against the relevant environmental management conditions of the mining leases up to 1 July 2022, including implementation of the mining operations plan for the site. From 2 July 2022, the independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. It is noted that the 6 mining leases that comprise the Mount Pleasant Coal Mine have been approved by the Regulator to be treated as a single lease for the purposes of Part 2 of Schedule 8A.	Audit period started in March 2023, after 2 July 2022. Therefore compliance against the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the <i>Mining Regulation 2016</i> was assessed.	<b>Appendix C</b>
	The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. It would be appreciated if a copy of the final audit report could be sent to the Regulator at <a href="mailto:nswresourcesregulator@service-now.com">nswresourcesregulator@service-now.com</a> upon completion of the audit.	Best practice observations noted by lead auditor. Rehabilitation detail is included against the relevant conditions.	<b>Appendix C</b>
<b>DCCEEW Water Group</b>			
18/10/24	NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:  The requirement to prepare and implement management plans that relate to water sources and their dependent	The Water Management Plan (SSD 10418) is approved. The 30% design plan for the Northern Surface Water Infrastructure shows deviations in the location and timing of some water management elements. MPO advises this is a fairly typical outcome of a detailed engineering design process, and MACH intends to update its Water Management Plan and any associated subsidiary plans (i.e. as well as the RMP etc) to	<b>Appendix C</b>

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Date	Feedback	Response	Section
	ecosystems and users, and associated impact management and mitigation.	reflect the planned on-ground water management works before they are constructed (i.e. for compliance management purposes) The updated WMP will be lodged for approval in 2025.	
	These plans may include: Water Management Plans and related sub-plans e.g. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan. Extraction Plans and related sub-plans e.g. Water Management Plan, Subsidence Management Plan.	Water Management Plan contains Site Water Balance, ESCP, and separate Surface Water and Ground Water Management Plans. Extraction plans and subsidence management plans not required as MPO is open-cut only.	<b>Section 2.2.2</b>
	The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.	See review of and recommendations in relation to trigger responses in Appendix C.	<b>Table 5</b>
	Water supply availability is clearly defined for the project.	Water supply is adequate for the project during the audit period.	<b>Section 1.3.2</b>
	Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.	Information around WALs is described. Recommendations regarding water take reporting are addressed.	<b>Section 1.3.2 Table 5</b>
	Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.	HR2 (main pump for mine operations) has not yet received certification as specialist installer has not yet completed works. Reviewed Water NSW correspondence and acknowledgement of certified installer (Branden Cook for PPS CMI #57657) dated 27 October 2024. Reviewed Meter Validation Certificate dated 21 January 2025.	<b>Table 4</b>
	Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.	Water licences tracked through Water NSW IWAS and internal spreadsheet.	<b>Section 1.3.2</b>
	Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years and 3) identifies exceedances and how these are managed/mitigated.	Recommendations regarding reporting of water take and comparisons are made. No exceedances identified in the audit period.	<b>Table 5</b>
<b>Muswellbrook Shire Council</b>			
<b>28/10/24</b>	Staff provided comments on the Traffic Management Plan (TMP) in April 2024, which are included in Appendix B of the approved TMP. Although the TMP has been approved by DPHI, it remains unclear whether comments have been incorporated or addressed. Staff regularly encounter this issue with proponents of State Significant Development in the Shire, where consultation does not always allow for sufficient engagement. This often results in proponents not providing feedback on the comments submitted, limiting Staff's	Viewed letter dated 4 December 2024 which provided confirmation of consultation on the TMP with Council.	<b>Table 4</b>



**MOUNT PLEASANT OPERATIONS  
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Date	Feedback	Response	Section
	ability to assess whether key concerns have been addressed.		
	The Environmental Impact Statement (EIS) for SSD 10418 outlined key social commitments, listed below (EIS, Section 7.17.4). However, it is unclear how progress on these commitments is being reported. Staff would welcome a status update, including any relevant recommendations, as part of the Independent Environmental Audit (IEA ).	<p>Social commitments include operation of CCC, which Council actively participates in. Each quarter, the CCC provides a comprehensive update on activities at MPO, which is shared with the Council representative. These updates, including detailed presentations and minutes, are available on the MACH Energy public facing website. Social commitments and activities include:</p> <ul style="list-style-type: none"> <li>• Sponsored and attended the 2024 Muswellbrook Chamber of Commerce and Industry (MCCI) Business Awards.</li> <li>• Attended, conducted and supported NAIDOC events including a site recognition, Small Schools celebration, Muswellbrook and Singleton Family Days and the Wanaruah Local Aboriginal Land Council NAIDOC Business Awards.</li> <li>• Hosted three school tours through the Upper Hunter Mining Dialogue School Tour Program.</li> <li>• Attended the opening of the Kayuga RFS Brigade shed.</li> <li>• The General Manager Operations and team members attended Muswellbrook Chamber of Commerce meetings.</li> <li>• Participated in the NSW Mining Voice for Mining Family Day activation zone prior to the Knights Game.</li> <li>• A community meeting in Cassilis to gauge interest in the development and potential uses for the sorting shed next to Llangollen Shearing Shed. NB noted that community had been keen to see the shed developed and she will keep the CCC updated.</li> <li>• Hosted the MACH Energy Aboriginal Community Development Fund (ACDF) Cultural Spectacular in Muswellbrook with more than 5,000 attending.</li> <li>• Recent Sponsorships include: <ul style="list-style-type: none"> <li>• Merriwa Springtime Show</li> <li>• Mullins Conceptual Photography Prize</li> <li>• Cassilis Rodeo</li> <li>• Lunch Box Rally</li> <li>• Towarri Physie</li> <li>• Snake Gully Quilters - Defibrillator Machine.</li> <li>• Muswellbrook Red Cross 110 Birthday morning tea.</li> </ul> </li> </ul>	<b>Table 4</b>
	Working with the main contractors on site (i.e. mining services and coal processing) to identify ways to prioritise local employment (existing population) and develop strategies for people to relocate to Muswellbrook, Singleton, and Upper Hunter LGAs;	<p>The primary employer at Mount Pleasant is the Mining Services Provider who provides regular reports to MACH Energy on Aboriginal and Torres Strait Islander (ATSI) diversity, and local content i.e. workers residing locally.</p> <p>These reports are considered in employee procurement. Reviewed 'Staff Demographic' statistics screenshot.</p>	<b>Table 4</b>

**MOUNT PLEASANT OPERATIONS  
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Date	Feedback	Response	Section
	Include local residential workforce as a Key Performance Indicator in procurement processes for main contractors with associated management, monitoring and reporting; and	Reviewed 'Staff Demographic' statistics screenshot showing percentage of staff from within the LGA which was 70%.	<b>Table 4</b>
	Continue to deliver positive social impacts for Aboriginal people with connections to the land and waters on which the Project is located by supporting on-country land management (such as cool burns) and involvement in rehabilitation programs.	. Blackrock is a team of long term, Aboriginal contractors which completes general maintenance including gardening, mowing and land care services.	<b>Table 4</b>
	Note - Condition B103 of SSD 10418 requires the Proponent to maintain a section of the existing Bengalla Link Road, which is approved for relocation under SSD 5170 for the Bengalla Mine. Staff note that maintenance responsibilities may need to be adjusted during the construction of the realigned Bengalla Link Road, particularly if Bengalla Mine needs to use the existing road for construction purposes.	Construction of BLR section referred to has not commenced.	<b>Table 4</b>
	In its response to the EIS for SSD 10418, Council Staff raised concerns about mining-induced seismic activity and recommended the consideration of adaptive management measures. These recommendations were not incorporated by MACH Energy. There has been a notable increase in seismic activity within the Shire recently and although not explicitly included in the Mount Pleasant approval, Staff are keen to understand whether MACH Energy is implementing any adaptive management in response to this issue.	MPO provided the following response: Regarding seismic activity, MACH Energy, Muswellbrook Shire Council, the Department of Planning and Environment (DPE), and the Independent Planning Commission (IPC) examined concerns related to seismic effects as part of the Mount Pleasant Optimisation Project assessment. MACH Energy addressed Council's comments on seismic impacts in its Submissions Report, ultimately assuring regulators that the project's impacts were within acceptable limits and did not warrant additional conditions. The DPE and IPC reviewed MACH's response, concluding that no further management measures were needed, as the proposed measures aligned with best practice standards and posed minimal risk under the project's current guidelines. References: <a href="https://www.ipcn.nsw.gov.au/news/2022/09/mt-pleasant">https://www.ipcn.nsw.gov.au/news/2022/09/mt-pleasant</a>	<b>Table 4</b>

## 4 NON-COMPLIANCES AND RECOMMENDATIONS

A summary of the non-compliances against each condition of SSD 10418, DA 92/97, EPL 20850 and the *Mining Regulation 2016* Schedule 8A is provided in **Table 5**. Recommendations arising from the non-compliances are also included, where required.

**Appendix C** provides a complete tabulated list of conditions of SSD 10418, DA 92/97, EPL 20850 and the *Mining Regulation 2016* Schedule 8A with detail on the compliance status, comments and evidence provided against each.

**Table 5 Summary of 2024 IEA Non-compliances**

Ref	Non Compliance
SSD 10418 B27 and DA 92/97 S3 C18	<p>(zephyr) 2 odour complaints received via EPA:</p> <ol style="list-style-type: none"> <li>25/06/2024 – spontaneous combustion. Heated area identified by OCE at the time of the complaint, but management measure not identified. Information on off-site PM10 concentrations provided.</li> <li>5/07/2024 – spontaneous combustion. Heated area identified by OCE but management measures not identified. Information on off-site PM10 concentrations provided.</li> </ol> <p><b>Offensive Odours</b></p> <p>The POEO Act defines an offensive odour as “offensive odour means an odour—</p> <ol style="list-style-type: none"> <li>that, by reason of its strength, nature, duration, character or quality, or the time at which it is emitted, or any other circumstances—</li> <li>(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or</li> <li>(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, or</li> <li>(b) that is of a strength, nature, duration, character or quality prescribed by the regulations or that is emitted at a time, or in other circumstances, prescribed by the regulations.”</li> </ol> <p>The two complaints were potentially triggered by aii in the definition (unable to be confirmed). MACH argued that no evidence was provided by the complainants to demonstrate “unreasonable interference”. <b>MACH was unable to provide evidence to the contrary, resulting in the identified non compliance. Recommend that should MACH intend to rely on this argument in future (should complaints / incidents occur), evidence is prepared to demonstrate.</b></p>
SSD 10418 B52 and DA 92/97 S3 C28	<p>The GWMP commits to including reporting on elevation at each bore with water levels being presented in Australian Height Datum (AHD) and depth in the Annual Review. Water levels are presented in depth (as meter below ground level) only.</p> <p>Recommendation: Present water levels in both depth and AHD in the Annual Review. Alternatively, with justification seek to remove this requirement from the GWMP (2024).</p>
SSD 10418 B55 and B56	<p>500 m<sup>2</sup> disturbance for mining laydown purposes occurred on 2 October 2025 without the required credit retirement within the Stage 1 area. Relevant regulators have been advised of the occurrence. Credits must be retired prior to any disturbance of Stage 1 and 2 areas.</p>
MLs 16(3)	<p>The upload times of the rehabilitation documents to the MACH public website are outside of the 14 day window required by this condition.</p>
EPL M2.1 and M2.2	<p>Incomplete data capture at EPL Point 1 and Point 2. PM10 not monitored continuously at EPL Point 1 and Point 2.</p>
EPL M4.1	<p>Meteorological data at EPA 4 and 11 was not captured continuously between March 2023 and August 2024.</p>
EPL M9.1	<p>EPL Condition M9.1 requires the licensee to record the average PM10 concentration at Monitoring Points 1 and 2 at intervals of 10 minutes. Reviewed ‘1024 MPO HVAS’ and ‘Met Data Compiled 010124-311224’ spreadsheets provided. PM10 is shown to be recorded at intervals of 10 minutes. There are some periods where PM10 was not recorded for all 10 minute intervals (however data was captured majority of time).</p>

## 5 CONTINUOUS IMPROVEMENT

**Table 6** includes a consolidated list of continuous improvement recommendations from this IEA. These are recommendations for consideration only, are not mandatory and generally not related to a non-compliance.

Outstanding items from the previous IEA are listed in Table 6 and should be progressed and closed out.

**Table 6 Summary of 2024 IEA Continuous Improvement Recommendations**

Ref	Document	Recommendation
		Complete all actions from previous audits shown as 'ongoing' in <b>Table 1</b> .
B22 & B24	SSD 10418	Update Blast Management Plan at next review to provide correct MSC website and provide Blasting Hotline number.
B27	SSD 10418	Viewed letter dated 3 July 2024 where MACH responded to the EPA regarding the 25 June 2024 complaint. Action was taken to remediate the spontaneous combustion issue with material utilised to manage it. Viewed letter dated 17 July 2024 where MACH responded to the EPA regarding the 5 July 2024 complaint. The community complainant reported smelly air pollution with the strong smell of rotten egg gas and visible smoke from spontaneous combustion. The complainant was on Wybong Road at the time 500m west of the rail overpass. Improvements have been made to dust management TARP since the incident. The TARP did not previously include a section relating to odour observed offsite. Reviewed dust tarp which now includes the question "Is there any heated material and/or Odour?" <b>Recommend ongoing management of spontaneous combustion and revision of TARP in next audit period to ensure continuous improvement.</b>
B40	SSD10418	Water taken under all water licences (including unregulated river and groundwater licences) should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.
B52	SSD 10418	Monitoring bores have been in place since 2018 and monitoring is undertaken quarterly. The GWMP commits to establishment of trigger levels for these bores once sufficient monitoring data has been recorded. Current monitoring data is considered sufficient but trigger levels have not been established. Triggers should be established for the Melody and MPBH5 monitoring bores.
B52	SSD 10418	Results for annual laboratory analysis of analytes listed in table 19 of the GWMP should be presented in the Annual Review
B52	SSD 10418	Water taken under all water licences should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.
B52	SSD 10418	Results for annual laboratory analyses of analytes listed in Table 19 of the GWMP (MPO, 2024) should be included in the Annual Review.
B52	SSD 10418	Comparison between the predicted groundwater levels and observed levels is not included in the 2023 Annual Review. This should be included in future Annual Reviews. No evidence was provided to indicate that a suitably qualified hydrogeologist undertook assessment of the modelled and observed water levels. This should also be provided in future.
B52	SSD 10418	The GWMP 2024 commits to privately-owned bores (shown in Figure 8a to 8c and listed in Table 10) being monitored regularly (subject to landholder access) to detect if mining-related drawdown of greater than 2 m occurs or is likely to occur. No evidence was provided to indicate that monitoring of privately-owned bores was undertaken during the audit period and no evidence provided to compare drawdown extents in existing monitoring network with the groundwater model predictions. Now that the GWMP 2024 is in force, this will need to occur. Land access for privately owned bores should be arranged.
B52	SSD 10418	The groundwater model was developed by AGE Consultants in 2020. As per the GWMP 2024, it should undergo review every three years. There was no evidence provided during the audit that the groundwater model has been refined with results from the groundwater monitoring program and no revised groundwater model is reported in the Annual review. There was no evidence to indicate a peer review has occurred. Now that the GWMP 2024 is in force, the MPO groundwater model (AGE Consultants, 2020) should be refined with results

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**

Ref	Document	Recommendation
		from the site groundwater monitoring program and undergo peer review as soon as possible and every three years henceforth.
B81	SSD 10418	Some errors in waste sorting occurring in bins around site and 44 gallon drum with grease inappropriately stored. Recommend refresher training on waste management and clear signage on waste bins following finalisation of new workshop area. Old truck wash also requires regular cleanout was full at time of inspection.
B93	SSD 10418	The coal transport register in the Annual Review should be updated to track daily amounts of coal transported for next period.
B104	SSD 10418	As the Road Maintenance Plan predates this consent, it is recommended this plan is reviewed and updated (if required) in the next audit period in consultation with Council.
D4	SSD 10418	Potential cause of electrical conductivity should be further investigated in next audit period and considered further.
S3 C5	DA 92/97	Check transcription errors in Monthly Environmental Monitoring Reports where exceedances are identified in text but not in numbers. Check measured cumulative noise is measured as Nil when MPO is inaudible for future exceedance reports.
P1.2	EPL 20850	At next EPL variation, the monitoring requirement for Point 14 should be sought to be removed. LR advised on 6 February 2025 that Point 14 has been removed with EPL variation approved 4 December 2024.
P1.4	EPL 20850	Recommend Noise Assessment Groups (NAGs) are updated when EPL is varied in future for SSD consent
L3.1	EPL 20850	Recommend plan is developed for appropriate tyre disposal when use is finished in line with Waste Tyre Disposal Procedure as large volume of tyres was observed on site
L4.4	EPL 20850	There is no condition L3.3. At next variation, this should be fixed to L4.3
O3.2	EPL 20850	Ongoing training for controlling dust generation especially during loading to trucks in the pit.
O3.9	EPL 20850	Recommend refresher training for key personnel in dry weather.
O4.1	EPL 20850	There is no discharge utilisation area as such this condition could be updated or deleted at next variation.
M2.1	EPL 20850	Investigate to understand if any practical changes can be made to capture all data.
7	ML Standard Conditions	Since a new final landform is required under SSD 10418, the risk assessment should be reviewed and a new rehabilitation risk assessment performed if required in next audit period.
10(4)(b)	LM Standard Conditions	The Fines Emplacement Area Rehabilitation Strategy should be completed as soon as possible in 2025 as it was committed to be done in 2024.
16 (3)	ML Standard Conditions	The standard conditions of Schedule 8A of the Mining Regulation 2016 should be added to MPO's compliance register to ensure compliance actions are recorded against all of the conditions.
17	ML Standard Conditions	The standard conditions of Schedule 8A of the Mining Regulation 2016 should be added to MPO's compliance register to track compliance actions against all of the conditions
19 (2)	ML Standard Conditions	Contact person and details the Secretary can communicate with in relation to the mining leases for the purposes of the Act should be updated early in 2025.
1	Regulatory Issues	The updated WMP should be lodged for approval in 2025.
2	Incidents	Include a column in its incident summary reporting to indicate if an incident is a complaint for each of interpretation and to assist in identifying any patterns requiring remediation.
3	Incidents	The October 2023 Monthly Environmental Monitoring Report does not mention any adverse weather conditions, even though an adverse weather shutdown was reported on 25 October 2023. Table 6.1 and Table 6.2 mentions that 'results in bold indicate elevated readings during adverse weather conditions', however no results are provided in bold in the report. Adverse weather events are mentioned in future monitoring reports



## **Appendix A** **Audit Itinerary and** **Attendees**



# MOUNT PLEASANT COAL MINE IEA 12 – 14 NOVEMBER 2024

## SITE VISIT ITINERARY

Unit 2A, 45 Fitzroy Street  
Carrington NSW 2294  
T +61 2 4940 4200

### Invitees

Name	Company	Title
Michael Redman	MACH MPO	General Manager of Operations
Andrew Reid (AR)	MACH MPO	Superintendent Environment (operations)
Nina Rotton (NR)	MACH MPO	Environmental Advisor
Peter York (PY)	Thiess	Environment Superintendent (Thiess)
Brodie Morrison (BM)	Thiess	Environment and Community Advisor (Thiess)
Pat Jacobson or delegate (PJ)	Sedgman	CHPP Plant Manager
Sandy Lettice (SL)	MACH MPO	Land and Property Officer
Richard Ali (RA)	MACH MPO	Land and Property Officer
Blake Shackleton (BS)	MACH MPO	Graduate Environmental Advisor
Dianne Munro (DM)	RPS	Lead Auditor
Luke Wiggins (LW)	RPS	Assistant Auditor
Tara Boreham (TB)	RPS	Biodiversity Specialist
Dale Redwood (DR)	Muller	Noise and Blasting Specialist
Jane Barnett (JB)	Zephyr	Air Quality Specialist

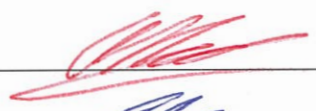


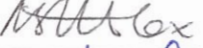
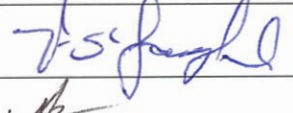





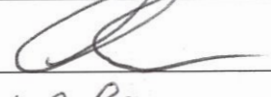

### Site Visit Itinerary

Day 1 – Tuesday, 12 November 2024		
Time	Task	Personnel
8:00 – 8:30 am	<b>Arrival on Site</b> <ul style="list-style-type: none"><li>Visitor induction and set up</li></ul>	AR, NR, BS, DM, LW
8:30 – 9:00 am	<b>Opening Meeting</b> <ul style="list-style-type: none"><li>Introductions</li><li>IEA scope and purpose (DM)</li><li>Confidentiality arrangements (DM)</li><li>IEA process and timing (DM)</li></ul>	All
9:00 am – 12:00 pm	<b>Compliance Review</b> <ul style="list-style-type: none"><li>SSD 10418 and DA 92/97 conditions review</li></ul>	AR, NR, BS, DM, LW
12:00 – 12:30 pm	<b>Lunch Break</b>	All
12:30 pm – 5:00 pm	<b>Compliance Review (cont.)</b> <ul style="list-style-type: none"><li>SSD 10418 and DA 92/97 conditions review</li></ul>	AR, NR, BS, DM, LW

## Mount Pleasant IEA Agenda

Day 2 – Wednesday, 13 November 2024		
Time	Task	Personnel
8:00 – 8.15 am	<b>Day 2 Overview Meeting</b> <ul style="list-style-type: none"><li>Plan arrangements for Day 2</li></ul>	AR, NR, BS, DM, LW
8:15 am – 12:45 pm	<b>Compliance Review</b> <ul style="list-style-type: none"><li>DA 92/97 + SOC</li><li>EIS Consistency</li><li>Mining Leases</li><li>EPL</li><li>Water licences</li><li>Management Plans review</li></ul>	AR, NR, BS, DM, LW
9:00 am – 12:30 pm	<b>Air and Noise Specialists Site Inspections</b> <ul style="list-style-type: none"><li>Site Visit via escort</li></ul>	PY (or BM), BS, DR, JB
12:30 pm – 1:00 pm	<b>Air and Noise Lead Auditor Briefings</b> <ul style="list-style-type: none"><li>Subconsultants brief auditors on findings</li></ul>	DM, LW DR, JB
12:00 pm – 12:15 pm	<b>Lunch Break</b>	All
1:00 pm – 5:00 pm	<b>RPS Site Inspection</b> <ul style="list-style-type: none"><li>Open cut and waste emplacement</li><li>Rehabilitation</li><li>Workshop/s (chemical and waste storage)</li><li>Waste storage</li><li>Fines Emplacement Area</li><li>Sewage treatment system</li><li>CHPP, loadout and stockpiles</li><li>Pit top area (general)</li></ul>	PY (or BM), AR, PJ (or delegate) DM, LW
Day 3 – Thursday, 14 November 2024		
Time	Task	Personnel
8:00 – 8.15 am	<b>Day 3 Overview Meeting</b> <ul style="list-style-type: none"><li>Confirm arrangements for Day 3</li></ul>	All
8:15 – 1:00 pm	<b>Biodiversity Site Inspection</b> <ul style="list-style-type: none"><li>Offsets</li><li>Onsite biodiversity areas</li></ul>	BS, SL or RA, DM, LW
8:15 am – 12:45 pm	<b>Compliance Review</b> <ul style="list-style-type: none"><li>Regulatory Engagement Requests</li><li>Previous audit recommendations</li><li>Any areas not closed out</li></ul>	AR, NR, DM, LW
1:00 – 1:30 pm (TBC)	<b>Closeout Preparation</b> <ul style="list-style-type: none"><li>Auditor preparation for Closeout Meeting</li></ul>	AR, NR, DM, LW
1:30 – 2 pm (TBC)	<b>Close out Meeting</b> <ul style="list-style-type: none"><li>Overview of findings</li><li>Confirmation of outstanding documents</li><li>Confirmation IEA completion process</li></ul>	All

## IEA Closing Meeting

Name	Company / Position	Signature
ANDREW REID	SUPERINTENDENT ENV.	
Peter York	Superintendent Env.	
Brodie Morrison	Advisor Env	
Ashlee Cox	Undergrad. Enviro	
PAUL O'LEIGH	MACH - TECH SERVICES MANAGER	
Nina Potton	Mach - Enviro advisor	
MICHAEL REDMAN	MACH - CM OPERATIONS	
BLAKE SHACKLETON	MACH - Environmental Advisor	
PAT JACOBSON	SEDLMAN - PRODUCTION SUPERINTENDENT	
Thomas Wilson	MACH - CHPP Manager	
Christopher Forbes	Sedgman - CHPP Manager	
Matt Travis	MACH - Maintenance & Reliability Eng	

## MPO IEA Opening Meeting

NAME

POSITION

ANDREW REID

SUPERINTENDENT ENV.

Nina Rotton

Environmental Advisor

Brodie Manson

Thiess Environmental Advisor

RICH ALI

MACH Land & Property.

BLAKE SHACKLETON

MACH ENVIRONMENTAL ADVISOR

PAUL O'LOUGHLIN

MACH TECHNICAL SERVICES MANAGER

Peter York

Env Superintendent.

Christopher Forbes

CHPP Manager

Thomas Wilson

CHPP Manager (MACH)

Michael Redman

General Manager - Operations


PAT JACOBSEN

PRODUCTION SUPERINTENDENT (SOM)

NGAIRE BAKER

EXTERNAL RELATIONS MANAGER

## MPO IEA Closeout Meeting



## **Appendix B**

### **Independent Audit Team Approval and Declarations of Independence**

NSW Planning ref: SSD-10418-PA-23

Andrew Reid  
Superintendent Environment (Operations)  
MACH Energy Australia Pty Ltd  
Wonnarua Country  
1100 Wybong Road  
MUSWELLBROOK NSW 2333

05/09/2024

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Sent via the Major Projects Portal only

Subject: Mount Pleasant Optimisation Project - Independent Environmental Audit Proposal

Dear Mr Reid

I refer to the request from MACH Energy Australia Pty Ltd for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Mount Pleasant Optimisation Project, submitted as required by Schedule 2, Condition D13 of development consent SSD-10418 (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 20 July 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Dianne Munro, Lead Auditor
- Luke Wiggins, Assistant Auditor
- Tara Boreham, biodiversity and offset specialist
- Dale Redwood, noise and vibration specialist
- Tim Wilkinson, groundwater specialist
- Jane Barnett, air quality specialist

Please ensure this correspondence is appended to the Independent Audit Report.

The audit period will be 9 March 2023 (the day after the previous audit period) to the last day of the site inspection. Development consents SSD 10418 and DA92/97 as modified both apply during the



audit period, with development under the former consent commencing on 12 February 2024. As such, the audit must assess compliance with both consents, as appropriate.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 6575 3420 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters  
Team Leader  
Compliance

As nominee of the Planning Secretary



# Appendix C

## Compliance Tables

Apx Table 1 SSD 10418

Ref	Requirement	Status	Comments
<b>SCHEDULE 2</b>			
<b>Part A Administrative conditions</b>			
A1	In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Compliant	<p>MPO displayed a high level of compliance against conditions of this consent through the audit period, operating under dual consents.</p> <p>Auditors observed effective environmental management systems in place, including real time monitoring, a WhatsApp group where live notifications and alerts are shared across teams, a comprehensive noise and dust management tool (CAT Tool) and a competent team of professionals with cooperation across MACH, Thiess and Sedgman.</p> <p>Zero non compliances were observed due to environmental factors.</p> <p>No reportable incidents occurred in the audit period.</p>
A2	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS and EAs;</p> <p>(d) generally in accordance with the Development Layout in Appendix 2</p>	Compliant	<p>(a) MPO displayed a high level of compliance with this consent.</p> <p>(b) Interview with the Environmental Superintendent confirmed no directions from the Planning Secretary were received in the audit period.</p> <p>(c) Auditors compared the EIS maps and predictions to the physical site during site inspection, confirming compliance.</p> <p>(d) Auditors compared the 2026 layout (Appendix 2 of SSD 10418) to the physical layout of the site during site inspection. Rehabilitation, open cut areas, the tailings dam and maximum footprint appears to be generally within the 2026 layout (noting the site inspection occurred in November 2024). Although within the overall footprint area, a <b>500 m² area was disturbed ahead of schedule</b> (see condition B56 for further detail).</p>
A3	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant regarding</p> <p>(i) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent; and</p> <p>(ii) the implementation of any actions or measures contained in any such document referred to in condition A3(a).</p>	Compliant	Interview with the Environmental Superintendent confirmed no directions were received from the Planning Secretary.
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity	Compliant	Some inconsistencies occur where conditions or criteria deviate under DA92/97, however this consent prevails.

Ref	Requirement	Status	Comments
	or conflict between them and any document/s listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Relevant management plans were updated and approved following the audit site inspection.
A5	Mining operations may be carried out on the site, within the approved disturbance area, until 22 December 2048.	Compliant	Cessation date has not yet occurred.
A6	A maximum of 21 million tonnes of ROM coal may be extracted from the site in any calendar year.	Compliant	Reviewed Annual Review (AR) 2023. 10.5 Mt of ROM coal was extracted in the 2023 calendar year. Reviewed MPO Daily Report Output V6 dated 26 November 2024. 2024 YTD coal extraction from 1 January 2024 to 26 November was 10.3 Mt. Viewed notification of intent to extract more than 10.5 Mtpa (previous extraction limit) following approval of required management plans dated 11 November 2024.
A7	A maximum of 17 million tonnes of product coal may be transported from the site in any calendar year.	Compliant	Reviewed 'Coal Transport Records 2024' spreadsheet dated 30 September 2024. 5.9 Mt transported from MPO to end of September 2024. Reviewed AR 2023 which reported 7.6 Mt saleable product coal produced in 2023 calendar year.
A8	Product coal may only be transported from the site by rail.	Compliant	Reviewed AR 2023 and 'Coal Transport Records 2024' spreadsheet showing train movements in and out of site. Coal was only transported by rail.
A9	A maximum of 10 laden trains may leave the site in any 24-hour period.	Compliant	Reviewed 'Coal Transport Records 2024'. No exceedances of 10 laden trains leaving site were recorded since development commenced under SSD 10418.
A10	The Applicant may undertake mining operations 24 hours a day, 7 days a week.	Compliant	Operations occur over a 24 hr / 7 day period (AR pers comms).
A11	Within three months of commencement of development under this consent, the Applicant must provide to the Department a survey plan (or spatial files in a format agreed by the Planning Secretary) of the boundaries of the approved disturbance areas.	Compliant	Commencement under this consent occurred on 12 February 2024. Viewed survey plan dated 25 March 2024 and cover letter submitted through the Major Projects Portal, dated 15 April 2024. Notification provided within the 3 month period.
A12	The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least two weeks before that date: (a) commencement of development under this consent; (b) commencement of construction of the Northern Link Road; (c) extraction of more than 10.5 million tonnes of ROM coal from the site in any calendar year; (d) cessation of mining operations (i.e. mine closure); and	Compliant	(a) Viewed letter of commencement lodged via Major Projects Portal dated 29 January 2024, two weeks prior to commencement of development on 12 February 2024 (b) AR confirmed that Northern Link Road (NLR) construction not commenced. (c) Reviewed AR 2023 and MPO Daily Report Output V6. 10.5 Mt of ROM coal has not been exceeded as of 26 November 2024.. (d) Not triggered (e) Not triggered

Ref	Requirement	Status	Comments
	(e) any period of suspension of mining operations (i.e. care and maintenance).		
A13	If the phases of the development are to be further staged, the Department must be notified in writing at least two weeks prior to the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Not triggered	No phases were staged in the audit period. Reviewed notification of non-compliance related to Stage 1 dated 9 October 2024. Refer to Condition B56.
A14	Within 12 months of the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must surrender the existing development consent for the Mount Pleasant Open Cut Coal Mine (DA 92/97) in accordance with the EP&A Regulation.	Not triggered	Timing requirement not yet triggered as due on 12 February 2025. Interview with AR confirmed MPO is aiming to surrender DA 92/97 in 2025.
A15	Upon the commencement of development under this consent, and before the surrender of existing development consents required under condition A 14, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents.	Compliant	See response to condition A4.
A16	Within six months of the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a PA with Council in accordance with (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the offer in Appendix 7.	Compliant	Commencement occurred 12 February 2024. Six months equates to 11 August 2024. Council is defined in the consent as Muswellbrook Shire Council. Reviewed 'Approval of Extension to Enter into Planning Agreement' letter from the Department dated 12 August 2024. The letter provided MPO an extension on requirement to enter a planning agreement with MSC until 12 November 2024 based on ongoing consultation and public exhibition of the planning agreement. Reviewed planning agreement between MACH Energy Australia and MSC dated 22 October 2024. None of the timing requirements for payments under the VPA have been triggered as the existing consent (DA 92/97) has not yet been surrendered.
A17	If the Applicant and Council do not enter into a PA within the timeframe under condition A16, then within a further three months, the Applicant must make a Section 7 .12 of the EP&A Act contribution to Council of \$9.52 million which is to be paid in equal annual instalments over a period of 10 years. The amount to be paid is to be adjusted at the time of the actual payment, in accordance with the provisions of the Muswellbrook Shire Council Section 94A Development Contributions Plan 2010.	Not triggered	Reviewed Approval of Extension to Enter into Planning Agreement letter from the Department dated 12 August 2024. Not triggered as planning agreement was entered into under a time extension (see condition A16).

Ref	Requirement	Status	Comments
A18	Further to conditions A 16 and A 17, within six months of the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must also enter into a PA with Upper Hunter Shire Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the offer in Appendix 8.	Compliant	Reviewed signed planning agreement between Mach Energy and Upper Hunter Shire Council dated 14 September 2022. Reviewed three tax invoices from Upper Hunter Shire Council: - 26 June 2024. 36,065.58 - 26 June 2024. \$67,622.96 - 26 June 2024. \$68,374.32 Reviewed remittance dated 24 July 2024 showing proof of payment.
A19	If there is any dispute between the Applicant, Council and/or Upper Hunter Shire Council in regard to conditions A 16, A 17 and A 18 then either party may refer the matter to the Planning Secretary for resolution.	Compliant	This has not occurred in the audit period (AR pers comms).
A20	Within six months of the commencement of development under this consent, a Community Consultative Committee (CCC) must be established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2019). The CCC must continue to operate during the life of the development, or other timeframe agreed by the Planning Secretary.	Compliant	Commencement was 12 February 2024; therefore 6 months is 12 August 2024. Reviewed existing CCC meeting minutes for 2023 and 2024 meetings (quarterly). MPO went through process confirming that current CCC would extend under this consent. Viewed agreement letter dated 19 April 2024.
A21	With the approval of the Planning Secretary, the Applicant may combine the CCC required by this consent with any similar CCC required by a consent or approval for any adjoining mine subject to common, shared or related ownership or management.	Compliant	Viewed letter from nominee of the Planning Secretary dated 19 April 2024 approving existing CCC's continuation under SSD 10418.
A22	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document; and (b) provide details of the consultation undertaken, including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has or proposes to address the matters not resolved.	Compliant	(a) Reviewed documents requiring consultation including all environmental management plans and rehabilitation documents. Records of consultation in Section 1 of management plans (e.g. Heritage NSW and RAPs for Aboriginal Heritage Management Plan Rev 03, October 2024). (b) (i) contained in Section 1 of management plans. (ii) contained in Section 1 of management plans.
A23	Prior to the approval of management plans under this consent, the Applicant must continue to implement any	Compliant	Management plans that were not approved by DPHI for SSD 10418 as of 14 November 2024 were generally not audited. In this case, the relevant management plan for DA



Ref	Requirement	Status	Comments
	equivalent or similar management plan/s required under DA 92/97, to the satisfaction of the Planning Secretary.		<p>92/97 was audited instead. Management plans which were applicable and audited under this IEA included:</p> <p>Biodiversity Management Plan (November 2024) (SSD 10418)</p> <p>Water Management Plan (August 2024) (SSD 10418)</p> <p>Noise Management Plan (November 2024))</p> <p>Traffic Management Plan (September 2024)(SSD 10418)</p> <p>Historic Heritage Management Plan (September 2024) (SSD 10418)</p> <p>Air Quality and Greenhouse Gas Management Plan (November 2024) (SSD 10418) (Draft)</p> <p>Aboriginal Cultural Heritage Management Plan (October 2024) (SSD 10418)</p> <p>Blast Management Plan (April 2020) (DA 92/97), (November 2024 Draft also reviewed)</p> <p>Visual Impact Management Plan (March 2024) (DA 92/97)</p> <p>Rehabilitation Management Plan (August 2022) (DA 92/97)</p> <p>Bushfire Management Plan (September 2020) (DA 92/97)</p>
A24	<p>With the approval of the Planning Secretary, the Applicant may:</p> <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p>	Not triggered	No plans or programs were requested to be prepared in a stages or combined states (AR pers comms).
A25	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Not triggered	See response to A24.

Ref	Requirement	Status	Comments
A26	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Not triggered	See response to A24.
A27	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Not triggered	This has not occurred in the audit period (AR pers comms).
A28	The Applicant must ensure that mining activities on the site are not reasonably likely to cause damage to road reserves outside of the site.	Compliant	No evidence of damage to road reserves offsite was observed during site inspection. AR confirmed none have occurred. No public infrastructure has been identified as needing repair or relocation as a result of the development.
A29	Should the increased elevation of the development's waste rock emplacement result in adverse impacts on the reception of broadcasting services from the Rossgole Tower transmission facilities, the Applicant must implement make-good provisions to the satisfaction of the Planning Secretary (such as raising the existing tower or construction of a re-transmission station) which would meet the siting and technical requirements of the Australian Communications and Media Authority.	Not triggered	No impacts to Rossgole tower occurred due to increased elevation of the waste rock emplacement (AR pers comms). Reviewed Community Complaints registers for the audit period. No complaints related to transmission towers were made. Review of sections 3 and 5 of Annual Review 2023 confirmed no adverse impacts on reception of broadcasting services from Rossgole Tower transmission facilities.
A30	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001 ).	Compliant	11 buildings were demolished in the audit period: <ul style="list-style-type: none"> <li>- 53 Kayuga Road (reviewed pre-demolition checklist and clearance certificates)</li> <li>- Waitomo, 613 Kayuga Road (reviewed pre-demolition checklist and clearance certificate)</li> <li>- Casey's Dairy, 435 Kayuga Road (reviewed pre-demolition checklist and clearance certificates)</li> <li>- Belgrave Homestead, Belgrave Access Road (reviewed pre-demolition checklist and clearance certificates)</li> <li>- Warrawee, Coal Creek Road (reviewed pre-demolition checklist)</li> <li>- Broomfield, 1100 Wybong Road (reviewed pre-demolition checklist)</li> </ul>

Ref	Requirement	Status	Comments
			<ul style="list-style-type: none"> <li>- Bates Homestead, 1100 Wybong Road (reviewed pre-demolition checklist and clearance certificates)</li> <li>- Gum Ridge, Gum Ridge Road (reviewed pre-demolition checklist and clearance certificate)</li> <li>- Cooba Bulga Road, Casilis (reviewed clearance certificate)</li> <li>- Warrawee House, 186 Castlerock Road (reviewed pre-demolition checklist)</li> <li>- Thorndale 270 Castlerock Road (reviewed clearance certificate)</li> </ul>
A31	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.	Compliant	<p>Buildings and structures new and/or amended in the period include:</p> <p>Stage 1 - Early works including earthworks and slab for administration and workshop buildings (see <b>Plate 48</b>. Site inspection of the workshop area revealed a well-considered building with clear considering of stormwater control, rainwater diversion, visual considerations (pale eucalypt), hydrocarbon management facility, oil/water separator and new truck wash facilities (see <b>Plate 1 to Plate 11</b>).</p> <p>Stage 2 - Administration, training, residential buildings, workshop and tyre &amp; wash bays ATCO Administration Building, decks and covered walkways</p> <p>Offsite manufacture and onsite installation of a modular administration office</p> <p>Reviewed construction certificates for ' ATCO Administration Building &amp; Decks and Covered Walkways' dated 5 August 2024, Notice of Intention to Commence Work for 'Offsite manufacture &amp; onsite installation of a modular administration office' dated 13 September 2024, Occupation Certificate for Stage 1 - Early works including earthworks and slab for administration and workshop buildings dated 25 September 2018 and Occupation Certificate for Stage 2 - Administration, training, residential buildings, workshop and tyre &amp; wash bays dated 12 October 2018.</p> <p>Auditors physically inspected the new workshop under construction where erosion and sediment control measures were observed in place. Buildings were clad in pale eucalypt (see <b>Plate 1</b>).</p>
A32	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Compliant	<p>Reviewed 'maintenance shift plan summary' for week ending 20 October 2024 which showed daily servicing of site equipment. Reviewed 'training presentation' for 18M3 grader which included machine and parts overviews, safety instructions, isolation, tagging, emergency shutdown, haul road maintenance information and park up instructions.</p> <p>Reviewed 'Forecast Maintenance Schedule dated from 11 October – 13 November 2024.</p> <p>Auditors observed the operation of mobile equipment during site inspection with limited dust visible (see <b>Plate 25</b>) – see weather discussion in the main IEA report.</p>

Ref	Requirement	Status	Comments
			<p>The site inspection of the CHPP and main conveyor also revealed all observable Colourbond shielding in place and the loadout loading coal at low speed (see <b>Plate 27</b>).</p> <p>Section 9.5 of the Noise Management Plan (Plant and Equipment Sound Power Level Monitoring) describes the program to test Sound Power Levels of mobile plant and equipment to inform servicing and maintenance.</p> <p>Reviewed 'MPO -sound power testing register' dated February 2024 – October 2025 showing majority of equipment passing and only one dozer (DZ2268) exceeded by 4 dBA, which is required to be retested per the spreadsheet in 2024..</p> <p>(Muller) Section 8.2 of the Noise Management Plan (Construction and Operational Controls) describes measures and controls to manage noise generation. These include regular maintenance of plant and machinery used on site and operation of plant and machinery in an efficient manner.</p> <p>Section 9.5 of the Noise Management Plan (Plant and Equipment Sound Power Level Monitoring) describes the program to test Sound Power Levels of mobile plant and equipment to inform servicing and maintenance. Sighted MPO – Sound Power Testing Register, examples of Sound Power Testing reports, Mining Services Contract and Work Order for sound suppression.</p> <p>A review of the 2023 Annual Review and Monthly Environmental Monitoring Reports identified that there were no exceedances of the applicable noise criteria during the Audit period.</p>
A33	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Compliant	<p>Reviewed Thiess staff induction slides dated 26/11/2024 relating to environmental compliance and consent requirements.</p> <p>Site interview confirmed inductions occur every Monday with a LAMP online learning process in place (BM pers comms).</p> <p>Reviewed Mach Energy completion.png, Thiess Completion.png, Subcontractor 1 Completion.png and Subcontractor 2 Completion.png. These screenshots showed completion of the induction training by a Thiess staff member, a MACH staff member and two subcontractors.</p>
A34	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of inclusion in the condition.	Compliant	See relevant specific conditions.
A35	Notwithstanding condition A34, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, in respect of ongoing monitoring and management obligations, agree to or require compliance with an updated or revised version of such a	Compliant	<p>No requests by DPHI made in audit period (AR pers comms).</p> <p>(Muller) Reviewed example of monthly attended noise monitoring reports (July 2024). Confirmed that noise monitoring undertaken in accordance with relevant guidelines.</p>

Ref	Requirement	Status	Comments
	guideline, protocol, Standard or policy, or a replacement of them.		
A36	The Applicant must consult with OPE - Crown Lands prior to undertaking any development on Crown Land or Crown Roads.	Compliant	<p>There is a small parcel of Crown Land inside the Mining Lease Boundary (shown in Figure 11, Appendix 3) which has not been impacted in the audit period. Site interview confirmed avoidance of crown lands where possible and nothing built on crown land in the audit period. Reviewed Crown Land Management Act 2016 – Section 2.18 Licence RN 626388 dated 25 June 2021 for the existing pipeline and pump site located near Lot 8 DP 770911.</p> <p>DW1 is discharge dam proposed to be relocated on crown land, with lots affected being Lot 2 DP561117 – Diversion Drain, Lot 91 DP620639, Lot 102 &amp; 103 DP1148907, and Wyndham Arms Row. Reviewed email correspondence with Crown Lands dated 24 October 2024, confirming MPO is in consultation with CL regarding the dam. Response from CL outlined the need to apply for a new General Licence for the proposed dam.</p>
<b>Part B Specific Environmental Conditions</b>			
<b>Noise</b>			
B1	Except for the noise affected land in condition C1, the Applicant must ensure that the operational noise generated by the development does not exceed the criteria in Table 1. Noise generated by the development must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017). The noise enhancing meteorological conditions determined by monitoring at the meteorological station required under condition B38 and as defined in Part D of the NSW Noise Policy for Industry (EPA, 2017) apply to the noise criteria in Table 1.	Compliant	<p>(Muller) Reviewed 2023 Annual Review and Monthly Environmental Monitoring Reports for March 2023 – October 2024. Identified that there were no exceedances of the criteria in Table 1.</p> <p>Reviewed example of monthly attended noise monitoring reports (July 2024). Noted that noise monitoring undertaken in accordance with the consent conditions, Noise Management Plan and relevant Standards and guidelines.</p>

Ref	Requirement	Status				Comments
		Day	Evening	Night	Night	
Noise Assessment Location <sup>a</sup>		L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)	L <sub>A1</sub> (1 min)	
Residences on Privately-Owned Land						
19, 77, 79, 84a, 140c, 169, 171, 172, 172b, 172c, 181c, 189, 190, 191, 192, 202, 203, 203b, 203c, 207, 213, 214, 215, 216, 216b, 217, 218, 219, 220, 221, 222, 223, 223b, 224, 225, 289, 526, 667a		40	37	37	45	
20, 21, 35, 35b, 67, 74, 86a		40	38	38	45	
43		40	39	39	45	
43b		40	39	39	46	
96		40	39	39	48	
47		40	40	40	45	
102		40	40	40	48	
108		40	40	40	50	
140a		40	40	40	47	
82, 83, 86b, 310, 180b, 197, 202b, 212, 212b		40	36	36	45	
112		40	36	36	47	
194, 195, 547		42	41	36	45	
193		42	41	37	45	
All other residences in Noise Assessment Group (NAG) 1		40	36	36	45	
All other residences in NAG 2		42	41	35	45	
Other privately-owned residences		40	35	35	45	
<sup>a</sup> The Noise Assessment Locations and NAGs referred to in Table 1, are shown in Appendix 3.						
B2	The noise criteria in Table 1 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the noise criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Not triggered		No agreements for exceedances are in place (AR pers comms).		
B3	With the written agreement of the Planning Secretary, the Applicant may seek temporary construction noise limits above the operational noise criteria in Table 1, including for construction works outside of standard hours. In order to seek a temporary construction noise limit, the Applicant must develop a Construction Noise Protocol to the satisfaction of the Planning Secretary. This protocol must: (a) be prepared in consultation with the EPA and any residents who may be affected by the noise generated by these works;	Not triggered		(Muller) There were no requests for temporary construction noise limits during the Audit period.		



Ref	Requirement	Status	Comments
	(b) specify the construction works to which the temporary construction noise limits would apply and provide justification for these limits; and (c) address the relevant requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009).		
B4	The Applicant must continue to operate in accordance with the noise criteria in Table 1 until and unless a Construction Noise Protocol for the specified construction works is approved by the Planning Secretary.	Not triggered	(Muller) There were no significant noise generating construction works completed during the Audit period.
B5	The Applicant must implement any Construction Noise Protocol approved by the Planning Secretary.	Not triggered	(Muller) There were no significant noise generating construction works completed during the Audit period.
B6	The Applicant must: (a) take all reasonable and feasible steps to minimise noise from construction and operational activities, including low frequency noise and other audible characteristics, as well as road noise associated with the development; (b) implement reasonable and feasible noise attenuation measures on all plant and equipment (other than light vehicles) that will operate in noise sensitive areas; (c) take all reasonable steps to minimise the noise impacts of the development in noise sensitive areas during the evening and night; (d) take all reasonable steps to minimise the noise impacts of the development during noise-enhancing meteorological conditions; (e) operate a comprehensive noise management system that uses a combination of predictive meteorological forecasting and real-time noise monitoring data to guide the day-to-day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this consent; (f) carry out regular attended noise monitoring (at least once a month, unless otherwise agreed by the Planning Secretary) to determine whether the development is complying with the relevant conditions of this consent; and	Compliant	(Muller) MPO has prepared and implemented a Noise Management Plan (MP001-0000-ENV-PLN-0003, 21 December 2021), which describes the management measures that are implemented to manage noise to acceptable levels. a) Section 8 of the Noise Management Plan describes noise management measures and controls to minimise noise generated by MPO. Measures include a range of proactive and reactive measures consistent with current best practice. b) Section 9.5 of the Noise Management Plan describes the program implemented by MPO to test the sound power levels of plant and equipment. The results of the testing are used to inform ongoing servicing and maintenance of mobile equipment, including the implementation of additional reasonable and feasible attenuation measures. Confirmed with MPO personnel that all equipment fitted with noise suppression kits. Where new equipment is brought onto site that does not have noise suppression fitted, the equipment is proactively managed to avoid noise impacts. Sighted MPO – Sound Power Testing Register, examples of Sound Power Testing reports, Mining Services Contract and Work Order for sound suppression. c) Section 8 of the Noise Management Plan describes noise management measures to minimise noise impacts during the evening and night periods, including limiting vegetation clearing works to the day period, operating plant and equipment in less exposed areas during the evening and night and implementing a real-time noise protocol to reactively manage noise. Discussed MPOCAT system with Dispatch, including management of operations to proactively and reactively minimise noise impacts. Review of Monthly Environmental Monitoring Reports show compliance with the relevant noise limits during the evening and night periods.

Ref	Requirement	Status	Comments
	(g) regularly assess the noise monitoring data and modify or stop operations on the site to ensure compliance with the relevant conditions of this consent.		<p>d) Section 8.4 of the Noise Management Plan describes the predictive modelling, including predictive meteorological forecasting to inform the need for any additional controls during noise enhancing meteorological conditions.</p> <p>Section 9.4 of the Noise Management Plan provides details on continuous meteorological monitoring at MPO, including the monitoring of temperature lapse rate. As per Section 8.5 of the Noise Management Plan, where adverse meteorological conditions are experienced or predicted, operational changes are implemented to minimise noise impacts.</p> <p>e) Section 8.4 and Section 9.3 of the Noise Management Plan describe the predictive modelling and real-time noise monitoring protocols to proactively and reactively manage noise at MPO. Proactive noise management measures are described in Section 8.1 and Section 8.2 of the Noise Management Plan and the real-time response protocol (reactive measures) are described in Section 8.5 of the Noise Management Plan.</p> <p>f) Section 9.2 of the Noise Management Plan describes the attended noise monitoring program and methodology. Review of Monthly Environmental Monitoring Reports demonstrates monitoring is undertaken in accordance with the Noise Management Plan and satisfies the condition of consent.</p> <p>g) Section 10.1 of the Noise Management Plan describes the contingency measures to be implemented where non-compliances are observed. Section 11 of the Noise Management Plan describes the review and improvement of performance measures. The real-time response protocol and measures are described in Section 8.5 of the Noise Management Plan.</p> <p>A review of the 2023 Annual Review and Monthly Environmental Monitoring Reports for March 2023 – October 2024 identified that there were no exceedances of the applicable noise criteria during the Audit period.</p> <p>Noted: Version 4 of the NMP, approved on 26 November 2024, references the conditions of consent from SSD 10418.</p>
B7	Any MOD4 Rail maintenance or rectification works outside of the Mining Lease Boundary that will be audible at the nearest private residences must be carried out during Standard Construction Hours (7 am to 6 pm, Monday to Friday; and 8 am to 1 pm on Saturdays), unless the works are: (a) required by: (i) NSW Police; or (ii) a public authority for the delivery of vehicles, plant or materials; or	Not triggered	(Muller) Previous Independent Environmental Audit notes that all construction works associated with MOD 4 have been completed. Hence, there were no MOD 4 construction works during the Audit period.

Ref	Requirement	Status	Comments
	(b) required in an emergency to avoid the loss of life, damage to property or to prevent material harm to the environment; (c) approved under a Construction Noise Protocol under condition B3.		
B8	<p>If the Applicant proposes to undertake MOD4 Rail construction works (outside of the Mining Lease Boundary) outside the hours specified in condition B7 above, then the Applicant must prepare an Out of Hours Work Protocol for these works, to the satisfaction of the Planning Secretary. This protocol must:</p> <p>(a) be prepared in consultation with the EPA and any residents who may be affected by the noise generated by these works;</p> <p>(b) address the relevant requirements of the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and</p> <p>(c) be approved by the Planning Secretary before any out of hours construction works are carried out.</p> <p>The Applicant must implement the Out of Hours Work Protocol as approved by the Planning Secretary.</p>	Not triggered	Previous Independent Environmental Audit notes that all construction works associated with MOD 4 have been completed. Hence, there were no MOD 4 construction works during the Audit period.
B9	<p>The Applicant must prepare a Noise Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be submitted for approval within six months of the commencement of development under this consent;</p> <p>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p> <p>(c) be prepared in consultation with the EPA;</p> <p>(d) describe the measures to be implemented to ensure:</p> <p>(i) compliance with the noise criteria and operating conditions of this consent;</p> <p>(ii) best practice management is being employed; and</p> <p>(iii) noise impacts of the development are minimised during noise-enhancing meteorological conditions;</p>	Compliant	<p>(a) Interview with MPO representatives confirmed Version 4 of the NMP was submitted in April (AR pers comms). (evidenced by provision of portal upload screenshot) MPO was awaiting approval of the NMP at the time of the audit site inspection.</p> <p>(b) Version 4 of the NMP has been prepared and reviewed by Roman Haverkamp of RWDI Australia (RWDI) (formerly Wilkinson Murray). Reviewed endorsement of specialist in Attachment 3 of the NMP.</p> <p>(c) Section 1.2.2 of the NMP (Rev 4, 2024) addresses this condition. (Muller) A review of the 2023 Annual Review and Monthly Environmental Monitoring Reports for March 2023 – October 2024 identified that there were no exceedances of the applicable noise criteria during the Audit period. Review of Monthly Environmental Monitoring Reports demonstrates monitoring is undertaken in accordance with the Noise Management Plan. Reviewed real-time noise monitoring and response protocol with MPO personnel, including use of an instant group messaging app to immediately respond to triggers or observations.</p>

Ref	Requirement	Status	Comments
	<p>(e) describe the measures to minimise development related road traffic noise generated on public roads;</p> <p>(f) describe the noise management system in detail; and</p> <p>(g) include a monitoring program that:</p> <p>(i) uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the development;</p> <p>(ii) monitors noise at locations representative of the most affected residences;</p> <p>(iii) includes a program to calibrate and validate the real-time noise monitoring results with the attended monitoring results over time;</p> <p>(iv) adequately supports the noise management system;</p> <p>(v) includes a protocol for distinguishing noise emissions of the development from any neighbouring developments; and</p> <p>(vi) includes a protocol for identifying any noise-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of any such event.</p>		Review of complaints register identifies that there were 20 noise related complaints during the Audit period. Each noise complaint was investigated, and management measures applied where applicable. Review of 2023 Annual Review notes that noise complaints have generally decreased each year from a peak in 2019.
B10	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal from the site in a calendar year until the Noise Management Plan is approved by the Planning Secretary.	Not triggered	<p>Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded.</p> <p>(Muller) Version 3 of the Noise Management Plan (MP001-0000-ENV-PLN-0003) was approved by the Planning Secretary on 21 December 2021.</p> <p>NMP required under this consent submitted April 2024 and approved 26 November 2024.</p>
B11	The Applicant must implement the Noise Management Plan as approved by the Planning Secretary.	Compliant	(Muller) The Planning Secretary approved the revised Noise Management Plan (MP001-0000-ENV-PLN-0003) on 21 December 2021 (Viewed letter from DPIE, 21 December 2021).
<b>Blasting</b>			
B12	The Applicant must ensure that blasting on the site does not cause exceedances of the criteria at the locations in Table 2.	Compliant	(Muller) A review of the 2023 Annual Review and Monthly Environmental Monitoring Reports for March 2023 – October 2024 identified that airblast overpressure and ground vibration from blasting activities complied with the blasting limits in Table 2.

Ref	Requirement	Status	Comments																							
	<table> <tr> <th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr> <tr> <td rowspan="2">Residence on privately-owned land<sup>a</sup></td><td>120</td><td>10</td><td>0%</td></tr> <tr> <td>115</td><td>5</td><td>5% of the total number of blasts a calendar year</td></tr> <tr> <td>Mine-owned residences</td><td>-</td><td>10</td><td>0%</td></tr> <tr> <td>Historic heritage sites<sup>b</sup></td><td>-</td><td>10</td><td>0%</td></tr> <tr> <td>Other public infrastructure</td><td>-</td><td>50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version)</td><td>0%</td></tr> </table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land <sup>a</sup>	120	10	0%	115	5	5% of the total number of blasts a calendar year	Mine-owned residences	-	10	0%	Historic heritage sites <sup>b</sup>	-	10	0%	Other public infrastructure	-	50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version)	0%		
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Other public infrastructure	-	50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version)	0%																							
<sup>a</sup> The locations referred to in Table 2 are shown in Appendix 3. <sup>b</sup> These limits do not apply to historic heritage sites located within the approved disturbance area																										
B13	The blasting criteria in Table 2 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or infrastructure to exceed the blasting criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Noted	No agreements for exceedances are in place (AR pers comms).																							
B14	The Applicant must only carry out blasting for the development between 9.00 am and 5.00 pm (Monday to Saturday inclusive). No blasting is allowed on Sundays, public holidays or any other time without the prior written approval of the Planning Secretary.	Compliant	(Muller) A review of blasting data identified that all blasting activities occurred within the prescribed blasting hours.																							
B15	The Applicant may carry out a maximum of: (a) 2 single blast events a day; and (b) 8 single blast events a week, averaged over a calendar year	Compliant	(Muller) A review of blasting data identified that blasting activities complied with the allowable maximum daily and weekly blasting events.																							
B16	Condition B15 does not apply to single blast events that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or to blast misfires or blasts required to ensure the safety of the mine, its workers or the general public.  Within conditions 815 and 816, 'single blast event' means a blast which involves either a single detonation or a number of individual blasts fired in quick succession in a discrete area of the development. Should an additional blast be required after a blast misfire, this	Noted																								

Ref	Requirement	Status	Comments
	additional blast and the blast misfire are counted as a single blast event.		
B17	<p>If the Applicant receives a written request from the owner of any privately-owned land within 3 kilometres of any active open cut mining pit on the site, or any other landowner where the Planning Secretary is satisfied an inspection is warranted, for a property inspection to establish the <b>baseline condition</b> of any buildings and structures on their land, or to have a previous property inspection updated, then within two months of receiving this request (or, in the case of a request for an inspection outside the 3 kilometres, within two months of receiving notice that the Planning Secretary is satisfied that an inspection is warranted) the Applicant must:</p> <p>(a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to:</p> <p>(i) establish the baseline condition of any buildings and other structures on the land, or update the previous property inspection report;</p> <p>(ii) identify measures that should be implemented to minimise the potential blasting impacts of the development on these buildings and structures; and</p> <p>(b) give the landowner a copy of the new or updated property inspection report.</p>	Compliant	<p>Requests were received from a landowner (EIS ID 195) for a baseline property report on 3 houses including 519 new England Hwy, 1 hayshed and 1 dairy shed. All are within 3 km of active open cut mining.</p> <p>Reviewed property inspection preliminary information letter dated 30 May 2024 for the landowner. Sighted letter to property owner confirming receipt of request and intent to investigate dated 30 May 2024. Reviewed associated Baseline Structural Reports for the three properties owned by this landholder dated 11 July 2024, 13 August 2024 and 16 August 2024. With the first investigation completed in July. The timeframe has been met.</p> <p>Reviewed email correspondence between MACH and resident / owner of the properties dated 19 August 2024.</p> <p>(a) MPC Consulting Engineers were employed by MPO to undertake the inspections. Reviewed agreement to baseline inspection works signed by the landholder dated 30 May 2024.</p> <p>(i) A baseline structural report addressed this condition</p> <p>(ii) Management measures were suggested in the conclusions of the reports. Interview with MPO environment team confirmed property investigations have not yet progressed to the point where the landowner has made a claim.</p> <p>(b) The owner was provided electronic copies by email, which also suggested a staff member would drop off a hardcopy to the property.</p> <p>Viewed drafted follow up letter to landowner to be sent out after audit period.</p>
B18	If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the property inspection report, either party may refer the matter to the Planning Secretary for resolution.	Not triggered	No disputes have occurred in the audit period (AR Pers comms).
B19	If the owner of any privately-owned land within 3 kilometres of any active open cut mining pit on the site or any other landowner where the Planning Secretary is satisfied an investigation is warranted, claims in writing that buildings or structures on their land have been damaged as a result of blasting on the site, then within two months of receiving this written claim ( or, in the case of a request for an inspection outside the 3 kilometres, within two months of receiving notice	Not triggered	This has not occurred in the audit period (AR pers comms).

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	that the Planning Secretary is satisfied that an inspection is warranted) the Applicant must: (a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to investigate the claim; and (b) give the landowner a copy of the property investigation report.		
B20	If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Applicant must repair the damage to the satisfaction of the Planning Secretary.	Not triggered	See response to B19. .
B21	If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Planning Secretary for resolution .	Not triggered	See response to B19.
B22	The Applicant must: (a) take all reasonable steps to: (i) ensure the safety of people and livestock from blasting impacts of the development; (ii) protect public and private infrastructure and property in the vicinity of the site from blasting damage associated with the development; and (iii) minimise blast-related dust and fume emissions; (b) ensure that blasting on the site does not damage heritage items (outside the approved disturbance area - see Appendix 5), and develop specific measures to protect heritage items from any blasting damage associated with the development; (c) minimise the frequency and duration of any public road closures for blasting, and use all reasonable efforts to avoid road closures during peak traffic periods; (d) operate a comprehensive blast management system that uses a combination of meteorological forecasts and predictive blast modelling to guide the planning of blasts to minimise blasting impacts; (e) operate a suitable system to enable interested members of the public to get up-to-date information on the proposed	Compliant	(Muller) MPO has prepared and implemented a Blast Management Plan (MP001-0000-EXR-PLN-0005, 14 April 2020), which describes the management measures that are implemented to manage potential blasting impacts. a) Section 9 of the Blast Management Plan describes blast management and control measures to ensure the safety of people and livestock, including road closures and buffer zones to land outside the site not owned by MACH Energy and protection of public infrastructure. Strategies to minimise dust and fume are provided in Section 9.5.2 of the Blast Management Plan. b) Section 9.4 of the Blast Management Plan addresses blasting effects on heritage sites. c) MPO has prepared and implemented a Road Closure Management Plan (00939529-002, 14 January 2019), which describes the management of blasting when carried out within 500m of a public road. Confirmed with MPO personnel that no blasting occurred within 500m of a public road during the Audit period. d) Section 8.6 of the Blast Management Plan provides a summary of historic blast assessments for the site. The historic blast assessments, and ongoing blast monitoring is used to refine blast design. Section 9.5.1 of the Blast Management Plan describes the pre-blast assessments prepared by the Drill and Blast Coordinator, including assessment of meteorological conditions prior to the blast to minimise impact. e) Section 9.5.4 of the Blast Management Plan provides details on MPO's system to provide information to the public on blasting. The system includes information published on the Mach Energy website ( <a href="https://machenergyaustralia.com.au">https://machenergyaustralia.com.au</a> ),



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	<p>blasting schedule on the site and any associated road closures, including notification via SMS message of the blasting schedule and associated road closures for that day and any variations to that schedule and closures;</p> <p>(f) use all reasonable efforts to co-ordinate the timing of blasting at the site with any nearby mines to minimise cumulative blasting impacts; and</p> <p>(g) carry out regular blast monitoring to determine whether the development is complying with the relevant conditions of this consent.</p>		<p>Muswellbrook Shire Council (MSC) website (<a href="https://www.muswellbrook.nsw.gov.au/blast-notifications">https://www.muswellbrook.nsw.gov.au/blast-notifications</a>), and the Community Hotline (1800 886 889) and Blasting Hotline (1800 931 872). Confirmed that up-to-date information is provided on each of the systems, including notification of road closures.</p> <p>Section 9.5.4 of the Blast Management Plan notes that stakeholders within 2km of the open cut extent that register to be informed of the MPO blasting schedule will be notified prior to blasting.</p> <p>f) Section 9.5.3 of the Blast Management Plan describes the Cumulative Blasting Protocol to coordinate the timing of blasting with Begala Mine, Mt Arthur Coal Mine, Dartbrook Mine, Mangoola Coal and Muswellbrook Coal. Prior to each blasting event, MPO reviews the scheduled blasts listed on the MSC website. Communication with the surrounding mines is undertaken to confirm blast schedule.</p> <p>g) Section 10 of the Blast Management Plan describes the blast monitoring program to determine compliance with the relevant consent conditions.</p> <p>A detailed review of blasting data identified that all blasting activities are undertaken in accordance with the conditions of consent. No exceedances of the blasting limits were noted in the Audit period.</p> <p>Noted: Version 6 of the BMP (Draft for Consultation) references the conditions of consent from SSD 10418.</p> <p><b>Recommendation: Update Blast Management Plan to provide correct MSC website (<a href="https://www.muswellbrook.nsw.gov.au/blast-notifications/">https://www.muswellbrook.nsw.gov.au/blast-notifications/</a>) and provide Blasting Hotline number (1800 931 872).</b></p>
B23	<p>The Applicant must not undertake blasting on the site within 500 metres of any public road or any land outside the site not owned by the Applicant, unless the blast generates ground vibration of 0.5 mm/s or less at that location, or the Applicant has:</p> <p>(a) a written agreement with the relevant infrastructure owner or landowner to allow blasting to be carried out closer to the public road or land, and the Applicant has advised the Department in writing of the terms of this agreement; or</p> <p>(b) demonstrated, to the satisfaction of the Planning Secretary, that the blasting can be carried out closer to the public road or land without compromising the safety of people or livestock or damaging the road or other buildings and structures, and updated the Blast Management Plan to include specific mitigation measures to be implemented while</p>	Compliant	<p>(Muller) Appendix B of the Blast Management Plan (Road Closure Management Plan) details specific management measures to be implemented when blasting within 500m of a public road. The Road Closure Management Plan was approved by Muswellbrook Shire Council (MSC) on 16 May 2017.</p> <p>Section 9.1.2 of the Blast Management Plan indicates that no blasting within 500m of land outside the site, not owned by MACH Energy, will be undertaken unless a written agreement has been made with the relevant landowner, or MACH Energy has updated the Blast Management Plan to include specific measures that would be implemented while blasting is carried out within 500m of the land.</p> <p>Section 9.3 of the Blast Management Plan states that blast vibration monitoring would be undertaken at a representative location when blasting is within 500 metres of public infrastructure demonstrate that ground vibration is within the blasting limits.</p>

Ref	Requirement	Status	Comments
	blasting is being carried out within 500 metres of the road or land.		
B24	<p>The Applicant must prepare a Blast Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be submitted for approval within six months of the commencement of development under this consent;</li> <li>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</li> <li>(c) be prepared in consultation with the EPA;</li> <li>(d) describe the blast management system and the measures that will be implemented to ensure compliance with the blasting criteria and conditions of this consent;</li> <li>(e) include a Blast Fume Management Strategy for: <ul style="list-style-type: none"> <li>(i) minimising blast fume emissions;</li> <li>(ii) rating and recording blast fume events; and</li> <li>(iii) reporting significant blast fume events to the Department and the EPA;</li> </ul> </li> <li>(f) include a Road Closure Management Plan for any blasting within 500 metres of a public road, that has been prepared in consultation with relevant roads authorities and includes provisions for: <ul style="list-style-type: none"> <li>(i) minimising the duration of closures, both on a per event basis and weekly basis;</li> <li>(ii) avoiding closures during peak traffic periods as far as reasonable; and</li> <li>(iii) using reasonable efforts to co-ordinate closures with nearby mines to minimise the cumulative effect of road closures;</li> </ul> </li> <li>(g) identify any agreed alternative ground vibration limits for public or private infrastructure in the vicinity of the site (if relevant);</li> <li>(h) include a strategy to manage potential blast interactions with nearby mines;</li> <li>(i) include a strategy to monitor, mitigate and manage the effects of blasting on heritage items, including details of</li> </ul>	Compliant	<ul style="list-style-type: none"> <li>(a) Blast Management Plan Revision 6 for SSD 10418 was submitted for approval in April 2024 (reviewed draft BMP), two months after development commenced under the consent. Reviewed Blast Management Plan Revision 5 dated 10 April 2020 as the SSD plan not yet approved.</li> <li>(b) Rev 6 of the BMP has been prepared and reviewed by Roman Haverkamp of RWDI Australia (RWDI) (formerly Wilkinson Murray), who was endorsed by the Planning Secretary as a suitably qualified and experienced person. A copy of the endorsement by the Planning Secretary is included as Attachment 3.</li> <li>(c) Section 1.2.2 of the BMP Rev 6 addresses this condition.</li> </ul> <p>(Muller) A detailed review of blasting data identified that all blasting activities are undertaken in accordance with the conditions of consent. No exceedance of the blasting limits were noted in the Audit period.</p> <p>Called the community hotline and viewed MSC and MPO websites to confirm that up-to-date information is provided on each of the systems, including notification of road closures.</p> <p><b>Recommendation: Update Blast Management Plan to provide correct MSC website and provide Blasting Hotline number.</b></p>

Ref	Requirement	Status	Comments
	<p>baseline (i.e. pre-blasting) and ongoing risk-based dilapidation surveys (subject to landowner access arrangements);</p> <p>U) include a monitoring program for evaluating and reporting on compliance with the relevant conditions of this consent (including but not limited to condition B22(b));</p> <p>(k) include a protocol for identifying any blast-related exceedance, incident or non-compliance and for notifying the Department, the EPA and relevant stakeholders of these events;</p> <p>(l) include public notification procedures to enable members of the public, particularly surrounding residents, to get up-to-date information on the proposed blasting schedule; and</p> <p>(m) include a protocol for investigating and responding to blast-related complaints.</p>		
B25	The Applicant must not undertake any blasting north of Castlerock Road until the Blast Management Plan is approved by the Planning Secretary.	Compliant	No site blasting has not occurred north of Castlerock Road in audit period (AR pers). BMP approved November 2024.
B26	The Applicant must implement the Blast Management Plan as approved by the Planning Secretary.	Compliant	<p>(Muller)</p> <p>A detailed review of blasting data identified that all blasting activities are undertaken in accordance with the conditions of consent. No exceedances of the blasting limits were noted during the Audit period.</p>
<b>Air Quality and Greenhouse Gas Emissions</b>			
B27	The Applicant must ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	<b>Not compliant</b>	<p>(zephyr) 2 odour complaints were received via EPA:</p> <p>* 25/06/2024 – spontaneous combustion. Heated area identified by OCE at the time of the complaint, but management measure not identified. Information on off-site PM10 concentrations provided.</p> <p>* 5/07/2024 – spontaneous combustion. Heated area identified by OCE but management measures not identified. Information on off-site PM10 concentrations provided.</p> <p><b>Management</b></p> <p>Viewed letter dated 3 July 2024 where MACH responded to the EPA regarding the 25 June 2024 complaint. Action was taken to remediate the spontaneous combustion issue with material utilised to manage it.</p> <p>Viewed letter dated 17 July 2024 where MACH responded to the EPA regarding the 5 July 2024 complaint. The community complainant reported smelly air pollution with the</p>

Ref	Requirement	Status	Comments
			<p>strong smell of rotten egg gas and visible smoke from spontaneous combustion. The complainant was on Wybong Road at the time 500m west of the rail overpass. Improvements have been made to dust management TARP since the incident. The TARP did not previously include a section relating to odour observed offsite. Reviewed dust tarp which now includes the question "Is there any heated material and/or Odour?"</p> <p><b>Recommend ongoing management of spontaneous combustion and revision of TARP in next audit period to ensure continuous improvement.</b></p> <p><b>Offensive Odours</b></p> <p>The POEO Act defines an offensive odour as "offensive odour means an odour—</p> <p>(a) that, by reason of its strength, nature, duration, character or quality, or the time at which it is emitted, or any other circumstances—</p> <p>(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or</p> <p>(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, or</p> <p>(b) that is of a strength, nature, duration, character or quality prescribed by the regulations or that is emitted at a time, or in other circumstances, prescribed by the regulations."</p> <p>The two complaints were potentially triggered by aii in the definition (unable to be confirmed). MACH argued that no evidence was provided by the complainants to demonstrate "unreasonable interference". <b>MACH was unable to provide evidence to the contrary, resulting in the identified non compliance. Recommend that should MACH intend to rely on this argument in future (should complaints / incidents occur), evidence is prepared to demonstrate.</b></p>
B28	Except for the air quality affected land in condition C1 , the Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Table 3 at any residence on privately-owned land.	Compliant	<p>(zephyr) No events recorded in 2024.</p> <p>Annual criteria not exceeded for either TSP, PM10 or PM2.5</p>

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<b>Table 3:</b> Air quality criteria																			
<table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td rowspan="2">Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td><td>Annual</td><td><sup>a, c</sup> 25 µg/m<sup>3</sup></td></tr><tr><td>24 hour</td><td><sup>b</sup> 50 µg/m<sup>3</sup></td></tr><tr><td rowspan="2">Particulate matter &lt; 2.5 µm (PM<sub>2.5</sub>)</td><td>Annual</td><td><sup>a, c</sup> 8 µg/m<sup>3</sup></td></tr><tr><td>24 hour</td><td><sup>b</sup> 25 µg/m<sup>3</sup></td></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td><sup>a, c</sup> 90 µg/m<sup>3</sup></td></tr></table>				Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a, c</sup> 25 µg/m <sup>3</sup>	24 hour	<sup>b</sup> 50 µg/m <sup>3</sup>	Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	Annual	<sup>a, c</sup> 8 µg/m <sup>3</sup>	24 hour	<sup>b</sup> 25 µg/m <sup>3</sup>	Total suspended particulate (TSP) matter	Annual	<sup>a, c</sup> 90 µg/m <sup>3</sup>
Pollutant	Averaging period	Criterion																	
Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a, c</sup> 25 µg/m <sup>3</sup>																	
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	24 hour	<sup>b</sup> 25 µg/m <sup>3</sup>																	
Total suspended particulate (TSP) matter	Annual	<sup>a, c</sup> 90 µg/m <sup>3</sup>																	
<div><div><sup>a</sup> Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations of all other sources).</div><div><sup>b</sup> Incremental impact (i.e. incremental increase in concentrations due to the development on its own).</div><div><sup>c</sup> Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Planning Secretary.</div></div>																			
B29	The air quality criteria in Table 3 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the air quality criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Noted																	
B30	<p>Particulate matter emissions generated by the development must not exceed the criteria listed in Table 3 at any occupied residence on mine-owned land (including land owned by another mining company) unless:</p> <p>(a) the tenant and landowner (if the residence is owned by another mining company) have been notified of any health risks associated with such exceedances in accordance with the notification requirements under PART C of this consent;</p> <p>(b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving 14 days' notice;</p> <p>(c) air quality monitoring is regularly undertaken to inform the tenant and landowner (if the residence is owned by another mining company) of the likely particulate matter emissions at the residence; and</p> <p>(d) data from this monitoring is presented to the tenant and landowner in an appropriate format for a medical practitioner to assist the tenant and landowner in making informed decisions on the health risks associated with occupying the property.</p>	Not triggered	(Zephyr) No events recorded in 2024.																

Ref	Requirement	Status	Comments
B31	<p>The Applicant must:</p> <p>(a) take all reasonable and feasible steps to:</p> <p>(i) minimise odour, fume and particulate matter (including PM10 and PM2) emissions of the development, paying particular attention to minimising wheel-generated haul road emissions;</p> <p>(ii) eliminate or minimise the risk of spontaneous combustion;</p> <p>(iii) improve energy efficiency and minimise Scope 1 and Scope 2 GHGs generated by the development;</p> <p>(iv) minimise any visible off-site air pollution generated by the development; and</p> <p>(v) minimise the extent of potential dust generating surfaces exposed on the site at any given point in time;</p> <p>(b) ensure that all new 'non-road' mobile diesel equipment used in undertaking the development includes reasonable and feasible diesel emissions reduction technology;</p> <p>(c) operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and real-time air quality monitoring data to guide the day-to-day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent;</p> <p>(d) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above);</p> <p>(e) minimise air quality impacts of the development on air quality-affected land referred to in condition C1 for as long as the land remains privately-owned (i.e. until it is acquired);</p> <p>(f) make all reasonable efforts to co-ordinate air quality management on the site with the air quality management at nearby mines to minimise cumulative air quality impacts;</p> <p>(g) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent; and</p>	Compliant	<p>(Zephyr) The site visit, discussions with site personnel, and viewing of evidence provided indicates all reasonable and practical measures are being implemented to minimise odour, fume and particulate matter emissions at the site.</p> <p>The proactive and reactive management system is well designed and operates with a number of safeguards to ensure every effort is made to reduce emissions at the source.</p> <p>Adverse meteorological conditions have been identified and are used to notify alerts and alarms. The WhatsApp group for OCEs is linked to a 24h/d call centre, enabling actions to be taken at any time of day. This group includes communications and photographs, enabling the smooth operation of the proactive and reactive management systems.</p> <p>The Airen dust plume prediction tool enables good management of blast times to coincide with favourable meteorological conditions, therefore minimising any likely off-site impacts.</p> <p>There are dust curtains on drill rigs, polymers have been used with general success to reduce wheel generated dust on highly trafficked routes.</p> <p>In an effort to reduce scope 1 GHG emissions there has been the introduction of some new electric trucks.</p> <p>There is room for some improvement on drier days where additional water carts may be required on some haul roads, as wheel generated dust was observed during the site visit.</p> <p>In addition, it would be good to investigate whether any addition measures could be introduced during loading trucks in the pit.</p> <p>As and when the operations are approved to the north, there may also be additional monitoring required near Aberdeen.</p>

Ref	Requirement	Status	Comments
	(h) regularly assess meteorological and air quality monitoring data, and modify operations on the site to ensure compliance with the relevant conditions of this consent.		
B32	<p>The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be submitted for approval within six months of the commencement of development under this consent;</p> <p>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p> <p>(c) be prepared in consultation with the CAS and EPA;</p> <p>(d) describe the measures to be implemented to ensure:</p> <p>(i) compliance with the air quality criteria and operating conditions of this consent;</p> <p>(ii) best practice management is being employed to:</p> <ul style="list-style-type: none"> <li>• minimise the development's air quality impacts;</li> <li>• minimise the development's Scope 1 and 2 GHGs; and</li> <li>• improve the development's energy efficiency; and</li> </ul> <p>(iii) the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;</p> <p>(e) describe the air quality management system in detail; and</p> <p>(f) include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007), that:</p> <p>(i) includes an estimate of the emissions of PM2s per kilometre travelled from all 'non-road' mobile diesel equipment used for the development;</p> <p>(ii) uses monitors to evaluate the performance of the development against the air quality criteria in this consent and to guide day-to-day planning of mining operations;</p> <p>(iii) adequately supports the air quality management system;</p> <p>(iv) includes a protocol for distinguishing the dust emissions of the development from any neighbouring developments;</p> <p>and</p>	Compliant	<p>(a) AQGGMP SSD 10418 was submitted for approval in August 2024, within six months of commencement under the consent. Reviewed AQGGMP (2019) and the draft 2024 AQGGMP.</p> <p>(b) The AQGGMP has been prepared and reviewed by Aleks Todoroski, Director of TAS, who has been endorsed by the Planning Secretary as a suitably qualified and experienced person. A copy of the endorsement by the Planning Secretary is included in Attachment 3.</p> <p>(c) Page 2 of the AQGGMP references EPA consultation.</p> <p>(Zephyr) The draft AQGHG Management Plan for SSD-10418 conditions was supplied on 29 November 2024.</p> <p>It complies with all requirements of this condition.</p>



Ref	Requirement	Status	Comments
	(v) includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.		
B33	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Air Quality and Greenhouse Gas Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded
B34	<p>Within 12 months of approval of the Air Quality and Greenhouse Gas Management Plan and then every 3 years during the life of mining operations (and any period of suspension of ROM coal extraction and/or processing), the Air Quality and Greenhouse Gas Management Plan must be updated to include the following information in relation to Scope 1 and Scope 2 GHGs:</p> <p>(a) a review of all available GHGE abatement measures relevant to the development;</p> <p>(b) a review, to the satisfaction of the Planning Secretary, of the reasonable and feasible GHGE abatement measures, and economic considerations for the development;</p> <p>(c) a 3-year action plan to investigate and implement all reasonable and feasible abatement measures to minimise GHGs;</p> <p>(d) a description of measures to minimise long-term Scope 1 GHGs. These measures are to:</p> <p>(i) have regard to the abatement measures and abatement options required by condition B34(a) and (b); and</p> <p>(ii) be aimed at achieving, as soon as reasonably feasible but by 2034 at the latest, a 5-year rolling average by calendar year of the annual Scope 1 GHGE intensities of not more than 0.028 tonnes of CO<sub>2</sub>-e emitted from the development per tonne of ROM coal; and</p> <p>(e) a reporting of compliance with the performance measures in Table 4, and revise where reasonable and feasible to minimise GHGs.</p>	Compliant	<p>(Zephyr) The draft AQGHG Management Plan for SSD-10418 conditions was supplied on 29 November 2024.</p> <p>It complies with all requirements of this condition.</p>
B35	The Applicant must implement the Air Quality and Greenhouse Gas Management Plan (and any update	Compliant	(Zephyr) The draft AQGHG Management Plan for SSD-10418 conditions was supplied on 29 November 2024 and complies with this condition.

Ref	Requirement	Status	Comments						
	thereof), including any measures it describes, as approved by the Planning Secretary.								
B36	<p>The Applicant must comply with the performance measures in Table 4.</p> <p><i>Table 4: Greenhouse gas performance measures</i></p> <table><tr><th>Feature</th><th>Performance Measure</th></tr><tr><td>Scope 1</td><td><ul style="list-style-type: none"><li>Less than 0.87 million tonnes CO2-e emitted per calendar year, or lower emissions as determined under condition B34</li><li>Less than 0.80 million tonnes CO2-e emitted per calendar year (5-year rolling average), or lower emissions as determined under condition B34</li><li>Less than 13.9 million tonnes CO2-e emitted over the life of the development lower emissions as determined under condition B34</li></ul></td></tr><tr><td>Scope 2</td><td><ul style="list-style-type: none"><li>Minimise CO2-e emissions by using electricity generated by renewable or carbon neutral energy sources where reasonable and feasible</li></ul></td></tr></table>	Feature	Performance Measure	Scope 1	<ul style="list-style-type: none"><li>Less than 0.87 million tonnes CO2-e emitted per calendar year, or lower emissions as determined under condition B34</li><li>Less than 0.80 million tonnes CO2-e emitted per calendar year (5-year rolling average), or lower emissions as determined under condition B34</li><li>Less than 13.9 million tonnes CO2-e emitted over the life of the development lower emissions as determined under condition B34</li></ul>	Scope 2	<ul style="list-style-type: none"><li>Minimise CO2-e emissions by using electricity generated by renewable or carbon neutral energy sources where reasonable and feasible</li></ul>	Compliant	(Zephyr) Calculation of 0.82 Mt CO2-e from 2023 Annual review for Scope 1.
Feature	Performance Measure								
Scope 1	<ul style="list-style-type: none"><li>Less than 0.87 million tonnes CO2-e emitted per calendar year, or lower emissions as determined under condition B34</li><li>Less than 0.80 million tonnes CO2-e emitted per calendar year (5-year rolling average), or lower emissions as determined under condition B34</li><li>Less than 13.9 million tonnes CO2-e emitted over the life of the development lower emissions as determined under condition B34</li></ul>								
Scope 2	<ul style="list-style-type: none"><li>Minimise CO2-e emissions by using electricity generated by renewable or carbon neutral energy sources where reasonable and feasible</li></ul>								
B37	<p>In determining compliance with the performance measures in Table 4, the Planning Secretary will take into account any atypical or abnormal operating conditions, any exceedances already offset (or required to be offset or otherwise accounted for) under other applicable Commonwealth or State requirements (for example the NGERs scheme), changes in Global Warming Potential and/or any voluntary offsetting of CO2-e emissions by the Applicant. If, following this consideration, the Planning Secretary determines that the Applicant has exceeded any of these performance measures, including revised performance measures determined under condition B34, then the Applicant must offset the excess CO2.e emissions within six months of the Planning Secretary's determination, using a mechanism to the satisfaction of the Planning Secretary.</p>	Noted	(Zephyr) The 2023 Annual Review used a GWP of 21 for methane. This is likely to increase and is currently 28. This could lead to exceedances of scope 1 emissions, particularly for fugitives.						
B38	<p>Within three months of the commencement of development under this consent, the Applicant must ensure that there is a suitable meteorological station operating in the vicinity of the site that:</p> <p>(a) complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007); and</p> <p>(b) is capable of measuring meteorological conditions in accordance with the NSW Noise Policy for Industry (EPA, 2017), unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.</p>	Compliant	(Zephyr) There are currently two operating meteorological stations which comply with relevant siting and monitoring requirements.						

Ref	Requirement	Status	Comments
<b>Water</b>			
B39	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.	Compliant	<p><b>Hunter River Take</b></p> <p>Reviewed Annual Review 2023.</p> <p>37 of MPO's 51 WALs allow take from Hunter Regulated River Water Source. MPO's water take from the Hunter Regulated River Water Source was 602 ML, 3,156 ML less than the MPO total entitlement of 3,758 ML. Site water balance at section 6.5 of the Annual Review confirmed MPO has sufficient water for the development.</p> <p>Auditors interviewed Craig Hawkins (CH) Project Manager for water second day of site inspection discussed water management and ordering. Water is managed at MPO using spreadsheet 'Licensed Water Usage_23-24' and 'Licensed Water Usage_24-25' and the Internet Water Access System from Water NSW website. As water is consumed and ordered the tracking spreadsheet is updated against all WALs. Updated each year and compared to what is in Water NSW.</p> <p>Licensed Water Usage_24-25t is updated with carryover (water that is not consumed in the previous year).</p> <p>Reviewed first pumping campaign for 2024/25 year – order of 116.1 ML used 4.3 ML</p> <p>Dam inspections occur every day</p> <p>Flexible water pumping system with many water storage areas to manage ensuring enough water is available and enough storage available to pump water out of the pit if needed (CH pers comms).</p> <p><b>Groundwater Interception</b></p> <p>The water Management Plan Water Balance (which has only just been completed and approved) demonstrates the site water usage, balancing, and water sources.</p> <p>Per the Site water balance the Maximum predicted inflow for the project is approximately 303ML to occur in 2034-35 water year, current hard rock water licence holdings are 730ML. (MPO Water Management Plan_Site Water Balance Section 7.1 and Mount Pleasant Optimisation Project – Groundwater Impact Assessment – v01.06 (G1970A) Section 7.1.1).</p> <p>The two water licences held in the Sydney Basin – Nth Coast Groundwater Source, totalling 730ML is well in excess of the maximum predicted inflow of 303ML.</p> <p>LR indicates that the calculation and assessment of the GW take for the 2024 period and the Water Balance review has not yet been finalised for the 2024 period for inclusion in the 2024, once the 2024 assessment is complete it will be included in the 2024 Annual Review.</p>
B40	The Applicant must report on water extracted from the site each year (direct and indirect) in the Annual Review (referred	Not triggered	SSD 10418 not in force at the time of the AR 2023.Reviewed Annual Review 2023. Condition addressed throughout Section 6, Tables 26 and 27.

Ref	Requirement	Status	Comments				
	to in condition D11), including water taken under each water licence.		<p>(Engeny) MPO holds water access licences for groundwater and surface water (both regulated and unregulated). These licences are listed in Table 3 of the 2023 Annual Review. Section 6.4 of the Annual Review details the water taken under licences held for the Hunter Regulated River water source only.</p> <p><b>No indication of water taken under groundwater or regulated river licences is provided.</b></p> <p>Water extracted from the site (both direct and indirect) is reported in Section 6.5 of the 2023 Annual Review.</p> <p><b>Water taken under all water licences (including unregulated river and groundwater licences) should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.</b></p>				
B41	<p>Prior to commencing construction of development under this consent, the Applicant must notify the owner of the bore listed in Table 5 that they may request monitoring of the listed bore to determine the level of drawdown from the development.</p> <p>In the event that monitoring data records drawdown of more than 2 metres as a result of the development, the Applicant must provide compensatory water in accordance with conditions B42 to B47.</p> <p><b>Table 5:</b> Private bore monitoring</p> <table><tr><th>Bore ID<sup>a</sup></th><th>Receiver ID</th></tr><tr><td>Belgrave</td><td>143f</td></tr></table> <p><sup>a</sup> The receiver ID and bore location referred to in Table 5 are shown in Appendix 4.</p>	Bore ID <sup>a</sup>	Receiver ID	Belgrave	143f	Compliant	<p>Construction is defined under the consent as “all physical works to enable mining operations to be carried out, including demolition and removal of buildings or works, and erection of buildings and other infrastructure permitted by this consent and the associated removal , storage and/or emplacement of vegetation and topsoil, but not including pre-construction activities. No construction has occurred in the audit period (AR pers comms).</p> <p>Viewed letter of notification of right to request monitoring to owner of existing bore dated 29 February 2024. No response has been received (AR pers comms) .</p> <p>No monitoring has been requested. (AR pers comms)</p> <p>As per notification letters dated 29 February 2024, none of the bores are in use (CAS1_G, CAS2_G, CAS3_G, CAS4_G and JLON1.</p>
Bore ID <sup>a</sup>	Receiver ID						
Belgrave	143f						
B42	Within three months of the commencement of development under this consent, the Applicant must notify owners of licensed privately-owned groundwater bores that are predicted to have a drawdown of greater than 2 metres as a result of the development.	Not triggered	See response to B41.				
B43	The Applicant must provide a compensatory water supply to any landowner of privately-owned land whose rightful water supply is adversely and directly impacted (other than an impact that is minor or negligible) as a result of the development, in consultation with OPE Water, and to the satisfaction of the Planning Secretary.	Not triggered	No rightful water supply was found to be adversely affected during the audit period (AR pers comms).				

Ref	Requirement	Status	Comments
B44	The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent, in quality and volume, to the loss attributable to the development. Equivalent water supply should be provided (at least on an interim basis) as soon as practicable after the loss is identified, unless otherwise agreed with the landowner.	Not triggered	See response to B43.
B45	If the Applicant and the landowner cannot agree on whether the loss of water is attributed to the development or the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.	Not triggered	See response to B43.
B46	<p>If the Applicant is unable to provide an alternative long-term supply of water, then the Applicant must provide compensation, to the satisfaction of the Planning Secretary</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• The Water Management Plan (see condition B52) is required to include trigger levels for investigating potentially adverse impacts on water supplies.</li> <li>• The burden of proof that any loss of surface water or groundwater access is not due to mining impacts rests with the Applicant.</li> </ul>	Not triggered	See response to B43.
B47	In the event of any complaint relating to a privately-owned licensed groundwater bore which may, in the opinion of the Planning Secretary, have been adversely and directly impacted as a result of the development (other than an impact that is minor or negligible), the Applicant must, as soon as practicable, facilitate the provision of a temporary water supply, pending the outcome of any groundwater investigation and/or the provision of an alternative long-term supply of water as required under condition B44, to the satisfaction of the Planning Secretary.	Not triggered	See response to B43.
B48	Conditions B41 to B47 do not apply if the Applicant has a compensatory water agreement with the owner/s of the land and the Applicant has advised the Department in writing of the terms of this agreement.	Not triggered	See response to B43. .
B49	The Applicant must ensure that all surface discharges from the site comply with:	Not triggered	Reviewed Water Management Plan Version 2 dated August 2024. Section 6.2 controls discharge limits with regard to the EPL.

Ref	Requirement	Status	Comments
	(a) discharge limits (both volume and quality) set for the development in any EPL; or (b) relevant provisions of the POEO Act or Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.		No surface water discharges occurred during the audit period confirmed (AR pers comms). A review of the AR 2023 and EPL condition P1.2 did not indicate any surface discharges occurred in the audit period.
B50	The Applicant must ensure that the development complies with the performance measures in Table 6.	Compliant	(RPS) Reviewed Water Management Plan Version 2. Requirements of Table 6 are addressed in: Water Management General - Site Water Balance (Appendix 1 of the WMP) Section 4 Water Management System. This section of the site water balance sits addresses each requirement. Alluvial aquifers – Appendix 4, Sections 5 and 7 Erosion and sediment control works – Appendix 2 Section 5 and Appendix 3 Section 6. Clean water diversions and storage infrastructure – Appendix 1 Section 4 and Appendix 3 Section 6. Sediment dams – Appendix 1 Section 4 Mine water storage – Appendix 1 Section 4. Chemical and hydrocarbon storage – Appendix 3 Section 6 Tailings Storages Appendix 1, Appendix 3 and Appendix 4 Overburden emplacements – Appendix 3 and Appendix 4. Aquatic and riparian ecosystems – Appendix 3 section 6 and Appendix 4 section 7. (Engeny) Compliance with groundwater related performance measures in Table 6 has been assessed, including: •Negligible impacts to alluvial aquifers as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: -negligible change in groundwater levels; -negligible change in groundwater quality; and -negligible impact to other groundwater users. Section 7 of the MPO Groundwater Water Management Plan (GWMP) (MPO, 2024) outlines groundwater trigger levels to monitor impacts to groundwater levels, groundwater quality and groundwater users. Section 8 of the GWMP outlines the groundwater monitoring program. Reporting against these trigger levels and groundwater monitoring results in the 2023 Annual Review indicates compliance with this performance measure. •Maintain appropriate setbacks in accordance with the Aquifer Interference Policy (DPI, 2012)

Table 6: Water management performance measures

Feature	Performance Measure <sup>a</sup>
Water management – General	<ul style="list-style-type: none"> <li>• Maintain separation between clean and dirty (i.e. sediment-laden) and mine water management systems</li> <li>• Minimise the use of clean and potable water on the site</li> <li>• Maximise water recycling, reuse and sharing opportunities</li> <li>• Minimise the use of make-up water from external sources, including extraction from the Hunter River</li> <li>• Minimise the need for discharges to the Hunter River Salinity Trading Scheme</li> <li>• Design, install, operate and maintain water management systems in a proper and efficient manner</li> <li>• Minimise risks to the receiving environment and downstream water users</li> </ul>

Ref	Requirement	Status	Comments
	<p>Alluvial aquifers</p> <ul style="list-style-type: none"> <li>Negligible impacts to alluvial aquifers as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: <ul style="list-style-type: none"> <li>negligible change in groundwater levels;</li> <li>negligible change in groundwater quality; and</li> <li>negligible impact to other groundwater users,</li> </ul> </li> <li>Maintain appropriate setbacks in accordance with the <i>Aquifer Interference Policy</i> (DPI, 2012)</li> <li>Protect GDEs surrounding the site by maintaining negligible impacts as a result of the development, beyond those predicted in the documents listed in condition A2(c)</li> </ul> <p>Erosion and sediment control works</p> <ul style="list-style-type: none"> <li>Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book (Landcom, 2004)</i>, <i>Volume 2A: Installation of Services (DECC, 2008)</i>, <i>Volume 2C: Unsealed Roads (DECC, 2008)</i>, <i>Volume 2D: Main Road Construction (DECC, 2008)</i> and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i></li> <li>Design, install and maintain any creek crossings in accordance with the <i>Fisheries NSW Policy and Guidelines for Fish Habitat Conservation and Management</i> (2013) and <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries, 2003)</li> <li>Design, install and maintain any new infrastructure within 40 metres watercourses in in accordance with the guidance series for <i>Controlled Activity on Waterfront Land</i> (DPI Water, 2012)</li> </ul> <p>Clean water diversions and storage infrastructure</p> <ul style="list-style-type: none"> <li>Maximise, as far as reasonable, the diversion of clean water around disturbed areas on the site, except where clean water is captured for use on the site</li> </ul> <p>Sediment dams</p> <ul style="list-style-type: none"> <li>Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004)</i> and <i>Volume 2E: Mines and Quarries (DECC, 2008)</i> and requirements under the POEO Act</li> </ul> <p>Mine water storages</p> <ul style="list-style-type: none"> <li>Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water</li> <li>New mine water storages designed to contain the 1% AEP 24-hour-storm event and minimise permeability</li> <li>On-site storages (including mine infrastructure dams, groundwater storage and treatment dams) are suitably designed, installed and maintained (including to minimise permeability)</li> <li>Ensure adequate freeboards within all pit voids at all times to minimise the risk of discharge to surface waters</li> </ul> <p>Chemical and hydrocarbon storage</p> <ul style="list-style-type: none"> <li>Chemical and hydrocarbon products to be stored in bunded areas in accordance with the relevant Australian Standard</li> </ul> <p>Tailings storages</p> <ul style="list-style-type: none"> <li>Maximise dewatering and co-disposal of dewatered tailings from the Stage 2 CHPP within overburden emplacements</li> <li>Design and maintain tailings storage areas to prevent the movement of tailings seepage/leachate offsite</li> </ul> <p>Overburden emplacements</p> <ul style="list-style-type: none"> <li>Design, install and maintain emplacements to prevent migration of acid forming and potentially acid forming materials, and saline and sodic materials</li> <li>Design, install and maintain out-of-pit emplacements to prevent and/or manage long term saline seepage</li> </ul> <p>Aquatic and riparian ecosystems</p> <ul style="list-style-type: none"> <li>Negligible environmental consequences beyond those predicted in the document/s listed in condition A2(c)</li> <li>Maintain or improve baseline channel stability</li> <li>Develop site-specific in-stream water quality objectives in accordance with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC &amp; ARMCANZ, 2000) and Using the ANZECC Guidelines and Water Quality Objectives in NSW (DEC, 2006) or its latest version</li> </ul>		<p>Groundwater mapping figures provided in Figure 3 of the GWMP (MPO, 2024) indicates that appropriate setbacks have been maintained.</p> <p>•Protect GDEs surrounding the site by maintaining negligible impacts as a result of the development, beyond those predicted in the documents listed in condition A2(c)</p> <p>Section 6.2.2 presents groundwater levels. For the Eastern bores (representative of the alluvial aquifer). MPBH6 is close to the area of predicted drawdown in the vicinity of GDES (Figure 8.3 GWIA [AGE, 2020]). MPBH6 shown on Chart 30 shows minimal change of groundwater level for the audit period.</p> <p>(RPS) Auditors physically inspected water management system during site inspection including runoff and stormwater systems, oil/water separators, sediment dam draining into EW3, and fines emplacement / tailings dam. No environmental concerns or non-compliances were observed. See <b>Plate 31</b>, <b>Plate 41</b> and <b>Plate 44</b> showing elements of the water management system.</p>
B51	The performance measures in Table 6 apply to the entire site, including all landforms constructed under previous development consents. However, these performance measures do not require any additional earthmoving works to be undertaken for landforms that have been approved and constructed under previous consents, except where those	Compliant	<p>Reviewed WMP Version 2.</p> <p>The application of Table 6 to the entire site including landforms constructed under DA 92/97 is addressed throughout Appendix 1 Section 4, Appendix 2 Section 5.1, Appendix 3 Section 5 and Appendix 4 Section 7.</p>



Ref	Requirement	Status	Comments
	earthworks are required for the establishment of a stable and non-polluting landform.		
B52	<p>The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be submitted for approval within six months of the commencement of development under this consent;</li> <li>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</li> <li>(c) be prepared in consultation with OPE Water and the EPA;</li> <li>(d) describe the measures to be implemented to ensure that the Applicant complies with the water management performance measures (see Table 6);</li> <li>(e) utilise existing data from nearby mines and build on existing monitoring programs, where practicable;</li> <li>(f) include a: <ul style="list-style-type: none"> <li>(i) Site Water Balance that includes details of: <ul style="list-style-type: none"> <li>• predicted annual inflows to and outflows from the site;</li> <li>• sources and security of water supply for the life of the development (including authorised entitlements and licences);</li> <li>• water storage capacity;</li> <li>• water use and management on the site, including any water transfers or sharing with neighbouring mines;</li> <li>• licensed discharge points and limits;</li> <li>• reporting procedures, including the annual preparation of an updated site water balance; and</li> <li>• a program to periodically validate the water balance for the development.</li> </ul> </li> <li>(ii) Erosion and Sediment Control Plan that: <ul style="list-style-type: none"> <li>• is consistent with the requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) and Volume 2E: Mines and Quarries (DECC, 2008);</li> <li>• identifies activities that could cause soil erosion, generate sediment or affect flooding ;</li> </ul> </li> </ul> </li> </ul>	<b>Not compliant</b>	<p>Reviewed WMP Version 2 August 2024. Reviewed approval letter from the Department dated 2 August 2024.</p> <ul style="list-style-type: none"> <li>(a) Reviewed confirmation of submission email dated 29 February 2024.</li> <li>(b) The groundwater related components of the WMP were prepared by Bryce McKay, Principal – Hydrologist at Australasian Groundwater and Environmental Consultants Pty Ltd and the surface water components have been prepared by Dr Camilla West, Associate Scientist at ATC Williams. A copy of the endorsements by the Planning Secretary are included in Attachment 3.</li> <li>(c) Addressed in Section 1.3.1</li> <li>(d) Addressed in detail throughout Appendix 1 – Appendix 4.</li> <li>(e) Evidence of data use from nearby mines to build on existing programs throughout Appendix 3 and Appendix 4.</li> <li>(f) <ul style="list-style-type: none"> <li>i) The site water balance is included in detail as Appendix 1.</li> <li>ii) Erosion and Sediment Control Plan makes up Appendix 2.</li> <li>iii) Surface Water Management and Monitoring Plan is in Appendix 3.</li> <li>iv) Groundwater Management Plan is in Appendix 5</li> <li>v) Addressed in Section 5.</li> </ul> </li> </ul> <p>Water metering: HR2 (main pump for mine operations) has not yet received certification as specialist installer has not yet completed works. Reviewed Water NSW correspondence and acknowledgement of certified installer (Branden Cook for PPS CMI #57657) dated 27 October 2024. Reviewed Meter Validation Certificate dated 21 January 2025</p> <p>(Engeny) Requirements and commitments identified in the MPO GWMP (MPO, 2024) are italicised below with commentary provided for each commitment.</p> <p><i>Trigger levels will be established for the new monitoring bores (Melody and MPBH5) when sufficient monitoring data, with a minimum of two years, is available.</i></p> <ul style="list-style-type: none"> <li>• These monitoring bores have been in place since 2018 and monitoring is undertaken quarterly. It is that the opinion of Engeny that there is sufficient monitoring data to establish trigger levels for these bores.</li> <li>• Recommendation for continuous improvement: Triggers should be established for the Melody and MPBH5 monitoring bores.</li> </ul>

Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>describes measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, and manage flood risk;</li> <li>describes the location, function, and capacity of erosion and sediment control structures and flood management structures; and</li> <li>describes what measures would be implemented to maintain (and if necessary decommission) the structures over time;</li> </ul> <p>(iii) Surface Water Management and Monitoring Plan that includes:</p> <ul style="list-style-type: none"> <li>detailed baseline data on surface water flows and quality of watercourses and/or water bodies potentially impacted by the development, including: <ul style="list-style-type: none"> <li>stream and riparian vegetation health;</li> <li>channel stability (geomorphology); and</li> <li>water supply for other surface water users;</li> </ul> </li> <li>a detailed description of the surface water management system;</li> <li>details of the water licensing requirements for all water storages (i.e. exempt, harvestable rights or licenced);</li> <li>detailed plans, design objectives and performance criteria for water management infrastructure, including: <ul style="list-style-type: none"> <li>water run-off diversions and catch drains;</li> <li>water storages and sediment dams including mine water management systems;</li> <li>emplacement areas;</li> <li>backfilled pits and final voids for the development; and</li> <li>reinstated drainage networks on rehabilitated areas of the site;</li> </ul> </li> <li>surface water performance criteria, including trigger levels for identifying and investigating any potentially adverse impacts (or trends) associated with the development, for: <ul style="list-style-type: none"> <li>water supply for other water users;</li> <li>downstream surface water flows and quality;</li> <li>downstream flooding impacts;</li> </ul> </li> </ul>		<p><i>Where accurate data is available for comparison, estimates of seepage inflows to the open cut will be compared to the modelled groundwater inflows. The rainfall runoff component estimates will also be determined where appropriate for comparison using the rainfall records and the existing site water balance model. Operational water balance reviews will be conducted regularly, as described in the Site Water Balance.</i></p> <ul style="list-style-type: none"> <li>Reviewed Daily Operations Report Tuesday 31 December 2024. Groundwater take in 2024 was 2.9 ML.</li> <li>SSD 10418 was not in force when the AR 2023 was published. Recommendation for continuous improvement: Water taken under all water licences should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.</li> </ul> <p><i>In relation to water, the MPO Annual Review will:</i></p> <ul style="list-style-type: none"> <li><i>include a comprehensive review of the groundwater monitoring results at the MPO over the past year, which includes a comparison of the results to evaluate compliance against:</i> <ul style="list-style-type: none"> <li><i>- relevant statutory requirements, limits or performance measures/criteria (refer Sections 2 and 5);</i></li> <li><i>- monitoring results of the previous years;</i></li> <li><i>- relevant predictions in the Mount Pleasant Operation EIS and MOD 1, MOD 2, MOD 3 and MOD 4 EAs (prior to the surrender of Development Consent DA 92/97); and</i></li> <li><i>- relevant predictions in the Project EIS.</i></li> </ul> </li> <li><i>identify any groundwater-related non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;</i></li> <li><i>identify any trends in the groundwater monitoring data over the life of the MPO;</i></li> <li><i>identify any discrepancies between the predicted and actual groundwater impacts of the MPO, and analyse the potential cause of any significant discrepancies; and</i></li> <li><i>describe what groundwater-related measures will be implemented over the next year to improve the environmental performance of the MPO.</i></li> </ul> <ul style="list-style-type: none"> <li>The 2023 Annual Review includes a comprehensive overview of most monitoring results (for the annual review year and previous years) that are required to be captured as per commitments in the GWMP (BPO, 2024). Results are not presented for annual laboratory analysis of analytes listed in</li> </ul>

Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>- stream and riparian vegetation heath; and</li> <li>- post-mining water pollution from rehabilitated areas of the site, including final voids;</li> <li>• a water pollution impact assessment to manage any discharges from the site;</li> <li>• a program to monitor and evaluate:</li> <li>- compliance with the relevant performance measures listed in Table 6 and the performance criteria in this plan;</li> <li>- controlled and uncontrolled discharges and seepage/leachate from the site;</li> <li>- impacts on water supply for other water users, including potential cumulative impacts;</li> <li>- surface water inflows, outflows and storage volumes, to inform the Site Water Balance; and</li> <li>- the effectiveness of the surface water management system and the measures in the Erosion and Sediment Control Plan;</li> <li>• reporting procedures for the results of the monitoring program, including notifying other water users of any elevated results; and</li> <li>• a trigger action response plan to respond to any exceedances of the relevant performance measures or performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development, including measures to provide compensatory water supply to any affected water user under condition B41 of this Schedule.</li> </ul> <p>(iv) Groundwater Management Plan that includes:</p> <ul style="list-style-type: none"> <li>• detailed baseline data of groundwater levels, yield and quality for groundwater resources and groundwater dependent ecosystems potentially impacted by the development, including groundwater supply for other water users;</li> <li>• a detailed description of the groundwater management system;</li> </ul>		<p>table 19 of the GWMP (MPO, 2024). However the GWMP 2024 and SSD 10418 were not in place when the AR 2023 was published.</p> <ul style="list-style-type: none"> <li>• No groundwater-related non-compliances were reported in the 2023 Annual Review.</li> <li>• Trends in the groundwater monitoring data are described.</li> <li>• No discrepancies between predicted and actual impacts are provided in the annual report.</li> <li>- Recommendation: opportunity for improvement is to supplement the existing groundwater monitoring network with the addition of new boreholes is listed as a 2024 commitment for improvement of environmental performance.</li> <li>- Recommendation for continuous improvement: Results for annual laboratory analyses of analytes listed in Table 19 of the GWMP (MPO, 2024) should be included in the Annual Review.</li> </ul> <p><i>The MPO Annual Review will also include reporting on elevation at each bore with water levels being presented in Australian Height Datum and depth.</i></p> <ul style="list-style-type: none"> <li>• <b>Water levels are presented in depth (as meter below ground level) only.</b></li> <li>- <b>Recommendation: Present water levels in both depth and AHD in the Annual Review. Alternatively, remove this requirement from the GWMP (2024).</b></li> </ul> <p><i>The numerical model developed and used for the Mount Pleasant Optimisation EIS Groundwater Impact Assessment (AGE Consultants, 2020) will be used as a management tool for the periodic review and calibration of predicted groundwater impacts through the life of the MPO. The numerical model will be progressively refined, with refinements informed by the results of the groundwater monitoring program. Revised outputs from the numerical model will be reported in the Annual Review, as relevant over the life of the MPO, and used to inform regular site water balance reviews. The model will be peer reviewed every three years.</i></p> <p>The groundwater model was developed by AGE Consultants in 2020. As per the GWMP 2024, it should undergo review every three years. There was no evidence provided during the audit that the groundwater model has been refined with results from the groundwater monitoring program and no revised groundwater model is reported in the Annual review. There was no evidence to indicate a peer review has occurred. Now that the GWMP 2024 is in force, the MPO groundwater model (AGE Consultants, 2020) should be refined with results from the site groundwater monitoring program and undergo peer review as soon as possible and every three years henceforth. <i>The observed groundwater levels will be reviewed against the</i></p>

Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>groundwater performance criteria, including trigger levels for identifying and investigating any potentially adverse groundwater impacts (or trends) associated with the development, on: <ul style="list-style-type: none"> <li>regional and local aquifers (alluvial and hardrock); and</li> <li>groundwater supply for other water users such as licensed privately-owned groundwater bores;</li> </ul> </li> <li>a program to monitor and evaluate: <ul style="list-style-type: none"> <li>compliance with the relevant performance measures listed in Table 6 and the performance criteria in this plan;</li> <li>water loss/seepage from water storages into the groundwater system, including from final voids;</li> <li>impacts on GDEs identified outside the development footprint (including stygofauna);</li> <li>groundwater inflows, outflows and storage volumes, to inform the Site Water Balance;</li> <li>the hydrogeological setting of any nearby alluvial aquifers and the likelihood of any indirect impacts from the development;</li> <li>impacts on groundwater supply for other water users, including cumulative impacts;</li> <li>the effectiveness of the groundwater management system;</li> </ul> </li> <li>reporting procedures for the results of the monitoring program, including notifying other water users of any elevated results;</li> <li>a trigger action response plan to respond to any exceedances of the relevant performance measures and groundwater performance criteria, and repair, mitigate and/or offset any adverse groundwater impacts of the development, including measures to provide compensatory water supply to any affected water user under condition B41 of this Schedule;</li> <li>a program to periodically validate the groundwater model for the development, including a peer review of the model every 3 years, and comparison of monitoring results with modelled predictions; and</li> </ul>		<p><i>model predictions on an annual basis. A suitably qualified hydrogeologist will determine when water levels deviate significantly from that predicted by the model and the reason for this deviation. The review will consider the impact of mining, and other factors that could result in varying water levels including climatic conditions, rainfall recharge and pumping from privately-owned bores and/or other mining operations.</i></p> <ul style="list-style-type: none"> <li>Comparison between the predicted groundwater levels and observed levels is not included in the 2023 Annual Review. This should be included in future Annual Reviews. No evidence was provided to indicate that a suitably qualified hydrogeologist undertook assessment of the modelled and observed water levels. This should also be provided in future.</li> </ul> <p><i>Groundwater level monitoring is to be undertaken quarterly.</i></p> <ul style="list-style-type: none"> <li>Review of level results presented in the 2023 Annual Review and 2024 monitoring data indicates that level monitoring was undertaken quarterly during the audit period.</li> </ul> <p><i>Groundwater quality laboratory analysis is to be undertaken annually for parameters listed in Table 19 of the WMP.</i></p> <ul style="list-style-type: none"> <li>Groundwater quality monitoring data for the audit period indicates that this commitment has been fulfilled.</li> </ul> <p><i>To satisfy the requirements of the NSW Aquifer Interference Policy, privately-owned bores (shown in Figure 8a to 8c and listed in Table 10) will be monitored regularly (subject to landholder access) to detect if mining-related drawdown of greater than 2 m occurs or is likely to occur. Bores to the east of the MPO will be monitored quarterly to obtain baseline records and to detect if initial mining is impacting water levels. Bores to the north and west of the MPO will be monitored 6-monthly to obtain baseline records, until mining progresses closer to those areas, at which time monitoring frequency may increase. The existing network of monitoring bores will also be utilised to compare drawdown extents to the groundwater model predictions.</i></p> <ul style="list-style-type: none"> <li>The GWMP 2024 commits to privately-owned bores (shown in Figure 8a to 8c and listed in Table 10) being monitored regularly (subject to landholder access) to detect if mining-related drawdown of greater than 2 m occurs or is</li> </ul>

Ref	Requirement	Status	Comments
	(v) a protocol to report on the measures, monitoring results and performance criteria identified above, in the Annual Review referred to in condition D11.		<p>likely to occur. No evidence was provided to indicate that monitoring of privately-owned bores was undertaken during the audit period and no evidence provided to compare drawdown extents in existing monitoring network with the groundwater model predictions. Now that the GWMP 2024 is in force, this will need to occur. Land access for privately owned bores should be arranged.</p> <p><i>In the event that groundwater levels at the bores listed in Table 16 fall below the trigger values, the response protocol in Table 20 will be initiated.</i></p> <ul style="list-style-type: none"> <li>Table 16 of the GWMP (MPO, 2024) includes trigger levels for MPBH1, MPBH2, MPBH3b and MPBH7. Result presented in the 2023 Annual review that no level values recorded at these bores were below the trigger levels. Groundwater monitoring results for 2024 indicate that no groundwater level values recorded at the bores were below the trigger levels.</li> </ul> <p><i>In the event that a monitoring bore records an EC or pH value above (or outside the range of) the trigger values specified in Table 18 for three consecutive monitoring rounds, the response protocol in Table 21 will be initiated.</i></p> <ul style="list-style-type: none"> <li>The response protocol in Table 21 of the GWMP (MPO, 2024) was initiated once during 2023 due to three consecutive exceedances of the EC trigger at MPBH2. Reporting in the 2023 Annual Review indicates the protocol was followed correctly.</li> </ul> <p><i>In the event that a groundwater-related complaint is received from a local landholder in relation to a potential mine-related impact on their groundwater supply, or an investigation undertaken in accordance with the Groundwater Level Response Protocol (Table 20) indicates a drawdown of greater than 2 m at a privately-owned bore, the response protocol in Table 22 will be initiated.</i></p> <ul style="list-style-type: none"> <li>Review of the community complaints registers provided on the MPO website from start 2023 to September 2024 indicate no groundwater related complaints have been received.</li> </ul> <p><i>The condition of the Type 3 terrestrial GDE Forest Red Gum Grassy Open Forest (PCT 618) vegetation will be assessed twice annually during the stream health monitoring surveys (discussed in the SWMMP, Section 7.5).</i></p> <ul style="list-style-type: none"> <li>The 2023 Annual Review indicates that stream health monitoring surveys were undertaken twice during 2023. The report states that “examination of results from the 2023 autumn and spring surveys found no measurable changes that could be indicative of an impact associated with the MPO”.</li> </ul>

Ref	Requirement	Status	Comments
			<p><i>Groundwater monitoring of the Hunter River alluvium will be undertaken as described in Sections 8.2 and 8.3.</i></p> <ul style="list-style-type: none"><li>Monitoring data provided for 2023 and 2024 indicates that monitoring of the Hunter River alluvium has been undertaken as described in Sections 8.2 and 8.3 of the GWMP (MPO, 2024).</li></ul> <p><i>In the event that deterioration of GDEs is identified, the response protocol outlined in Table 23 will be initiated.</i></p> <ul style="list-style-type: none"><li>The evidence provided does not indicate deterioration of GDEs.</li></ul> <p><i>Bores MPBH1 and MPBH2 (Figure 5) will be monitored annually and analysed to identify the presence of any stygofauna taxa.</i></p> <ul style="list-style-type: none"><li>MPO has advised that: "The Water Management Plan (SSD10418) approved on 2-Aug-24, requires Hunter River alluvial bores be monitored annually and analysed to identify the presence of any stygofauna taxa. This monitoring has been included in the AECOM scope of work for 2025 and will occur in Feb-25."</li></ul> <p><i>Predictions of changes to baseflow to the Hunter River, Sandy Creek and Dart Brook are described in Section 6.4. In the event that a detailed investigation concludes that water take is higher than previously predicted, MACH Energy will hold or source additional licences to account for this take. Any incidental water take from the Hunter River will be licensed in accordance with requirements of the Water Management Act, 2000, and the baseflow reduction for Sandy Creek and Dart Brook is negligible.</i></p> <ul style="list-style-type: none"><li>Not triggered.</li></ul> <p><i>In the event that a detailed investigation concludes that water take is higher than previously predicted, MACH Energy will hold or source additional licences to account for this take.</i></p> <ul style="list-style-type: none"><li>Not triggered.</li></ul> <p><i>Reporting Procedures</i></p> <ul style="list-style-type: none"><li>The reporting procedure was triggered by an exceedance of electric conductivity on 2 March 2023 at monitoring bore MPBH2.</li><li>Evidence provided indicates that reporting completed following the event was done in accordance with the reporting procedure.</li><li>This evidence included; Report on Mount Pleasant MPBH2 EC Investigation (AGE, 2024), and correspondence with DCCEEW and DPE Water.</li></ul>



Ref	Requirement	Status	Comments
B53	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Water Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded.
B54	The Applicant must implement the Water Management Plan as approved by the Planning Secretary.	Compliant	<p>(Engeny) The GWMP (MPO, 2024) was approved by the planning secretary in August 2024 and has been reviewed for the purpose of the audit. Refer to response to Condition B52 for implementation of WMP. (RPS) Reviewed Water Management Plan (August 2024). Interviewed Craig Hawkins as discussed at Condition B39. Undertook a full review of water management system including daily dam inspection and water ordering processes. Reviewed MPO internal incidents for the audit period. No water related incidents were considered reportable. No water related non-compliances were noted. Site inspection confirmed management of water in line with Water Management Plan.</p>

#### Biodiversity

B55	<p>The Applicant must retire the biodiversity credits specified in Table 7, unless otherwise agreed by the Planning Secretary in consultation with BCD.</p> <p>The retirement of credits must be carried out in consultation with BCD and in accordance with the Biodiversity Offsets Scheme of the BC Act.</p>	Not compliant	<p>(RPS Planning) No intentional activity has taken place in the Stage 1 or Stage 2 footprint.</p> <p>However, an incident occurred as described in B56, where 500 m<sup>2</sup> disturbance for mining laydown purposes occurred on 2 October 2025 without the required credit retirement within the Stage 1 area.</p> <p>BCS commented on Biodiversity Management Plan on 7 August 2023. Reviewed MPO internal document Biodiversity Management Plan (SSD 10418) – Response to Consultation Comments (undated) showing each comment addressed.</p> <p>(RPS Ecology)MACH lodged a project commencement notice on 29 January 2024 via Major Project Portal. Works commenced on 12 February 2024 in accordance with SSD 10418.</p> <p>A Biodiversity Conservation Fund (BCF) Charge report was generated on 28/20/2024 which displays recently retired credits and BCF Quote Obligation Quotes. This report displays that MACH has been issues with a credit obligation quote for the biodiversity credits specified in Table 7 for Stage 1 and Stage 2 on 24/11/2022.</p> <p><b>Credits must be retired prior to any disturbance of Stage 1 and 2 areas.</b> It is noted that MACH is in the process of establishing a Biodiversity Stewardship Agreement (BSA) at Merriwa East to generate some Box-Gum Woodland credits.</p> <p>The Biodiversity Development Assessment Report also outlines mitigation measures prior to ground disturbance as per Biodiversity Measure 1 – Vegetation Clearance Protocol and Section 4 of the Biodiversity Management Plan:</p>
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<b>Table 7: Biodiversity credit requirements – Project excluding Northern Link Road</b>																																																															
<table border="1"> <thead> <tr> <th>Credit Type</th><th>Credits Required Stage 1</th><th>Credits Required Stage 2</th><th>Total</th></tr> </thead> <tbody> <tr> <td colspan="4"><b>Ecosystem Credits</b></td></tr> <tr> <td>483 – Grey Box x White Box Grassy Woodland</td><td>2,225</td><td>0</td><td>2,225</td></tr> <tr> <td>483 – Grey Box x White Box – Spotted Gum Grassy Woodland</td><td>328</td><td>0</td><td>328</td></tr> <tr> <td>618 – Forest Red Gum Grassy Open Forest</td><td>5</td><td>0</td><td>5</td></tr> <tr> <td>1691 – Narrow-leaved Ironbark – Grey Box Grassy Woodland</td><td>22</td><td>405</td><td>427</td></tr> <tr> <td>1602 – Spotted Gum – Narrow-leaved Ironbark Woodland</td><td>152</td><td>20</td><td>172</td></tr> <tr> <td>1605 – Narrow-leaved Ironbark Shrubby Forest</td><td>1,587</td><td>0</td><td>1,587</td></tr> <tr> <td>1605 – Plantation</td><td>289</td><td>0</td><td>289</td></tr> <tr> <td>1606 – White Box – Narrow-leaved Ironbark – Blakely's Red Gum</td><td>3</td><td>0</td><td>3</td></tr> <tr> <td>1606 – Derived Native Grassland</td><td>4</td><td>0</td><td>4</td></tr> <tr> <td><b>Total</b></td><td><b>4,615</b></td><td><b>425</b></td><td><b>5,040</b></td></tr> <tr> <td colspan="4"><b>Species Credits</b></td></tr> <tr> <td>Cymbidium canaliculatum</td><td>0</td><td>2</td><td>2</td></tr> <tr> <td>Squirrel Glider (<i>Petaurus norfolcensis</i>)</td><td>4,357</td><td>50</td><td>4,407</td></tr> </tbody> </table>				Credit Type	Credits Required Stage 1	Credits Required Stage 2	Total	<b>Ecosystem Credits</b>				483 – Grey Box x White Box Grassy Woodland	2,225	0	2,225	483 – Grey Box x White Box – Spotted Gum Grassy Woodland	328	0	328	618 – Forest Red Gum Grassy Open Forest	5	0	5	1691 – Narrow-leaved Ironbark – Grey Box Grassy Woodland	22	405	427	1602 – Spotted Gum – Narrow-leaved Ironbark Woodland	152	20	172	1605 – Narrow-leaved Ironbark Shrubby Forest	1,587	0	1,587	1605 – Plantation	289	0	289	1606 – White Box – Narrow-leaved Ironbark – Blakely's Red Gum	3	0	3	1606 – Derived Native Grassland	4	0	4	<b>Total</b>	<b>4,615</b>	<b>425</b>	<b>5,040</b>	<b>Species Credits</b>				Cymbidium canaliculatum	0	2	2	Squirrel Glider ( <i>Petaurus norfolcensis</i> )	4,357	50	4,407
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			<ul style="list-style-type: none"> <li>delineation of approved native vegetation clearing areas;</li> <li>a Ground Disturbance Permit process prior to any ground disturbance activities being carried out on-site;</li> <li>pre-clearance survey conducted by an appropriately trained and suitably qualified and/or experienced person(s) prior to native vegetation clearing (including derived grassland);</li> <li>reuse of trees containing features with the potential to provide significant habitat (i.e. numerous suitable hollows) for nesting threatened birds, hollow-dwelling bats and/or arboreal mammals (e.g. for the Squirrel Glider [<i>Petaurus norfolcensis</i>]), wherever practicable;</li> <li>management strategies to minimise impacts of ground disturbance on fauna during clearing activities; and</li> <li>provision for seed collection during clearance activities.</li> </ul> <p>Documents reviewed</p> <p>BCF charge quote to September 2024</p> <p>Appendix E Biodiversity Development Assessment Report (BDAR) Mount Pleasant Optimisation Project (Hunter Eco 2021)</p> <p>Commencement notification 29 January 2024 (MACH 2024)</p> <p>Mount Pleasant Operation Biodiversity Management Plan Rev 02 effective on 5 November 2024 (MACH 2024)</p> <p>Reviewed letter request to adjust the staging of surface disturbance and associated biodiversity credit retirement associated with Development Footprint 1 (Stage 1). dated 14 January 2025.</p> <p>Reviewed evidence of consultation with the BCD regarding offset retirement, pending advice 11 February 2025.</p>																																																												
B56	Prior to disturbance within the Development Footprint 1 (Stage 1) (as shown on Figure 9 in Appendix 2) the Applicant must retire the Stage 1 credits as specified in Table 7.	<b>Not compliant</b>	<p>(RPS Planning) Viewed Notification of Non-Compliance letter to DPHI dated 9 October 2024. Letter contained detail about the non-compliance including what happened, the investigation and actions to remediate.</p> <p>Letter subject is 500m<sup>2</sup> disturbance for mining laydown purposes, without required credit retirement within the Stage 1 area. The non-compliance occurred on 2 October 2024.</p> <p>MPO took the following remedial actions according to the follow up letter dated 31 October 2024, which contained ecology report:</p>																																																												

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			<ul style="list-style-type: none"><li>- Undertook further work with Future Ecology to characterise the area that was disturbed.</li><li>- Initiated an investigation with MACH Energy's mine operator (Thiess) to investigate how disturbance could occur without a Ground Disturbance Permit.</li><li>- Identified actions to mitigate the risk of future non-compliances.</li><li>- Commissioned Dr Colin Driscoll of Hunter Eco to calculate the biodiversity credits required by Condition B55 (in Table 7) of SSD 10418 that would be attributable to the area of approximately 500m<sup>2</sup> that was disturbed.</li></ul> <p>MPO indicated a Biodiversity Stewardship Agreement would be in place by March 2025 (AR pers comms).</p> <p>Reviewed Mount Pleasant Operation Environmental Breach Ecological Survey Report (Version 1, Future Ecology, 28 October 2024). No threatened flora or fauna was found in the disturbed area. The area contained no live vegetation and one habitat feature. The recommendations from the report include:</p> <ul style="list-style-type: none"><li>- The relevant mitigation procedures in the MPO Biodiversity Management Plan are to be implemented as per section 7.1 Rehabilitation of Disturbance Areas including Subsections 7.1.1 Woodland Rehabilitation and 7.2.1 Weed Control. This includes revegetation / regeneration of the cleared area with plant species of the woodland remnant vegetation observed in the study area i.e. PCT 3395 Northwest Elevated White Box Woodland.</li><li>- Consideration should also be given to re-respreading the topsoil cleared from the site which appears to be stockpiled on site as it is likely to contain the seeds of native species and may assist natural regeneration. It will however also likely contain the seeds of weed species.</li></ul> <p>Site interview confirmed no response from DPPI to date (AR pers comms).</p> <p>LAMP training 'Ground Disturbance – Mount Pleasant Operations' (undated) slideshow reviewed rolled out regarding areas that are not to be disturbed (AR pers comms). No evidence of staff having completed this LAMP was provided. Site visit confirmed 'golden areas' on site now physically taped off (see <b>Plate 37</b>) and clearly shown on example GDPs viewed at site.</p> <p>(RPS Ecology) <b>Credits must be retired prior to any disturbance of Stage 1 and 2 areas.</b></p> <p>A Ground Disturbance Permit (GDP) breach incident occurred on the 2/10/2024, clearing approximately 0.1 hectare (ha) of habitat adjacent Skippens Road within PCT 483 Derived Grassland consistent with White Box Grassy Woodland and White Box-Spotted Gum Grassy Woodland and related derived native grasslands Critically Endangered Ecological Community. An ecological assessment was carried out 28 October 2024 to determine the level of clearing (Future Ecology 2024). The report</p>

Ref	Requirement	Status	Comments
			<p>suggests revegetation/regeneration on the impacted area, however as this area has been assessed by the BDAR and is proposed for clearing, revegetation may not be feasible or practical.</p> <p><b>Credits must be retired immediately, and mitigation measures in accordance with Biodiversity Measure 1 – Vegetation Clearance Protocol of the BDAR must be followed prior to any future disturbance. Additionally, clearing procedure and management strategies within Section 4.3 of the Biodiversity Management Plan must be implemented prior to disturbance. A clearing report must be prepared and provided to BCD on request.</b></p> <p>Documents reviewed</p> <p>Appendix E Biodiversity Development Assessment Report (BDAR) Mount Pleasant Optimisation Project (Hunter Eco 2021)</p> <p>Mount Pleasant Operation Environment Breach Ecological Survey Report 28 October 2024 (Future Ecology 2024)</p> <p>Mount Pleasant Operation Biodiversity Management Plan Rev 02 effective on 5 November 2024 (MACH 2024)</p> <p>Reviewed letter request to adjust the staging of surface disturbance and associated biodiversity credit retirement associated with Development Footprint 1 (Stage 1). dated 14 January 2025.</p> <p>Reviewed evidence of consultation with the BCD regarding offset retirement, pending advice 11 February 2025.</p>
B57	Prior to disturbance within the Development Footprint 1 (Stage 2) (as shown on Figure 9 in Appendix 2) the Applicant must retire the Stage 2 credits as specified in Table 7.	Not triggered	Site inspection confirmed no development in Stage 2 footprint.
B58	With the agreement of the Planning Secretary, the Applicant may adjust the staging of surface disturbance and the associated credit retirements in Table 7. Except in accordance with condition B59, the relevant credits must be retired, prior to the commencement of the associated surface disturbance.	Not triggered	No request for adjust the staging of disturbance and associated credits (AR pers comms).
B59	The Applicant may carry over surplus retired credits to satisfy the credit requirements of a later stage. This may occur, for example, where approved clearing for an earlier stage was not undertaken, but the impact has already been offset.	Not triggered	No request made during audit period (AR pers comms).
B60	With the agreement of the Planning Secretary in consultation with BCD, biodiversity credits associated with any	Not triggered	No request made during audit period (AR pers comms).

Ref	Requirement	Status	Comments																																						
	undisturbed areas agreed under condition B59 as not to be subject to any surface disturbance may be removed from the total credit obligations in Table 7 (subject to recalculation and possible reduction).																																								
B61	<p>Prior to the commencement of construction of the Northern link Road the Applicant must retire the biodiversity credits specified in Table 8, unless otherwise agreed by the Planning Secretary in consultation with BCD. The retirement of credits must be carried out in consultation with BCD and in accordance with the Biodiversity Offsets Scheme of the BC Act.</p> <p><i>Table 8: Biodiversity credit requirements – Northern Link Road</i></p> <table><tr><th rowspan="2">Credit Type</th><th colspan="2">Credits Required</th></tr><tr><th>Option 1</th><th>Option 2</th></tr><tr><td colspan="3"><b>Ecosystem Credits</b></td></tr><tr><td>PCT 483 – Grey Box x White Box Grassy Woodland</td><td>17*</td><td>104*</td></tr><tr><td>PCT 483 – Grey Box x White Box – Spotted Gum Grassy Woodland</td><td>237*</td><td>72*</td></tr><tr><td>PCT 483 – Spotted Gum Derived Native Grassland</td><td>0</td><td>2*</td></tr><tr><td>PCT 618 – Forest Red Gum Grassy Open Forest</td><td>5*</td><td>5*</td></tr><tr><td>PCT 1605 – Plantation</td><td>6</td><td>5</td></tr><tr><td>PCT 1606 – White Box – Narrow-leaved Ironbark – Blakely's Red Gum</td><td>16*</td><td>16*</td></tr><tr><td>PCT 1606 – Derived Native Grassland</td><td>32*</td><td>30*</td></tr><tr><td><b>Total</b></td><td><b>313</b></td><td><b>234</b></td></tr><tr><td colspan="3"><b>Species Credits</b></td></tr><tr><td>Squirrel Glider (<i>Petaurus norfolcensis</i>)</td><td>268</td><td>194</td></tr></table> <p><small>* Credits relevant to EPBC 2020/8735.</small></p>	Credit Type	Credits Required		Option 1	Option 2	<b>Ecosystem Credits</b>			PCT 483 – Grey Box x White Box Grassy Woodland	17*	104*	PCT 483 – Grey Box x White Box – Spotted Gum Grassy Woodland	237*	72*	PCT 483 – Spotted Gum Derived Native Grassland	0	2*	PCT 618 – Forest Red Gum Grassy Open Forest	5*	5*	PCT 1605 – Plantation	6	5	PCT 1606 – White Box – Narrow-leaved Ironbark – Blakely's Red Gum	16*	16*	PCT 1606 – Derived Native Grassland	32*	30*	<b>Total</b>	<b>313</b>	<b>234</b>	<b>Species Credits</b>			Squirrel Glider ( <i>Petaurus norfolcensis</i> )	268	194	Not triggered	<p>Northern Link Road construction has not yet commenced. Site communications provided the following update on credit retirement (AR pers comms):</p> <p>“The cost to pay into the Credit Fund has been calculated based on the charge quote obtained by MACH on 24/11/2022 (BCF Quote Number: Q00030, attached) with monthly indexation applied to January 2025. This charge quote applies until 23/11/2025.</p> <p>It may be more cost effective to discharge credit obligations through an offset broker, but this takes some time and will depend on the whether the credits required are available on the market.</p> <p>MACH is in the process of establishing a Biodiversity Stewardship Agreement (BSA) over Merriwa East that will generate Box-Gum Woodland credits, which will be the most cost effective way to discharge your Box-Gum Woodland credit obligations.</p> <p>For some areas (e.g. NIW LV Road and Pipeline Corridor and the 2025 exploration program), there may be material financial benefit delaying these works until after the Merriwa East BSA is established in Q2 2025.</p> <p>For other areas (e.g. the new Product Stockpile Area and the relocation of the go-line), Merriwa East will not generate the credits required and there is no advantage in delaying these areas until after the Merriwa East BSA is established.”</p> <p>(RPS Ecology) It is unclear if credits have been retired at this stage. Credits must be retired in consultation with BCD prior to commencement.</p> <p>Documents reviewed</p> <p>Appendix E Biodiversity Development Assessment Report (BDAR) Mount Pleasant Optimisation Project (Hunter Eco 2021)</p> <p>Commencement notification 29 January 2024 (MACH 2024)</p>
Credit Type	Credits Required																																								
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B62	If the Legless Lizard, <i>Delma vescolineata</i> , is listed as a threatened species under the BC Act and/or EPBC Act during the life of this consent, or otherwise agreed by the Planning Secretary, the Applicant must retire the applicable biodiversity credits (consistent with the applicable Biodiversity Risk Weighting as per the relevant row in Table 9) within 2 years of the species being listed as a threatened species under the BC Act and/or EPBC Act.	Not triggered	<p>Time requirement not yet reached – due 16 July 2026.</p> <p><i>Delma vescolineata</i> listed as Endangered under the BC Act (effective from 11 October 2024) and EPBC Act (effective from 16 July 2024).</p>																																						

Ref	Requirement	Status	Comments																				
	<p>The retirement of credits must be carried out in consultation with the Planning Secretary and BCD and in accordance with the Biodiversity Offsets Scheme of the BC Act, including the application of Ancillary Rules: Biodiversity conservation actions that may be relevant to <i>Delma vescolineata</i> published under clause 6.5 of the Biodiversity Conservation Regulation 2017.</p> <p><i>Table 9: Biodiversity credit requirements – Delma vescolineata</i></p> <table><tr><th>Biodiversity Risk Weighting</th><th>Credits Required Stage 1</th><th>Credits Required Stage 2</th><th>Northern Link Road Option 1</th><th>Northern Link Road Option 2</th></tr><tr><td>1.5</td><td>4,060</td><td>352</td><td>293</td><td>225</td></tr><tr><td>2</td><td>5,413</td><td>469</td><td>391</td><td>300</td></tr><tr><td>3</td><td>8,120</td><td>704</td><td>586</td><td>450</td></tr></table>	Biodiversity Risk Weighting	Credits Required Stage 1	Credits Required Stage 2	Northern Link Road Option 1	Northern Link Road Option 2	1.5	4,060	352	293	225	2	5,413	469	391	300	3	8,120	704	586	450		
Biodiversity Risk Weighting	Credits Required Stage 1	Credits Required Stage 2	Northern Link Road Option 1	Northern Link Road Option 2																			
1.5	4,060	352	293	225																			
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3	8,120	704	586	450																			
B63	<p>The Applicant must prepare a Biodiversity Management Plan to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be submitted for approval prior to the commencement of development under this consent;</p> <p>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p> <p>(c) be prepared in consultation with BCD;</p> <p>(d) describe the vegetation clearance protocol to avoid accidental clearance in vegetation to be retained, including the relinquishment area;</p> <p>(e) describe how a mixture of pasture and woodland would be established in the final land use to minimise long term impacts to vegetation and habitat;</p> <p>(f) describe measures to establish 66.6 ha of PCT 1605 and 7 ha of PCT 1602 as part of the rehabilitation program, consistent with the Rehabilitation Management Plan referred to in condition B92;</p> <p>(g) describe the measures to be implemented within the approved disturbance areas to:</p> <p>(i) minimise the amount of clearing;</p> <p>(ii) minimise impacts of ground disturbance on fauna and fauna habitat resources, including undertaking pre-clearance surveys;</p>	Compliant	<p>(RPS Ecology) MPO has submitted the biodiversity management plan accordance with Condition B63, Schedule 2 of the consent for the Mount Pleasant Optimisation Project (SSD-10418). The revised Biodiversity Management Plan (Rev. 02, November 2024) was approved on 5 November 2024.</p> <p>As per the Commencement of notification letter (29 January 2024) a Biodiversity Management Plan should have been submitted to the department prior to 12 February 2024.</p> <p>The Mount Pleasant Operation Biodiversity Management Plan (BioMP; MACH 2024) rev 2 is available on the Major Project portal. The BioMP satisfies the conditions of consent:</p> <p>(a) submitted to BCS (formerly BCD) and approved 5 November 2024</p> <p>(b) was prepared by a suitably qualified and experienced persons whose appointment was endorsed by the Planning Secretary detailed in Attachment 2</p> <p>(c) was prepared in consultation with BCD as per Section 1.1.2, Appendix A</p> <p>(d) describes the vegetation clearance protocol to avoid accidental clearance in vegetation to be retained, including the relinquishment area as per Section 4</p> <p>(e) describes how a mixture of pasture and woodland would be established in the final land use to minimise long term impacts to vegetation and habitat as per Section 7.1</p> <p>(f) describe measures to establish 66.6 ha of PCT 1605 and 7 ha of PCT 1602 as part of the rehabilitation program, consistent with the Rehabilitation Management Plan referred to in condition B92 as per Section 7.1</p> <p>(g) describe the measures to be implemented within the approved disturbance areas to:</p> <p>(i) minimise the amount of clearing as per Section 4</p>																				

Ref	Requirement	Status	Comments
	<p>(iii) provide for the reuse of trees containing features with the potential to provide significant habitat for nesting threatened birds, hollow-dwelling bats and/or arboreal mammals;</p> <p>(iv) maximise the relocation of the Tiger Orchid (<i>Cymbidium canaliculatum</i>) recorded; and</p> <p>(v) manage the provenance, collection and propagation of seed;</p> <p>(h) describe the measures to be implemented on the site to:</p> <p>(i) control weeds, including measures to avoid and mitigate the spread of aggressive tussock grasses (e.g. Coolatai Grass, Jaragua Grass, and African Love Grass) along with priority and environmental weeds;</p> <p>(ii) control feral pests with consideration of actions identified in relevant threat abatement plans;</p> <p>(iii) limit vehicle speed;</p> <p>(iv) manage bushfire hazards;</p> <p>(v) avoid impacts to the variant of PCT 483 with Spotted Gum in the canopy mapped within the relinquishment area; and</p> <p>(vi) manage potential impacts to <i>Delma vescolineata</i>, if it is listed as a threatened species under the BC Act and/or EPBC Act in consideration of any relevant Commonwealth Conservation Advice, Recovery Plan and Threat Abatement Plans;</p> <p>(i) investigate and identify habitat that supports populations in the wild of <i>Delma vescolineata</i>, and identify, and where relevant, implement measures to remove threats to that population;</p> <p>U) demonstrate how development under this consent will be carried out in a manner that avoids or minimises to the greatest extent practicable any serious or irreversible damage to the survival of <i>Delma vescolineata</i>;</p> <p>(k) describe how potential conflicts with Aboriginal heritage values will be addressed;</p> <p>(l) include a seasonally-based program to monitor and report on:</p> <p>(i) priority and environmental weeds, vertebrate pests and rehabilitation; and</p>		<p>(ii) minimise impacts of ground disturbance on fauna and fauna habitat resources, including undertaking pre-clearance surveys as per Section 4.2</p> <p>(iii) provide for the reuse of trees containing features with the potential to provide significant habitat for nesting threatened birds, hollow-dwelling bats and/or arboreal mammals as per Section 4.2.3</p> <p>(iv) maximise the relocation of the Tiger Orchid (<i>Cymbidium canaliculatum</i>) recorded as per Section 4.3.5</p> <p>(v) manage the provenance, collection and propagation of seed as per Sections 4.3.6 and 5.1.1</p> <p>(h) describes the measures to be implemented on the site to:</p> <p>(i) control weeds, including measures to avoid and mitigate the spread of aggressive tussock grasses (e.g. Coolatai Grass, Jaragua Grass, and African Love Grass) along with priority and environmental weeds in Section 7.2.1</p> <p>(ii) control feral pests with consideration of actions identified in relevant threat abatement plans in Section 7.2.2</p> <p>(iii) limit vehicle speed in Section 7.6</p> <p>(iv) manage bushfire hazards in Section 7.7</p> <p>(v) avoid impacts to the variant of PCT 483 with Spotted Gum in the canopy mapped within the relinquishment area in Section 6 and</p> <p>(vi) manage potential impacts to <i>Delma vescolineata</i>, if it is listed as a threatened species under the BC Act and/or EPBC Act in consideration of any relevant Commonwealth Conservation Advice, Recovery Plan and Threat Abatement Plans in Section 7.9</p> <p>(i) investigates and identifies habitat that supports populations in the wild of <i>Delma vescolineata</i>, and identify, in Section 7.9</p> <p>j) demonstrates how development under this consent will be carried out in a manner that avoids or minimises to the greatest extent practicable any serious or irreversible damage to the survival of <i>Delma vescolineata</i> in Section 7.9</p> <p>(k) describe how potential conflicts with Aboriginal heritage values will be addressed in Section 2.1.4</p> <p>(l) include a seasonally-based program to monitor and report on in Section 8 and 12 :</p> <p>(i) priority and environmental weeds, vertebrate pests and rehabilitation in Section 9</p> <p>(ii) the effectiveness of the above measures, progress against the detailed performance indicators and completion criteria, and identify improvements that could be implemented to improve biodiversity outcomes in Section 9</p> <p>(m) include details of who would be responsible for monitoring, reviewing, and implementing the plan in Section 11.</p>



Ref	Requirement	Status	Comments
	(ii) the effectiveness of the above measures, progress against the detailed performance indicators and completion criteria, and identify improvements that could be implemented to improve biodiversity outcomes; and (m) include details of who would be responsible for monitoring, reviewing, and implementing the plan.		Documents reviewed Commencement notification 29 January 2024 (MACH 2024) Mount Pleasant Operation Biodiversity Management Plan Rev 02 effective on 5 November 2024 (MACH 2024)
B64	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Biodiversity Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded
B65	The Applicant must implement the Biodiversity Management Plan as approved by the Planning Secretary.	Not triggered	(RPS Ecology) The Biodiversity Management Plan was approved by the Planning Secretary on 5 November 2025. Biodiversity Monitoring and Management has commenced including translocation and monitoring of the Tiger Orchid, stream health monitoring and vertebrate pest control. Documents reviewed Commencement notification 29 January 2024 (MACH 2024) Mount Pleasant Operation Biodiversity Management Plan Rev 02 effective on 5 November 2024 (MACH 2024)As of 28/10/2024, MPO has submitted the biodiversity management plant relevant to SSD10418 to the Department (in February 2024) and are awaiting approval. Tiger Orchid (Cymbidium canaliculatum) Monitoring Report (Narla 2023) Tiger Orchid - Cymbidium canaliculatum Mt Pleasant Translocation Report – August 2023 (Future Harvest 2023) Mount Pleasant Operation Stream Health Monitoring Autumn 2024 (AECOM 2024). Mount Pleasant Operation Bi-Annual Vertebrate Pest Monitoring Report (MACH 2024) See response to B63 for further detail.
<b>Heritage</b>			
B66	The Applicant must ensure that the development does not cause any direct or indirect impact on any identified Aboriginal sites, conservation areas or heritage items located outside the approved disturbance area, beyond those predicted in the document/s listed in condition A2(c).	Compliant	No unapproved Aboriginal heritage sites impacted in Audit period (AR pers comms).  Reviewed incidents and non-compliance reports provided by MPO for the audit period. No impacts to heritage values outside of the disturbance area were identified. Reviewed 'Mount Pleasant Operations (MPO) - Annual Aboriginal Heritage Site Inspection Report, December 2023'. This document reports onsite inspections of Aboriginal cultural heritage sites performed by subconsultants. No impacts were found and no further actions were required. The next Aboriginal heritage report by Niche is due end of 2024.



Ref	Requirement	Status	Comments
			<p><b>Plate 49</b> is an excerpt from 'Mount Pleasant Operations (MPO) - Annual Aboriginal Heritage Site Inspection Report, December 2023' showing wooden fence protecting Aboriginal cultural heritage sites.</p> <p>Site interview confirmed GDPs focus on footprint and protect heritage items.</p> <p>No heritage values have been harmed outside of the footprint (AR pers comms and Brodie Morrison (BM) pers comms).</p> <p>Fencing of heritage items occurs if in close proximity to construction or demolition (BM pers comms).</p> <p>Viewed maps of artefacts on site showing Aboriginal heritage items which have been salvaged and are planned to be salvaged in 2024-25. Reviewed MPO Northern Link Road Salvage Report dated 19 December 2024 and Test Excavation Results.</p> <p><u><b>Historic</b></u> None impacted in audit period (AR pers comms).</p> <p>Assessment methodologies are triggered by significant heritage sites as pit moves north (AR pers comms). This includes photographic recording and excavation for Kayuga, an historic school which contains artefacts, homesteads that may be impacted in 2025 with excavation and recording scheduled.</p>
B67	If suspected human remains are discovered on the site, then all work surrounding the area must cease, and the area must be secured. The Applicant must immediately notify the Department of Climate Change, Energy, the Environment and Water, NSW National Parks and Wildlife Service, NSW Police Force and Heritage NSW, and work must not recommence in the area until authorised by NSW Police Force and Heritage NSW.	Not triggered	<p>No human remains were discovered on site during the audit period (AR pers comms).</p> <p>Section 5.11 of the ACHMP outlines the protocol for discovery of human remains and potential burial site. The protocol has steps which address the requirements of this condition.</p>
B68	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site, are properly recorded and those records are kept up to date, in the Aboriginal Heritage Information Management System (AHIMS) Register.	Compliant	<p>Section 5.2 of the ACHMP details procedures for recording Aboriginal objects and places on site, which are compliant with the requirements of this condition.</p> <p>Niche Environment and Heritage are due to provide an annual Aboriginal heritage inspection report to MPO before the end of 2024. This will trigger an AHIMS upload (AR pers comms). Reviewed 'G20 Cultural Heritage Sites – Nov 24' spreadsheet confirming recording of &gt;1000 Aboriginal heritage sites.</p>
B69	The Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development. The plan must: (a) be submitted for approval within six months of the commencement of development under this consent; (b) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;	Compliant	<p>(a) Reviewed confirmation of submission dated 9 August 2024.</p> <p>(b) The ACHMP was prepared and reviewed by MACH Energy and Jamie Reeves of Niche Environmental and Heritage Pty Ltd, who was endorsed by the Planning Secretary as a suitably qualified and experienced person on 17 May 2023.</p> <p>(c) Approval letter from the Department dated 16 October 2024 notes appropriate consultation occurred.</p> <p>(d) Addressed below.</p>

Ref	Requirement	Status	Comments
	<p>(c) be prepared in consultation with Heritage NSW and Registered Aboriginal Parties;</p> <p>(d) describe the measures to be implemented on the site to:</p> <p>(i) comply with the Aboriginal cultural heritage-related operating conditions of this consent;</p> <p>(ii) ensure all workers receive suitable Aboriginal cultural heritage training/inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions;</p> <p>(iii) protect, monitor and manage identified Aboriginal objects and Aboriginal places (including as part of any proposed archaeological investigation of potential subsurface objects and salvage of objects within the approved disturbance area) in accordance with the commitments made in the document/s listed in condition A2(c);</p> <p>(iv) establish alternative Aboriginal cultural heritage conservation areas (Areas B and C), or otherwise agreed alternative conservation areas, or other agreed conservation measures, within 12 months of commencement of development under this consent;</p> <p>(v) maintain all Aboriginal cultural heritage conservation areas (Areas A, B and C), or otherwise agreed alternatives, throughout the life of the project;</p> <p>(vi) undertake further archaeological investigations, test excavations and analysis of scarred trees in accordance with the commitments made in the document/s listed in condition A2(c) (including the documents in the MACH response dated 9 September 2021 );</p> <p>(vii) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development;</p> <p>(viii) manage the discovery of suspected human remains over the life of the development;</p> <p>(ix) manage the discovery of any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development;</p>		<p>(1) The ACHMP has been prepared to address these measures.</p> <p>(2) Addressed in Section 6.</p> <p>(3) Addressed in Section 4.</p> <p>(4) Addressed in Section 4.1.</p> <p>(5) Addressed in Section 5.6.</p> <p>(6) Addressed in Section 5.6.</p> <p>(7) Addressed in Section 5.8.</p> <p>(8) Addressed in Section 5.11.</p> <p>(9) Addressed in Section 5.10.</p> <p>(10) Addressed in Section 5.15.</p> <p>(11) Addressed in Section 3.</p> <p>(e) Addressed in Section 5.12.</p> <p>During site inspection, RAPs were present conducting salvages of the area to the north of Castlerock Road (planned to be mined once commencement of approved activities under this consent occurs.</p>

Ref	Requirement	Status	Comments
	<p>(x) maintain and manage reasonable access for relevant Aboriginal stakeholders to Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and</p> <p>(xi) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site and in the area, in accordance with the commitments made in the documents listed in condition A2(c); and</p> <p>(e) include a strategy for the care, control and storage of Aboriginal objects salvaged from the site, both during the life of the development and in the long term.</p> <p>Note: Areas A, B and C are defined in EIS - Appendix G.</p>		
B70	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Aboriginal Cultural Heritage Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded
B71	The Applicant must not undertake disturbance of Aboriginal objects not covered by a valid Aboriginal Heritage Impact Permit prior to approval of the Aboriginal Cultural Heritage Management Plan by the Planning Secretary	Compliant	<p>Site interviewed confirmed no AHIPs were sought or acted upon in the audit period (AR pers comms).</p> <p>Section 2.4 of the ACHMP notes MPO's commitment to not disturb any Aboriginal objects not covered by an AHIP until the ACHMP is approved. The ACHMP approved as of 16 October 2024.</p> <p>Reviewed potential incidents and non-compliance reports for the audit period from internal filing provided by MPO. No unapproved disturbance of Aboriginal objects was noted.</p>
B72	The Applicant must implement the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary.	Compliant	No activities under the ACHMP were undertaken in the audit period.
B73	<p>The Applicant must prepare a Historic Heritage Management Plan for the development, in respect of all non-Aboriginal cultural heritage items, to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be submitted for approval within 6 months of the commencement of development under this consent;</p> <p>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p>	Compliant	<p>(a) . Commencement of development occurred 12 February 2024. Reviewed HHMP submission confirmation email dated 26 July 2024.</p> <p>(b) The HHMP was prepared and reviewed by MACH Energy and Dr Andrew Sneddon, Director of Extent Heritage, who has been endorsed by the Planning Secretary as a suitably qualified and experienced person.</p> <p>(c) HHMP approval letter from the Department dated 17 September 2024 noted appropriate consultation has been undertaken.</p> <p>(d) Addressed in Section 4.9.</p> <p>(e) Section 3.3.</p>

Ref	Requirement	Status	Comments
	<p>(c) be prepared in consultation with Heritage NSW, Council and relevant landowners and in accordance with the relevant Heritage NSW guidelines;</p> <p>(d) describe how historic heritage values of the site would be recorded , preserved and archived;</p> <p>(e) identify all heritage items in the vicinity of the site and include a statement of significance for each item;</p> <p>(f) describe the measures to be implemented on the site to:</p> <p>(i) ensure all workers on the site receive suitable heritage inductions prior to carrying out any activities which may cause impacts to historic heritage, and that suitable records are kept of these inductions;</p> <p>(ii) protect heritage items located outside the approved disturbance area from impacts of the development, beyond those impacts predicted in the documents listed in condition A2(c);</p> <p>(iii) undertake photographic/archival recording of any items of heritage significance predicted to be impacted by the development, prior to disturbance within the Additional Disturbance Area;</p> <p>(iv) avoid project-related use of the (timber) Kayuga Bridge;</p> <p>(v) undertake additional archaeological investigation of sites anecdotally reported to contain human burials; and</p> <p>(vi) identify, evaluate, record and manage any new heritage items discovered during the life of the development;</p> <p>(g) include a program to monitor the effects of blasting on heritage items (including but not limited to Kayuga Cemetery) located outside of the approved disturbance area;</p> <p>(h) include a strategy for the care, control and storage of heritage relics salvaged from the site; and</p> <p>(i) include a comprehensive conservation management plan for the ongoing management of Rosebrook and Negoa Estate.</p>		<p>(f) Addressed below</p> <p>(1) Section 8</p> <p>(2) Section 4.8</p> <p>(3) Section 4.9, Appendices C – G.</p> <p>(4) Section 3.3.14</p> <p>(5) Section 5.2</p> <p>(6) Section 5.1</p> <p>(g) Section 4.3</p> <p>(h) Section 4.7</p> <p>(i) Section 4.2, Appendix H</p> <p>Site interview confirmed no actions under the HHMP have occurred in the audit period (AR pers comms).</p>
B74	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Historic Heritage Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded

Ref	Requirement	Status	Comments
B75	The Applicant must implement the Historic Heritage Management Plan as approved by the Planning Secretary.	Compliant	
<b>Visual</b>			
B76	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the visual and off-site lighting impacts of the development;</p> <p>(b) take all reasonable steps to shield views of mining operations and associated equipment from users of public roads and privately-owned residences;</p> <p>(c) ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;</p> <p>(d) ensure no in-pit mobile lighting rigs shine directly above the pit wall and other mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes);</p> <p>(e) ensure that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 1997 - Control of Obtrusive Effects of Outdoor Lighting;</p> <p>(f) ensure that the visual appearance of any new builds, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape.</p>	Compliant	<p>The VIMP for SSD 10418 has been submitted and was with Muswellbrook Shire Council for consultation at the time of the audit site inspection.</p> <p>As such, reviewed Visual Impact Management Plan Revision 3 dated 15 March 2024, prepared to address DA 92/97.</p> <p>(a) Section 5.3 'Lighting' provides appropriate management measures to minimise visual and offsite lighting impacts.</p> <p>(b) MPO employs a variety of mitigation measures under the VIMP such as visual bunding and screen planting.</p> <p>(c) Section 5.3 'Lighting' provides appropriate management measures to minimise visual and offsite lighting impacts.</p> <p>(d) To be addressed in SSD VIMP.</p> <p>(e) Addressed in Section 5.3.</p> <p>(f) Addressed in Section 5.4 Building Treatment.</p> <p>Reviewed 'Internal filing of information' folder containing 42 summaries of potential incidents and non-compliances, Compliance report 2023, Compliance Report #1 MACH Thiess Sedgman Projects Jan-Feb_2024, Compliance Report #2 MACH Thiess Sedgman Projects Mar-Apr_2024, Compliance Report #3 MACH Thiess Sedgman Projects May-Jun_2024, Compliance Report #4 MACH Thiess Sedgman Projects Jul-Aug_2024.</p> <p>Reviewed monthly community complaints registers for audit period.</p> <p>Complaint received 16/06/2024, lights in northern areas shut down as a result.</p> <p>Complaint received 16/03/2024 regarding lighting. Light source unable to be identified due to shift change but later investigation revealed all lights facing pit bar one environment light.</p> <p>Complaint received 19/02/2024. Site interviewed confirmed most complaints are related to mobile plant lighting which was rectified immediately.</p> <p>Lighting audit against Australian Standards occurred day prior to site inspection (reviewed Mt Pleasant Operation Lighting Audit 2024 (EMM, 2024). Investigation for this complaint revealed all lights were facing the pit.</p> <p>Audit occurred on first train movement on new load out, confirmed impact of new train line on lighting is not significant (AR pers comms). No complaints have been received due to train operational lights.</p>

Ref	Requirement	Status	Comments
			<p>MPO has investigated light shielding options but they are not needed to be put in. MPO agreed with ARTC train lights to be dimmed while in areas that could be sensitive to lighting impacts.</p> <p>Tree screening has increased in audit period. Viewed Landscape Plan (2023) which showed proposed screening along Kayuga and Wybong Road.. A review of the Annual review and site inspection confirmed tree screen infill planting along key roads with views of the MPO such as Kayuga and Wybong Road and implementation of visual bunding/tree screen planting along the CHPP road on the western edge of the ROM coal storage area</p> <p>Lighting towers are controlled by OCE handbook, must be facing west away from potential receivers around Muswellbrook (AR pers comms). MSC has been consulted about screening in draft SSD VIMP.</p>
B77	<p>The Applicant must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. The plan must:</p> <p>(a) be prepared in consultation with Council;</p> <p>(b) provide for the establishment of trees and shrubs and/or the construction of mounding or bunding;</p> <p>(i) around the water storage dams and coal preparation plant;</p> <p>(ii) at other areas identified as necessary for the maintenance of satisfactory visual amenity;</p> <p>(c) include details of the visual appearance of all buildings, structures, facilities or works (including paint colours and specifications), aimed at blending as far as possible with the surrounding landscape;</p> <p>(d) include detailed measures to minimise the visual impacts of the out-of-pit emplacements and rail infrastructure, including:</p> <p>(i) details of macro- and microrelief, revegetation and screen plantings for the emplacements;</p> <p>(ii) details of proposed light screens, earth bunds and screen planting for the rail infrastructure; and</p> <p>(iii) procedures to monitor and maintain the effectiveness of visual impact mitigation measures for the life of the development; and</p>	Compliant	<p>a) The VIMP was being updated considering consultation with Muswellbrook Shire Council at the time of the site inspection (viewed letter dated 9 October 2024). Feedback was received on 7 November (reviewed letter dated 7 November), with four recommendations.</p> <p>b) Reviewed draft VIMP for SSD 10418 (Version 4, undated).</p> <p>i) Sections 5.5.4 and 5.5.2 address shrubs / bunding around water storage and the CHPP. "The existing visual bund and screen plantings along Wybong Road currently assists in shielding proportions of the MIA from Wybong Road. As construction and mining progresses, the existing bund will be extended along the southern boundary of the MPO area, adjacent to Wybong Road. Screen plantings will be established along the bund, where necessary, to increase shielding of the MIA from Wybong Road" Auditors viewed the existing screens along Wybong Road. Review of Annual Review confirmed planting of tree screens increasing in this area in the audit period.</p> <p>ii) Section 5.5 addresses shrubs / bunding at other areas as necessary, including fines emplacement area and future water storage areas.</p> <p>c) Section 5.4 includes details of the visual appearance of buildings, structures, etc aimed at blending in with the surrounding landscape. During site inspection auditors observed extension of administration areas in eucalypt colour which blended into the surrounding environment (see <b>Plate 48</b>).</p> <p>d) Addressed in:</p> <p>i) Sections 5.1, 5.3 and 5.5.1</p> <p>ii) Section 5.5.6</p> <p>iii) Section 6</p> <p>e) Section 8.2</p>

Ref	Requirement	Status	Comments
	(e) include a program to implement, monitor, maintain and report on the implementation and effectiveness of the visual impact mitigation measures.		
B78	The Visual Impact Management Plan must be submitted for approval within 12 months of commencement of development under this consent.	Not triggered	See response to B77. Time requirement not yet reached (12 February 2025)
B79	The Applicant must implement the Visual Impact Management Plan as approved by the Planning Secretary.	Compliant	See response to B77.
B80	<p>Upon receiving a written request from the owner of any residence on privately-owned land which is within 2 kms of mine landforms and has, or would have, significant direct view of the mining operations on site, the Applicant must implement visual mitigation measures (such as landscaping treatments or vegetation screens) on the land in consultation with the landowner. These measures must be reasonable and feasible, and directed toward minimising the visibility of the mining operations from the residence.</p> <p>If within three months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>Note: Except in exceptional circumstances, the Planning Secretary will not require additional visual impact mitigation to be undertaken for residences that are more than 2 kilometres from the mining operations.</p>	Not triggered	<p>According to the Landscape and Visual Impact Assessment – Appendix M of the Mount Pleasant Optimisation Project EIS (2020),</p> <p>No requests for visual mitigation have been received during the audit period (AR pers comms).</p>
<b>Waste</b>			
B81	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the waste (including coal rejects and tailings) generated by the development;</p> <p>(b) classify all waste in accordance with the Waste Classification Guidelines (EPA, 2014);</p> <p>(c) dispose of all waste at appropriately licensed waste facilities or facilities otherwise permitted to receive the waste including under an applicable resource recovery order or exemption;</p>	Compliant	<p>Reviewed Waste Management Plan Revision 1 dated 14 January 2019.</p> <p>(a) Section 5 provides appropriate management measures to minimise waste. Mineral waste: Tailings dam approved up to seven stages. Requirement to investigate alternate tailings waste methods such as in pit disposal. MPO plans to move to in pit disposal once tailings dam is complete to Stage 7. Rejects go back into the pit for disposal. In-situ cores were taken in 2023 to confirm consolidation and geotechnical parameters (i.e. compaction, levels, what will fit in tailings dam). Thiess is responsible for safety of dams. Tailings is operated by Sedgeman (pumping etc). Water moves from tailings to decamp ponds for drying. This water is then recycled through the CHPP. MACH is in charge of safety and reporting /</p>



Ref	Requirement	Status	Comments
	<p>(d) manage on-site sewage treatment and disposal in accordance with the requirements of the appropriate regulatory authority; and</p> <p>(e) monitor and report on the effectiveness of the waste minimisation and management measures in the Annual Review referred to in condition D11.</p>		<p>regulatory requirements. This is all controlled by Dam Safety Management System. The DSMS is audited.</p> <p>Other waste: sewage treatment plant under Council approval WTA 7/2017 (commenced 18 June 2018) (AR pers comms) (No Council approval letter was available to view at the time of the audit). Old sewage plant at CHPP decommissioned prior to audit period (AR pers comms). Sewage plant is licensed for discharge, goes into water management system after treatment. MPO has contract with Remondis for management of waste. There is an internal waste management system. Ablutions are discharged into primary treatment management plant.</p> <p>General waste and recycling checked during site inspection <b>some errors in waste sorting occurring in bins around site and 44 gallon drum with grease in appropriately storage (see Plate 23). Recommend refresher training on waste management and clear signage on waste bins following finalisation of new workshop area. Old truck wash also requires regular cleanout was full at time of inspection (see Plate 12).</b></p> <p>Monthly meetings occur between MPO and Remondis</p> <p>Tyre Disposal is approved in pit under EPL. Reviewed Scrap Tyre Checklist_2024 Update. No tyre disposal in pit in 2024, however <b>significant volume of used tyres (&gt; 50 T observed around workshop and onsite in general as 'safety-bollards') which will require categorisation and disposal in accordance with relevant protocols in 2025.</b></p> <p>(b) Section 3 provides for the classification of waste under the Waste Classification Guidelines (EPA, 2014).</p> <p>(c) Section 5 provides for the disposal of waste at lawful facilities.</p> <p>(d) Addressed in Section 5. Reviewed incident report dated 5 February 2024 which involved a minor sewage spill at the crib toilets. Spill was contained by stopping usage of toilet with out of service tag.</p> <p>(e) This was not considered a reportable incident or non-compliance. Appropriate action was taken. Waste monitoring and reporting is presented in Section 5.8 of the Annual Review 2023.</p>
B82	Except as expressly permitted in an applicable EPL, specific resource recovery order or exemption under the Protection of the Environment Operations (Waste) Regulation 2014, the Applicant must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.	Compliant	<p>Reviewed Annual Review 2023 and monthly Waste Tracking certificates January - September for 2024.</p> <p>Waste was not received at the site in the audit period (AR pers comms).</p>

Ref	Requirement	Status	Comments
<b>Dangerous Goods</b>			
B83	<p>The Applicant must ensure that the storage, handling, and transport of:</p> <p>(a) dangerous goods is carried out in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and</p> <p>(b) explosives are managed in accordance with the requirements of the Resources Regulator.</p>	Compliant	<p>Reviewed MPO Explosives Security Plan (23 February 2023), Hydrocarbon Management Procedure (March 2023) and Manage Hazardous Chemicals Procedure (September 2018).</p> <p>Key commitments from the Mount Pleasant Explosives Security Plan include:</p> <ul style="list-style-type: none"> <li>- Any person that is deemed authorised and is required to access the Magazine Area or Reload Facilities unsupervised must have a Security / Police Clearance as a minimum and be suitably licensed (as per Workcover requirements) and appointed by the site MEM</li> <li>- All personnel who hold a Security Clearance or Blasting Explosive Users Licence must be listed on the Authorised Personnel to Access Explosives/SSAN/UHL Register.</li> <li>- All blasting personnel must obtain a Security Clearance as defined by Workcover NSW</li> <li>- Explosive / SSAN Storage areas must be locked and secure at all times.</li> <li>- The Explosive / SSAN storage areas are a restricted entry zone and is only accessed by approved, competent and appointed personnel.</li> <li>- Appropriate signage identifying restricted access is displayed.</li> <li>- Gates are installed at site entry to prevent unauthorised entry to site.</li> <li>- Shotfirers Vehicle is emptied daily with all stocks returned to the Magazine. Mobile Processing Units shall be locked within the Reload compound when not to use</li> </ul> <p>Reviewed incident report dated 23 September 2024 describing an oil spill in stores. An operator noticed the spill, notified their supervisor and began to contain the spill. The IBC had been punctured by a damaged IBC. Actions included providing spill awareness to team members. <b>Plate 23</b> shows storage of hydrocarbons. A review of the Internal Information Filing folder containing incident reports for the audit period did not show any dangerous goods reportable incidents occurred.</p> <p>Reviewed 'Compliance Audit Report (Final) – Environment Management System and Practices Environment Protection Licence 20850 Mount Pleasant Operations – Mach Energy Australia Pty Ltd – Muswellbrook' (4 September 2024). EPA did not present any issues regarding hazardous material, Dangerous Goods or hydrocarbon storage.</p> <p>Reviewed MPO Explosives Licence XMNF200033. MPO Explosives Security Plan provisions in line with MPO's explosive licence.</p>

Ref	Requirement	Status	Comments
<b>Bushfire Management</b>			
B84	<p>The Applicant must:</p> <p>(a) ensure that the development:</p> <p>(i) provides for asset protection in accordance with the relevant requirements in the Planning for Bushfire Protection (RFS, 2019) guideline; and</p> <p>(ii) ensure that there is suitable equipment to respond to any fires on the site; and</p> <p>(b) assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.</p>	Compliant	<p>(a) Reviewed Bushfire Management Plan V1 dated September 2020. SSD bushfire management plan not yet due. No bushfires have occurred in the audit period.</p> <p>(1) Section 5 provides appropriate risk management measures for asset protection.</p> <p>(2) Site inspection confirmed suitable equipment is present on site (see <b>Plate 11</b>). MPO has fire water tanks and hydrants across the site. MPO has access to water carts for fire response (AR pers comms). All data is given to MACH by THIESS to check water cart capability.</p> <p>'Reviewed Bush Fire Season Preparedness – as of 1 October'. Confirmed adequacy of water supply, onsite firefighting resources, inspection and maintenance of control lines and inspection and maintenance of Asset Protection Zones. MPO is prepared to assist the RFS if required, with channels of communication easily accessible through Thiess and the head of Kayuga RFS, who works with Thiess. MPO consults with RFS each year, RFS attends site each year for inspection. . No bushfire in period but roadside burn occurred along Castlerock Road on 20 September 2023 (reviewed aerial image and photos of burnt area). RFS and MPO responded and the fire did not cause any considerable damage. All control lines mowed in 2024 (AR pers comms).</p>
B85	<p>Within 12 months of the commencement of development under this consent, the Applicant must prepare a Bushfire Management Plan for the development in consultation with RFS. This plan must include a:</p> <p>(a) contact person and 24-hour contact phone number;</p> <p>(b) schedule and description of proposed bushfire mitigation works, including:</p> <p>(i) location of managed and unmanaged vegetation within the site;</p> <p>(ii) location of water supply; and</p> <p>(iii) internal access roads;</p> <p>(c) plan identifying the location and storage of bulk flammable liquids and materials;</p> <p>(d) 'hot works' management plan, including:</p> <p>(i) circumstances when 'hot works' are limited or prohibited; and</p> <p>(ii) safety measures to be implemented when 'hot works' are being conducted; and</p>	Not triggered	<p>Timing requirement not yet reached (due 12 February 2025).</p> <p>MPO is currently operating under the DA 92/97 Bushfire Management Plan.</p>

Ref	Requirement	Status	Comments
	(e) emergency/evacuation plan in accordance with the Guidelines for the Preparation of Emergency/Evacuation Plans (RFS) and Australian Standard AS3745 Planning for Emergencies in Facilities.		
B86	The Applicant must implement the Bushfire Management Plan in consultation with RFS.	Not triggered	Timing requirement for this Bushfire Management Plan not yet reached per response to B85. Compliance with Bushfire Management Plan for DA 92/97 assessed. See B84 for bushfire management actions taken in audit period.

### Rehabilitation

B87

The Applicant must rehabilitate the site in accordance with the provisions under the Mining Act 1992. This rehabilitation must be generally consistent with the proposed rehabilitation activities described in the document/s listed in condition A2(c) and shown conceptually in Appendix 6, and must comply with the objectives in Table 10.

Note: The rehabilitation objectives related to the establishment of native vegetation communities do not constitute an obligation for biodiversity offset purposes. Biodiversity offsets obligations in relation to development approved under this consent are regulated by conditions 855 to 861.

*Table 10: Rehabilitation objectives*

Feature	Objective
All areas of the site affected by the development	<ul style="list-style-type: none"><li>• Safe, stable and non-polluting</li><li>• Fit for the intended post-mining land use/s</li><li>• Establish the final landform and post-mining land use/s as soon as practicable after cessation of mining operations</li><li>• Minimise post-mining environmental impacts</li></ul>
Areas proposed for native ecosystem re-establishment	<ul style="list-style-type: none"><li>• Establish/restore self-sustaining native woodland ecosystems</li><li>• Establish local plant community types</li><li>• Establish:<ul style="list-style-type: none"><li>- riparian habitat within any diverted and/or re-established creek lines and retained water features;</li><li>- habitat, feed and foraging resources for threatened fauna species; and</li><li>- vegetation connectivity and wildlife corridors, as far as is reasonable and feasible</li></ul></li></ul>

Compliant

(RPS Ecology) MPO submitted a Rehabilitation Strategy in accordance with Condition 54 Schedule 3 of DA 92/97 which was approved by the Planning Secretary on 18 March 2024.

The draft Rehabilitation Strategy will comply with any relevant rehabilitation related conditions in Development Consent SSD 10418 (i.e. Conditions B87 – B91). The endorsed specialist (Chloe Annandale – Landroc) is required to review and sign off a revised draft of the Rehabilitation Strategy (LR pers comms).The Rehabilitation Strategy complied with the Rehabilitation Objectives outlined in Table 10:

Section 3.1.3, 3.2, 3.3, 3.4 and 3.5 addresses how all areas of the site affected by the development will be:

- Safe, stable and non-polluting
- Fit for the intended post-mining land use/s

Figure 4 in Appendix 2 and Section 3.2 addresses areas proposed for native ecosystem re-establishment will be:

- Restore self-sustaining native woodland ecosystems characteristic of vegetation communities found in the local area, as shown conceptually in Figure 4 in Appendix 2.
- Establish areas of self-sustaining riparian habitat, within any diverted and/or re-established creek lines and retained water features; potential habitat for threatened flora and fauna species; and wildlife corridors, as far as is reasonable and feasible.

Section 3.1.3 addresses areas proposed for agricultural land will:

- Establish/restore grassland areas to support sustainable agricultural activities
- Achieve the nominated land capability classification

Section 3.1.3 addresses final landform will be:

- Stable and sustainable for the intended post-mining land use/s
- Integrated with surrounding natural landforms
- Incorporate micro-relief and drainage lines that are consistent with surrounding topography, to the greatest extent practicable

Ref	Requirement	Status	Comments														
	<table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Areas proposed for agricultural land</td><td><ul style="list-style-type: none"><li>Establish/restore grassland areas to support sustainable agricultural activities</li><li>Re-establish agricultural land areas generally in accordance with the final landform plan (Appendix 6)</li><li>Use species found in the local area that are suitable for pasture production</li><li>Implement reasonable and feasible measures to rehabilitate agricultural land areas to LSC Class 3 to 4</li><li>Maintain the agricultural productivity and production of non-operational project-related land</li><li>Locate adjacent to surrounding agricultural land, where practicable</li></ul></td></tr><tr><td>Final Landform</td><td><ul style="list-style-type: none"><li>Stable for the intended post-mining land use/s</li><li>Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable</li><li>Incorporate micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable</li><li>Maximise surface water drainage to the natural environment i.e. free drainage (excluding final void catchment)</li><li>Minimise visual impacts, where practicable</li></ul></td></tr><tr><td>Final void</td><td><ul style="list-style-type: none"><li>Designed as long-term groundwater sink to prevent the release of saline water into the surrounding environment, unless further mine planning and final landform design processes identify a more suitable outcome for the void (see condition B89)</li><li>Minimise to the greatest extent practicable having regard to post-mining beneficial land uses for the site:<ul style="list-style-type: none"><li>the size and depth;</li><li>the drainage catchment;</li><li>any high wall instability risk; and</li><li>the risk of flood interaction</li></ul></li><li>Maximise potential for beneficial reuse, where practicable</li></ul></td></tr><tr><td>Surface infrastructure of the development</td><td><ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Resources Regulator agrees otherwise</li></ul></td></tr><tr><td>Water quality</td><td><ul style="list-style-type: none"><li>Water retained on the site is fit for the intended post-mining land use/s</li><li>Water discharged from the site is suitable for receiving waters and fit for aquatic ecology and riparian vegetation</li></ul></td></tr><tr><td>Community</td><td><ul style="list-style-type: none"><li>Ensure public safety</li><li>Minimise adverse socio-economic effects associated with mine closure</li></ul></td></tr></table>	Feature	Objective	Areas proposed for agricultural land	<ul style="list-style-type: none"><li>Establish/restore grassland areas to support sustainable agricultural activities</li><li>Re-establish agricultural land areas generally in accordance with the final landform plan (Appendix 6)</li><li>Use species found in the local area that are suitable for pasture production</li><li>Implement reasonable and feasible measures to rehabilitate agricultural land areas to LSC Class 3 to 4</li><li>Maintain the agricultural productivity and production of non-operational project-related land</li><li>Locate adjacent to surrounding agricultural land, where practicable</li></ul>	Final Landform	<ul style="list-style-type: none"><li>Stable for the intended post-mining land use/s</li><li>Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable</li><li>Incorporate micro-relief and drainage features that mimic natural topography and mitigate erosion, to the greatest extent practicable</li><li>Maximise surface water drainage to the natural environment i.e. free drainage (excluding final void catchment)</li><li>Minimise visual impacts, where practicable</li></ul>	Final void	<ul style="list-style-type: none"><li>Designed as long-term groundwater sink to prevent the release of saline water into the surrounding environment, unless further mine planning and final landform design processes identify a more suitable outcome for the void (see condition B89)</li><li>Minimise to the greatest extent practicable having regard to post-mining beneficial land uses for the site:<ul style="list-style-type: none"><li>the size and depth;</li><li>the drainage catchment;</li><li>any high wall instability risk; and</li><li>the risk of flood interaction</li></ul></li><li>Maximise potential for beneficial reuse, where practicable</li></ul>	Surface infrastructure of the development	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Resources Regulator agrees otherwise</li></ul>	Water quality	<ul style="list-style-type: none"><li>Water retained on the site is fit for the intended post-mining land use/s</li><li>Water discharged from the site is suitable for receiving waters and fit for aquatic ecology and riparian vegetation</li></ul>	Community	<ul style="list-style-type: none"><li>Ensure public safety</li><li>Minimise adverse socio-economic effects associated with mine closure</li></ul>		<ul style="list-style-type: none"><li>Maximise surface water drainage to the natural environment (excluding final void catchment)</li><li>Minimise visual impacts, where practicable</li></ul> <p>Section 3.1.3 and 3.4 addresses how final voids will be:</p> <ul style="list-style-type: none"><li>Designed as long term groundwater sinks to maximise ground water flows across back filled pits to the final void</li><li>Minimise to the greatest extent practicable:<ul style="list-style-type: none"><li>the size and depth of final voids;</li><li>- the drainage catchment of final voids;</li><li>- any high wall instability risk; and</li><li>- the risk of flood interaction</li></ul></li></ul> <p>Section 3.1.1 and Section 3.5 details how surface infrastructure of the development is to be decommissioned and removed.</p> <p>Section 3.5 addresses water quality, specifically:</p> <ul style="list-style-type: none"><li>Water retained on the site is fit for the intended post-mining land use/s</li><li>Water discharged from the site is suitable for receiving waters and fit for aquatic ecology and riparian vegetation</li></ul> <p>Section 4.6 address community, specifically to:</p> <ul style="list-style-type: none"><li>Ensure public safety</li><li>Minimise adverse socio-economic effects associated with mine closure.</li></ul> <p>Documents reviewed:</p> <p>Mount Pleasant Operation Rehabilitation Strategy Rev 03 18 March 2024 (MACH 2024)</p> <p>(RPS Planning) Reviewed annual rehabilitation reporting in Section 7 of AR 2023. Rehabilitation completed is in line with the RMP. 155 ha of active rehabilitation in 2023 with 173 forecast for calendar year 2024. Visually inspected rehabilitation on eastern face of the mine during site inspection. Good establishment noted, especially in older areas. Use of dead standing trees noted, anecdotal evidence provided at staff interview of birds of prey using these (Peter York pers comms).</p> <p>On site reviewed Figure 2 Appendix 2 SSD10418, confirmed mining areas are within and consistent with the plan.</p> <p>Objectives are addressed in Forward Program (March 2024) submitted and confirmed by Resources Regulator and Rehabilitation Strategy.</p>
Feature	Objective																
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Community	<ul style="list-style-type: none"><li>Ensure public safety</li><li>Minimise adverse socio-economic effects associated with mine closure</li></ul>																
			Reviewed Mount Pleasant Coal Mine Forward Program Monday 1 January 2024 to Thursday 31 December 2026. Document addressed hypothetical scenario that DA														

Ref	Requirement	Status	Comments
			<p>continues; this will be updated for SSD after the audit period (AR pers comms). Production is consistent with the milestones in the Forward program. Construction and mining activities also consistent. Auditors checked rehabilitation was consistent with the Forward Program while on site.</p> <p>Interview with Brodie Morrison (Thiess Environmental Advisor) occurred on Day 2. Thiess is responsible for the design of the rehabilitation at MPO. Auditors reviewed 'Blueview' rehabilitation tracking software with BM. Blueview creates a map showing outcomes of rehabilitation report, shows what need to be treated against where weed management has occurred. Blueview also shows weed load at monitoring points, red dots show high weed load, green means within required parameters, orange within around 20-30%, as well as weed species distribution. There is a built-in work order system for weed management.</p> <p>Reviewed weed mapping pre-treatment and designated treatment areas. Mostly targeting Galinea and African Boxthorn but opportune weed spraying will occur where identified. Weed species are tracked by weed sprayer and entered into Blueview. Rehabilitation is discussed at weekly team meetings.</p> <p>Auditors and BM also review 'ITP 2024 Tracker' Excel spreadsheet, which shows each stage of each rehabilitation ITP including rip and seed, topsoil placement, landform design.</p> <p>Inspection and Test Plans (ITPs) control rehabilitation processes for each stage. At Stage 25 in program currently. These are completed by Thiess and signed off by MACH. Each ITP must be signed off by MACH before the next stage is commenced to ensure no issues with landforms or rehabilitation. Reviewed '2024 Stage 21 I-M Topsoil Placement' ITP, '2024 Stage 21 I-M Ripping, Seeding &amp;Planting' ITP, '2024 Stage 21 I-M Landform Construction Profiling' ITP '2024 Stage 21 F-H Landform Construction Profiling ITP. Reviewed 'ITP 224 Tracker'. ITPs confirmed in line with rehabilitation objectives.. Targeted Assessment Program done by Resources Regulator recommended adding ITPs for maintenance. This was confirmed implemented on site. Final landform has been completed to geofluvial design and submitted. Reviewed Final Landform Rehabilitation Plan (FLRP) with environment team on site. All of the rehabilitation so far has been open woodland, on the eastern side of the site. Agricultural final land use rehabilitation not yet required. Final landform is confirmed and the land is shaped to this (AR pers comms). Reviewed Geofluvial Rehab Dayworks Stage 20 plan 12 March 2023. Shows cut and fill required for shaping to final landform for 12.9 Ha. Conditions generally in seeding ITPs require planting occurs around favourable conditions (BM pers comms).</p> <p>Reviewed Geofluvial Rehab Dayworks Stage 24 Plan 1 April 2024, showed A-C topsoiling signed off and cut and fill around existing landform.</p>

Ref	Requirement	Status	Comments
			<p>Auditors physically checked Geofluvial rehab against the ITPs / geofluvial rehab plans. See <b>Plate 39</b> to <b>Plate 43</b>.</p> <p>(AR pers comms): As dumps become full and available, the ITP process commences and rehab occurs. There is still available rehab in the southern sections of the site. Rehab teams alternate between landform and drain construction. TARP has been developed for rehab maintenance. Drone imagery is used as decision making framework for implementing rehabilitation maintenance. Some maintenance practices are being trialled currently by MACH for example cross ripping bare areas and reseeding, mulch being used to fill in gully erosion. Rehabilitation monitoring program is in place, annually reviewed by external consultants. Transects are monitored to look at growth and species, etc, set up at random sites on rehab. Sites increasing as rehab is progressing. Drone surveys occur alongside for ecology, weed management, etc. Reviewed rehabilitation maintenance report on site with environment team.</p> <p>Meetings occur between Thiess and MACH to implement recommendations from external consultant's rehabilitation monitoring reports. There has been improvement in high threat weed species. New full time weed sprayer appointed in April 2024, therefore better weed control results can be expected. Thiess has consulted Future Harvest showing them what has come out of the rehabilitation report and Future Harvest provides input to strategic decision making regarding supplementary planting etc. (AR pers comms)</p> <p>MPO is planning to use drone imagery to heat map future rehabilitation (AR pers comms).</p> <p>Reviewed 'Erosion Quantification Ground Truthing' PowerPoint slideshow. Contained screenshots of ground truthing site inspections.</p> <p>Rehabilitation cost estimates are completed every year. Reviewed externally by mine planning engineer (AR pers comms).</p> <p>Forward plan is currently being updated for SSD 10418. (AR pers comms)</p> <p>Reviewed Rehab Blocks.png showing GIS imagery of current rehabilitation compared to Figure projection in Figure 2 Appendix 2 of the SSD consent. In Figure 2 Appendix 2 of SSD MWD2 has not yet been constructed, HWD2 has been constructed. SD08, SD05, SD06 does not exist but other aspects are in line, or shaping up to be in line with projections / requirements.</p> <p>Reviewed 2024 'Rehabilitation Erosion Quantification Assessment' (WSP, 2024). Key findings as outlined in exec summary are that most of the older rehabilitation areas are performing better than in the previous year due to robust vegetation cover. The best performing sites have a downward trend in erosion.</p>



Ref	Requirement	Status	Comments
B88	<p>The rehabilitation objectives in Table 10 apply to the entire site, including all landforms constructed under either this consent or previous consents.</p> <p>However, the Applicant is not required to undertake any additional earthmoving works on landforms that have been approved and constructed under previous consents, except where those earthworks are required for the establishment of a stable, non-polluting and free-draining landform.</p>	Compliant	Reviewed Forward Plan and rehabilitation ITPs as per condition B87 for landform design, landform construction profiling, topsoil placement, ripping, seeding and planting.
B89	<p>The Applicant must prepare a Rehabilitation Strategy for all land disturbed by the development to the satisfaction of the Planning Secretary. This strategy must:</p> <p>(a) be submitted for approval within 12 months of the commencement of development under this consent;</p> <p>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p> <p>(c) be prepared in consultation with the BCD, Resources Regulator and Council;</p> <p>(d) build upon the Rehabilitation Objectives in Table 10, describe the overall rehabilitation outcomes for the site, and address all aspects of rehabilitation including mine closure, final landform (including final void), postmining land use/s and water management;</p> <p>(e) align with strategic rehabilitation and mine closure objectives and address the principles of the Strategic Framework for Mine Closure (ANZMEC and MCA, 2000);</p> <p>(f) describe how the rehabilitation measures would be integrated with the measures in the Biodiversity Management Plan referred to in condition B63 and the Visual Impact Management Plan referred to in condition B77;</p> <p>(g) describe how rehabilitation will be integrated with the mine planning process, including a plan to address premature mine closure;</p> <p>(h) include indicative mine plans and scheduling for life-of-mine rehabilitation showing each rehabilitation domain;</p>	Not triggered	<p>(RPS Planning) Commencement of development occurred 12 February 2024. The Rehabilitation Strategy was being updated at the time of the site inspection. As such the Rehabilitation Strategy is due to be submitted for approval 12 February 2025.</p> <p>The draft Rehabilitation Strategy was not provided.</p>

Ref	Requirement	Status	Comments
	<p>(i) include details of target vegetation communities and species (including seed provenance) to be established within the proposed revegetation areas;</p> <p>(j) investigate opportunities to refine and improve the final landform and final void outcomes over time;</p> <p>(k) include a post-mining land use strategy to investigate and facilitate post-mining beneficial land uses for the site (including the final void), that:</p> <p>(i) align with regional and local strategic land use planning objectives and outcomes;</p> <p>(ii) support a sustainable future for the local community;</p> <p>(iii) utilise existing mining infrastructure, where practicable; and</p> <p>(iv) avoid disturbing self-sustaining native ecosystems, where practicable;</p> <p>(l) include a stakeholder engagement plan to guide rehabilitation and mine closure planning processes and outcomes;</p> <p>(m) investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure; and</p> <p>(n) include a program to periodically review and update this strategy at least every three years.</p>		
B90	The Applicant must not commence mining operations north of Castlerock Road until the Rehabilitation Strategy is approved by the Planning Secretary.	Not triggered	Site inspection confirmed mining has not commenced north of Castlerock Road.
B91	The Applicant must implement the Rehabilitation Strategy approved by the Planning Secretary.	Not triggered	<p>Rehabilitation strategy for SSD10418 is not yet approved and cannot be implemented. See B89. However, reviewed implementation with Rehabilitation Strategy Version 3 dated 18 March 2024 (for DA 92/97). Key commitments relevant to the current stage of Mount Pleasant in the Rehabilitation Strategy include native Woodland / Grassland objectives, with the final landform being progressively revegetated with native tree and shrub species.</p> <p>See B89 response for summary of rehabilitation activities on site.</p>
B92	The Applicant must prepare a Rehabilitation Management Plan for the development, in accordance with the provisions under the Mining Act 1992.	Not triggered	<p>MPO is currently operating under the DA 92/97 Rehabilitation Management Plan Version 2 dated August 2022. Section 1 of the RMP states it has been prepared in accordance with the <i>Mining Act 1992</i>.</p> <p>The revised Rehabilitation Management Plan relevant to B92/ SSD10418 is being prepared and will be submitted after this audit (AR pers comms).</p>

Ref	Requirement	Status	Comments
<b>Transport</b>			
B93	<p>The Applicant must:</p> <p>(a) keep accurate records of the amount of coal transported from the site (on a daily basis); and</p> <p>(b) publish these records in the Annual Review.</p>	Compliant	<p>Viewed Coal Transport Records 2024.</p> <p><b>Coal Transport Records 2024 spreadsheet shows all train movements and provides monthly coal amounts but does not show the amount of coal transported on a daily basis.</b></p> <p>Reviewed Annual Review 2023 which has a rail movement summary in Appendix C. Amounts of coal were required to be recorded monthly by DA 92/97. <b>It is recommended the coal transport register in the Annual Review is updated to track daily amounts of coal transported. It is noted that these records are kept in MPO Daily Report Output V6 excel spreadsheet, therefore compliant with this condition.</b></p>
B94	<p>By no later than 31 October 2022, unless otherwise agreed to by the Planning Secretary, the Applicant must:</p> <p>(a) remove all infrastructure associated with the development within Mining Lease No. 1645 (ML 1645) south of Wybong Road (other than infrastructure which the operator of the Bengalla mine agrees with the Applicant, in writing, can remain in situ);</p> <p>(b) do all things available to transfer or cause the grant of a mining lease over that part of ML 1645 south of Wybong Road to the operator of Bengalla mine (or its nominee);</p> <p>(c) transfer the freehold land owned by the Applicant within ML 1645 south of Wybong Road to the operator of Bengalla mine (or its nominee) at rural market value;</p> <p>(d) release any easements for pipeline and rail spur within or in the vicinity of ML 1645 south of Wybong Road which benefit land owned by the Applicant; and</p>	Compliant	<p>Compliance confirmed in 2023 IEA.</p>
B95	<p>Following the completion of the Bengalla Link Road under SSD-5170, or as otherwise directed by the Planning Secretary, the Applicant must demolish the Bengalla Link Road bridge and, unless otherwise agreed by the Planning Secretary, reinstate the road reserve to the satisfaction of Council</p>	Not triggered	<p>Bengalla Link Road is complete and operational</p> <p>Viewed letter from General Manager of Bengalla Mining Company dated 2 December 2021 requesting Bengalla Link Road Bridge structures remain in place and are removed at a later time. "BMC, the operator of Bengalla Mine agrees with MACH Energy Australia Pty Limited (MACH Energy) that the Bengalla Link Road (BLR) Bridge, being infrastructure associated with the development within Mining Lease no. 1645 south of Wybong Road (now ML 1796), can remain in situ after 31 October 2022 on the basis of the commercial agreements about future removal of the BLR bridge documented in our correspondence including your letter dated 30 November 2021 and relevant approvals (Reviewed letter from the Department dated 24 March 2022</p>

Ref	Requirement	Status	Comments
			confirming approval of extension to extend the timeline for this until after the Bengalla Link Road realignment is complete)."
B96	<p>The Applicant must, at its own expense:</p> <p>(a) construct the Northern Link Road realignment (Option 1 or Option 2, as described in the documents in condition A2(c)), prior to the closure of the eastern portion of Castlerock Road; and</p> <p>(b) undertake a safety audit for the full length of Castle rock Road and the intersection of Dorset Road and Kayuga Road, and implement any recommendations that may apply to the western portion of Castlerock Road within 1 km of the site that would continue to serve public traffic, prior to the closure of the eastern portion of Castlerock Road, to the satisfaction of Council</p>	Compliant	<p>(a) Reviewed Northern Link Road Amended Option 2 Alignment Proposed Disturbance Footprint. Construction not yet required as Castlerock Road not yet closed.</p> <p>(b) Reviewed Castlerock Road, Muswellbrook Existing Road, Road Safety Audit Version 3 dated 7 September 2023. The audit identified road safety concerns regarding Castlerock Road and the intersection of Dorset Road with Kayuga Road. Section 4.3 of the road safety audit states "in line with TfNSW's best practice, recommendations have not been included in the road safety audit findings." Therefore, no recommendations required implementing by MPO.</p>
B97	<p>The Applicant must, as far as reasonable and feasible:</p> <p>(a) implement strategies to minimise project-related use of Castlerock Road;</p> <p>(b) require all project-related traffic to use Bengalla Link Road and Wybong Road for access; and</p> <p>(c) ensure that workers associated with major construction activities as defined in the Traffic Management Plan are transported to the site via shuttle bus.</p>	Compliant	<p>Reviewed Traffic Management Plan (TMP) Revision 1 dated 17 September 2024.</p> <p>(a) Section 3.1.11 addresses this requirement.</p> <p>(b) Section 6.1.1 addresses this requirement. Auditors were instructed to use Bengalla Link Road for access during the audit.</p> <p>(c) Section 4.3.2 addresses this requirement. No major construction requiring worker shuttle bus transport in the audit period.</p>
B98	<p>The Applicant must maintain signs and give at least 24 hours' notice of temporary road closures. The location and wording of the signs are to be approved by Council. A protocol is to be established, in consultation with the emergency service providers and Council, to permit the passage of emergency vehicles during road closures.</p>	Compliant	<p>Section 5.5 of TMP addresses community notification of traffic impacts and approval of signs by MSC. Section 5.7.2 addresses the emergency response protocol. Emergency vehicle passage is also addressed throughout the TMP. Road closure plan is part of Blast Management Plan, which was prepared in consultation with MSC. Section 2 of the Blast Management Plan states "The RCMP has been prepared cognisant of Muswellbrook Shire Council (MSC) review comments for blasting and road closure procedures for nearby mine operations."</p> <p>Sighted road closures notification sign at entrance during site inspection. No community complaints around road closures.</p> <p>Road closures are also posted on MSC website (reviewed by auditors during site inspection). MPO operates an SMS messaging system for road closures for anyone who wants to be notified. Texts are sent out 24 hours in advance. Road closure signs also go up the day prior to closures. Emergency services have not needed passage during road closures in the audit period.</p>

Ref	Requirement	Status	Comments
B99	<p>The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be submitted for approval within six months of the commencement of development under this consent;</li> <li>(b) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</li> <li>(c) be prepared in consultation with TfNSW and Council;</li> <li>(d) include details of all transport routes and traffic types to be used for development-related traffic;</li> <li>(e) include a protocol for undertaking pre and post-dilapidation surveys and repairing any roads identified in the dilapidation surveys to have been damaged during construction and/or decommissioning works;</li> <li>(f) include details of the measures to be implemented to minimise traffic safety issues and disruption to local road users during construction, operation and decommissioning phases of the development, including:               <ul style="list-style-type: none"> <li>(i) temporary traffic controls, including detours and signage (where relevant);</li> <li>(ii) notifying the local community about development-related traffic impacts;</li> <li>(iii) define the major construction activities during which shuttle buses will be used to transport construction workers to the site;</li> <li>(iv) minimising potential for conflict with school buses and stock movements;</li> <li>(v) access and car parking arrangements;</li> <li>(vi) staggering shift changes with other mining operations in the locality, where practicable, to minimise impacts during AM and PM peak traffic periods;</li> <li>(vii) responding to any emergency repair requirements or maintenance during construction and/or decommissioning; and</li> <li>(viii) a traffic management system for managing over-dimensional vehicles; and</li> </ul> </li> </ul>	Compliant	<p>Reviewed TMP Rev 1 17 September 2024.</p> <ul style="list-style-type: none"> <li>(a) Reviewed TMP submission confirmation email dated 26 July 2024</li> <li>(b) The TMP was prepared by MACH Energy and Penny Dalton, who has been endorsed by the Planning Secretary as a suitably qualified and experienced person (Attachment 1 to the TMP).</li> <li>(c) Approval letter from the Department dated 17 September acknowledges consultation with TfNSW and MSC.</li> <li>(d) Sections 3.1 and 4.3 address these requirements.</li> <li>(e) This protocol is in Section 7. MPO has a road maintenance plan with MSC showing evidence of historical dilapidation surveys.</li> <li>(f) Addressed:               <ul style="list-style-type: none"> <li>(1) Section 5.7</li> <li>(2) Section 5.5</li> <li>(3) Section 4.3 and 5.4</li> <li>(4) Section 5.9 and 5.10</li> <li>(5) Section 4.2</li> <li>(6) Section 6.2</li> <li>(7) Section 5.2</li> <li>(8) Section 5.8</li> </ul> </li> <li>(g) Drivers code of conduct is addressed in Section 5.11 and Appendix C.               <ul style="list-style-type: none"> <li>(1) Section 1 and throughout</li> <li>(2) Section 1 and throughout</li> <li>(3) Section 1 and throughout</li> </ul> </li> </ul>

Ref	Requirement	Status	Comments
	(g) include a Drivers' Code of Conduct that includes procedures to ensure that drivers: (i) adhere to posted speed limits or other required travelling speeds; (ii) adhere to the designated transport routes; and (iii) implement safe driving practices.		
B100	If the construction and/or decommissioning of the development is to be staged, the obligations in condition B99 apply to each stage of construction and/or decommissioning.	Not triggered	Not triggered (AR pers comms).
B101	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Traffic Management Plan is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded
B102	The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.	Compliant	Reviewed incidents and complaints for the audit period. No traffic related incidents or complaints in the audit period.
B103	During the development, the Applicant must maintain the roads and intersections between the Bengalla Mine main entrance and the Mount Pleasant Mine main entrance, including: (a) part of the Bengalla Link Road; and (b) part of the Wybong Road.	Compliant	Reviewed Mount Pleasant Project Road Maintenance Plan Revision 0 dated April 2019. Reviewed Operations and Maintenance Manual Version 1 dated February 2021. Reviewed Bridge Inspection and Maintenance Plan dated 6 April 2022. Reviewed letter 4 March 2024 showing road works schedule addressing this condition. Auditors travelled on Bengalla Link Road and Wybong Road to access site.
B104	The Applicant must develop a Maintenance Management Plan in respect of these roads, to the satisfaction of Council.	Compliant	2023 IEA confirmed MPO consulted MSC for 2021 Road Maintenance Plan. <b>As this Road Maintenance Plan predates this consent, it is recommended this plan is reviewed and updated (if required) in the next audit period in consultation with Council.</b>
B105	The Applicant must contribute to the upgrade and maintenance of Thomas Mitchell Drive, proportionate to its impact (based on usage) on that infrastructure, in accordance with the Contributions Study prepared by GHD titled, "Thomas Mitchell Drive Contributions Study, August 2018" (as amended from time to time). For Thomas Mitchell Drive, the contributions must be paid to Council in accordance with: (a) the payment schedule in the Contributions Study for the upgrade works; and	Compliant	No amendment to the Thomas Mitchell Drive Study from 2018 has been made in the audit period (AR pers comms). Viewed confirmation of contributions dated 1 February 2023 for \$783,442 for Thomas Mitchell Drive for FY23-24. Payment not yet required to be made for FY 24-25.

Ref	Requirement	Status	Comments
	<p>(b) the maintenance schedule established in accordance with the Contributions Study during the life of the development, unless otherwise agreed with Council.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• In making a determination about the applicable contributions under this condition, the Planning Secretary will take into account the contributions already paid or required to be paid towards the upgrade and maintenance of the local road network in the Muswellbrook Local Government Area under this consent and any associated Planning Agreement with Council.</li> <li>• If there is a dispute between the relevant parties about the implementation of this condition, then any party may refer the matter to the Planning Secretary for resolution.</li> </ul>		

#### Part C Additional Procedures

C1	Upon receiving a written request for acquisition from the owner of the privately-owned land listed in Table 11, the Applicant must acquire the land in accordance with the procedures in conditions C12 to C19 inclusive.	Not triggered	No written requests for acquisition were made in the audit period (AR per comms).
<b>Table 11: Land subject to acquisition upon request</b>			
<b>Acquisition Basis</b>		<b>Receiver ID</b>	
Air Quality and Noise		118, 120, 120c, 121, 143b, 143e, 147, 153a, 154, 156a, 157a, 159	
Air Quality		112	
Noise		136, 143a	
* The location of the land referred to in Table 11 is shown in Appendix 3.			
C2	Upon receiving a written request for mitigation from the owner of any residence on the privately-owned land listed in Table 11 or Table 12, the Applicant must implement additional mitigation measures at or in the vicinity of the residence in consultation with the landowner. These measures must be consistent with the measures outlined in the Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Development (NSW Government, 2018). They must also be reasonable and feasible, proportionate to the level of predicted impact and directed towards reducing the noise and/or air quality impacts	Compliant	<p>Reviewed unsigned agreement dated 20 August 2024 for Mitigation Works between MACH and Cowtime Investments (EIS ID 86a). This agreement has not been signed or returned at the time of the audit (AR pers comms).</p> <p>Reviewed Agreement for Mitigation Works between MACH and a private landowner (EIS ID 156a). These works are complete (AR pers comms).</p> <p>Reviewed response letter to a separate private landowner's (EIS ID 157a) request for mitigation works dated 17 August 2023. Reviewed follow up emails dated 26 February 2024 confirming the requested works at 157a were completed.</p>



Ref	Requirement	Status	Comments				
	<p>of the development. The Applicant must also be responsible for the reasonable costs of ongoing maintenance of these additional mitigation measures until the cessation of mining operations.</p> <p><b>Table 12: Land subject to additional mitigation upon request</b></p> <table><tr><th>Mitigation Basis</th><th>Receiver ID</th></tr><tr><td>Noise</td><td>20, 21, 35, 35b, 43, 43b, 47, 67, 74, 86a, 96, 102, 140a</td></tr></table> <p><sup>a</sup> The locations of the land referred to in Table 12 are shown in Appendix 3.</p>	Mitigation Basis	Receiver ID	Noise	20, 21, 35, 35b, 43, 43b, 47, 67, 74, 86a, 96, 102, 140a		
Mitigation Basis	Receiver ID						
Noise	20, 21, 35, 35b, 43, 43b, 47, 67, 74, 86a, 96, 102, 140a						
C3	If within three months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, the Applicant must arrange an independent review of the measures to be implemented and either party may then refer the matter to the Planning Secretary for resolution.	Not triggered	Not triggered (AR pers comms).				
C4	For the life of the development, the Applicant must continue to contribute to reasonable maintenance and recurrent operating costs associated with the noise mitigation measures installed at privately-owned residences under the development and as described in the documents listed in condition A2(c). The contribution to ongoing maintenance and recurrent operating costs must be consistent with any existing agreement between the Applicant and the relevant landowner.	Compliant	<p>Reviewed Agreement for Mitigation Works between MACH and Cowtime Investments (EIS ID 86a). This agreement has not been signed or returned at the time of the audit (AR pers comms)</p> <p>Reviewed Agreement for Mitigation Works between MACH and a private landowner (EIS ID 156a). Reviewed response letter to a separate private landowner's (EIS ID 157a) request for mitigation works dated 17 August 2023. Agreements showed monetary compensation to landowners for operation and maintenance will occur if signed.</p>				
C5	<p>Within one month of the commencement of development under this consent, the Applicant must:</p> <p>(a) notify in writing the owner of:</p> <p>(i) the land listed in Table 11 that they have the right to require the Applicant to acquire their land at any stage during the development;</p> <p>(ii) the residences on the land listed in Table 11 that they are entitled to ask the Applicant to install additional mitigation measures at the residence; and</p> <p>(iii) any privately-owned land within 3 kilometres of the approved open cut mining pit/s that they are entitled to ask the Applicant for an inspection to establish the baseline</p>	Compliant	<p>Commencement (as per definition in consent) of development occurred on 12 February 2024.</p> <p>(a) Reviewed 16 letters of notification to landowners listed in Table 11, all dated 29 February 2024 (within one month of development commencing).</p> <p>Each letter had (where applicable):</p> <p>(i) Notification of rights to acquisition; and</p> <p>(ii) Notification of mitigation rights</p> <p>(iii) notification of entitlement for baseline condition investigations</p> <p>(iv) Notifications of mine owned land rights</p> <p>(v) A copy of 'Mine Dust and You'</p> <p>Reviewed property inspection preliminary information letter dated 30 May 2024.</p> <p>Reviewed associated Baseline Structural Reports dated 11 July 2024, 13 August 2024</p>				

Ref	Requirement	Status	Comments
	condition of any buildings or structures on their land, or to have a previous property inspection report updated; (b) notify the tenants of any mine-owned land of their rights under this consent; and (c) send a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017) to the owners and/or existing tenants of any land (including mine-owned land) where the predictions in the document/s listed in condition A2(c) identify that dust emissions generated by the development are likely to be greater than the relevant air quality criteria identified in condition B28 at any time during the life of the development.		and 16 August 2024. Reviewed email correspondence between MACH and resident / owner of the properties dated 19 August 2024. (b) Reviewed multiple letters of notification of rights under SSD 10418 dated 29 February. (C) Reviewed multiple letters of notification dated 29 February each including Mine Dust and You sheet.
C6	Prior to entering into any tenancy agreement for any land owned by the Applicant that is predicted to experience exceedances of the recommended air quality criteria in Table 3 and/or noise criteria in Table 1, the Applicant must: (a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017); and (b) advise the prospective tenants of the rights they would have under this consent, to the satisfaction of the Planning Secretary.	Compliant	Reviewed letters of notification dated 29 February advising tenants of health impacts, providing Mine Dust and You sheet and rights under SSD 10418. These were sent via email.
C7	As soon as practicable and no longer than 7 days after obtaining monitoring results showing an exceedance of any noise, blasting or air quality criterion in PART B of this consent, the Applicant must provide the details of the exceedance to any affected landowners, tenants and the CCC.	Not triggered	No relevant exceedances occurred during audit period.
C8	For any exceedance of any air quality criterion in PART B of this consent, the Applicant must also provide to any affected landowners and/or tenants a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017).	Not triggered	Reviewed Monthly Environmental Monitoring reports for each month of the audit period. No relevant exceedances occurred during audit period (see condition B28); No letters required to be sent.
C9	If a landowner considers the development to be exceeding any relevant noise, blasting or air quality criterion in PART B of this consent, they may ask the Planning Secretary in writing for an independent review of the impacts of the development on their residence or land.	Not triggered	Site interview confirmed not triggered (AR pers comms).

Ref	Requirement	Status	Comments
C10	If the Planning Secretary is not satisfied that an independent review is warranted, the Planning Secretary will notify the landowner in writing of that decision, and the reasons for that decision, within 21 days of the request for a review.	Not triggered	Site interview confirmed not triggered (AR pers comms).
C11	<p>If the Planning Secretary is satisfied that an independent review is warranted, within three months of the Planning Secretary's decision, the Applicant must:</p> <p>(a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Planning Secretary, to:</p> <p>(i) consult with the landowner to determine their concerns;</p> <p>(ii) conduct monitoring to determine whether the development is complying with the relevant criterion in PART B of this consent; and</p> <p>(iii) if the development is not complying with the relevant criterion, identify measures that could be implemented to ensure compliance with the relevant criterion;</p> <p>{b) give the Planning Secretary and landowner a copy of the independent review; and</p> <p>(c) comply with any written requests made by the Planning Secretary to implement any findings of the review.</p>	Not triggered	No requests were made in audit period (AR pers comms).
C12	<p>Within three months of receiving a written request for acquisition from a landowner with acquisition rights, the Applicant must make a binding written offer to the landowner based on:</p> <p>(a) the current market value of the landowner's interest in the land at the date of this written request, as if the land was unaffected by the development, having regard to the:</p> <p>(i) existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and</p> <p>(ii) presence of improvements on the land and/or any approved building or structure which has been physically commenced at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the</p>	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).

Ref	Requirement	Status	Comments
	<p>implementation of the additional noise and/or air quality mitigation measures in condition C2;</p> <p>{b) the reasonable costs associated with:</p> <p>(i) relocating within the Muswellbrook Local Government Area, or to any other local government area determined by the Planning Secretary; and</p> <p>(ii) obtaining independent legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and</p> <p>(c) reasonable compensation for any disturbance caused by the land acquisition process.</p>		
C13	<p>If, within two months of the binding written offer being made under condition C12, the Applicant and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Planning Secretary for resolution.</p>	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).
C14	<p>Upon receiving a request, under condition C13, the Planning Secretary will request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to:</p> <p>(a) consider submissions from both parties;</p> <p>{b) determine a fair and reasonable acquisition price for the land and/or the terms upon which the land is to be acquired, having regard to the matters referred to in condition C12;</p> <p>(c) prepare a detailed report setting out the reasons for any determination; and</p> <p>(d) provide a copy of the report to both parties.</p>	Not triggered	No requests received under C13 (AR pers comms).
C15	<p>Within 14 days of receiving the independent valuer's report, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.</p>	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).
C16	<p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, either party may refer the matter to the Planning Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's</p>	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).

Ref	Requirement	Status	Comments
	determination. Following consultation with the independent valuer and both parties, the Planning Secretary will determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in condition C12, the independent valuer's report, the detailed report of the party that disputes the independent valuer's determination and any other relevant submissions.		
C17	Within 14 days of this determination, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the Planning Secretary's determination.	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).
C18	If the landowner refuses to accept the Applicant's binding written offer under this condition within six months of the offer being made, then the Applicant's obligations to acquire the land shall cease, unless the Planning Secretary determines otherwise.	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).
C19	The Applicant must pay all reasonable costs associated with the land acquisition process described in conditions C12 to C18 inclusive, including the costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of this plan at the Office of the Registrar-General.	Not triggered	No requests for acquisition were made in the audit period (AR pers comms).
<b>Part D Environmental Management Reporting and Auditing</b>			
<b>Environmental Management</b>			
D1	The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: (a) be submitted for approval within six months of the commencement of development under this consent; (b) provide the strategic framework for environmental management of the development; (c) identify the statutory approvals that apply to the development; (d) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (e) set out the procedures to be implemented to:	Compliant	Reviewed Environmental Management Strategy Revision 5, approved 7 February 2024. (a) The EMS was submitted in September 2023, within 6 months of commencement, according to the approval letter from the Department dated 7 February 2024. (b) Addressed in Section 3 and 4 of the EMS. (c) Addressed in Section 4. (d) Section 5.1 and Appendix B. (e) Addressed in: (1) Section 5.6. (2) Section 5.7. (3) Section 5.9. (4) Section 6.2.

Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>(ii) receive record, handle and respond to complaints;</li> <li>(iii) resolve any disputes that may arise during the course of the development;</li> <li>(iv) respond to any non-compliance and any incident;</li> <li>(v) respond to emergencies; and</li> <li>(f) include: <ul style="list-style-type: none"> <li>(i) references to any strategies, plans and programs approved under the conditions of this consent; and</li> <li>(ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>(5) Section 5.5</li> <li>(f)</li> <li>(i) Section 2 and Appendix C</li> <li>(ii) Figure 5</li> </ul>
D2	The Applicant must not commence construction of the Northern Link Road or extract more than 10.5 Mt of ROM coal in a calendar year until the Environmental Management Strategy is approved by the Planning Secretary.	Not triggered	Site inspection and AR 2023 confirmed Northern Link Road construction has not commenced. AR 2023 and MPO Daily Report Output V6 dated 26 November 2024 confirmed ROM coal extraction limit has not been exceeded.
D3	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	Compliant	<p>Reviewed Environmental Management Strategy Revision 5, approved 7 February 2024. Section 5 addresses implementation of the EMS.</p> <p>5.1 – all employees and contractors at MPO are responsible for complying with relevant legislation and the EMS. Viewed excerpt from staff inductions teaching new employees about their environmental responsibilities, especially regarding development consent conditions.</p> <p>5.2 all plant and equipment is to be maintained and operated in a proper and efficient manner. See response to A32.</p> <p>5.3 – cooperation with adjacent mines. Reviewed Blast Management Plan (2020), Traffic Management Plan (2024) and Air Quality and Greenhouse Gas Management Plan (2019). Each plan notes consultation with the neighbouring mines occurs to manage cumulative impacts. Site interview also confirmed.</p> <p>5.4 – monitoring programs. Reviewed monthly environmental monitoring reports. Environmental monitoring is compliant with the consent conditions and monitoring programs which are detailed in each respective management plan.</p> <p>5.5 – Environmental emergencies. Review PIRMP (Rev 7, dated September 2024). No environmental emergencies occurred in the audit period; however small self-reported incidents occurred. Reviewed multiple incident reports on site with environment team. Reporting was completed in accordance with the reporting protocol outlined in Section 6.3 of the EMS.</p>

Ref	Requirement	Status	Comments
			<p>5.6 – Information dissemination. Reviewed CCC meeting minutes for the audit period. The CCC for DA 92/97 will continue operating as the DA is surrendered, according to agreement letter dated 19 April 2024. Reviewed MACH Energy external facing website. All required information was present and up to date at the time of the audit. Reviewed internal communication in form of WhatsApp environmental management group chat. Showed daily updates from management staff around MPO and demonstrated the ability to quickly react to adverse environmental conditions or incidents.</p> <p>5.7 – complaints management. Viewed community complaints register for the audit period. All required information was recorded. Reviewed examples of responses to complaints with environment team on site. A noise complaint made to the EPA was referred to DPHI on 4 October 2022. The complainant contacted the EPA about loud rumbling and banging sounds from 7pm to 9:54pm on 22 September. It was noted the complainant is in the process of negotiating property acquisition with MPO. MPO investigated the complaint. On the date of the complaint, normal truck and shovel mining operations were being conducted at MPO. Prior to receiving a complaint at 9:52pm, the Open Cut Examiner (OCE) had already noted elevated noise levels and acted by relocating operations to a lower dump to reduce noise impact. At 10:10pm, after conducting another inspection, the OCE made further operational adjustments, again relocating trucks to a lower dump, and ensuring that silent horns were being used to mitigate any additional noise concerns. After the complaint was received, the OCE positioned themselves on the northeast corner of the LV road, the pit extent closest to the complainant's location. The OCE recorded a 1-minute video with audio, noting an industrial hum and faint dozer noise, but no loud banging noises were heard. Before the complaint, there were no exceedances reported from NB04, which is the monitoring station most representative of the complainant's location.</p> <p>Sound files from NB06, located approximately 100 meters from the residence, were reviewed. In the lead-up to and during the time of the complaint, distant mining noise, wind, and a train were audible. Additionally, sound files from NB05 were reviewed to further assess potential mining noise, and during the same period, mine noise was detected.</p>
D4	<p>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&amp;A Act or EP&amp;A Regulation. Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity:</p>	Compliant	<p>Some trigger values exceeded for water with one bore (outside pit) triggered for electrical conductivity (bore 2300C500S). Site inspection confirmed investigation concluded natural phenomenon around rainfall and river flows. Exceedances noted upstream of mine. MPO has not discharged in the audit period. Trigger values were reviewed and have been incorporated into water management plan which has been approved. <b>Recommend potential cause of issue to be further investigated in next audit period and considered at that time further.</b></p> <p>No other exceedances identified.</p>



Ref	Requirement	Status	Comments
	<p>(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement reasonable remediation measures as directed by the Planning Secretary.</p>		
D5	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) summary of relevant background or baseline data;</p> <p>(b) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p> <p>(c) any relevant commitments or recommendations identified in the documents listed in condition A2(c);</p> <p>(d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(e) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to condition D4(c);</p> <p>(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;</p> <p>(g) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(h) a protocol for managing and reporting any:</p>	Compliant	<p>Reviewed Water Management Plan (August 2024), Biodiversity Management Plan (October 2019), Noise Management Plan (December, 2021), Traffic Management Plan (September 2024), Historic Heritage Management Plan (September 2024), Air Quality and greenhouse Gas Management Plan (May, 2019), Aboriginal Cultural Heritage Management Plan (October 2024), Blast Management Plan (April 2020), Visual Impact Management Plan (March 2024), Rehabilitation Management Plan (August 2022) and Bushfire Management Plan (September 2020). Where plans were not yet approved for SSD 10418, the management plans relevant to DA 92/97 were reviewed. The management plans which have been approved under this consent at the time of the audit are Water Management Plan, Traffic Management Plan, Historic Heritage Management Plan and Aboriginal Cultural Heritage Management Plan. These plans contained:</p> <p>(a) Summary of relevant background data: generally in Appendices 1-4.</p> <p>(b) Details of:</p> <p>(1) Relevant statutory requirements: Appendices 1-4 and Section 2</p> <p>(2) Relevant limits or performance measures and criteria: Appendices 1-4 and Section 2</p> <p>(3) Specific performance indicators: Appendices 1-4 and Section 2</p> <p>(c) Commitments and recommendations: Appendices 1-4</p> <p>(d) Management measures to comply with requirements: Appendices 1-4</p> <p>(e) Program to monitor and report on impacts and environmental performance of the development and effectiveness of management measures: Appendices 2-4 and section 6</p> <p>(f) Contingency plan to manage unpredicted impacts and consequences and to ensure ongoing impacts reduce to levels below impact assessment criteria as quickly as possible: Appendices 1-4 and section 4.</p> <p>(g) Program to investigate and implements ways to improve environmental performance over time: Appendices 1-4 and Sections 5 and 6</p>

Ref	Requirement	Status	Comments
	<p>(i) incident, non-compliance or exceedance of any impact assessment criterion or performance criterion;</p> <p>(ii) complaint; or</p> <p>(iii) failure to comply with other statutory requirements;</p> <p>(i) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and</p> <p>U) a protocol for periodic review of the plan.</p> <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</p>		<p>(h) Protocol for managing incidents, non-compliances, exceedances, complaints and failure to comply with other statutory requirements: Section 5 and 6.</p> <p>(i) Public sources of information and data to assist stakeholders in understanding environmental impacts: Sections 5 and 6</p> <p>(j) Protocol for periodic review: Section 5.</p>
D6	The Applicant must ensure that management plans prepared for the development are consistent with the conditions of this consent and any EPL issued for the site.	Compliant	<p>Site interview confirmed EPL generally in line with consent and EPL is being updated for Northern Link Road in the future.</p> <p>MPO applied to have monitoring equipment operating 95% of the time instead of 100%. There are some exemptions to shutdown of dust generating activities in EPL. Exemptions and stipulations of the EPL have been considered by MPO when designing each management plan (AR pers comms).</p>
D7	<p>Within three months of:</p> <p>(a) the submission of an incident report under condition D9 or D10;</p> <p>(b) the submission of an Annual Review under condition D11;</p> <p>(c) the submission of an Independent Environmental Audit under condition D13;</p> <p>(d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or</p> <p>(e) notification of a change in development phase under condition A12; the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.</p>	Compliant	<p>(a) No reportable incidents in audit period.</p> <p>(b) Reviewed letter dated 30 June 2023 showing management plan review at submission of annual review (on 27 June 2023). VIMP was subsequently updated. This is relevant to DA as prior to SSD commencement.</p> <p>(c) The previous IEA was submitted 5 May 2023.</p> <p>(d) Not triggered</p> <p>(e) Not triggered</p>
D8	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	Not triggered	Site interview confirmed not triggered.

Ref	Requirement	Status	Comments
	Planning Secretary for approval within six weeks of the review.		
D9	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 via the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.	Compliant	<p>Reviewed Annual Review 2023. AR reported no 'incidents' as defined in the consent occurred during 2023. Some non-compliances occurred, were identified and self-reported. These were not considered material harm to the environment. These included:</p> <ul style="list-style-type: none"> <li>- Dozer operation during dust shutdown (refer to D10).</li> <li>- Unapproved land disturbance ((refer to B56).</li> </ul> <p>Cumulative noise exceedance was also reported and investigated. This was not related to operations at MPO. Reviewed internal cumulative noise investigation dated 18 October 2024.</p>
D10	<p>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance.</p> <p>The notification must be in writing via the Department's Major Projects Website 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.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	Compliant	<p>The two non-compliances that occurred in the audit period were:</p> <ul style="list-style-type: none"> <li>- Dozer operation during dust shutdown – occurred on 25 October 2023, reviewed draft email 25 October 2023, report provided to Department on 1 November 2023. Dozer operator was reprimanded and issued a final written warning for breaching MPO's EPL according to letter reviewed. MPO did not identify any environmental harm from the incident.</li> <li>- Unapproved land disturbance occurred on 2 October 2024 – Original incident was identified on 2 October, reviewed letter dated 9<sup>th</sup> October. Refer to Condition B56.</li> </ul> <p>Department was notified of both non-compliances within a 7 day period as required.</p>
D11	<p>By the end of March each year after the commencement of development under this consent 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:</p> <p>(a) describe the development (including any rehabilitation) that as carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(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:</p>	Not triggered	<p>Development under this consent commenced 12 February 2024, meaning this condition will be activated in March 2025. Reviewed submission of last year's annual review, noting this time requirement does not apply.</p> <p>2023 Annual review submitted on 27 June 2024 (reviewed submission receipt).</p> <p>Reviewed Annual Review 2023 approval letter dated 28 October 2024.</p> <p>Approval letter contained recommendations: include a status updated on actions required by IEAs. Site interview confirmed this will be implemented in 2024 AR.</p> <p>Since this consent commenced in February 2024, the first Annual Review under this consent will be due in March 2025.</p> <p>AR 2023 included the documents required by this condition in:</p> <p>(a) Section 3</p> <p>(b) Sections 5, 6 and 7.</p>

Ref	Requirement	Status	Comments
	<p>(i) relevant statutory requirements, limits or performance measures/criteria;</p> <p>(ii) requirements of any plan or program required under this consent;</p> <p>(iii) monitoring results of previous years; and</p> <p>(iii) relevant predictions in the document/s listed in condition A2(c);</p> <p>(iv) relevant predictions in the document/s listed in condition A2(c);</p> <p>(c) 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;</p> <p>(d) evaluate and report on:</p> <p>(i) the effectiveness of the noise and air quality management systems, including a review of the reactive management measures implemented at the site during the previous year of operations;</p> <p>(ii) quantification of the number of hours that reactive management measures were implemented, specifying the trigger for the implementation of these measures; and</p> <p>(iii) compliance with the performance measures, criteria and operating conditions of this consent;</p> <p>(e) include an addendum report on Scope 1 and Scope 2 GHGs, which reports:</p> <p>(i) annual methane and annual total CO<sub>2</sub>-e emissions (both categorised by source);</p> <p>(ii) overall emissions benchmarked against representative industry sectors and the predictions in the EIS, and performance measures set in condition B36 and/or under condition B34; and</p> <p>(iii) measures undertaken to minimise Scope 1 and Scope 2 GHGs, including actions taken under condition B34 and estimated reductions in CO<sub>2</sub>-e as a result of measures implemented;</p> <p>(f) identify any trends in the monitoring data over the life of the development;</p>		<p>(1) Sections 5, 6 and 7.</p> <p>(2) Sections 5, 6 and 7.</p> <p>(3) Sections 5, 6 and 7.</p> <p>(4) Sections 5, 6 and 7.</p> <p>(c) Section 10.2.</p> <p>(d) (i) Section 5.2 and 5.4</p> <p>(ii) Not required by DA condition so not included but should be for 2024 AR.</p> <p>(iii) Section 5</p> <p>(e) Not required by DA condition so not included. To be included in 2024 AR.</p> <p>(f) Section 5</p> <p>(g) Section 5</p> <p>(h) Section 5</p>

Ref	Requirement	Status	Comments
	(g) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (h) describe what measures will be implemented over the next calendar year to improve the environmental performance of the development.		
D12	Copies of the Annual Review must be submitted to Council and made available to the CCC and any interested person upon request.	Not triggered	The Annual Review 2023 was submitted to DPHI on 27 June 2024. Interview with MPO employees confirmed Annual Review 2023 will be submitted to Council and CCC once approved (AR pers comms). AR 2023 is available to any interested person on Mount Pleasant website. Reviewed email dated 29 October where AR 2023 was distributed to MSC.
D13	Within one year of commencement of development under this consent, 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: (a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary; (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; (c) be carried out in consultation with the relevant agencies and the CCC; (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); (e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent; (f) recommend appropriate measures or actions to improve the environmental performance of the development	Compliant	This audit was commissioned to satisfy this condition. (a) Audit led by Dianne Munro, refer to Appendix A for Department approval. (b) Refer to appendices for declarations of independence and Department approval of audit team. (c) Check <b>Appendix E</b> for consultation and regulatory issues (d) Refer to main report for assessment of environmental performance. This table assesses compliance with the relevant requirements. (e) Refer to the main report (f) Refer to main report (g) This audit report will be submitted to the Department.

Ref	Requirement	Status	Comments
	and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and (g) be conducted and reported to the satisfaction of the Planning Secretary.		
D14	Within three months of commencing an Independent Environmental Audit, 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 implemented.	Not triggered	Time requirement not yet triggered, Site interview confirmed MPO is aware of this requirement and will submit the audit report to the Department.
D15	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.	Noted	
D16	For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is 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. Noise, blast and/or air quality monitoring under this consent may be undertaken at suitable representative monitoring locations instead of at privately-owned residences or other locations listed in Part B, providing that these representative monitoring locations are set out in the respective management plants.	Noted	
D17	Within one month of the commencement of development under this consent until the completion of all rehabilitation required under this consent, the Applicant must:	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . Documents were due to be uploaded 12 March 2024. (a) (1) Viewed on website approved documentation listed under D17(a)..

Ref	Requirement	Status	Comments
	<p>(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:</p> <p>(i) the documents listed in condition A2(c) of this consent;</p> <p>(ii) all current statutory approvals for the development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(iv) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</p> <p>(v) minutes of CCC meetings;</p> <p>(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;</p> <p>(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;</p> <p>(viii) a summary of the current phase and progress of the development;</p> <p>(ix) contact details to enquire about the development or to make a complaint;</p> <p>(x) a complaints register, updated monthly;</p> <p>(xi) the Annual Reviews of the development;</p> <p>(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;</p> <p>(xiii) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>		<p>(2) Viewed on website statutory approvals under 'Modification Documents' tab.</p> <p>(3) Viewed on website approved strategies and plans under 'Management Plans and Reporting' tab.</p> <p>(4) Non applicable.</p> <p>(5) Viewed on website 'Community Consultative Committee Minutes' tab.</p> <p>(6) Viewed on website 'Management Plans and Reporting' tab.</p> <p>(7) Viewed on website 'Management Plans and Reporting' tab.</p> <p>(8) Viewed on website in Overview.</p> <p>(9) Viewed on website in Contact.</p> <p>(10) Viewed on website under 'Other' tab.</p> <p>(11) Viewed on website under 'Management Plans and Reporting' noting 2023 Annual Review not yet approved.</p> <p>(12) Viewed on website under 'Management Plans and Reporting'.</p> <p>(13) Non-applicable as no requests made in audit period (confirmed during site interview with environment team)</p> <p>(b) Auditors were satisfied the information was up to date considering MPO is awaiting approval from the Department on some management plans and reports.</p>



Apx Table 2 DA 92/97

Ref	Requirement	Status	Comments
<b>Schedule 2 Administrative Conditions</b>			
1	In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Compliant	Refer to Condition A1 of SSD 10418.
2	The Applicant must carry out the development: (a) generally in accordance with the EIS, EA (MOD 1), EA (MOD 2), EA (MOD 3), EA (MOD 4) and project layout plans; and (b) in accordance with the Statement of Commitments and conditions of this consent. Notes: • The project layout plans are shown in Appendix 2. • The Statement of Commitments is reproduced in Appendix 3	Compliant	Refer to Condition A2 of SSD 100418.
3	Consistent with the requirements in this consent, the Secretary may make written directions to the Applicant in relation to: a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Secretary; and b) the implementation of any actions or measures contained in any such document referred to in condition 3(a).	Compliant	Refer to Condition A3 of SSD 10418.
4	The conditions of this consent and directions of the Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document/s listed in condition 2(a) above. In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition 2(a) the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Compliant	Refer to Condition A4 of SSD10418.
5	The Applicant may carry out mining operations on the site until 22 December 2026. Note: Under this consent, the Applicant is required to rehabilitate the site and carry out additional undertakings to the satisfaction of both the Secretary and the Resources Regulator. Consequently this consent will continue to apply in all other respects - other than the right to conduct mining operations - until the rehabilitation of the site and these additional undertakings have been carried out satisfactorily.	Compliant	Refer to Condition A5 of SSD 10418.
6	The Applicant must not extract more than 10.5 million tonnes of ROM coal from the site in a calendar year.	Compliant	Refer to Condition A6 of SSD 10418.
7	Product coal may only be transported from the site by rail.	Compliant	Refer to Condition A8 of SSD 10418.

Ref	Requirement	Status	Comments
8	<p>The Applicant must ensure that train movements at the site (i.e. arrival or dispatch) do not exceed:</p> <p>(a) a maximum of 18 per day; or</p> <p>(b) 6 per day, averaged over each calendar year.</p> <p>Note: In this condition, “day” means any 24-hour period.</p>	Compliant	Refer to Condition A9 of SSD 10418.
9	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with:</p> <p>(a) the relevant requirements of the BCA; and</p> <p>(b) any additional requirements of SA NSW where the building or structure is located on land within a declared Mine Subsidence District.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</li> <li>• Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development</li> <li>• The development is located in the Muswellbrook Mine Subsidence District. Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of SA NSW’s approval before carrying out certain development in a Mine Subsidence District.</li> </ul>	Compliant	Refer to Condition A31 of SSD 10418.
10	The Applicant must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures , or its latest version.	Compliant	Refer to Condition A30 of SSD 10418.
11	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development,</p> <p>Note: This condition does not include matters that are expressly provided for in the conditions of this consent, such as the maintenance of public roads.</p>	Not triggered	Refer to Condition A27 of SSD 10418.
12	<p>The Applicant must ensure that all 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>	Compliant	Refer to Condition A31 of SSD 10418.
13	The Applicant must continue to apply existing management strategies, plans or monitoring programs approved prior to the approval of Modification 4, until the approval of a similar plan, strategy or program following the approval of Modification 4.	Compliant	Refer to Condition A23 of SSD 10418.

Ref	Requirement	Status	Comments
14	By the end of March 2012, unless otherwise agreed by the Secretary, the Applicant must enter into a planning agreement with Council in accordance with: (a) Division 6 of Part 4 of the EP&A Act; and (b) the terms of the Applicant's offer dated 14 February 2011, which is summarised in Appendix 4. This agreement must provide for annual payments to be made to Council with the first period for payment commencing upon the commencement of development on the site.	Not triggered	Time requirement passed; compliance status noted in previous audit. Refer to Conditions A16-A18 of SSD 10418.
15	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Secretary for approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Compliant	Refer to Condition A22 of SSD 10418.
16	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Compliant	Refer to Condition A33 of SSD 10418.
17	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Compliant	Refer to Conditions A34 and A35 of SSD 10418.

### Schedule 3 Environmental Performance Conditions

1

If the Applicant receives a written request for acquisition from the owner of any land listed in Table 1, then the Applicant must acquire the land in accordance with the procedures in conditions 6-7 of Schedule 4.

Table 1: Land subject to acquisition upon request

Basis	Receiver
Noise	23, 45, 47, 67, 96, 102, 108, 112, 118, 120, 120c, 121, 136, 143a, 143b, 143c, 143d, 143e, 147, 153a, 153b, 156a, 157a, 158, 159, 447, 448, 449
Noise & Air	43, 43b
Air	20 <sup>2</sup> , 21 <sup>2</sup>

2

Notes:

To identify the locations referred to in Table 1, see the figures in Appendix 5.

Not triggered

Refer to Condition C1 of SSD 10418.

Ref	Requirement	Status	Comments				
	<i>The Applicant is only required to acquire and/or install mitigation measures at this property if acquisition and/or mitigation is not reasonably achievable under a separate approval for the Bengalla mine.</i>						
2	<p>Upon receiving a written request from the owner of any residence on any land listed in Table 1 (unless the owner of that land has requested acquisition) or Table 2, the Applicant must implement additional:</p> <p>(a) noise mitigation measures (such as double-glazing, insulation and/or air conditioning); and/or</p> <p>(b) air quality mitigation measures (such as air filters, a first flush roof water drainage system and/or air conditioning), as relevant, at the residence(s) in consultation with the owner.</p> <p>These measures must be reasonable and feasible, and directed towards reducing the noise and/or air quality impacts of the development on the residence(s). The Applicant must also be responsible for the reasonable costs of ongoing maintenance of these additional mitigation measures until the cessation of mining operations.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <table><caption>Table 2- Land where additional mitigation measures are available on request</caption><tr><th>Basin</th><th>Receiver</th></tr><tr><td>Noise</td><td>19, 20, 21, 68, 74, 77, 79, 80a, 84a, 86a, 139, 140a, 140c, 154, 203, 207, 257, 258, 259, 526</td></tr></table> <p><small>Note: 1 To identify the locations referred to in Table 2, see the figures in Appendix 5.</small></p> <p><b>Note:</b></p> <p><i>1 To identify the locations referred to in Table 2, see the figures in Appendix 5.</i></p>	Basin	Receiver	Noise	19, 20, 21, 68, 74, 77, 79, 80a, 84a, 86a, 139, 140a, 140c, 154, 203, 207, 257, 258, 259, 526	Compliant	Refer to Conditions C2 and C4 of SSD10418.
Basin	Receiver						
Noise	19, 20, 21, 68, 74, 77, 79, 80a, 84a, 86a, 139, 140a, 140c, 154, 203, 207, 257, 258, 259, 526						
<b>Noise</b>							
3	Except for the noise-affected land referred to in Table 1, the Applicant must ensure that the operational noise generated by the development does not exceed the criteria in Table 3 at any residence on privately-owned land.	Compliant	Refer to Conditions B1 and B2 of SSD 10418.				

Ref	Requirement	Status	Comments
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Table 3: Noise criteria dB(A)

Receiver or other location	Day	Evening	Night	
	<i>L<sub>day</sub>(15min)</i>	<i>L<sub>even</sub>(15min)</i>	<i>L<sub>night</sub>(15min)</i>	<i>L<sub>A1</sub>(1min)</i>
68, 74	43	42	42	45
86a	42	42	42	45
35, 35b, 77	42	41	41	45
79, 80a, 140c, 526	41	41	41	45
289	41	40	40	45
84a, 139, 154, 203, 257, 258a	40	40	40	45
83	40	39	39	45
86b, 140a, 202, 259	39	39	39	45
198, 202b	38	38	38	45
260, 261	37	37	37	45
169, 272	36	36	36	45
NAG 5 - All privately-owned land	41	40	39	45
NAG 6 - All privately-owned land	37	37	37	45
NAG 7 - All privately-owned land	40	37	37	45
NAG 8 - All privately-owned land	41	39	39	45
NAG 9 - All privately-owned land	39	38	37	45
NAG 11 - All privately-owned land	37	36	35	45
All other privately-owned land	35	35	35	45

**Notes:**

To identify the locations referred to in Table 3, see the figures in Appendix 5.

Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy, with the exception of the application of modifying factors under Fact Sheet C of the Noise Policy for Industry.

However, these criteria do not apply if the Applicant has a written agreement with the relevant landowner to exceed the criteria, and the Applicant has advised the Department in writing of the terms of this agreement.

4	Deleted		
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5	Except for the noise-affected land referred to in Table 1, the Applicant must implement all reasonable and feasible measures to ensure that the operational noise generated by the development combined with the noise generated by other mines in the area does not exceed the criteria in Table 5 at any residence on privately-owned land.	Compliant	(Muller) 26/07/2023 00:18 - Exceedance of cumulative noise criterion (40dBA) by 1dBA at location N-AT1. MPO contribution below the applicable intrusive and sleep disturbance noise criteria.
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Table 5: Cumulative noise criteria dB(A) *L<sub>day</sub>* (perce)

Location	Day	Evening	Night
NAG 8, 9	55	45	40
All other privately-owned land	50	45	40

**Notes:**

To identify the locations referred to in Table 5, see the figures in Appendix 5; and

Cumulative noise is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.

30/08/2023 00:53 - Exceedance of cumulative noise criterion (40dBA) by 1dBA at location N-AT1. MPO contribution was inaudible and below the applicable intrusive and sleep disturbance noise criteria.  
Investigation into the identified exceedances found that MPO contribution was either

Ref	Requirement	Status	Comments
			inaudible or below the applicable criteria, and all reasonable and feasible measures had been implemented.  Remedial actions included notification of other mine's nominated representative and raised at Cumulative Framework Group meeting, with scope of work identified for cumulative noise management protocol.  Note: Monthly Environmental Monitoring Reports regularly identify exceedance of cumulative noise criteria in text when no exceedances occurred. Check transcription errors. Also note that table note 2 of Table 9-3 indicates that where MPO is inaudible, the measured cumulative noise is defined as 'Nil', hence, event on 30/08/2023 should not have been identified as an exceedance of the cumulative criterion.  Also note that the 2023 Annual Review only identifies exceedance on 30/08/2023.
6	Deleted		
7	The Applicant must only use locomotives and rolling stock that are approved to operate on the NSW rail network in accordance with the noise limits in Sydney Trains' EPL (No. 12208) and ARTC's EPL (No. 3142).	Compliant	(Muller) Section 6.1.5 of the Noise Management Plan (Rail Noise) addresses this condition.  Advised that rail contracts with Aurizon include a requirement that all trains must comply with the Sydney Trains EPL 12208 and ARTC EPL 3142. Received confirmation from Aurizon that all locomotives in the Hunter Valley are listed on the Locomotive Class Register for locomotives approved for operation on the NSW Licenced Rail Network.
8	The Applicant must: (a) implement best practice noise management, including all reasonable and feasible noise mitigation measures to minimise the construction, operational, low frequency, and rail noise generated by the development; (b) minimise the noise impacts of the development during temperature inversions; (c) regularly assess the real-time noise monitoring and meteorological forecasting data and relocate, modify, and/or stop operations on site to ensure compliance with the relevant conditions of this consent; and	Compliant	Refer to Condition B6 of SSD 10418.

Ref	Requirement	Status	Comments
	<p>(d) co-ordinate the noise management on site with the noise management at nearby mines (including the Bengalla mine) to minimise the cumulative noise impacts of the mines, to the satisfaction of the Secretary.</p> <p>Note: Monitoring under this consent is not required at all residences and the use of representative monitoring locations can be used to demonstrate compliance with criteria, if agreed to by the Secretary.</p>		
9	<p>The Applicant must prepare a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 30 June 2019, unless otherwise agreed by the Secretary;</p> <p>(b) describe the measures (including both proactive and reactive mitigation measures) to be implemented to:</p> <ul style="list-style-type: none"> <li>• ensure compliance with the noise criteria and operating conditions in this consent;</li> <li>• minimise rail noise (including wheel and brake squeal) to the greatest extent practicable; and</li> <li>• minimise the noise impacts of the development during noise-enhancing meteorological conditions when the operational noise criteria in this consent do not apply (see Notes to condition 3 of Schedule 3);</li> </ul> <p>(c) include a noise monitoring program that:</p> <ul style="list-style-type: none"> <li>• uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the development;</li> <li>• accounts for the occurrence of any noise enhancement between the site, and any sensitive receivers located beyond the site boundary; and</li> <li>• includes a protocol for determining exceedances of the relevant conditions of this consent.</li> </ul> <p>(d) include a protocol that has been prepared in consultation with the owners of the nearby mines (including the Bengalla mine) to minimise the cumulative noise impacts of the mines.</p> <p>The Applicant must implement the management plan as approved by the Secretary.</p>	Compliant	Refer to Conditions B9 and B11 of SSD 10418.

## Blasting

10	<p>The Applicant must ensure that the blasting on the site does not cause exceedances of the criteria in Table 7.</p> <table border="1"> <caption>Table 7: Blasting criteria</caption> <thead> <tr> <th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr> </thead> <tbody> <tr> <td></td><td>120</td><td>10</td><td>0%</td></tr> <tr> <td>Residences on privately owned land</td><td>115</td><td>5</td><td>5% of the total number of blasts over a period of 12 months</td></tr> <tr> <td>Historic heritage sites</td><td>-</td><td>10</td><td>0%</td></tr> <tr> <td>All public infrastructure</td><td>-</td><td>50</td><td>0%</td></tr> </tbody> </table> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant owner or infrastructure provider/owner, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance		120	10	0%	Residences on privately owned land	115	5	5% of the total number of blasts over a period of 12 months	Historic heritage sites	-	10	0%	All public infrastructure	-	50	0%	Compliant	Refer to Condition B12 and B13 of SSD 10418.
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance																				
	120	10	0%																				
Residences on privately owned land	115	5	5% of the total number of blasts over a period of 12 months																				
Historic heritage sites	-	10	0%																				
All public infrastructure	-	50	0%																				



Ref	Requirement	Status	Comments
11	The Applicant must only carry out blasting on site between 9am and 5pm Monday to Saturday inclusive. No blasting is allowed on Sundays, public holidays, or at any other time without the written approval of the Secretary.	Compliant	Refer to Condition B14 of SSD 10418.
12	<p>Unless otherwise agreed by the Secretary, the Applicant may carry out a maximum of:</p> <p>(a) 1 blast a day; and</p> <p>(b) 5 blasts a week, averaged over any calendar year; for the development.</p> <p>This condition does not apply to blasts that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or to blasts required to ensure the safety of the mine or its workers.</p> <p>Note: For the purposes of this condition, a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the mine.</p>	Compliant	Refer to Conditions B15 and B16 of SSD 10418.
13	<p>If the Applicant receives a written request from the owner of any privately-owned land within 2 kilometers of the approved open cut mining pit/s on site, for a property inspection to establish the baseline condition of any buildings and/or structures on his/her land, or to have a previous property inspection report updated, then within 2 months of receiving this request the Applicant must:</p> <p>(c) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to:</p> <p>establish the baseline condition of the buildings and/or structures on the land, or update the previous property inspection report;</p> <p>identify any measures that should be implemented to minimise the potential blasting impacts of the development on these buildings and/or structures; and</p> <p>(d) give the landowner a copy of the new or updated property inspection report.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the property inspection report, either party may refer the matter to the Secretary for resolution.</p>	Compliant	Refer to Conditions B17 – B19 of SSD 10418.
14	<p>If the owner of any privately-owned land claims that the buildings and/or structures on his/her land have been damaged as a result of blasting on site, then within 2 months of receiving this claim the Applicant must:</p> <p>(a) commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties, to investigate the claim; and</p> <p>(b) give the landowner a copy of the property investigation report.</p> <p>If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the property investigation report, either party may refer the matter to the Secretary for resolution.</p>	Not triggered	Refer to Conditions B20 and B21 of SSD 10418.

Ref	Requirement	Status	Comments
	<p>If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Applicant must repair the damages to the satisfaction of the Secretary.</p> <p>If the Applicant or landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution.</p>		
15	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) implement best blasting management practice on site to: <ul style="list-style-type: none"> <li>• protect the safety of people and livestock in the surrounding area;</li> <li>• protect public or private infrastructure/property in the surrounding area;</li> <li>• minimise the dust and fume emissions of the blasting on site; and</li> <li>• minimise blasting impacts on heritage items in the vicinity of the site;</li> </ul> </li> <li>(b) co-ordinate the blasting on site with the blasting at nearby mines (including the Bengalla mine) to minimise the cumulative blasting impacts of the mines; and</li> <li>(c) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site, to the satisfaction of the Secretary.</li> </ul>	Compliant	Refer to Condition B22 of SSD 10418.
16	<p>The Applicant must not undertake blasting within 500 metres of:</p> <ul style="list-style-type: none"> <li>(a) a public road without the approval of Council; and</li> <li>(b) any land outside the site not owned by the Applicant, unless: <ul style="list-style-type: none"> <li>• the Applicant has a written agreement with the relevant landowner to allow blasting to be carried out closer to the land, and the Applicant has advised the Department in writing of the terms of this agreement, or</li> <li>• the Applicant has: <ul style="list-style-type: none"> <li>o demonstrated to the satisfaction of the Secretary that the blasting can be carried out closer to the land without compromising the safety of the people or livestock on the land, or damaging the buildings and/or structures on the land; and</li> <li>o updated the Blast Management Plan to include the specific measures that would be implemented while blasting is being carried out within 500 metres of the land.</li> </ul> </li> </ul> </li> </ul>	Compliant	Refer to Condition B23 of SSD 10418.
17	<p>The Applicant must prepare a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be submitted to the Secretary for approval prior to carrying out any blasting on site;</li> <li>(b) describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent;</li> <li>(c) include a road closure management plan, prepared in consultation with Council;</li> </ul>	Compliant	Refer to Conditions B24 and B26 of SSD 10418.

Ref	Requirement	Status	Comments
	(d) include a blast monitoring program for evaluating compliance with the relevant conditions of approval; and (e) include a protocol that has been prepared in consultation with the owners of nearby mines (including the Bengalla mine) for minimising and managing cumulative blasting impacts of the mines. The Applicant must implement the management plan as approved by the Secretary.		
18	The Applicant must ensure that no offensive odours are emitted from the site, as defined under the POEO Act, unless otherwise authorised by an EPL.	Not compliant	Refer to Condition B27 of SSD 10418.
19	The Applicant must implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	Compliant	(Zephyr) AQGHGMP lists the following measures: - Optimising the design of haul roads to minimise the distance travelled between the pit and the CHPP. - Minimising the re-handling of material (i.e. coal, overburden and topsoil). - Maintaining the fleet in good operating order. 2023 Annual Review provides a summary of GHG emissions.
20	Except for the air quality-affected land referred to in Table 1, the Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not exceed the criteria listed in Tables 8, 9 or 10 at any residence on privately-owned land.	Compliant	Refer to Condition B28 of SSD 10418.

Table 8: Long term criteria for particulate matter

Pollutant	Averaging Period	<sup>d</sup> Criterion
Total suspended particulate (TSP) matter	Annual	<sup>a</sup> 90 µg/m <sup>3</sup>
Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a</sup> 25 µg/m <sup>3</sup>
Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	Annual	<sup>a</sup> 8 µg/m <sup>3</sup>

Table 9: Short term criteria for particulate matter

Pollutant	Averaging Period	<sup>d</sup> Criterion
Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>b</sup> 50 µg/m <sup>3</sup>
Particulate matter < 2.5 µm (PM <sub>2.5</sub> )	24 hour	<sup>b</sup> 25 µg/m <sup>3</sup>

Table 10: Long term criteria for deposited dust

Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level
<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month	<sup>a</sup> 4 g/m <sup>2</sup> /month

Notes to Tables 8-10:

*a* Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources);

Ref	Requirement	Status	Comments
	<p><i>b Incremental impact (i.e. incremental increase in concentrations due to the development on its own);</i></p> <p><i>c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and</i></p> <p><i>d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.</i></p>		
21	Deleted		
22	<p>The Applicant must:</p> <p>(a) implement best practice air quality management, including all reasonable and feasible measures to minimise the odour, fume and dust emissions of the development;</p> <p>(b) minimise visible air pollution generated by the development;</p> <p>(c) minimise, where reasonable and feasible, the extent of potential dust generating surfaces exposed on the site at any given point in time;</p> <p>(d) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note d above under Tables 8-10);</p> <p>(e) regularly assess the real-time air quality monitoring and meteorological forecasting data and relocate, modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent; and</p> <p>(f) co-ordinate the air quality management on site with the air quality management at nearby mines (including the Bengalla mine) to minimise cumulative air quality impacts from the mines, to the satisfaction of the Secretary</p>	Compliant	Refer to Condition B31 of SSD 10418.
23	<p>The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval prior to carrying out any development on site;</p> <p>(b) describe the measures that would be implemented to ensure compliance with the relevant conditions of this consent, including a real-time air quality management system that employs reactive and proactive mitigation measures;</p> <p>(c) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>• uses a combination of real-time monitors and supplementary monitors to evaluate the performance of the development;</li> <li>• includes PM2.5 monitoring (although this obligation could be satisfied by the regional air quality monitoring network if sufficient justification is provided);</li> <li>• includes a protocol for determining exceedances of the relevant conditions of this consent; and</li> </ul>	Compliant	Refer to Conditions B32 and B35 of SSD 10418.

Ref	Requirement	Status	Comments
	(d) include a protocol that has been prepared in consultation with the owners of nearby mines to minimise the cumulative air quality impacts of the mines. The Applicant must implement the management plan as approved by the Secretary.		
24	For the life of the development, the Applicant must ensure that there is a meteorological station operating in the vicinity of the site that: (a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in NSW guideline; and (b) is capable of continuous real-time measurement of temperature lapse rate in accordance with the NSW Industrial Noise Policy , or as otherwise approved by the Secretary.	Compliant	Refer to Condition B38 of SSD 10418.
25	The Applicant must ensure that it has sufficient water for all stages of development, and if necessary, adjust the scale of mining operations on site, to match its available water supply to the satisfaction of the Secretary.	Compliant	Refer to Condition B39 of SSD 10418.
26	The Applicant must ensure that any surface water discharges from the site comply with the: (a) discharge limits (both volume and quality) set for the development in any EPL; or (b) relevant provisions of the POEO Act or Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	Not triggered	Refer to Condition B49 of SSD 10418.
27	The Applicant must provide compensatory water supply to any landowner of privately-owned land whose water entitlements are adversely and directly impacted (other than an impact that is negligible) as a result of the development, in consultation with DPE Water, and to the satisfaction of the Secretary.  The compensatory water supply measures must provide an alternative long-term supply of water that is equivalent, in quality and volume, to the loss attributed to the development. Equivalent water supply should be provided (at least on an interim basis) as soon as practicable after the loss is identified, unless otherwise agreed with the landowner.  If the Applicant and the landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.  If the Applicant is unable to provide an alternative long-term supply of water, then the Applicant must provide alternative compensation to the satisfaction of the Secretary.	Not triggered	Refer to condition B43 of SSD 10418.
28	The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with DPE Water and EPA, and be submitted to the Secretary for approval by 30 June 2019, unless otherwise agreed by the Secretary. The plan must include: (a) a Site Water Balance, which must: • include details of: o sources and security of water supply; o water use on site;	Not compliant	Refer to Condition B52 of SSD 10418.

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>o water management on site;</li> <li>o any off-site water transfers; and</li> <li>• investigate and implement all reasonable and feasible measures to minimise water use by the development;</li> <li>(b) an Erosion and Sediment Control Plan, which must: <ul style="list-style-type: none"> <li>• identify activities that could cause soil erosion, generate sediment or affect flooding;</li> <li>• describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, and manage any flood risk;</li> <li>• describe the location, function, and capacity of erosion and sediment control structures;</li> <li>• describe what measures would be implemented to maintain the structures over time;</li> </ul> </li> <li>(c) a Surface Water Management Plan, which must include: <ul style="list-style-type: none"> <li>• detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the development;</li> <li>• surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts;</li> <li>• a program to monitor and maintain the bridge openings and culverts associated with the MOD 4 rail infrastructure and ensure that they remain clear of blockages;</li> <li>• a program to monitor surface water flows and quality in the watercourses that could be affected by the project; and</li> <li>• reporting procedures for the results of the monitoring program;</li> </ul> </li> <li>(d) a Groundwater Management Plan, which must include: <ul style="list-style-type: none"> <li>• detailed plans, including design objectives and performance criteria, for the design and management of the proposed final voids;</li> <li>• detailed baseline data of groundwater levels, yield and quality in the region, and privately-owned groundwater bores, that could be affected by the development;</li> <li>• groundwater impact assessment criteria including trigger levels for investigating any potentially adverse groundwater impacts;</li> <li>• a program to monitor and assess: <ul style="list-style-type: none"> <li>o groundwater inflows to the mining operations;</li> <li>o impacts on regional and local (including alluvial) aquifers;</li> <li>o impacts on the groundwater supply of potentially affected landowners;</li> <li>o impacts on groundwater dependent ecosystems and riparian vegetation;</li> </ul> </li> </ul> </li> <li>(e) a Surface and Ground Water Response Plan, which must include:</li> </ul>		
28A	The Applicant must decommission the existing water supply infrastructure within the rail loop and infrastructure corridor, including the associated pump station, within 6 months of the commissioning of the MOD 4 water infrastructure.	Not triggered	Reviewed Mount Pleasant Operations Independent Environmental Audit 2023. All

Ref	Requirement	Status	Comments
	<p>Notes:</p> <ul style="list-style-type: none"> <li>The existing rail loop and infrastructure corridor is shown in Figure 3 of Appendix 2.</li> <li>The decommissioning of infrastructure within the rail loop and infrastructure corridor is also controlled under condition 37 of Schedule 3.</li> </ul>		decommissioned prior to audit period, checked at last audit.
28B	<p>The Applicant must notify DPE Water, in writing, within 14 days of completing the following:</p> <p>(a) the commissioning of the MOD 4 water infrastructure; and</p> <p>(b) the decommissioning of existing water supply infrastructure within the rail loop and infrastructure corridor.</p>	Not triggered	Reviewed Mount Pleasant Operations Independent Environmental Audit 2023. Compliance confirmed at last audit.
29	Deleted		
30	Deleted		
31	Deleted		
32	<p>The Applicant must prepare a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with BCD and Council, and be submitted to the Secretary for approval by 30 June 2019, unless otherwise agreed by the Secretary;</p> <p>(b) include:</p> <ul style="list-style-type: none"> <li>a description of the short, medium, and long term measures that would be implemented to: <ul style="list-style-type: none"> <li>manage the remnant vegetation and habitat on the site; and</li> <li>avoid and manage remnant vegetation and habitat within the relinquishment area;</li> </ul> </li> <li>a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: <ul style="list-style-type: none"> <li>implementing revegetation and regeneration within the disturbance areas, including establishment of canopy, sub-canopy (if relevant), understorey and ground strata;</li> <li>maximising salvage and beneficial use of resources in areas that are to be impacted, including vegetative, soil and cultural heritage resources;</li> <li>protecting vegetation and soil outside the disturbance areas;</li> <li>rehabilitating creeks and drainage lines on the site, to minimise net loss of stream length and aquatic habitat;</li> <li>managing salinity;</li> <li>conserving and reusing topsoil;</li> <li>undertaking pre-clearance surveys;</li> <li>managing impacts on fauna;</li> <li>landscaping the site and along public roads to minimise visual and lighting impacts;</li> <li>collecting and propagating seed;</li> <li>salvaging and reusing material from the site for habitat enhancement;</li> </ul> </li> </ul>	Compliant	Refer to Condition B63 of SSD 10418.



Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>o salvaging, transplanting and/or propagating threatened flora and native grassland;</li> <li>o controlling weeds and feral pests;</li> <li>o managing grazing and agriculture on site;</li> <li>o controlling access; and</li> <li>o bushfire management;</li> <li>• a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria;</li> <li>• a description of the potential risks to successful revegetation, and a description of the contingency measures that would be implemented to mitigate these risks; and</li> <li>• details of who would be responsible for monitoring, reviewing, and implementing the plan.</li> </ul> <p>The Applicant must implement the management plan as approved by the Secretary.</p>		
33	<p>The Applicant must prepare an Aboriginal Heritage Conservation Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</li> <li>(b) be prepared in consultation with Heritage NSW and the Registered Aboriginal Parties;</li> <li>(c) be submitted to the Secretary for approval prior to carrying out any development on site;</li> <li>(d) provide for the establishment and conservation of an off-site Aboriginal cultural heritage conservation area/s that has comparable Aboriginal cultural heritage values (both cultural and archaeological) to the areas that would be developed on site;</li> <li>(e) describe the measures that would be implemented to provide appropriate long term security for the proposed Aboriginal cultural heritage conservation areas; and</li> <li>(f) include an action plan for the implementation of the strategy.</li> </ul> <p>The detailed measures for the implementation of the strategy are to be outlined in the Heritage Management Plan (see condition 36). The Applicant must implement the approved strategy as approved from time to time by the Secretary.</p> <p>Note: The Aboriginal cultural heritage conservation area/s may be combined with any similar offset/conservation area required for the development under Commonwealth legislation, subject to suitably offsetting the cultural heritage impacts of the development.</p>	Compliant	<p>Reviewed Aboriginal Cultural Heritage Management Plan Revision 3 dated October 2024. Section 4 of the ACHMP contains the Aboriginal Heritage Conservation Strategy.</p> <ul style="list-style-type: none"> <li>(a) The ACHMP was prepared and reviewed by MACH Energy and Jamie Reeves of Niche Environmental and Heritage Pty Ltd, who was endorsed by the Planning Secretary as a suitably qualified and experienced person on 17 May 2023.</li> <li>(b) Approval letter from the Department dated 16/10 notes appropriate consultation occurred.</li> <li>(c) The ACHMP was submitted and approved within the required time period.</li> <li>(d) Addressed in Section 4.1.</li> <li>(e) Addressed in Section 4.2.</li> <li>(f) Addressed in Section 4.4.</li> </ul> <p>Refer to Condition B68 of SSD 10418 for detail on AHIMS register recording..</p>
34	<p>Within 2 years of the approval of the Aboriginal Heritage Conservation Strategy, the Applicant must demonstrate to the satisfaction of the Secretary, that it has made suitable arrangements to provide appropriate long term security for the Aboriginal cultural heritage conservation area/s in the Aboriginal Heritage Conservation Strategy.</p>	Not triggered	<p>An application was submitted in July 2019 to the Department to place a covenant under section 88(3) of the NSW Conveyancing Act, 1919 over Aboriginal Heritage Conservation Area A. At the time of the audit, the security of Aboriginal Heritage Conservation Area A is</p>

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			being finalised with the Department (AR pers comms). MACH Energy will continue to progress this process with DPHI. An Aboriginal Heritage Conservation Area ACMP was also developed in consultation with RAPs (Evidenced by letter from Department dated 16 October 2024). This is addressed in Section 4.3 of the ACHMP. Reviewed Mount Pleasant Operations 2023 IEA. Compliance confirmed at last audit.
35	By the end of December 2013, the Applicant must prepare a detailed history of the Mount Pleasant locality to the satisfaction of the Secretary. This history must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the Heritage NSW, the local history society, local community (including former residents as far as is practicable), and Registered Aboriginal Parties; (c) be prepared in accordance with the relevant Heritage Council of NSW guidelines; and (d) include detailed historical research as well as an oral history.	Compliant	Time requirement outside of audit period. Compliance confirmed in 2023 IEA.
36	The Applicant must prepare a Aboriginal Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with Heritage NSW and the Registered Aboriginal Parties by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be submitted to the Secretary for approval by 30 June 2019, unless otherwise agreed by the Secretary; (c) include: • a detailed plan for the implementation of the approved Aboriginal Heritage Conservation Strategy (required under condition 34); • a description of the measures that would be implemented to: o comply with the requirements of any Aboriginal Heritage Impact Permit issued for the development, including any approved archaeological testing and salvage program; o store the Aboriginal objects salvaged, both during construction and in the long term; o protect, monitor and/or manage all Aboriginal objects on site until the impacts of the development on these objects is unavoidable; o minimise the blasting impacts of the development on Aboriginal objects in the vicinity of the site;	Compliant	(a) See condition B69 of SSD 10418 audit table. (b) No longer applicable. (c) Refer to Condition B68 of SSD 10418.

Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>o manage the discovery of any human remains or previously unidentified Aboriginal objects on site;</li> <li>o enable Registered Aboriginal Parties to get reasonable access to the site during the development;</li> <li>o ensure Registered Aboriginal Parties are consulted about the conservation and management of Aboriginal cultural heritage on site; and</li> <li>o ensure construction personnel receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions.</li> </ul> <p>The Applicant must implement the management plan as approved by the Secretary.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• The Aboriginal Heritage Management Plan must be consistent with the requirements of any Aboriginal Heritage Impact Permit(s) issued by Heritage NSW relevant to the development.</li> <li>• The Applicant must ensure that Aboriginal site recording forms for newly recorded sites and Aboriginal site impact recording forms for salvaged sites are submitted to Heritage NSW for inclusion on the Aboriginal Heritage Information Management System database.</li> </ul>		
37	<p>The Applicant must, by no later than 31 October 2022:</p> <ul style="list-style-type: none"> <li>(a) remove all infrastructure associated with the development within Mining Lease No. 1645 (ML 1645) south of Wybong Road (other than infrastructure which the operator of the Bengalla mine agrees with the Applicant, in writing, can remain in situ);</li> <li>(b) do all things available to transfer or cause the grant of a mining lease over that part of ML 1645 south of Wybong Road to the operator of Bengalla mine or its nominee;</li> <li>(c) transfer the freehold land owned by the Applicant within ML 1645 south of Wybong Road to the operator of Bengalla mine (or its nominee) at rural market value;</li> <li>(d) release any easements for pipeline and rail spur within or in the vicinity of ML 1645 south of Wybong Road which benefit land owned by the Applicant; and</li> <li>(e) demolish the Bengalla Link Road bridge required under condition 38 (a) below and, unless otherwise agreed by the Secretary, reinstate the road reserve to the satisfaction of Council.</li> </ul> <p>Note: The rail loop and infrastructure corridor is shown in Figure 3 of Appendix 2.</p>	Compliant	Time requirement outside audit period. Reviewed 2023 IEA. Compliance confirmed at last audit.
38	<p>The Applicant must, at its own expense:</p> <ul style="list-style-type: none"> <li>(a) construct a bridge to carry the Bengalla Link Road over the proposed Mount Pleasant rail loop, in consultation with the operators of the Bengalla Mine;</li> <li>(b) construct the Mount Pleasant Northern Link Road to Dorset Road, prior to the closure of Castlerock Road;</li> <li>(c) construct the Mount Pleasant Western Link Road (generally in accordance with Council's Western Roads Strategy) from the intersection of the Bengalla Link Road to the intersection of the Mount Pleasant Northern Link Road, prior to the closure of Wybong Road;</li> <li>(d) construct the Mount Pleasant Mine Access Road;</li> </ul>	Compliant	Reviewed 2023 IEA. Compliance and completion of works. Site interview confirmed MPO not building western link Road (AR pers comms). Northern Link Road not yet constructed (AR pers comms).

Ref	Requirement	Status	Comments
	(e) upgrade the Wybong Road from the Bengalla Link Road to the Mount Pleasant Mine Access Road; and (f) construct an overpass or underpass across Wybong Road, or other means of crossing Wybong Road, should a construction road be proposed, to the satisfaction of Council.		
39	Should the following intersections be required, the Applicant must undertake construction works at: (a) the intersection of the Western Link Road and access to the mine site; (b) the intersection of the Bengalla Link Road and the Western Link Road; (c) the intersection of the Castlerock/Mount Pleasant Northern Link Road and the Western Link Road; and (d) the intersection of the Mount Pleasant Northern Link Road and Kayuga Road, to the satisfaction of Council and/or TfNSW. If there is any dispute between the Applicant and Council or TfNSW in relation to the funding or upgrade works, then any of the parties may refer the matter to the Secretary for resolution.	Compliant	Reviewed 2023 IEA, compliance confirmed. A) Western Link Road not being built so not required (AR pers comms) B) Intersection not proposed (AR pers comms). C) Not yet required (AR pers comms). D) Not yet required (AR pers comms).
39A	The Applicant must, by no later than 31 October 2022: (a) construct a rail overpass to carry the MOD 4 rail infrastructure over Wybong Road; (b) construct a road bridge to carry Overton Road over the MOD 4 rail infrastructure; and (c) partially realign Overton Road, as shown conceptually in Figure 5 of EA (MOD 4), in accordance with the relevant requirements of Austroads Guide to Road Design and to the satisfaction of Council. The Secretary may waive or alter the above requirements if they are no longer required following the completion of the final design of the MOD 4 rail infrastructure.	Compliant	Reviewed 2023 IEA. Compliance confirmed.
40	The Applicant must: (a) prepare a detailed schedule outlining the timing of the road works required by conditions 38, 39 and 39A by the end of June 2018; and (b) update this schedule annually, to the satisfaction of Council.	Compliant	A) Reviewed 2020 IEA, compliance confirmed. B) Refer to Condition B104 of SSD 10418.
41	During the development, the Applicant must maintain the roads and intersections between the Bengalla Mine main entrance and the Mt Pleasant Mine main entrance, including: (a) part of the Bengalla Link Road; (b) part of the Wybong Road; and (c) part of the Mount Pleasant Western Link Road. The Applicant must develop a Maintenance Management Plan in respect of these roads, to the satisfaction of Council.	Compliant	Refer to Condition B103 of SSD 10418.
41A	The Applicant must contribute to the upgrade and maintenance of Thomas Mitchell Drive, proportionate to its impact (based on usage) on that infrastructure, in accordance with the Contributions Study prepared by GHD titled, "Thomas Mitchell Drive Contributions Study, May	Compliant	Refer to condition B105 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
	<p>2015" as amended by the supplementary report dated, August 2018 (as amended from time to time), unless otherwise agreed with the Secretary.</p> <p>For Thomas Mitchell Drive, the contributions must be paid to Council in accordance with:</p> <p>(a) the payment schedule in the Contributions Study for the upgrade works; and</p> <p>(b) the maintenance schedule established in accordance with the Contributions Study during the life of the development, unless otherwise agreed with Council.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• In making a determination about the applicable contribution/s under this condition, the Secretary will take into account the contributions already paid or required to be paid towards the upgrade and maintenance of the local road network in the Muswellbrook Local Government Area under this consent and any associated Planning Agreement with Council.</li> <li>• If there is a dispute between the relevant parties about the implementation of this condition, then any party may refer the matter to the Secretary for resolution.</li> </ul>		
42	The Applicant must ensure that as far as possible the preferred mine access road route, as described in the EIS, is the only route used by employees and contractors travelling to the mine site from Muswellbrook.	Compliant	Refer to Condition B97 of SSD 10418.
43	The Applicant must maintain signs and give at least 24 hours notice of temporary road closures. The location and wording of the signs are to be approved by Council. A protocol is to be established, in consultation with the emergency service providers and Council, to permit the passage of emergency vehicles during road closures.	Compliant	Refer to Condition B98 of SSD 10418.
44	<p>The Applicant must:</p> <p>(a) keep records of the:</p> <ul style="list-style-type: none"> <li>• amount of coal transported from the site (on a monthly basis); and</li> <li>• date and time of each train movement generated by the development; and</li> </ul> <p>(b) make these records available on its website at the end of each calendar year.</p>	Compliant	Refer to Condition B93 of SSD 10418.
44A	<p>The Applicant must carry out a detailed geotechnical investigation of former underground mine workings in the vicinity of the MOD 4 rail infrastructure. This investigation must:</p> <p>(a) be undertaken by suitably qualified and experienced persons;</p> <p>(b) be undertaken in consultation with SA NSW;</p> <p>(c) determine the extent of underground mine workings;</p> <p>(d) provide recommendations to ensure the geotechnical stability of MOD 4 rail infrastructure; and</p> <p>(e) be conducted and reported to the satisfaction of the Secretary.</p> <p>A final report detailing the outcomes of the geotechnical investigation must be submitted to the Secretary. The Applicant must not commence MOD 4 construction works in the vicinity of the former underground mine until the Geotechnical Investigation Report is approved by the Secretary.</p>	Compliant	Reviewed 2023 IEA. Compliance confirmed.

Ref	Requirement	Status	Comments
44B	The Applicant must implement the recommendations of the Geotechnical Investigation Report to the satisfaction of the Secretary.	Compliant	Reviewed 2023 IEA. Compliance confirmed.
44C	The Applicant must design and construct the MOD 4 rail infrastructure to meet the following performance criteria during a 1% Annual Exceedance Probability flood event: (a) no more than 0.1 m increase in flood levels on any privately-owned land; (b) no more than 0.01 m increase in flood levels at any privately-owned residence or commercial spaces; (c) no more than 0.01 m increase in flood levels at any public roads servicing privately-owned properties; and (d) no more than 0.1 m per second increase in flood velocities at privately-owned residences or commercial spaces.	Compliant	Reviewed 2023 IEA. Compliance confirmed.
44D	The Applicant must commission an independent review of the final design of the MOD 4 rail infrastructure, including any associated hydraulic structures. This review must: (a) be undertaken by suitably qualified and experienced persons; (b) be undertaken in consultation with BCD; (c) demonstrate that the final design meets the performance criteria in condition 44C above; (d) be conducted and reported to the satisfaction of the Secretary. A final report detailing the outcomes of the independent review must be submitted to the Secretary. The Applicant must not commence MOD 4 construction works until the final report is approved by the Secretary.	Compliant	Reviewed 2023 IEA. Compliance confirmed.
44E	The Applicant must ensure that any asbestos encountered during MOD 4 construction works is monitored, handled, transported and disposed of by appropriately qualified and licensed contractors in accordance with the requirements of SafeWork NSW and relevant guidelines, including: (a) Work Health and Safety Regulation 2017; (b) SafeWork NSW Code of Practice – How to Manage and Control Asbestos in the Workplace September 2016; (c) SafeWork NSW Code of Practice – How to Safely Remove Asbestos September 2016; (d) Protection of the Environment Operations (Waste) Regulation 2014; and (e) the EPA's Waste Classification Guidelines.	Compliant	Reviewed 2023 IEA. Compliance confirmed.
44F	All MOD 4 construction works outside of the Mining Lease Boundary must be carried out during Standard Construction Hours (7 am to 6 pm, Monday to Friday; and 8 am to 1 pm on Saturdays), unless the works are: (a) required by: • NSW Police; or • a public authority for the delivery of vehicles, plant or materials; or	Not triggered	Refer to Condition B7 of SSD 10418.

Ref	Requirement	Status	Comments
	<p>(b) required in an emergency to avoid the loss of life, damage to property or to prevent material harm to the environment; or</p> <p>(c) approved under an Out of Hours Work Protocol.</p> <p>Note: The Mining Lease Boundary is shown in Figure 2 of Appendix 2.</p>		
44G	<p>If the Applicant proposes to undertake MOD 4 construction works (outside of the Mining Lease Boundary) outside the hours specified in condition 44F above, then the Applicant must prepare an Out of Hours Work Protocol for these works, to the satisfaction of the Secretary. This protocol must:</p> <p>(a) be prepared in consultation with the EPA and any residents who may be affected by the noise generated by these works;</p> <p>(b) address the relevant requirements of the Interim Construction Noise Guideline (DECC, 2009); and</p> <p>(c) be approved by the Secretary before any out of hours construction works are carried out. The Applicant must implement the Out of Hours Work Protocol as approved by the Secretary.</p> <p>Note: For areas where construction noise is predicted to be at or below operational noise criteria at sensitive receptors, this is likely to provide sufficient justification for the need to operate outside of recommended standard hours as specified in the Interim Construction Noise Guideline (DECC, 2009).</p>	Not triggered	(Muller) The 2023 Annual Review notes that MOD 4 construction works were not undertaken during the Audit period.
44H	<p>The Applicant must ensure that the combined operational noise of the development and noise generated by the MOD 4 construction works outside of the Mining Lease Boundary does not exceed the criteria in Table 10A at any residence on privately-owned land</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• To identify the locations referred to in Table 10A, see the figures in Appendix 5.</li> <li>• The Mining Lease Boundary is shown in Figure 2 of Appendix 2.</li> <li>• Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy, with the exception of the application of modifying factors under Fact Sheet C of the Noise Policy for Industry.</li> </ul> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant landowner to exceed the criteria, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Not triggered	(Muller) The 2023 Annual Review notes that MOD 4 construction works were not undertaken during the Audit period.
44I	<p>The Applicant must prepare a Construction Environmental Management Plan for MOD 4 construction works, to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, Council and any relevant road or utilities authorities;</p> <p>(b) describe measures to be implemented to minimise construction-related noise, vibration, dust, biodiversity and visual impacts, including specific measures to minimise:</p>	Compliant	<p>Mod 4 has been previously completed.</p> <p>Reviewed MPO - Construction Environmental Management Plan, approved by DPE Secretary 10/3/2020. Available online at <a href="https://machenergyaustralia.com.au/wp-content/uploads/Mount-Pleasant-Operation-">https://machenergyaustralia.com.au/wp-content/uploads/Mount-Pleasant-Operation-</a></p>



Ref	Requirement	Status	Comments
	<ul style="list-style-type: none"> <li>• surface disturbance; and</li> <li>• the cumulative impacts of construction and operational noise;</li> </ul> <p>(c) describe detailed procedures to be implemented to:</p> <ul style="list-style-type: none"> <li>• notify affected landowners of upcoming construction activities;</li> <li>• receive, record, handle and respond to construction-related complaints; and</li> <li>• resolve any disputes that may arise during MOD 4 construction works;</li> </ul> <p>(d) include a Construction Traffic Management Plan which:</p> <ul style="list-style-type: none"> <li>• describes the measures to be implemented to minimise traffic safety issues and disruption to local road users, including managing light, heavy and over dimensional vehicles during construction works; and</li> <li>• includes procedures for notifying other road users (including local bus operators) of any construction works that may disrupt their usual use of the road; and</li> </ul> <p>(e) include a Historic Heritage Management Plan which describes measures to implement the relevant historic heritage management commitments outlined in Appendix 3; and</p> <p>(f) include an Unexpected Contamination Protocol which describes the procedures to be implemented in the event that potentially contaminated material is identified during construction, including:</p> <ul style="list-style-type: none"> <li>• procedures for testing, removal and disposal of potentially contaminated material; and</li> <li>• measures to ensure compliance with the requirements of SafeWork NSW and relevant guidelines.</li> </ul> <p>The Applicant must not commence MOD 4 construction works until the Construction Environmental Management Plan is approved by the Secretary.</p>		<p><a href="#">Redacted-Construction-Environmental-Management-Plan-MOD-4.pdf</a></p> <p>a) Section 1.3 of the CEMP confirms consultation with EPA, MSC, Telstra and Ausgrid.</p> <p>b) Section 5 of the CEMP includes measures to minimise environmental impacts, disturbance and cumulative impacts.</p> <p>c) Section 9 of the CEMP details notification, handling and reporting systems.</p> <p>d) Section 5.5 and Appendix A of the CEMP address the noted requirements.</p> <p>e) Section 5.6 and Appendix B of the CEMP address the noted requirements.</p> <p>f) Section 5.7 and Appendix C of the CEMP address the noted requirements</p>
45	<p>The Applicant must:</p> <p>(a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development;</p> <p>(b) ensure no outdoor lights shine above the horizontal; and</p> <p>(c) ensure that all external lighting associated with the development complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting or its latest version, to the satisfaction of the Secretary.</p>	Compliant	Refer to condition B76 of SSD 10418 audit table.
46	<p>Upon receiving a written request from the owner of any residence on privately-owned land which has, or would have, significant direct view of the mining operations on site, the Applicant must implement visual mitigation measures (such as landscaping treatments or vegetation screens) on the land in consultation with the landowner. These measures must be reasonable and feasible, and directed toward minimising the visibility of the mining operations from the residence.</p>	Not triggered	Refer to condition B80 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
	<p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>Note: Except in exceptional circumstances, the Secretary will not require additional visual impact mitigation to be undertaken for residences that are more than 3 kilometres from the mining operations.</p>		
47	<p>The Applicant must prepare a Visual Impact Management Plan to mitigate the visual impacts of the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with Council, and submitted to the Secretary for approval by 30 June 2019, unless otherwise agreed by the Secretary;</p> <p>(b) provide for the establishment of trees and shrubs and/or the construction of mounding or bunding:</p> <ul style="list-style-type: none"> <li>• along the access road to the mine site;</li> <li>• around the water storage dams and coal preparation plant;</li> <li>• at other areas identified as necessary for the maintenance of satisfactory visual amenity;</li> </ul> <p>(c) include details of the visual appearance of all buildings, structures, facilities or works (including paint colours and specifications), aimed at blending as far as possible with the surrounding landscape; and</p> <p>(d) include detailed measures to minimise the visual impacts of the MOD 4 rail infrastructure, including:</p> <ul style="list-style-type: none"> <li>• details regarding any proposed light screens, earth bunds and screen planting; and</li> <li>• procedures to monitor and maintain the effectiveness of visual impact mitigation measures for the life of the development. The Applicant must implement the management plan as approved by the Secretary.</li> </ul>	Compliant	Refer to condition B77 of SSD 10418 audit table. MOD 4 requirements no longer applicable to the development.
48	<p>The Applicant must:</p> <p>(a) ensure that the development is suitably equipped to respond to any fires on site; and</p> <p>(b) assist the Rural Fire Service and emergency services as much as possible if there is a fire in the vicinity of the site.</p>	Compliant	Refer to condition B84 of SSD 10418 audit table.
49	<p>The Applicant must:</p> <p>(a) minimise the waste (including coal reject) generated by the development;</p> <p>(b) ensure that the waste generated by the development is appropriately stored, handled and disposed of in a lawful manner.</p>	Compliant	Refer to condition B81 of SSD 10418 audit table.
50	The Applicant must ensure that all sewage generated on site is treated and disposed of to the satisfaction of Council.	Compliant	Refer to condition B81 of SSD 10418 audit table.
51	The Applicant must not emplace fine rejects in the southern catchment without the written approval of the Secretary	Compliant	Reviewed Waste Management Plan Revi 1 dated 14 January 2019. Section 7 addresses this condition. Site interview confirmed only

Ref	Requirement	Status	Comments																								
			placed in tailings dam in western catchment (AR pers comms).																								
52	<p>The Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with DPE Water and the Resources Regulator, and submitted to the Secretary for approval prior to carrying any development on site;</p> <p>(b) describe the measures that would be implemented to avoid, minimise, reuse and recycle all waste streams generated by the development;</p> <p>(c) include a fines emplacement plan; and</p> <p>(d) a program to evaluate the fines emplacement plan and methods, with a view to emplacing fines within active mining areas. The Applicant must implement the management plan as approved by the Secretary.</p>	Compliant	<p>Reviewed Waste Management Plan Rev 1 dated 14 January 2019.</p> <p>Reviewed approval letter from the Department dated 14 January 2019.</p> <p>Approval letter confirmed Department satisfaction that the requirements of this condition were met.</p>																								
53	<p>The Applicant must rehabilitate the site in accordance with the provisions under the Mining Act 1992. This rehabilitation must be generally consistent with the conceptual final landform depicted in Figure 4 in Appendix 2, and comply with the objectives in Table 11.</p> <table><tr><th colspan="2">Table 11: Rehabilitation Objectives</th></tr><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas of the site affected by the development</td><td><ul style="list-style-type: none"><li>Safe, stable &amp; non-polluting</li><li>Fit for the intended post-mining land users</li></ul></td></tr><tr><td>Areas proposed for native ecosystem re-establishment</td><td><ul style="list-style-type: none"><li>Restore self-sustaining native woodland ecosystems characteristic of vegetation communities found in the local area, as shown conceptually in Figure 4 in Appendix 2.</li><li>Establish areas of self-sustaining<ul style="list-style-type: none"><li>riparian habitat, within any diverted and/or re-established creek lines and retained water features;</li><li>potential habitat for threatened flora and fauna species; 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Refer to Condition B87 of SSD 10418 audit table.</p>
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54	<p>By the end of January 2019, unless otherwise agreed by the Secretary, the Applicant must prepare a Rehabilitation Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;</li> <li>(b) be prepared in consultation with the Resources Regulator and Council;</li> <li>(c) build upon the Rehabilitation Objectives in Table 11 and the conceptual final landform depicted in Figure 4 in Appendix 2, including identification of opportunities for increasing the areas of woodland and habitat connectivity within the rehabilitated landscape;</li> <li>(d) include details of the canopy, sub-canopy, understory and ground strata species to be established in the rehabilitation areas, with a particular focus on ensuring the achievement of an appropriate level of diversity and mix of functional groups within each target community;</li> <li>(e) include an indicative schedule for the staged rehabilitation of the development;</li> <li>(f) include a protocol for periodic trials to demonstrate that the proposed agricultural land capability of grassland areas in the final landform is being achieved; and</li> <li>(g) include a protocol for periodic trials to demonstrate that the target vegetation communities proposed in rehabilitated woodland areas and fauna habitat is being achieved.</li> </ul> <p>The Applicant must implement the approved strategy as approved from time to time by the Secretary.</p>	Compliant	Refer to Condition B89 of SSD 10418.
55	<p>The Applicant must rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable steps must be taken to minimise the total area exposed at any time. Interim stabilisation and temporary vegetation strategies must be employed when areas prone to dust generation, soil erosion and weed incursion cannot be permanently rehabilitated.</p> <p>Note: It is accepted that some parts of the site that are progressively rehabilitated may be subject to further disturbance at some later stage of the development.</p>	Compliant	<p>Reviewed annual rehabilitation reporting in Annual Review. Rehabilitation completed is in line with the RMP. 155 ha of active rehabilitation in 2023 with 173 ha forecast for calendar year 2024. Visually inspected rehabilitation on eastern face of the mine during site inspection. Good establishment noted, especially in older areas. Use of dead standing trees noted and construction of rock drains underway (see <b>Plate 39</b>).</p> <p>Reviewed 'Rehab Blocks.png' showing progressive rehabilitation occurring across different years in blocks across eastern face of the mine. Physically inspected rehabilitation occurring on this face of the mine during site inspection.</p>
55A	The Applicant must implement all reasonable and feasible measures to provide for the interim stabilisation and temporary vegetation of the existing rail loop and infrastructure corridor, as	Compliant	Reviewed 2023 IEA. Compliance confirmed.

Ref	Requirement	Status	Comments
	<p>soon as reasonably practicable following the removal of infrastructure as required under condition 37.</p> <p>Note: The Applicant's obligations under this condition will cease following the transfer or grant of a mining lease over that part of ML 1645 south of Wybong Road to the operator of Bengalla mine (or its nominee).</p>		
56	By the end of April 2019, unless otherwise agreed by the Secretary, the Applicant must prepare a Rehabilitation Management Plan for the development in accordance with the provisions under the Mining Act 1992 .	Compliant	Refer to Condition B92 of SSD 10418.
<b>Schedule 4 Additional Procedures</b>			
1	<p>By the end of December 2011, the Applicant must:</p> <p>(a) notify in writing the owners of:</p> <ul style="list-style-type: none"> <li>the land listed in Table 1 of Schedule 3 that they have the right to require the Applicant to acquire their land at any stage of the development;</li> <li>any residence on the noise-affected land in Table 1 or Table 2 of Schedule 3 that they are entitled to ask for additional noise mitigation measures to be installed at their residence at any stage of the development;</li> <li>any residences on the air quality-affected land listed in Table 1 that they are entitled to ask for additional air quality mitigation measures to be installed at their residence at any stage of the development;</li> <li>any privately-owned land within 2 kilometres of the approved open cut mining pit on the site that they are entitled to ask for an inspection to establish the baseline condition of any buildings and/or structures on their land, or to have a previous property inspection updated; and</li> </ul> <p>(b) send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the owners and/or existing tenants of any land (including mine-owned land) where the predictions in the documents listed in condition 2(a) of Schedule 2 identify that dust emissions generated by the development are likely to be greater than the relevant air quality criteria in Schedule 3 at any time during the life of the development. Within one month of any modification that leads to new land being added to Tables 1 or 2 of Schedule 3, the Applicant must notify affected land owners in accordance with the requirements of paragraph (a).</p>	Not triggered	Timing requirement outside audit period. Refer to Condition C5 of SSD 10418 audit table.
1A	<p>Prior to entering into any tenancy agreement for any land owned by the Applicant that is predicted to experience exceedances of the recommended dust and/or noise criteria, the Applicant must:</p> <p>(a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time); and</p>	Compliant	Refer to Condition C6 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
	(b) advise the prospective tenants of the rights they would have under this consent, to the satisfaction of the Secretary.		
2	<p>As soon as practicable after obtaining monitoring results showing:</p> <p>(a) exceedance of the relevant criteria in Schedule 3, the Applicant must notify the affected landowner and tenants in writing of the exceedance, and provide regular monitoring results to each of these parties until the development is complying with the relevant criteria again; and/or</p> <p>(b) an exceedance of the relevant criteria of Schedule 3, the Applicant must send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and/or existing tenants of the land (including the tenants of any mine-owned land).</p>	Not triggered	Refer to Conditions C7 and C8 of SSD 10418 audit table.
3	<p>If an owner of privately-owned land considers the development to be exceeding the criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.</p> <p>If the Secretary is not satisfied that an independent review is warranted, the Secretary will notify the landowner in writing of that decision, and the reasons for that decision, within 21 days of the request for a review.</p> <p>If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision, the Applicant must:</p> <p>(a) commission a suitably qualified, experienced and independent expert, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"> <li>• consult with the landowner to determine his/her concerns;</li> <li>• conduct monitoring to determine whether the development is complying with the relevant criteria; and</li> <li>• if the development is not complying with these criteria then: <ul style="list-style-type: none"> <li>o determine if more than one mine is responsible for the exceedance, and if so the relative share of each mine towards the impact on the land;</li> <li>o identify the measures that could be implemented to ensure compliance with the relevant criteria; and</li> </ul> </li> </ul> <p>(b) give the Secretary and landowner a copy of the independent review.</p>	Not triggered	Refer to Conditions C9-C11 of SSD 10418 audit table.
4	Deleted		
5	Deleted		
6	<p>Within 3 months of receiving a written request from a landowner with acquisition rights, the Applicant must make a binding written offer to the landowner based on:</p> <p>(a) the current market value of the landowner's interest in the land at the date of this written request, as if the land was unaffected by the development, having regard to the:</p> <ul style="list-style-type: none"> <li>• existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and</li> </ul>	Not triggered	Refer to Condition C12 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
	<p>• presence of improvements on the land and/or any approved building or structure which has been physically commenced at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the implementation of the additional mitigation measures required under condition 2 of Schedule 3;</p> <p>(b) the reasonable costs associated with:</p> <ul style="list-style-type: none"> <li>• relocating within the Muswellbrook, Singleton or Scone local government area, or to any other local government area determined by the Secretary; and</li> <li>• obtaining legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and</li> </ul> <p>(c) reasonable compensation for any disturbance caused by the land acquisition process.</p> <p>However, if at the end of this period, the Applicant and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution.</p> <p>Upon receiving such a request, the Secretary shall request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to:</p> <ul style="list-style-type: none"> <li>• consider submissions from both parties;</li> <li>• determine a fair and reasonable acquisition price for the land and/or the terms upon which the land is to be acquired, having regard to the matters referred to in paragraphs (a)-(c) above;</li> <li>• prepare a detailed report setting out the reasons for any determination; and</li> <li>• provide a copy of the report to both parties.</li> </ul> <p>Within 14 days of receiving the independent valuer's report, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.</p> <p>However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, they may refer the matter to the Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Secretary will determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in paragraphs (a)-(c) above, the independent valuer's report, the detailed report of the party that disputes the independent valuer's determination and any other relevant submissions.</p> <p>Within 14 days of this determination, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the Secretary's determination.</p> <p>If the landowner refuses to accept the Applicant's binding written offer under this condition within 6 months of the offer being made, then the Applicant's obligations to acquire the land shall cease, unless the Secretary determines otherwise.</p>		



**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
7	The Applicant must pay all reasonable costs associated with the land acquisition process described in condition 6 above, including the costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of this plan at the Office of the Registrar-General.	Not triggered	Refer to Condition C12 of SSD 10418 audit table.
1	<p>If the Secretary requires, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be submitted to the Secretary for approval prior to carrying out any development on site;</li> <li>(b) provide the strategic framework for environmental management of the development;</li> <li>(c) identify the statutory approvals that apply to the development;</li> <li>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>(e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the development;</li> <li>• respond to any non-compliance;</li> <li>• respond to emergencies; and</li> </ul> </li> <li>(f) include: <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this consent; and</li> <li>• a clear plan depicting all the monitoring to be carried out in relation to the development.</li> </ul> </li> </ul> <p>The Applicant must implement the approved strategy as approved from time to time by the Secretary.</p>	Compliant	Refer to condition D1 of SSD 10418 audit table.
1A	<p>The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity:</p> <ul style="list-style-type: none"> <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 Department describing those options and any preferred remediation measures or other course of action; and</li> <li>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</li> </ul>	Compliant	Refer to Condition D4 of SSD 10418 audit table.

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
2	<p>The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) a description of: <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant consent, licence or lease conditions);</li> <li>• any relevant limits or performance measures/criteria;</li> <li>• the specific performance 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) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>• impacts and environmental performance of the development;</li> <li>• effectiveness of any management measures (see c above);</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>• incidents;</li> <li>• complaints;</li> <li>• non-compliances with statutory requirements; and</li> <li>• exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul> </li> <li>(h) a protocol for periodic review of the plan.</li> </ul>	Compliant	Refer to Condition D5 of SSD 10418.
3	<p>By the end of March each year (or other such timing as agreed by the Secretary), the Applicant must submit a report to the Department reviewing the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> <li>(a) describe the development (including any rehabilitation) that was carried out in the past calendar year, and the development that is proposed to be carried out over the next calendar year;</li> <li>(b) include a comprehensive review of the monitoring results and complaints records of the development over the past calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> <li>• relevant statutory requirements, limits or performance measures/criteria;</li> <li>• monitoring results of previous years; and</li> <li>• relevant predictions in the documents listed in condition 2(a) of Schedule 2;</li> </ul> </li> </ul>	Not triggered	Refer to Condition D11 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
	<p>(c) identify any non-compliance over the last 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 development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the development, 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 development.</p>		
4	<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 7 below;</p> <p>(c) the submission of an audit under condition 9 below; and</p> <p>(d) any modification to the conditions of this consent,</p> <p>the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. Within 4 weeks of conducting any such review, the Applicant must advise the Secretary of the outcomes of the review, and submit any revised documents for the approval of the Secretary.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.</li> <li>• In the event of an inconsistency between condition 4(d) above and any condition in Schedule 3 of this consent, the latter prevails.</li> </ul>	Compliant	Refer to Condition D7 of SSD 10418 audit table.
4A	<p>The Applicant may at any time submit revised strategies, plans or programs for the approval of the Secretary. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis.</p> <p>With the agreement of the Secretary, the Applicant may prepare a revision or stage of any strategy, plan or program required under this consent without undertaking consultation with all parties nominated under the applicable condition in this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• While any strategy, plan or program may be submitted on a staged basis, the Applicant must ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.</li> <li>• If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</li> </ul>	Not triggered	Refer to Condition A24 of SSD 10418 audit table.

Ref	Requirement	Status	Comments
5	<p>In conjunction with the owners of the nearby mines (including the Bengalla mine), the Applicant must use its best endeavours to minimise the cumulative impacts of the development on the surrounding area to the satisfaction of the Secretary.</p> <p>Note: Nothing in this consent is to be construed as requiring the Applicant to act in a manner which is contrary to the Trade Practices Act 1974.</p>	Compliant	<p>Quarterly meetings with surrounding mines occur where discussions can occur regarding cumulative impacts (AR pers comms). MPO has access to Bengalla Mining Company's (BMC) meteorological station on the agricultural land along Bengalla Road.</p> <p>MPO has access to data from BMC air quality monitors on corner of Roxburgh Road.</p> <p>Environmental data is shared between MPO, BMC and Mangoola.</p> <p>Reviewed 20240320 Cumulative Framework Meeting Minutes _ Final, showing evidence of the above with attendees from MACH, BHP, Glencore and BMC.</p>
6	<p>The Applicant must operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Department's Community Consultative Committee Guidelines State Significant Projects November 2016, or its latest version.</p> <p>Note: The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</p>	Compliant	Refer to Conditions A20 and A21 of SSD 10418 audit table.
7	The Applicant must immediately notify the Department and any other relevant agencies after it becomes aware of an incident. The notification must be in writing via the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.	Compliant	Refer to Condition D9 of SSD10418 audit table.
7A	<p>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 via the Department's Major Projects Website 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.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	Compliant	Refer to Condition D10 of SSD 10418 audit table.
7B	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.	Noted	Refer to Condition D15 of SSD 10418 audit table.

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
	Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is 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.		
8	The Applicant must provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent, and to the satisfaction of the Secretary.	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . Confirmed compliance with Monthly Environmental Monitoring reports available as well as other documentation on environmental performance.
<b>Independent Environmental Audit</b>			
9	By the end of March 2014, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies and the CCC; (c) assess the environmental performance of the development and whether it is complying with the requirements in this consent and any relevant EPL or Mining Lease or necessary water licences (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals (including whether the development has met or is trended towards the progressive performance and completion criteria detailed in these strategies, plans or programs); (e) if necessary, recommend appropriate measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under the abovementioned approvals; and (f) be conducted and reported to the satisfaction of the Secretary. Notes: • This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.	Compliant	Refer to Condition D13 of SSD 10418 audit table.
10	Within 12 weeks of commencing any audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW Government agency that requests it, together with its response to any recommendations contained in the audit report and a timetable for the implementation of these recommendations, as required. The Applicant must implement the audit report recommendations, to the satisfaction of the Secretary.	Compliant	Refer to Condition D14 of SSD 10418 audit table.

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
11	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"><li>• the documents listed in condition 2(a) of Schedule 2;</li><li>• all current statutory approvals for the development;</li><li>• approved strategies, plans and programs required under the conditions of this consent;</li><li>• a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;</li><li>• a complaints register, which is to be updated on a monthly basis;</li><li>• minutes of CCC meetings;</li><li>• the annual reviews (over the last 5 years);</li><li>• any independent environmental audit, and the Applicant's response to the recommendations in any audit;</li><li>• any other matter required by the Secretary; and</li></ul> <p>(b) keep this information up to date, to the satisfaction of the Secretary.</p>	Compliant	Refer to Condition D17 of SSD 10418 audit table.

Apx Table 3 Mining Leases Standard Conditions

Ref	Requirement	Status	Comments
4	<p><b>Must prevent or minimise harm to environment</b></p> <p>(1) The holder of a mining lease must take all reasonable measures to prevent, or if that is not reasonably practicable, to minimise, harm to the environment caused by activities under the mining lease.</p> <p>(2) In this clause— harm to the environment has the same meaning as in the Protection of the Environment Operations Act 1997.</p>	Compliant	Refer to Condition A1 of SSD 10418.
5	<p><b>Rehabilitation to occur as soon as reasonably practicable after disturbance</b></p> <p>The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.</p>	Compliant	Refer to Condition B87 of SSD 10418.
6	<p><b>Rehabilitation must achieve final land use</b></p> <p>(1) The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area.</p> <p>(2) The holder of the mining lease must ensure any planning approval has been obtained that is necessary to enable the holder to comply with subclause (1).</p> <p>(3) The holder of the mining lease must identify and record any reasonably foreseeable hazard that presents a risk to the holder's ability to comply with subclause (1).</p> <p>Note—</p> <p>Clause 7 requires a rehabilitation risk assessment to be conducted whenever a hazard is identified under this subclause.</p> <p>(4) In this clause—</p> <p>final land use for the mining area means the final landform and land uses to be achieved for the mining area—</p>	Compliant	<p>(1) Reviewed Rehabilitation Management Plan Version 2 dated 1 August 2022. Table 2-1 identifies achievement of final land use as an ongoing commitment across the entire Mount Pleasant site. Final land use managed through Final Landform and Rehabilitation Plan (FLRP) 2024 for final landform. Reviewed final validations for submitted spatial rehabilitation documents dated 15 August 2024. Reviewed Forward Plan from 1 January 2024 to end of 2026. Reviewed Mine Rehabilitation Portal Viewer for Mount Pleasant Operation during site inspection. Physical site inspection of rehabilitation on eastern face of the mine confirmed rehabilitation is on track to achieve the final landform Refer to condition B87 of SSD 10418 for detail on how final landform is achieved through Inspection and Test Plans.</p> <p>(2) Rehabilitation occurring under SSD 10418 consent.</p> <p>(3) Section 3 Rehabilitation Risk Assessment of Rehabilitation Management Plan Version 2 dated 1 August 2022 addresses the requirement to identify and record any risks to rehabilitation. Refer to Condition B87 for detail on full rehabilitation process.</p>



Ref	Requirement	Status	Comments
	<p>(a) as set out in the rehabilitation objectives statement and rehabilitation completion criteria statement, and</p> <p>(b) for a large mine—as spatially depicted in the final landform and rehabilitation plan, and</p> <p>(c) if the final land use for the mining area is required by a condition of development consent for activities under the mining lease—as stated in the condition.</p> <p>planning approval means—</p> <p>(a) a development consent within the meaning of the Environmental Planning and Assessment Act 1979, or</p> <p>(b) an approval under that Act, Division 5.1</p>		
7	<p>Rehabilitation risk assessment</p> <p>(1) The holder of a mining lease must conduct a risk assessment (a rehabilitation risk assessment) that—</p> <p>(a) identifies, assesses and evaluates the risks that need to be addressed to achieve the following in relation to the mining lease—</p> <p>(i) the rehabilitation objectives,</p> <p>(ii) the rehabilitation completion criteria,</p> <p>(iii) for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan, and</p> <p>(b) identifies the measures that need to be implemented to eliminate, minimise or mitigate the risks.</p>	Compliant	<p>Reviewed Rehabilitation Management Plan Version 2 dated 1 August 2022. Section 3 Rehabilitation Risk Assessment addresses this requirement, containing a rehabilitation risk assessment that was undertaken 29 January 2020. Reviewed draft Rehabilitation Management Plan for SSD 10418, which contained the same rehabilitation risk assessment.</p> <p><b>Since a new final landform is required under SSD 10418, it is recommended the risk assessment is reviewed and a new rehabilitation risk assessment is performed if required.</b></p>
	<p>(2) The holder of the mining lease must implement the measures identified.</p>	Compliant	<p>14 items were identified as moderate risk and 23 as low.</p> <p>One risk identified in the risk assessment was ranked high risk - failure of the Fines Emplacement Area (FEA) embankment leading to release of fines material from the site. This risk is proactively managed through the Rehabilitation Trigger Action Response Plan in Section 10 of the Rehabilitation Management Plan with geotechnical monitoring. Section 3 of the RMP states further risk reduction measures were considered impracticable and cost prohibitive.</p>
	<p>(3) The holder of a mining lease must conduct a rehabilitation risk assessment—</p>	Compliant	<p>The rehabilitation risk assessment in Section 3 of the Rehabilitation Management Plan was prepared in 2020, prior to the Rehabilitation Management Plan which is dated 2022.</p>

Ref	Requirement	Status	Comments
	<p>(a) for a large mine—before preparing a rehabilitation management plan, and</p> <p>(b) for a small mine—before preparing the rehabilitation outcome documents for the mine, and</p> <p>(c) whenever a hazard is identified under clause 6(3)—as soon as reasonably practicable after it is identified, and</p> <p>(d) whenever given a written direction to do so by the Secretary</p>		
8	<p><b>Application of Division</b></p> <p>This Division does not apply to a mining lease unless—</p> <p>(a) the security deposit required under the mining lease is greater than the minimum deposit prescribed under the Act, section 261BF in relation to that type of mining lease, or</p> <p>(b) the Secretary gives a written direction to the holder of the mining lease that this Division, or a provision of this Division, applies to the mining lease.</p>	Compliant	<p>Reviewed submitted Rehabilitation Cost Estimate of \$101,149,536 dated February 2024 (greater than the minimum deposit prescribed under the Act).</p> <p>Invoice is anticipated in early 2025. Reviewed letter from Resources Regulator dated 4 November 2022 where Resources Regulator agreed to assessed amount of group security. Reviewed letter showing this year's bond has been assessed dated 6 September 2024.</p> <p><small>93 Minimum deposit—security deposit conditions (Former clause 75 of 2010 Reg)</small></p> <p><small>For the purposes of section 261BF of the Act, the minimum deposit for an authorisation is—</small></p> <p><small>(a) \$200 for a small-scale title, and</small></p> <p><small>(b) \$1,000 for an environmental assessment permit, and</small></p> <p><small>(c) \$10,000 for any other authorisation.</small></p>
9	<p><b>General requirements for documents</b></p> <p>A document required to be prepared under this Division must—</p> <p>(a) be in a form approved by the Secretary, and</p> <p>Note—</p> <p>The approved forms are available on the Department's website.</p> <p>(b) include any matter required to be included by the form, and</p> <p>(c) if required to be given to the Secretary—be given in a way approved by the Secretary</p>	Compliant	All documents reviewed in this audit were approved by the secretary.
10	<p><b>Rehabilitation management plans for large mines</b></p> <p>(1) The holder of a mining lease relating to a large mine must prepare a plan (a rehabilitation management plan) for the mining lease that includes the following—</p>	Compliant	<p>Reviewed Rehabilitation Management Plan Version 2 dated 1 August 2022.</p> <p>(a) Addressed throughout.</p> <p>(b) Addressed in Section 5</p> <p>(c) Addressed in Section 3</p> <p>(d) Addressed in Section 3</p>

Ref	Requirement	Status	Comments
	<p>(a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area,</p> <p>(b) a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation,</p> <p>(c) a summary of rehabilitation risk assessments conducted by the holder,</p> <p>(d) the risk control measures identified in the rehabilitation risk assessments,</p> <p>(e) the rehabilitation outcome documents for the mining lease,</p> <p>(f) a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.</p>		<p>(e) Addressed in Section 4 and 5</p> <p>(f) Addressed in Section 4</p> <p>Refer to Condition B92 of SSD 10418 for further detail.</p>
	(2) If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must include a proposed version of the document.	Compliant	The Rehabilitation Management Plan for SSD 10418 is in draft form, due 12 February 2025. Reviewed the Rehabilitation Management Plan Version 2 dated 1 August 2022 (prepared for DA 92/97). MPO is currently operating under this RMP until the SSD version is approved. This condition is addressed in Sections 4 and 5
	(3) A rehabilitation management plan is not required to be given to the Secretary for approval.	Noted	
	<p>(4) The holder of the mining lease—</p> <p>(a) must implement the matters set out in the rehabilitation management plan, and</p> <p>(b) if the forward program specifies timeframes for the implementation of the matters—must implement the matters within those timeframes.</p>	Compliant	<p>(a) Refer to Condition B87 of SSD 10418 audit table for implementation of rehabilitation.</p> <p>(b) Reviewed Mount Pleasant Coal Mine Forward Program Monday 1 January 2024 to Thursday 31 December 2026. The forward program covers a three year period through for rehabilitation activities. A Fines Emplacement Area Rehabilitation Strategy was committed to be conducted in 2024 including details of a proposed capping system for the facility. Site interview confirmed this document is being worked on currently (AR pers comms). <b>The Fines Emplacement Area Rehabilitation Strategy be completed as soon as possible in 2025.</b> Site inspection confirmed mining and rehabilitation generally occurring in line with schedule in Forward Program.</p> <p>An exploration drilling program occurred in 2024, to the north of the current pit. Exploration appears generally in accordance with the description of surface disturbance activities in Forward Program.</p> <p>Reviewed GDP 252 for drilling program. Site interview confirmed delineation of ‘golden areas’ which cannot be disturbed. These areas are demarcated prior to disturbance as per the GDP</p>

Ref	Requirement	Status	Comments
			(see <b>Plate 37</b> ). Evidence of access tracks in GDP which control disturbance. Physically inspected taping at golden areas on site.
11	<p><b>Amendment of rehabilitation management plans</b></p> <p>The holder of a mining lease must amend the rehabilitation management plan for the mining lease as follows—</p> <p>(a) to substitute the proposed version of a rehabilitation outcome document with the version approved by the Secretary—within 30 days after the document is approved,</p> <p>(b) as a consequence of an amendment made under clause 14 to a rehabilitation outcome document—within 30 days after the amendment is made,</p> <p>(c) to reflect any changes to the risk control measures in the prepared plan that are identified in a rehabilitation risk assessment—as soon as practicable after the rehabilitation risk assessment is conducted,</p> <p>(d) whenever given a written direction to do so by the Secretary—in accordance with the direction.</p>	Not triggered	Amendment of Rehabilitation Management Plan has not been required in the audit period (AR pers comms).
12	<p><b>Rehabilitation outcome documents</b></p> <p>(1) The holder of a mining lease must prepare the following documents (the rehabilitation outcome documents) for the mining lease and give them to the Secretary for approval—</p> <p>(a) the rehabilitation objectives statement, which sets out the rehabilitation objectives required to achieve the final land use for the mining area,</p> <p>(b) the rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives,</p> <p>(c) for a large mine, the final landform and rehabilitation plan, showing a spatial depiction of the final land use.</p>	Compliant	<p>The rehabilitation outcome documents are addressed in the following sections of the approved Rehabilitation Management Plan Version 2 dated 1 August 2022:</p> <p>(a) Section 4.</p> <p>(b) Section 4.</p> <p>(c) Section 5.</p>

Ref	Requirement	Status	Comments
	(2) If the final land use for the mining area is required by a condition of development consent for activities under the mining lease, the holder of the mining lease must ensure the rehabilitation outcome documents are consistent with that condition.	Not triggered	No specific final land use required by DA 92/97. A mixture of pasture and woodland is required under SSD 10418, this will be considered as the Rehabilitation Management Plan is updated (AR pers comms).
13	<p><b>Forward program and annual rehabilitation report</b></p> <p>(1) The holder of a mining lease must prepare a program (a forward program) for the mining lease that includes the following—</p> <p>(a) a schedule of mining activities for the mining area for the next 3 years,</p> <p>(b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years,</p> <p>(c) a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs.</p>	Compliant	<p>Reviewed Mount Pleasant Coal Mine Forward Program Monday 1 January 2024 to Thursday 31 December 2026.</p> <p>(a) Mining Schedule present on page 4.</p> <p>(b) Rehabilitation summary begins on page 8.</p> <p>(c) No specific requirement ensuring rehabilitation of land and water disturbed by mining activities under the mining lease occurs as soon as reasonably practicable after the disturbance occurs is stated in the Forward Program. <b>Recommendation: include specific wording in the rehabilitation methodology to address this requirement.</b></p>
	<p>(2) The holder of a mining lease must prepare a report (an annual rehabilitation report) for the mining lease that includes—</p> <p>(a) a description of the rehabilitation undertaken over the annual reporting period,</p> <p>(b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period,</p> <p>(c) a report demonstrating progress made towards the achievement of the following—</p> <p>(i) the objectives set out in the rehabilitation objectives statement,</p> <p>(ii) the criteria set out in the rehabilitation completion criteria statement,</p>	Compliant	<p>Reviewed Mount Pleasant Coal Mine Annual Rehabilitation Report Sunday 1 January 2023 to Sunday 31 December 2023.</p> <p>(a) Rehabilitation undertaken over the reporting period is described throughout the report.</p> <p>(b) The report provides a section describing progressive achievement of established rehabilitation.</p> <p>(c) i) Addressed from page 11. ii) Addressed from page 11. iii) Addressed from page 10.</p>

Ref	Requirement	Status	Comments
	(iii) for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan.		
	(3) If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must rely on a proposed version of the document.	Not triggered	The Rehabilitation Management Plan Version 2 was approved by the Department in August 2022.
	(4) The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary.	Compliant	Reviewed letter confirming receipt of Forward Program from Secretary dated 28 March 2024.
	(5) In this clause— annual reporting period means each period of 12 months commencing on— (a) the date on which the mining lease is granted, or (b) if the Secretary approves another date in relation to the mining lease—the other date.	Not triggered	
14	<b>Amendment of rehabilitation outcome documents and forward program</b> (1) This clause applies to— (a) a rehabilitation outcome document if it has been approved by the Secretary, and (b) a forward program if it has been given to the Secretary	Compliant	Has not been amended in audit period (AR pers comms).
	(2) The holder of a mining lease must not amend a document to which this clause applies that relates to the mining lease unless— (a) the Secretary gives the holder a written direction to do so, or (b) the Secretary, on written application by the holder, gives a written approval of the amendment.	Compliant	No amendments occurred in audit period (AR pers comms).
	(3) The holder of the mining lease must amend the document in accordance with the Secretary's direction or approval.	Not triggered	No amendments occurred in audit period (AR pers comms).

Ref	Requirement	Status	Comments
	(4) Nothing in this clause prevents the holder of a mining lease preparing a draft amendment for submission to the Secretary for approval.	Noted	Not triggered (AR pers comms).
15	<b>Times at which documents must be prepared and given</b> (1) The holder of a mining lease must do the following before the end of the initial period— (a) prepare a rehabilitation management plan, and (b) prepare rehabilitation outcome documents and give them, other than the rehabilitation completion criteria statement, to the Secretary for approval, and (c) prepare a forward program and give it to the Secretary.	Compliant	Division 3 of the <i>Mining Regulation 2016</i> defines <b>initial period</b> as the period commencing when the mining lease is granted and ending— (a) 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or (b) if this Division applies to the mining lease because of an increase in the required security deposit— (i) when the surface of the mining area is disturbed by activities under the mining lease, or (ii) at a later date approved by the Secretary. Auditors reviewed (a) Rehabilitation Management Plan Version 2 (2022) ((b) contains the rehabilitation outcomes documents in Sections 3-5) and Mount Pleasant Coal Mine Forward Program Monday 1 January 2024 to Thursday 31 December 2026 and Mount Pleasant Coal Mine Forward Program Saturday 17 December 2022 to Tuesday 16 December 2025.
	(2) The holder of the mining lease must prepare a forward program and annual rehabilitation report and give them to the Secretary before— (a) 60 days after the last day of each annual reporting period, commencing with the annual reporting period in which the forward program was given to Secretary under subclause (1)(c), or (b) a later date approved by the Secretary.	Compliant	Viewed email from Resources Regulator dated 21 March 2024 noting MPO was late submitting the Forward Program, Rehabilitation Cost Estimate and Annual Rehabilitation Report, which were due 1 March 2024. MPO advised it was under the impression the documents were due 31 March 2024. However, approval to amend the reporting and submission dates for these documents was issued on 6 November 2023, with the revised submission date of 31 March each year (reviewed email from Resources Regulator dated 6 November 2023). The notification of late submission is believed to have been a technical error.
	(3) A rehabilitation completion criteria statement relating to completion of rehabilitation during a period covered by a forward program must be given to the Secretary for approval when the forward program is required to be given to the Secretary.	Compliant	Reviewed MOUNT PLEASANT COAL MINE ANNUAL REHABILITATION REPORT Sunday 1 January 2023 to Sunday 31 December 2023, which is submitted to the NSW Resources Regulator online through their template and available to the public at <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> .
	(4) The holder of the mining lease must prepare updated rehabilitation outcome documents for the mining lease and give them to the Secretary for approval before— (a) 60 days after a development consent is modified following an application referred to in clause 20(1)(b), or (b) a later date approved by the Secretary.	Not triggered	(a) no modifications occurred in the audit period per review of NSW Major Projects website and site interview (AR pers comms). (b) not triggered (AR pers comms).



Ref	Requirement	Status	Comments
	(5) A rehabilitation completion criteria statement is not required to be given to the Secretary under subclause (4) unless a rehabilitation completion criteria statement has already been given to the Secretary under subclause (3).	Not triggered	Not triggered (AR pers comms).
	(6) The Secretary may, by written notice, direct the holder of a mining lease to prepare, or give to the Secretary, a document required to be prepared under this Division at a time other than that specified in this clause.	Not triggered	Not triggered (AR pers comms).
	(7) The holder of the mining lease must comply with the direction.	Not triggered	Not triggered (AR pers comms).
	(8) In this clause— initial period means the period commencing when the mining lease is granted and ending— (a) 30 days, or other period approved by the Secretary, after this Division first applies to the mining lease, or (b) if this Division applies to the mining lease because of an increase in the required security deposit— (i) when the surface of the mining area is disturbed by activities under the mining lease, or (ii) at a later date approved by the Secretary.	Noted	Noted.
16	<b>Certain documents to be publicly available</b> (1) This clause applies to the following documents— (a) a rehabilitation management plan, (b) a forward program, (c) an annual rehabilitation report.	Noted	
	(2) The holder of a mining lease must make a document to which this clause applies publicly available by— (a) publishing it on its website in a prominent position, or (b) if the holder does not have a website— providing a copy of it to a person—	Compliant	All required documents were online when checked on 12 December 2024 at <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a>

Ref	Requirement	Status	Comments
	(i) on the written request of a person, and (ii) without charge, and (iii) within 14 days after the request is received		
	(3) If a document is published on the website of the holder of the mining lease, the holder must ensure that it is published— (a) for a rehabilitation management plan—within 14 days after it is prepared or amended, or (b) for a forward program or an annual rehabilitation report—within 14 days after it is given to the Secretary or amended,	<b>Not compliant</b>	<p>All required documents online at <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a></p> <p>MPO opened a private link to the project website showing the upload times of documents.</p> <p>(a) The Rehabilitation Management Plan (2022) was uploaded 28 October 2023. The most recent update to the plan (Rev 02) was made 1 August 2022. This suggests the upload was many months late.</p> <p>(b) The Forward Program 2024 – 2026 was submitted 28 March 2024 and uploaded 15 June 2024, two months late.. The Forward Program is dated from 1 January 2024, suggesting it was uploaded at least 6 months late. The Rehabilitation Report 2023 was submitted 29 March and uploaded 17 April 2024, 3 days late.</p> <p><b>These upload times are all outside of the 14 day window required by this condition. In future, uploads are to be completed within the 14 day period. See response to condition 17 for further detail.</b></p>
	(4) Personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a document made available to a person under this clause.	Noted	Not triggered.
17	<b>Records demonstrating compliance</b> The holder of a mining lease must create and maintain records of all actions taken that demonstrate compliance with each of the conditions set out in this Part. Note— The Act, sections 163D and 163E provide for the form in which records must be kept and the period for which they must be retained.	Compliant	<p>Screenshots are generally taken of portal submissions.</p> <p>However, it is <b>recommended the standard conditions of Schedule 8A of the <i>Mining Regulation 2016</i> are added to MPO’s compliance register to track compliance actions against all of the conditions.</b></p>
18	<b>Report on non-compliance</b> (1) The holder of a mining lease must provide the Minister with a written report detailing any non-compliance with— (a) a condition of the mining lease, or Note—	Compliant	<p>No non compliances were identified in audit period (AR pers comms).</p> <p>Reviewed MPO’s internal compliance register and none were identified.</p> <p>No non-compliances with the conditions of MPO’s individual mining leases have been identified. 2023 IEA also found zero non-compliances against mining leases.</p>

Ref	Requirement	Status	Comments
	<p>The Act, section 364A contains provisions relating to the use and disclosure of information provided under this condition.</p> <p>(b) a requirement of the Act or this Regulation relating to activities under the mining lease.</p>		
	(2) The holder of the mining lease must provide the report within 7 days after becoming aware of the non-compliance.	Compliant	See condition 18(1)
	<p>(3) The holder of the mining lease must ensure the report—</p> <p>(a) identifies the condition of the mining lease, or the requirement of the Act or this Regulation, to which the non-compliance relates, and</p> <p>(b) describes the non-compliance and specifies the date or dates on which, or the period during which, the non-compliance occurred, and</p> <p>(c) describes the causes or likely causes of the non-compliance, and</p> <p>(d) describes the action that has been taken, or will be taken, to mitigate the effects, and to prevent any recurrence, of the non-compliance.</p>	Compliant	See condition 18(1)
19	<p><b>Nominated contact person</b></p> <p>(1) The holder of a mining lease must nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Act.</p> <p>Note—</p> <p>The Act, section 383 sets out the ways in which notices or other documents may be issued or given to, or served on, a person for the purposes of the Act.</p>	Compliant	AR Superintendent Environment (Operations) is the nominated contact person. Reviewed multiple emails from Secretary addressed to AR including 'Mount Pleasant Coal Mine   Forward Program submission   FWP0001389' dated 28 March 2024 and emails predating the audit period including 'Password Rest' dated 2 August 2022.
	<p>(2) The holder of the mining lease must give written notice to the Secretary of—</p> <p>(a) the full name and contact details of the nominated person—within 28 days after the date on which the standard conditions apply to the mining lease under clause 31A of this Regulation, and</p>	Not triggered	<p>Timing requirement outside audit period.</p> <p>Evidence the Secretary has AR's contact details from review of multiple emails during audit period including 'Mount Pleasant Coal Mine   Forward Program submission   FWP0001389' dated 28 March 2024 and 'FW: Screenshots for how to find the withdrawal form' dated 25 August 2023.</p>

Ref	Requirement	Status	Comments
	(b) any change in nomination or in the nominated person's contact details—within 28 days after the change occurs.		<b>Contact person and details the Secretary can communicate with in relation to the mining leases for the purposes of the Act should be updated early in 2025 upon the departure of AR.</b>
	(3) The holder of the mining lease must ensure that the contact details for the nominated person include the person's phone number and postal and email addresses.	Not triggered	Reviewed email to Resources Regulator predating audit period (2 August 2022). AR's phone number, postal and email addresses are included in email signature / footer.
20	<b>Additional requirements—application for or to modify development consent</b> (1) The holder of a mining lease must give written notice to the Secretary within 10 days after— (a) making an application for development consent that relates to the mining area, or (b) making an application for modification of a development consent— (i) under the Environmental Planning and Assessment Act 1979, section 4.55(2), and (ii) that proposes to modify a condition of the consent that relates to rehabilitation of the mining area in a way that may affect an obligation under the mining lease relating to rehabilitation of the mining area.	Not triggered	Clause does not apply as the development is SSD, per condition below.
	This clause does not apply if the development is State significant development.	Noted	As above.

Apx Table 4 EPL 20850

Ref	Requirement	Status	Comments											
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Coal works</td><td>Coal works</td><td>&gt; 5000000 T annual handling capacity</td></tr><tr><td>Mining for coal</td><td>Mining for coal</td><td>&gt; 5000000 T annual production capacity</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Coal works	Coal works	> 5000000 T annual handling capacity	Mining for coal	Mining for coal	> 5000000 T annual production capacity	Compliant	Refer to response to Condition A6 of SSD 10418 audit table for detail on coal production.		
Scheduled Activity	Fee Based Activity	Scale												
Coal works	Coal works	> 5000000 T annual handling capacity												
Mining for coal	Mining for coal	> 5000000 T annual production capacity												
A2.1	<p>The licence applies to the following premises:</p> <table><tr><th>Premises Details</th></tr><tr><td>MOUNT PLEASANT OPERATION</td></tr><tr><td>1100 WYBONG ROAD</td></tr><tr><td>MUSWELLBROOK</td></tr><tr><td>NSW 2333</td></tr><tr><td> </td></tr><tr><td>AREA IDENTIFIED AS 'MOUNT PLEASANT EPL 20850 (2022-10)' ON PLAN TITLED "MACH ENERGY AUSTRALIA MOUNT PLEASANT OPERATION ENVIRONMENT PROTECTION LICENCE PREMISES MAP" DATED 16/11/2022, PDF REF: MACH EPL - 10 221116.PDF</td></tr><tr><td> </td></tr><tr><td>EPA DOCUMENT REFERENCE: DOC22/1021486.</td></tr><tr><td> </td></tr><tr><td>THIS LICENCE DOES NOT APPLY TO, OR INCLUDE PUBLIC ROADS.</td></tr></table>	Premises Details	MOUNT PLEASANT OPERATION	1100 WYBONG ROAD	MUSWELLBROOK	NSW 2333		AREA IDENTIFIED AS 'MOUNT PLEASANT EPL 20850 (2022-10)' ON PLAN TITLED "MACH ENERGY AUSTRALIA MOUNT PLEASANT OPERATION ENVIRONMENT PROTECTION LICENCE PREMISES MAP" DATED 16/11/2022, PDF REF: MACH EPL - 10 221116.PDF		EPA DOCUMENT REFERENCE: DOC22/1021486.		THIS LICENCE DOES NOT APPLY TO, OR INCLUDE PUBLIC ROADS.	Compliant	Reviewed MACH Energy Australia Mount Pleasant Operation Environment Protection Licence Premises Map.
Premises Details														
MOUNT PLEASANT OPERATION														
1100 WYBONG ROAD														
MUSWELLBROOK														
NSW 2333														
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EPA DOCUMENT REFERENCE: DOC22/1021486.														
THIS LICENCE DOES NOT APPLY TO, OR INCLUDE PUBLIC ROADS.														
A3.1	<p>This licence applies to all other activities carried on at the premises, including:</p> <table><tr><th>Ancillary Activity</th></tr><tr><td>Coal Works</td></tr><tr><td>Land-based extractive activity</td></tr><tr><td>sewage treatment plant</td></tr></table>	Ancillary Activity	Coal Works	Land-based extractive activity	sewage treatment plant	Noted	Site inspection confirmed the three activities identified are carried out on site.							
Ancillary Activity														
Coal Works														
Land-based extractive activity														
sewage treatment plant														
A4.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces</p> <p>under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p>	Compliant	Reviewed 'MOUNT PLEASANT OPERATION – ENVIRONMENT PROTECTION LICENCE APPLICATION' (22 September 2016). Parameters in the application include more than 5 Mtpa for “coal works” and “mining for coal” activities. “Land based extractive activity” parameters were more than 100,000 t but not more than 500,000 tonnes.											

Ref	Requirement	Status	Comments																				
	b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		Reviewed MPO Daily Report Output V6 confirming operations are in line with the application. A) Not applicable. B) Site inspection confirmed location and activities in EPL application (September 2016) are relevant.																				
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table> <tr> <th colspan="4">Air</th></tr> <tr> <th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr> <tr> <td>1</td><td>Particulate Matter Monitoring (PM10)</td><td></td><td>Continuous particulate monitor located to the south-east of the premises, at MGA56 299558 6428748 shown as "A-PF2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr> <tr> <td>2</td><td>Particulate Matter Monitoring (PM10)</td><td></td><td>Continuous particulate monitor located to the north of the premises, at coordinates MGA56 295811 6434886 shown as "A-PF5" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr> </table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Particulate Matter Monitoring (PM10)		Continuous particulate monitor located to the south-east of the premises, at MGA56 299558 6428748 shown as "A-PF2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	2	Particulate Matter Monitoring (PM10)		Continuous particulate monitor located to the north of the premises, at coordinates MGA56 295811 6434886 shown as "A-PF5" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	Compliant	Reviewed Figure 3 of Air Quality and Greenhouse Gas Management Plan (SSD 10418) (Draft), shows the locations of air quality monitoring points on site. Air quality specialist inspected the monitoring sites during site inspection.				
Air																							
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																				
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2	Particulate Matter Monitoring (PM10)		Continuous particulate monitor located to the north of the premises, at coordinates MGA56 295811 6434886 shown as "A-PF5" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.																				
P1.2	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table> <tr> <th colspan="4">Water and land</th></tr> <tr> <th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr> <tr> <td>14</td><td>Effluent quality monitoring; Discharge to mine water system</td><td>Effluent quality monitoring; Discharge to mine water system</td><td>Monitoring of effluent discharge quality from CHPP STP at MGA56 293641 6429993 shown as "CHPP-STP" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr> <tr> <td>15</td><td>Effluent quality monitoring; Discharge to mine water system</td><td>Effluent quality monitoring; Discharge to mine water system</td><td>Monitoring of effluent discharge quality from MIA STP at MGA56 294163 6429420, shown as "MIA-STP" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr> <tr> <td>16</td><td>Discharge and monitoring of saline water under the Hunter River Salinity Trading Scheme (HRSTS)</td><td>Discharge and monitoring of saline water under the Hunter River Salinity Trading Scheme (HRSTS)</td><td>Discharge and monitoring from Mine Water Dam location named 'MWD' as shown in Figure titled 'Environment Protection Licence Premises Map' dated 8/12/22 (EPA ref DOC22/1084473)</td></tr> </table>	Water and land				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	14	Effluent quality monitoring; Discharge to mine water system	Effluent quality monitoring; Discharge to mine water system	Monitoring of effluent discharge quality from CHPP STP at MGA56 293641 6429993 shown as "CHPP-STP" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	15	Effluent quality monitoring; Discharge to mine water system	Effluent quality monitoring; Discharge to mine water system	Monitoring of effluent discharge quality from MIA STP at MGA56 294163 6429420, shown as "MIA-STP" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	16	Discharge and monitoring of saline water under the Hunter River Salinity Trading Scheme (HRSTS)	Discharge and monitoring of saline water under the Hunter River Salinity Trading Scheme (HRSTS)	Discharge and monitoring from Mine Water Dam location named 'MWD' as shown in Figure titled 'Environment Protection Licence Premises Map' dated 8/12/22 (EPA ref DOC22/1084473)	Compliant	<p>CHPP STP has been decommissioned. Recommend at next EPL variation, this monitoring requirement for Point 14 should be sought to be removed. LR advised on 6 February 2025 that Point 14 has been removed with EPL variation approved 4 December 2024.</p> <p>Point 15 is main STP viewed physically and on premises map.</p> <p>Point 16 is Hunter Water discharge, pipe comes out of mine water dam and goes around Bengalla and discharges into unnamed tributary. No discharges have occurred in the audit period (AR pers comms).</p>
Water and land																							
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P1.3	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p>	Noted	<p>'B-VOC' is shown on Figure 2 Blast Monitoring Locations of the Blast Management Plan (April 2020).</p> <p>Met station is at AP4, seen on Premises Map. Reviewed Mach Energy MTP04 data (25). Spreadsheet shows data recorded by met station in November 2024.</p>																				

# MOUNT PLEASANT OPERATIONS INDEPENDENT ENVIRONMENTAL AUDIT 2024



Ref	Requirement	Status	Comments																																	
<div>Noise/Weather</div> <table><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>3</td><td>Air blast overpressure &amp; ground vibration peak particle velocity monitoring</td><td>Blast monitor located to the south-west of the premises, at MGA56 296265 6430737, shown as "B-VOC" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr><tr><td>4</td><td>Meteorological Station</td><td>Meteorological monitoring located at MGA56 299023 6433749, shown as "M-WS4" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr><tr><td>5</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 291465, 6427162, shown as "N-AT1" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr><tr><td>6</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 290608 6434490, shown as "N-AT2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of dwellings to the north-west of the premises.</td></tr><tr><td>7</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 300725 6432946, shown as "N-AT3" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 5.</td></tr><tr><td>8</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 299947 6429264, shown as "N-AT4" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 6 &amp; 7.</td></tr><tr><td>9</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 299161 6427503, shown as "N-AT5" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 8 &amp; 9.</td></tr><tr><td>10</td><td>Noise monitoring</td><td>Attended noise monitoring at MGA56 289092 6423155, shown as "N-AT6" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 11.</td></tr><tr><td>11</td><td>Meteorological Station</td><td>Meteorological monitoring located at MGA56 299558 6428748, shown as "M-WM2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr><tr><td>13</td><td>Air blast overpressure &amp; ground vibration peak particle velocity monitoring</td><td>Blast monitor located to the south-west of the premises, at MGA56 300036 6428691, shown as "B-VOC2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.</td></tr></table>				EPA identification no.	Type of monitoring point	Location description	3	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor located to the south-west of the premises, at MGA56 296265 6430737, shown as "B-VOC" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	4	Meteorological Station	Meteorological monitoring located at MGA56 299023 6433749, shown as "M-WS4" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	5	Noise monitoring	Attended noise monitoring at MGA56 291465, 6427162, shown as "N-AT1" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	6	Noise monitoring	Attended noise monitoring at MGA56 290608 6434490, shown as "N-AT2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of dwellings to the north-west of the premises.	7	Noise monitoring	Attended noise monitoring at MGA56 300725 6432946, shown as "N-AT3" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 5.	8	Noise monitoring	Attended noise monitoring at MGA56 299947 6429264, shown as "N-AT4" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 6 & 7.	9	Noise monitoring	Attended noise monitoring at MGA56 299161 6427503, shown as "N-AT5" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 8 & 9.	10	Noise monitoring	Attended noise monitoring at MGA56 289092 6423155, shown as "N-AT6" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190. Representative of NAG 11.	11	Meteorological Station	Meteorological monitoring located at MGA56 299558 6428748, shown as "M-WM2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.	13	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor located to the south-west of the premises, at MGA56 300036 6428691, shown as "B-VOC2" on plan titled "Environment Protection Licence Premises Map" at EPA Reference: DOC21/1102190.
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P1.4	For the purpose of Condition P1.3, NAG refers to the Noise Assessment Groups shown in Figure 5-3 of Appendix 5 of DA 92/97 (MOD 4) dated 16 November 2018 (EPA reference DOC19/1010437).	Compliant	Noise monitoring sites shown in the table are listed in monthly noise monitoring reports for the audit period by Spectrum Acoustics. EPA 11 meteorological station is APF2. Reviewed Mach Energy MTP02 data (48). Spreadsheet shows data recorded by APF2 in November 2024. BV02 is an additional blast monitor which is shown on Figure 2 Blast Monitoring Locations of the Blast Management Plan (April 2020).																																	
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Compliant	No reportable water incidents reported in the audit period. Reviewed 'Internal Filing of Information' folder showing all potential incident and non-compliance reports for the audit period. Reviewed Annual Review 2023.																																	



Ref	Requirement	Status	Comments																		
			(Engeny) Review of groundwater monitoring data presented in the 2023 Annual Review provides no indication of pollution to groundwater.																		
L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Not triggered	Reviewed AR2023. No discharge in the audit period (AR pers comms).																		
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Not triggered	Not triggered. Refer to L2.1.																		
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	Noted	Not triggered. Refer to L2.1.																		
L2.4	Water and/or Land Concentration Limits  POINT 16 <table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 Percentile concentration limit</th><th>90 Percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5 - 9.5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>120</td></tr></table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	pH	pH				6.5 - 9.5	Total suspended solids	milligrams per litre				120	Not triggered	Not triggered. Refer to L2.1.
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																
pH	pH				6.5 - 9.5																
Total suspended solids	milligrams per litre				120																
L3.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence. <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>NA</td><td>Waste tyres</td><td>Disposal of used heavy mobile equipment tyres at approved on-site locations.</td><td>Waste disposal (application to land)</td><td>50 tonnes of used tyres stored per dump location.</td></tr></table>	Code	Waste	Description	Activity	Other Limits	NA	Waste tyres	Disposal of used heavy mobile equipment tyres at approved on-site locations.	Waste disposal (application to land)	50 tonnes of used tyres stored per dump location.	Compliant	Reviewed Annual Review 2023 and waste tracking certificates for 2024. Waste was not received at the site. Reviewed Scrap Tyre Checklist_2024 Update (Yorky) DL. No disposal of tyres in pit recorded in audit period. Used tyres are used for traffic management and safety in pit and around construction areas. <b>Recommend plan is developed for appropriate tyre disposal when use is finished in line with Waste Tyre Disposal Procedure as large volume of tyres was observed on site (see Plate 7).</b>								
Code	Waste	Description	Activity	Other Limits																	
NA	Waste tyres	Disposal of used heavy mobile equipment tyres at approved on-site locations.	Waste disposal (application to land)	50 tonnes of used tyres stored per dump location.																	
L4.1	Noise generated at the premises must not exceed the noise limits presented in the table below. Note: The noise limits in the table below do not apply if the licensee has a written agreement with the relevant landowner to exceed the noise limit and the licensee has advised the EPA in writing of the terms of the agreement. The noise limits in the table below do not apply to residences owned by the licensee or those residences that are subject to acquisition as listed in Table 1 of Schedule 3 of Development Consent DA 92/97 (MOD 4), dated 16 November 2018. Residences referenced in this table are	Compliant	(Muller) Reviewed 2023 Annual Review and Monthly Environmental Monitoring Reports. Identified that there were no exceedances of the relevant EPL noise limits.																		

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments																																																																																																																													
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L4.2	For the purposes of the noise limits in this licence: a) Day is defined as the period from 7 am to 6 pm Monday to Saturday, and 8 am to 6 pm Sundays and Public Holidays, b) Evening is defined as the period from 6 pm to 10 pm, and c) Night is defined as the period from 10 pm to 7 am Monday to Saturday, and 10 pm to 8 am Sundays and Public Holidays.	Noted	Noted																																																																																																																													
L4.3	The noise limits set out in this licence apply under all meteorological conditions except for the following:	Compliant	Site interview confirmed met data is provided to Spectrum Acoustics and considered in noise monthly reports and annual reporting.																																																																																																																													

Ref	Requirement	Status	Comments
	a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.		Section 9.1 of monthly environmental monitoring reports for the audit period confirmed these conditions were checked and whether noise limits applied.
L4.4	For the purposes of condition L3.3: a) Data recorded by the closest and most representative meteorological station installed on the premises at EPA Identification Point 4 or 11 must be used to determine the meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined using the sigma-theta method described in Appendix E of the Industrial Noise Policy (EPA 2000).	Not triggered	There is no condition L3.3. <b>Recommend at next variation, this should be fixed to L4.3.</b> Viewed current EPL variation application. Refer to condition L4.3.
L5.1	Blasting in or on the premises must only be carried out between 0900 hours and 1700 hours, Monday to Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.	Compliant	(Muller) A review of blasting data identified that all blasting activities occurred within the prescribed blasting hours.
L5.2	The airblast overpressure level from blasting operations in or on the premises must not exceed 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period at any blast monitoring location specified in this licence.	Compliant	(Muller) A review of blasting data identified that airblast overpressure from blasting activities did not exceed the relevant blasting limits during the Audit period.
L5.3	The airblast overpressure level from blasting operations in or on the premises must not exceed 120 dB (Lin Peak) at any time at any blast monitoring location specified in this licence.	Compliant	(Muller) A review of blasting data identified that airblast overpressure from blasting activities did not exceed 120dB (Lin Peak) at any time at any blast monitoring location during the Audit period.
L5.4	Ground vibration peak particle velocity from blasting operations in or on the premises must not exceed 5 mm/second for more than 5% of the total number of blasts during each reporting period at any blast monitoring location specified in this licence.	Compliant	(Muller) A review of blasting data identified that ground vibration from blasting activities did not exceed the relevant blasting limits during the Audit period.
L5.5	Ground vibration peak particle velocity from blasting operations in or on the premises must not exceed 10 mm/second at any time at any blast monitoring location specified in this licence.	Compliant	(Muller) A review of blasting data identified that ground vibration from blasting activities did not exceed the relevant blasting limits during the Audit period.
L5.6	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases 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:	Compliant	(Muller) A review of blasting data identified that MPO did not emit offensive blast fume during the Audit period.

Ref	Requirement	Status	Comments
	<p>1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted; or</p> <p>2. 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>		
L6.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	Noted	Refer to Condition B27 of SSD 10418 audit table.
O1.1	<p>Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity;</p> <p>and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	Compliant	Refer to Conditions A32, B81 and B83 of SSD 10418 audit table.
O2.1	<p>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</p> <p>b) must be operated in a proper and efficient manner.</p>	Compliant	Refer to Condition A32 of SSD 10418 audit table.
O2.2	The sewage treatment system at the premises must be serviced by a suitably qualified and experienced wastewater technician at least once in each quarterly period and a minimum of four times per year.	Compliant	Reviewed Service Reports dated 19/12/2023 and 11/11/2024. A New sewage system implemented with new membranes was put in by MACH Water during the audit period. (AR pers comms)
O2.3	The licensee must record each inspection and any actions required or recommended by the technician including date, time, and all results of tests performed on the sewage treatment system by the technician.	Compliant	Reviewed Service Reports dated 19/12/2023 and 11/11/2024. Adequate detail provided on service reports.
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant	<p>(Zephyr) Management measures are detailed in the AQGHGMP and Annual Review reports.</p> <p>15 air quality / dust / odour complaints made between March 2023 and December 2023, inclusive.</p> <p>13 air quality / dust / odour complaints made between January 2024 and September 2024, inclusive.</p>

Ref	Requirement	Status	Comments
			No evidence of dust leaving the premises during site visit. However, improvements could be made in controlling wheel generated dust from haul trucks
O3.2	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Compliant	(Zephyr) Management measures are detailed in the AQGHGMP and Annual Review reports.  Dust from most sources controlled very well at site visits. <b>Ongoing training for controlling dust generation especially during loading to trucks in the pit is recommended.</b>
O3.3	All trafficable areas, coal storage areas and vehicle manoeuvring areas in or on the premises must be maintained, at all times, in a condition that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Compliant	(Zephyr) Wheel generated dust on haul routes could be improved.
O3.4	The licensee must cease all dust generating activities during adverse conditions being the occurrence of both: i) the adverse wind conditions set out in Condition O3.5 (b), and ii) the adverse PM10 concentrations set out in Condition O3.5 (c).	Compliant	(Zephyr) Ceasing of operations in accordance with O3.4/O3.5 was detailed in 2023 Annual Review report:  Dust generating activities were discontinued on nine occasions during 2023 in accordance with Conditions O3.4 and O3.5 of EPL 20850.  MPO initiated an adverse weather condition dust shutdown at 12:42 on 25 October 2025. It is assumed that this is a typo and should be amended to 25 October 2023.  Personnel noted that the shutdown process works well and take about 1 hour to implement. The WhatsApp group works effectively and enables responsive efforts to be coordinated quickly and efficiently.  Records are kept for every shutdown alarm indicating possible causes.
O3.5	For the purpose of Condition O3.4 the following definitions apply: (a) 'dust generating activities' means drilling, blasting, earthworks, construction activities, all hauling activities on unsealed haul roads, all overburden and coal extraction operations including loading and dumping activities and grader, loader, dozer and dragline operations. (b) 'adverse wind conditions' means the 1-hour average wind direction between 250 degrees and 340 degrees (inclusive) measured at the Muswellbrook NW Upper Hunter Air Quality Monitoring Network monitor. Australian Standard AS3580.14-2014 is to be used to calculate the 1 hour average wind direction. (c) 'adverse PM10 concentrations' means a rolling 24-hour average PM10 concentration of equal to or greater than 44 micrograms per cubic metre measured at the Muswellbrook NW Upper Hunter Air Quality Monitoring Network monitoring station.	Noted	(Zephyr) Noted.

Ref	Requirement	Status	Comments
	(d) Operation of watercarts is permitted at all times. (e) Activities within the Coal Handling and Preparation Plant and Materials Handling Area, including run-of-mine (ROM) coal, product coal handling (including dozer/loader operations) and train loading operations as identified in blue on plan titled 'Mach Energy Materials Handling Area Dust Exclusion Zone General Arrangement Mount Pleasant Coal Drawing 90500-51-1-SV-Material Handling Area Update-r1' (EPA ref DOC23/37979-1) are not included as dust generating activities provided all automated dust suppression spray systems at the ROM hopper, conveyor transfer points and product stockpiles are in use, at least one water cart is in use on the ROM stockpile and an adjustable hood is lowered onto rail wagons loadings.		
O3.6	Shutdown of dust generating activities required by Condition O3.4 must be completed within 1 hour of receiving data that triggers action required by Condition O3.4.	Compliant	<p>(Zephyr) Ceasing of operations due to dust events is detailed in the 2023 Annual Review reports.</p> <p>Dust generating activities were discontinued on nine occasions during 2023 in accordance with Conditions O3.4 and O3.5 of EPL 20850.</p> <p>MPO initiated an adverse weather condition dust shutdown at 12:42 on 25 October 2025. It is assumed that this is a typo and should be amended to 25 October 2023.</p> <p>There was a minor breach of the 1-hour time frame at this time. Evidence sited of shutdown breach in a letter to EPA dated 1 November 2023. This was noted as an individual's error and not an indication of a systematic issue with compliance. The correct notification procedure was followed. Personnel noted that the shutdown process works well and take about 1 hour to implement. The WhatsApp group works effectively and enables responsive efforts to be coordinated quickly and efficiently.</p> <p>Records are kept for every shutdown alarm indicating possible causes.</p>
O3.7	The licensee may resume dust generating activities at the premises when: (a) adverse wind conditions as defined in Condition O3.5(b); or (b) adverse PM10 concentrations as defined in Condition O3.5(c) are not measured for a minimum time period of 1 hour from the time that cessation of dust generation activities is completed.	Compliant	<p>(Zephyr) As per the Annual Review reports all appropriate steps to reduce dust generation were undertaken in accordance with the MPO AQGGMP, consistent with Condition 23, Schedule 3 of DA 92/97.</p> <p>(RPS) Reviewed 'CAT tool' on site, sends out SMS recording shut down and start up due to this condition. Reviewed SMS / WhatsApp messages received on staff phones during site inspection.</p>
O3.8	At any time when there is no access to the meteorological data or PM10 data from the Muswellbrook NW Upper Hunter Air Quality Monitoring Network monitoring station,	Noted	Monitoring Point 11 is APF 2.

Ref	Requirement	Status	Comments
	<p>definitions of 'adverse wind conditions' and 'adverse PM10 concentrations' in condition O3.5 are replaced with:</p> <ul style="list-style-type: none"> <li>- 'adverse wind conditions' means a 1-hour average wind direction between 245 and 345 degrees (inclusive) measured at EPA Monitoring Point 11, identified in condition P1.3</li> <li>- 'adverse PM10 concentrations' means a rolling 24-hour average PM10 concentration of equal to or greater than 44 micrograms per cubic metre measured at the EPA Monitoring Point 1, identified in condition P1.3</li> </ul> <p>Note: If at any time, there is no access to the Muswellbrook NW Upper Hunter Air Quality Monitoring Network monitoring station and to either 1-hour average wind direction data from monitoring point 11 or PM 10 data from monitoring point 1 the licensee must cease dust generating activities at the premises.</p>		MPO automatically goes to APF 2 if Muswellbrook NW is not functioning. (AR pers comms)
O3.9	For the purpose of condition O3.5 (e), dust suppression systems must be operated in a manner to ensure that there is no visible dust emissions emitted from the premises.	Compliant	<p>(Zephyr) There were observations of visible dust for loading trucks and some areas of the haul routes (wheel generated). <b>Recommend refresher training for key personnel in dry weather.</b></p> <p>These minor emissions were unlikely to have caused off-site visible dust and generally, operations were very well managed.</p>
O4.1	The licensee must ensure that the effluent discharge utilisation area perimeter is fenced, signposted and controlled in a manner to ensure exclusion of persons from that area.	Not triggered	No discharge utilisation area exists on site (AR pers comms). <b>Recommend this condition could be updated or deleted at next variation.</b>
O4.2	The licensee must ensure that sprays or mists from irrigation do not drift beyond the boundary of the effluent discharge utilisation area and that no ponding occurs.	Not triggered	Not triggered.
O4.3	Application of wastewaters must only be applied at a rate that can be assimilated by the effluent discharge utilisation area and its evapotranspiration capacity.	Not triggered	Not applicable.
O5	<p>Note: The licensee must prepare a Pollution Incident Response Management Plan (PIRMP) as per section 153A of the Protection of the Environment Operations Act 2021. The PIRMP must:</p> <ol style="list-style-type: none"> <li>1. Include the information detailed in section 153A of the Protection of the Environment Operations Act 2021, and to be in the form required by clause 71 in the Protection of the Environment Operations (General) Regulation 2022.</li> <li>2. Be kept at the premises to which the licence relates; and</li> <li>3. Be tested in accordance with clause 75 of the Protection of the Environment Operations (General) Regulation 2022.</li> </ol>	Compliant	<p>Reviewed Pollution Incidence Response Management Plan Revision 7 dated 30 September 2024. The information detailed in section 153A of the Protection of the Environment Operations Act 2021, in the form required by clause 71 in the <i>Protection of the Environment Operations (General) Regulation 2022</i>, is throughout the PIRMP, as summarised in Section 1.1.</p> <p>The PIRMP is available online and at the site.</p> <p>Testing of the PIRMP is detailed in Section 8, with a record of testing and revisions of the PIRMP.</p>
O6.1	The licensee is authorised to dispose of heavy plant waste tyres generated on the premises, in the pit. The	Compliant	Reviewed Thiess Mount Pleasant Handling and Disposal of Waste Procedure dated 22 May 2018.



Ref	Requirement	Status	Comments
	<p>licensee must:</p> <p>a) ensure heavy plant waste tyres are reused on the premises as much as practical;</p> <p>b) ensure that any surplus waste tyres can be emplaced by being spread out on the pit floor and be buried as deep as is reasonably practical;</p> <p>c) ensure buried waste tyres are covered by at least 20 m of inert material beneath any final rehabilitated surfaces;</p> <p>d) place the waste tyres at least 10 m away from coarse reject material or tailings emplacement areas;</p> <p>e) not place waste tyres near heated material; and</p> <p>f) not place any waste tyres in an area likely to leach to any waters.</p>		<p>A) Recycling of tyres is addressed in Procedure 1. Sighted reuse of heavy plant tyres to divert traffic around construction areas.</p> <p>B) Reviewed Scrap Tyre Checklist 2024 Update, no tyres disposed of in pit in audit period.</p> <p>C) Not triggered.</p> <p>D) Not triggered.</p> <p>E) Not triggered.</p> <p>F) Not triggered.</p>
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition	Compliant	Reviewed 'monthly environmental monitoring reports' for audit period. Recording of monitoring compliant with EPL requirements.
M1.2	<p>All records required to be kept by this licence must be:</p> <p>a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	Compliant	Reviewed documents required by this licence including Annual Returns for past four years. Auditors were satisfied MPO records were legible, kept for at least 4 years and able to be produced to authorised EPA officers at any time.
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was taken;</p> <p>b) the time(s) at which the sample was collected;</p> <p>c) the point at which the sample was taken; and</p> <p>d) the name of the person who collected the sample.</p>	Compliant	See response to M1.1.
M2.1	<p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must</p> <p>monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p>	Not compliant	<p>(Zephyr) Details of monitors are provided in the AQGHGMP and Annual Review reports.</p> <p><b>Non-compliance as per 2023 Annual Report – incomplete data capture at both locations</b> (EPL Point 1 – A-PF2 and EPL Point 2 – A-PF5). Capture estimated at &lt;86% at EPL Point 1 and &lt;41% at EPL Point 2.</p> <p>Non-compliances in Annual Returns:</p> <p>- March 2023 to September 2024, inclusive, <b>PM10 was not monitored continuously</b> at EPL Point 1 / A-PF2 (&lt;86%) during the monitoring period. Unknown reasons for reduction in monitoring data.</p>

Ref	Requirement	Status	Comments																												
			<p>- March 2023 to September 2024, inclusive, <b>PM10 was not monitored continuously</b> at EPL Point 2 / A-PF5 (&lt;41%) during the monitoring period due to damage issues with the monitor</p> <p>Recommend investigation to understand if any practical changes can be made to capture all data.</p>																												
M2.2	<p>Air Monitoring Requirements</p> <p>POINT 1,2</p> <table> <tr> <th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr> <tr> <td>PM10</td><td>milligrams per cubic metre</td><td>Continuous</td><td>Special Method 1</td></tr> </table> <p>Special Method 1 requires the licensee to undertake the monitoring of PM10 concentrations in strict accordance with the manufacturer's operating manual supplied with the continuous monitoring equipment, or any updated versions as published by the manufacturer.</p>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	milligrams per cubic metre	Continuous	Special Method 1	Not compliant	(Zephyr) Refer to response to M2.1.																				
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M2.3	<p>Water and/ or Land Monitoring Requirements</p> <p>POINT 14,15</p> <table> <tr> <th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr> <tr> <td>Faecal Coliforms</td><td>colony forming units per 100 millilitres</td><td>Quarterly</td><td>Grab sample</td></tr> <tr> <td>pH</td><td>pH</td><td>Quarterly</td><td>Grab sample</td></tr> </table> <p>POINT 16</p> <table> <tr> <th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr> <tr> <td>Conductivity</td><td>microsiemens per centimetre</td><td>Continuous during discharge</td><td>A probe designed to measure the range 0 to 10,000 uS/cm</td></tr> <tr> <td>pH</td><td>pH</td><td>Daily during any discharge</td><td>Representative sample</td></tr> <tr> <td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Representative sample</td></tr> </table>	Pollutant	Units of measure	Frequency	Sampling Method	Faecal Coliforms	colony forming units per 100 millilitres	Quarterly	Grab sample	pH	pH	Quarterly	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Continuous during discharge	A probe designed to measure the range 0 to 10,000 uS/cm	pH	pH	Daily during any discharge	Representative sample	Total suspended solids	milligrams per litre	Daily during any discharge	Representative sample	Not triggered	Point 14 to be removed in EPL variation. LR advised on 6 February 2025 that Point 14 has been removed with EPL variation approved 4 December 2024. No discharge in the audit period (AR pers comms). Not triggered.
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M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p>Note: The Protection of the Environment Operations (Clean Air) Regulation 2022 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>	Compliant	<p>(Zephyr) Details of monitors are provided in the AQGHGMP and Annual Review reports.</p> <p>EPL 20850 describes monitoring points 1 and 2 (A-PF2 and A-PF5 respectively) as TEOMs.</p> <p>The equipment used on site are Palas Fidas dust monitors which are not TEOMs, are not Aus Standard.</p> <p>The 2020 IEA report recommended that: <i>the calibration factor used with the Palas Fidas particulate monitors be based on a dataset that covers seasonal variations (rather than the single month the current calibration factors are based on) as changes in particulate loads, temperature, humidity, etc. can affect the instrument's readings.</i></p> <p>Even though the monitors are not TEOMs as stated in the EPL, the AQGHGMP was approved by DPE.</p>																												

Ref	Requirement	Status	Comments																																																												
M3.2	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.	Not triggered	Not triggered, see M2.3.																																																												
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.  POINT 11 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 &amp; AM-4</td><td>metres per second</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Wind Direction at 10 metres</td><td>AM-2 &amp; AM-4</td><td>Degrees</td><td>10 minutes</td><td>Continuous</td></tr></table>  POINT 4 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 &amp; AM-4</td><td>metres per second</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Temperature at 2 metres</td><td>AM-4</td><td>degrees Celsius</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Sigma theta</td><td>AM-2 &amp; AM-4</td><td>degrees Celsius</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Rainfall</td><td>AM-4</td><td>millimetres per hour</td><td>1 hour</td><td>Continuous</td></tr><tr><td>Relative humidity</td><td>AM-4</td><td>percent</td><td>1 hour</td><td>Continuous</td></tr><tr><td>Siting</td><td>AM-1</td><td>None</td><td>-</td><td>-</td></tr><tr><td>Temperature at 10 metres</td><td>AM-4</td><td>degrees Celsius</td><td>10 minutes</td><td>Continuous</td></tr><tr><td>Total Solar Radiation</td><td>AM-4</td><td>Watts per square metre</td><td>10 minutes</td><td>Continuous</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	10 minutes	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	10 minutes	Continuous	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	10 minutes	Continuous	Temperature at 2 metres	AM-4	degrees Celsius	10 minutes	Continuous	Sigma theta	AM-2 & AM-4	degrees Celsius	10 minutes	Continuous	Rainfall	AM-4	millimetres per hour	1 hour	Continuous	Relative humidity	AM-4	percent	1 hour	Continuous	Siting	AM-1	None	-	-	Temperature at 10 metres	AM-4	degrees Celsius	10 minutes	Continuous	Total Solar Radiation	AM-4	Watts per square metre	10 minutes	Continuous	Not compliant	(Zephyr) Meteorological data at EPA 4 and 11 was not captured continuously between March 2023 and August 2024 (uninterrupted during the reporting period). Based on the monitoring reports the data is below 100%.
Parameter	Sampling method	Units of measure	Averaging period	Frequency																																																											
Wind Speed at 10 metres	AM-2 & AM-4	metres per second	10 minutes	Continuous																																																											
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M4.2	All methods specified in conditions M4.1 are specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales ('Approved Methods') and all monitoring must be conducted strictly in accordance with the requirements outlined the Approved Methods.	Compliant	(Zephyr) All monitoring was completed in accordance with the Approved Methods.																																																												
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . Community complaints recorded monthly under the 'Other' tab with historical complaints available dating back to 2017. Reviewed use of Consultation Manager used internally to track complaints.																																																												
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and	Compliant	Reviewed Community Complaints Register and Consultation Manager for audit period on site. (a) Date and time of complaints were recorded. (b) Method was present in responses to complaints. (c) Personal details are kept on file if available. (d) Contained in the response column. (e) Addressed in the response column. (f) Addressed in the response column.																																																												

Ref	Requirement	Status	Comments												
	f) if no action was taken by the licensee, the reasons why no action was taken.														
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . Records available dating back to 2017.												
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Compliant	Reviewed Compliance Audit Report (Final) – Environmental Management System and Practices (NSW EPA, 2024), records were provided to EPA officers as required.												
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/">https://machenergyaustralia.com.au/mount-pleasant/</a> . Site interview confirmed MACH operates a 24/7 Community Hotline (AR pers comms). The contact number is available on the MACH Energy public facing website. Noise specialist called hotline to confirm working.												
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Compliant	The community hotline phone number is in the top right hand corner of <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> .												
M6.3	M6.3 The preceding two conditions do not apply until two weeks from the date of the issue of this licence.	Noted	Not applicable, time period passed. Condition can be removed.												
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below.  POINT 16	Not triggered	See M2.3.												
	<table><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr><tr><td>Continuous during discharge</td><td>megalitres per day</td><td>Electronic level sensor and continuous logger</td></tr></table>	Frequency	Unit of Measure	Sampling Method	Continuous during discharge	megalitres per day	Electronic level sensor and continuous logger								
Frequency	Unit of Measure	Sampling Method													
Continuous during discharge	megalitres per day	Electronic level sensor and continuous logger													
M8.1	To determine compliance with the blast limits specified in this licence: a) Airblast overpressure and ground vibration levels must be measured and electronically recorded for Monitoring Points 3, 12 and 13 for the parameters specified in column 1 of the table below; and b) The licensee must use the units of measure, sampling method and sample at the frequency specified opposite in the other columns.	Compliant	(Muller) Section 10.1.1 of the Blast Management Plan identifies the permanent blast monitoring locations. Monitoring locations B-VO2, B-VOA and B-VOC are consistent with the EPL monitoring locations. Blasting is undertaken in accordance with AS 2187.2-2006.												
	<table><tr><th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Airblast Overpressure</td><td>Decibels (Linear Peak)</td><td>All blasts</td><td>Australian Standard AS 2187.2-2006</td></tr><tr><td>Ground Vibration Peak Particle Velocity</td><td>millimetres/second</td><td>All blasts</td><td>Australian Standard AS 2187.2-2006</td></tr></table>	Parameter	Units of Measure	Frequency	Sampling Method	Airblast Overpressure	Decibels (Linear Peak)	All blasts	Australian Standard AS 2187.2-2006	Ground Vibration Peak Particle Velocity	millimetres/second	All blasts	Australian Standard AS 2187.2-2006		
Parameter	Units of Measure	Frequency	Sampling Method												
Airblast Overpressure	Decibels (Linear Peak)	All blasts	Australian Standard AS 2187.2-2006												
Ground Vibration Peak Particle Velocity	millimetres/second	All blasts	Australian Standard AS 2187.2-2006												

Ref	Requirement	Status	Comments								
M9.1	The licensee must record the average PM10 concentration at Monitoring Points 1 and 2 at intervals of 10 minutes. This data must be made available upon request by any authorised officer of the EPA who asks to see them.	Not compliant	EPL Condition M9.1 requires the licensee to record the average PM10 concentration at Monitoring Points 1 and 2 at intervals of 10 minutes. Reviewed '1024 MPO HVAS' and 'Met Data Compiled 010124-311224' spreadsheets provided. PM10 is shown to be recorded at intervals of 10 minutes. <b>There are some periods where PM10 was not recorded at 10 minute intervals..</b>								
M9.2	The Licensee must continuously operate and maintain communication equipment which makes the conductivity and flow measurements, taken at Point 16 available to the "Service Coordinator" within one hour of those measurements being taken and makes them available in the format specified in the report titled "Hunter River Salinity Trading Scheme Discharge Point Telemetry Specification - Rev V1.0 Released 4 October 2018" as published by WaterNSW.	Not triggered	Not triggered.								
M9.3	The licensee must ensure that all monitoring data is within a margin of error of 5% for conductivity measurements and 10% for discharge flow measurement.	Not triggered	Not triggered.								
M9.4	The licensee must mark monitoring point 16 with a sign which clearly indicates the name of the licensee, whether the monitoring point is up or down stream of the discharge point and that it is a monitoring point for the Hunter River Salinity Trading Scheme.	Not triggered	Not triggered.								
M10.1	To assess compliance with the noise limits specified within this licence, the licensee must undertake operator attended noise monitoring at each specified noise monitoring point in accordance with the table below.  POINT 5,6,7,8,9,10	Compliant	(Muller) Section 9.2.3 of the Noise Management Plan describes the methodology for the noise monitoring program, including a 15-minute measurement on a monthly basis. Monthly Attended Noise Monitoring reports and Monthly Environmental Monitoring Report confirm compliance with this condition.								
<table border="1"> <thead> <tr> <th>Assessment period</th><th>Minimum frequency in a reporting period</th><th>Minimum duration within assessment period</th><th>Minimum number of assessment period</th></tr> </thead> <tbody> <tr> <td>Night</td><td>Monthly</td><td>15 minutes</td><td>1 operation day</td></tr> </tbody> </table>		Assessment period	Minimum frequency in a reporting period	Minimum duration within assessment period	Minimum number of assessment period	Night	Monthly	15 minutes	1 operation day	Compliant	(Muller) Section 9.2.2 of the Noise Management Plan identifies attended noise monitoring locations N-AT1 – N-AT6, as consistent with the EPL monitoring locations. Monthly Attended Noise Monitoring reports and Monthly Environmental Monitoring Report confirm attended noise monitoring undertaken during every calendar month, during the night period, for a minimum of 15 minutes per location, as required by this condition.
Assessment period	Minimum frequency in a reporting period	Minimum duration within assessment period	Minimum number of assessment period								
Night	Monthly	15 minutes	1 operation day								
M10.2	To assess compliance with the noise limits specified within the licence, operator attended noise monitoring must be undertaken in accordance with Conditions L3.2 to L3.4: a) at the noise monitoring locations specified in condition P1.3; and b) occur every calendar month in a reporting period; and c) occur during one night time period as defined in the Industrial Noise Policy (EPA 2000) for a minimum of 15 minutes at each location from a).	Compliant	(Muller) Section 9.2.2 of the Noise Management Plan identifies attended noise monitoring locations N-AT1 – N-AT6, as consistent with the EPL monitoring locations. Monthly Attended Noise Monitoring reports and Monthly Environmental Monitoring Report confirm attended noise monitoring undertaken during every calendar month, during the night period, for a minimum of 15 minutes per location, as required by this condition.								
M10.3	For the purposes of compliance monitoring and determining the noise generated at the premises the modification factors in Fact Sheet C of the Noise Policy for Industry (EPA 2017) must be applied, as appropriate, to the noise levels measured by noise monitoring equipment.	Compliant	(Muller) Section 9.2.3 of the Noise Management Plan describes the methodology for the noise monitoring program, including application of modifying factors in accordance with Fact Sheet C of the Noise Policy for Industry.								

Ref	Requirement	Status	Comments
			Monthly Attended Noise Monitoring reports confirm assessment of potentially annoying noise characteristics.
M10.4	Where required in writing by the EPA, the licensee must carry out attended noise monitoring at sensitive receivers in addition to the monitoring required by Condition M9.2.	Not triggered	(Muller) No additional attended noise monitoring was required by the EPA during the Audit period.
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Compliant	Reviewed Annual Return Nov 2022- Nov 2023. Reviewed Annual Return (orphan period to accommodate CY 23). Annual Returns completed in EPA template with all items addressed.
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Compliant	Reviewed Annual Return Nov 2022- Nov 2023. Reviewed Annual Return (orphan period to accommodate CY 23). Orphan period Annual Return completed to adjust to calendar year reporting period.
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Not triggered	No transfer of licence has occurred.
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or	Not triggered	Licence has not been surrendered.

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Ref	Requirement	Status	Comments
	b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.		
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant	Reviewed automated email showing Annual Return submitted from EPA dated 22 January 2024.
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Compliant	MPO provided auditors the previous four years' Annual Returns to review.
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	Reviewed Annual Return Nov 2022- Nov 2023. Reviewed Annual Return (orphan period to accommodate CY 23). Signatures present.
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all 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 Act.	Not triggered	No reportable incidents occurred in the audit period (AR pers comms).
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Not triggered	Not triggered.
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Compliant	Reviewed MPO response to EPA Operation Bust the Dust enquiry dated 9 September 2023. EPA took offsite drone footage and requested information about measures implemented to control dust from operating procedures. MPO provided a detailed report in response.  Reviewed MPO response to EPA request for PM10 data in ten minute intervals upwind and downwind of MPO from 4-6 August 2023 and 18-20 September 2023. The requested information was attached.  Reviewed MPO response to EPA request for information following 2 spontaneous combustion complaints dated 3 July 2024. MPO provided a detailed report containing the requested information.
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Compliant	Refer to R3.1. All reviewed responses were within required timeframes.
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event;	Compliant	Refer to R3.1.



Ref	Requirement	Status	Comments
	<p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) 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;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>		
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Compliant	Refer to R3.1.
R4.1	The licensee must report any exceedance of the blast limits specified in this licence to the EPA at <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a> as soon as practicable after the exceedance becomes known to the licensee or to one of its employees or agents.	Not triggered	(Muller) A review of blasting data identified that airblast overpressure and ground vibration from blasting activities did not exceed the relevant blasting limits during the Audit period.
R4.2	The licensee must report any exceedance of noise limits specified in this licence to the EPA at <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a> as soon as practicable after the exceedance becomes known to the licensee or to one of its employees or agents.	Not triggered	(Muller) A review of 2023 Annual Review and Monthly Environmental Monitoring Reports for March 2023 – August 2024 identified that there were no exceedances of the relevant EPL noise limits.
R4.3	The licensee must report any exceedance of the 1 hour dust shutdown timeframe prescribed in condition O3.6 of this licence to the EPA at <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a> as soon as practicable after the exceedance becomes known to the licensee or to one of its employees or agents.	Compliant	<p>(Zephyr) Dust generating activities were discontinued on nine occasions during 2023 in accordance with Conditions 03.4 and 03.5 of EPL 20850.</p> <p>MPO initiated an adverse weather condition dust shutdown at 12:42 on 25 October 2025. It is assumed that this is a typo and should be amended to 25 October 2023.</p> <p>Evidence sited of shutdown breach in a letter to EPA dated 1 November 2023. This was noted as an individual's error and not an indication of a systematic issue with compliance. The correct notification procedure was followed.</p>

**MOUNT PLEASANT OPERATIONS  
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Ref	Requirement	Status	Comments
R4.4	The licensee must notify the EPA by telephoning the Environment Line service on 131555 immediately after the licensee becomes aware of any contravention or potential contravention of Condition L1.1 of this licence.	Not triggered	Pollution of water under Section 120 did not occur in the audit period. See response to L1.1.
R4.5	The licensee must provide written details of the notification to the EPA at info@epa.nsw.gov.au within 7 days of the date of the notification.	Not triggered	As above.
R5.1	For each Annual Return reporting period the licensee must submit a Blast Monitoring Report to the EPA for that period. The report must: a) include the results of the blast monitoring required by this licence; b) identify any exceedance of the blast limits in this licence; and c) describe management actions taken to address any exceedances.	Compliant	(Muller) The 2023 Annual Review included a summary of blast monitoring results. It is noted that there were no exceedances of the EPL blast limits during the Audit period.
R5.2	For each Annual Return reporting period the licensee must submit a Noise Compliance Assessment Report to the EPA for that period. The report must: a) be prepared by an appropriately qualified acoustic consultant and determine compliance with noise limits specified in this licence; b) include all routine attended monitoring undertaken throughout the year; c) include measurement and reporting of C-weighted noise levels; and d) outline management actions taken within the monitoring period to address any exceedances of the limits specified in this licence.	Compliant	Reviewed 2023 Annual Review provides a summary of noise monitoring results. There were no exceedances of the EPL noise limits during the Audit period.  Table 31 of the 2023 Annual Review indicates that MACH Energy confirms that the monthly noise compliance assessment reports, prepared by suitably qualified specialists, are submitted through the EPA's eConnect portal during annual return submission.
R5.3	For each Annual Return reporting period the licensee must submit a Dust Monitoring Report to the EPA for that period. The report must include: a) details of times, wind speeds and wind direction during 'adverse conditions'; b) details of the date, time and duration when dust generating activities were ceased in accordance with condition O3.4; c) weather conditions monitored at Monitoring Point 4: i. during the period when dust generating activities were ceased; ii. for the 24 hour period immediately prior to dust generating activities being ceased; and iii. for the 24 hour period immediately after dust generating activities resumed. d) PM10 monitoring data measured at Monitoring Points 1 and 2: i. during the period when dust generating activities were ceased; ii. for the 24 hour period immediately prior to dust generating activities being ceased; and iii. for the 24 hour period immediately after dust generating activities resumed. e) details of the date and time dust generating activities were resumed;	Compliant	Reviewed EPL Annual Return 2022-2023 Dust Monitoring Report. Included: a) details of times, wind speeds and wind direction during 'adverse conditions'; b) details of the date, time and duration when dust generating activities were ceased in accordance with condition O3.4; c) weather conditions monitored at Monitoring Point 4: i. during the period when dust generating activities were ceased; ii. for the 24 hour period immediately prior to dust generating activities being ceased; and iii. for the 24 hour period immediately after dust generating activities resumed. d) PM10 monitoring data measured at Monitoring Points 1 and 2;

Ref	Requirement	Status	Comments
	<p>f) a list of days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p> <p>g) 10 minute wind speed and direction data at Monitoring Point 4 for days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p> <p>h) 10 minute PM10 data from Monitoring Points 1 and 2 for days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p> <p>Note: This information is necessary for the EPA to review whether conditions O3.4 to O3.8 are achieving the objective of ensuring that activities carried on at the premises do not increase the number of days when average PM10 concentrations in Muswellbrook exceed 50ug/m3. The EPA may review these conditions if this objective is not being achieved.</p>		<p>i. during the period when dust generating activities were ceased;</p> <p>ii. for the 24 hour period immediately prior to dust generating activities being ceased; and</p> <p>iii. for the 24 hour period immediately after dust generating activities resumed.</p> <p>e) details of the date and time dust generating activities were resumed;</p> <p>f) a list of days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p> <p>g) 10 minute wind speed and direction data at Monitoring Point 4 for days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p> <p>h) 10 minute PM10 data from Monitoring Points 1 and 2 for days when the average 24 hour PM10 at the Muswellbrook Upper Hunter Air Quality Monitoring Network monitor exceeded 50 µg/m3.</p>
R5.4	<p>For each Annual Return reporting period the licensee must submit a Sewage Treatment System Maintenance Report to the EPA for that period. The report must include:</p> <p>a) sewage system maintenance program including any logs;</p> <p>b) results of any water quality sampling undertaken;</p> <p>c) any system issues identified; and</p> <p>d) management response to any issues.</p>	Compliant	<p>Reviewed 'sewage treatment system maintenance reports' for the reporting period submitted with Annual Return. Included items required from a-d.</p>
R5.5	<p>The licensee must retain a copy of each report as required by Condition O2.5 for 3 years from the date each record is made.</p>	Compliant	<p>Reviewed last four years' Annual Returns, proving retained.</p>
R5.6	<p>For each Annual Return reporting period the licensee must submit a Heavy Plant Tyre Disposal Report to the EPA for that period.</p> <p>The report must include the following information for each waste tyre:</p> <p>a) the size and type;</p> <p>b) disposal date;</p> <p>c) cumulative tonnage of waste tyres disposed in each disposal area;</p> <p>d) GPS coordinates (easting and northing) of the disposal location;</p> <p>e) the Real Level (RL) in metres of the burial depth; and</p>	Compliant	<p>Reviewed waste plant tyre disposal report submitted with Annual Return 2023.</p> <p>a) Column G</p> <p>b) Column H</p> <p>c) Column K</p> <p>d) Column I</p> <p>e) Column I</p> <p>f) Column C</p>

**MOUNT PLEASANT OPERATIONS  
INDEPENDENT ENVIRONMENTAL AUDIT 2024**



Ref	Requirement	Status	Comments
	f) where reasonably available the purchase date, supplier and serial number.		
R5.7	The licensee must compile a written report of the activities under the Hunter River Salinity Trading Scheme for each scheme year. The scheme year shall run from 1 July to 30 June each year. The written report must be submitted to the EPA's regional office within 60 days after the end of each scheme year and be in a form and manner approved by the EPA. The information will be used by the EPA to compile an annual scheme report.	Compliant	Reviewed 'Hunter River Salinity Trading Scheme (HRSTS) MPO 2024' spreadsheet showing no discharges and signed by the GM Operations.
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant	Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . EPL is available online at any time.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not triggered	Not requested in audit period (AR pers comms). Reviewed <a href="https://machenergyaustralia.com.au/mount-pleasant/documentation/">https://machenergyaustralia.com.au/mount-pleasant/documentation/</a> . MPO can produce the licence at any time. It is available on the MACH website.
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant	See response to G1.1.
G2.1	The licensee must operate 24-hour telephone contact lines for the purpose of enabling the EPA to directly contact one or more representatives of the licensee who can: a) respond at all times to incidents relating to the premises; and b) contact the licensee's senior employees or agents authorised at all times to: i) speak on behalf of the licensee; and ii) provide any information or document required under this licence.	Compliant	(Muller) Called the community hotline to confirm that up-to-date information is provided. (RPS) Teams interview with Ngaire Baker (External Communications Manager) confirmed complaints come through hotline: if after 5 pm goes to call centre, otherwise NB answers. A number of people get email and SMS and immediately acknowledge, respond within 24 hrs. Email to a group, Thiess responds with technical detail to assist in response, then NB rings back with detail. (NB pers comms).
G2.2	The licensee is to inform the EPA in writing of the appointment of any subsequent contact persons, or changes to the person's contact details as soon as practicable and in any event within fourteen days of the appointment or change.	Not triggered	Not triggered.
E1.1	This licence authorises the discharge of saline water into the Hunter River Catchment from an authorised discharge point (or points), in accordance with the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	Not triggered	Noted but has not occurred in audit period (AR pers comms).
E1.2	For the purposes of Clauses 23 and 29 of the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002 the licensee must apply the conversion factor of 0.6.	Not triggered	No discharges in the audit period. (AR pers comms) Not triggered.
E1.3	The licensee must not exceed the hourly volume discharge limit calculated using the following formula, at all discharge point(s) on this licence titled "Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS)": $H = V / RRT$ Where:	Not triggered	No discharges in the audit period. (AR pers comms) Not triggered.

Ref	Requirement	Status	Comments
	<p>H is the hourly volume discharge limit (in megalitres per hour);</p> <p>V is the licence holder's volume discharge limit for the block (in megalitres) calculated in accordance with</p> <p>clause 23 of the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation (2002); and</p> <p>RRT is the difference between the discharge stop and start times shown on the river register for that block (in hours)</p> <p>Note 1: The intent of this condition is to prevent spikes of saline water in the Hunter River as a result of discharges of less than the duration permitted by the river register.</p> <p>Note 2: A river register is issued by the Service Co-ordinator and allows participants of the Hunter River Salinity Trading Scheme (HRSTS) to discharge saline to the Hunter River during a discharge period.</p>		

## Appendix D

### Site Inspection Plates





**Plate 1 – New Workshop Rear view of newly constructed workshop showing lighting facing down**



**Plate 2 – New Workshop New lubricant / engine oil fill point**





Plate 3 – New workshop lubricant / oil fill point with drainage and bunding

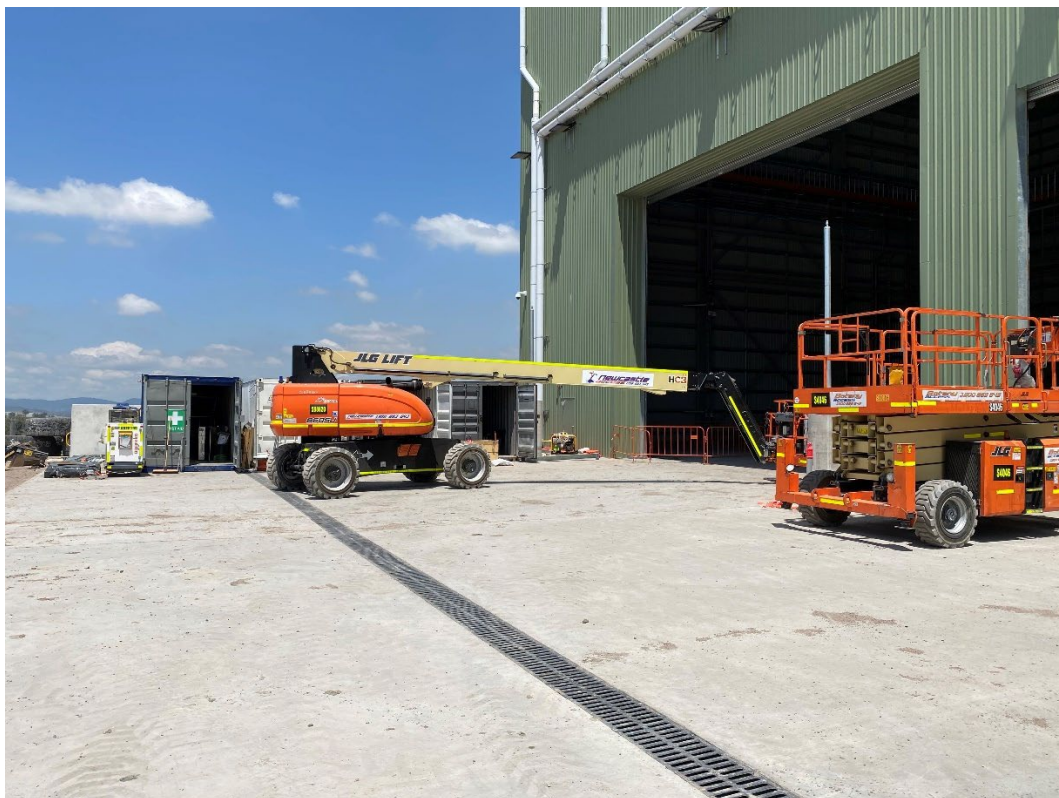


Plate 4 – New workshop lubricant storage with bunded drainage





**Plate 5 – New workshop “Salad bar” which delivers lubricants and oils**



**Plate 6 – New workshop slab with drain to contain runoff**





**Plate 7 –Used machinery tyres used for traffic management around new workshop construction zone**



**Plate 8 – New workshop construction of new stormwater discharge**





**Plate 9 – New workshop stormwater pit for new workshop slab**



**Plate 10 – New workshop oil / water separator for new workshop drainage system**





**Plate 11 – New workshop firefighting infrastructure**



**Plate 12 – Old workshop wash bay and infrastructure, and sump requiring maintenance**





**Plate 13 – Old workshop hydrocarbon cubes on unbanded pallets**



**Plate 14 – Old workshop heavy machinery washdown bay and sump**





**Plate 15 – Old Workshop conducting mobile fleet servicing**



**Plate 16 – Old workshop mixed waste in recycling bin**





**Plate 17 – Existing sewage treatment facility and potable water storage opposite old workshop**



**Plate 18 – Old workshop cubes storage old workshop**





**Plate 19 – Old workshop banded Intermediate Bulk Container storage**



**Plate 20 – Old workshop (temporary) refuelling area which will require remediation**





**Plate 21 – Old workshop IBC storage on bunded pallets**



**Plate 22 – Battery disposal bin**





**Plate 23 – IBC storage and oily drum on wooden pallet requiring attention**



**Plate 24 – Old workshop mixed waste in skip bins with inaccurate or faded labels**





Plate 25 – CHPP coal truck unloading at ROM hopper with little dust observed



Plate 26 – CHPP drainage





**Plate 27 – CHPP with pale eucalypt cladding in good condition**



**Plate 28 – CHPP Reject bin**





**Plate 29 – CHPP equipment laydown (various areas)**



**Plate 30 – CHPP ex-septic tanks to be disposed of in next period**





**Plate 31 –CHPP dam before draining to ED3**



**Plate 32 – CHPP product coal stockpile**





Plate 33 – CHPP signed and banded waste storage area



Plate 34 – CHPP concrete being laid at CHPP to reduce dust





**Plate 35 – CHPP area holding water, works proposed to resolve**



**Plate 36 – Train load out with overflow stockpile**





**Plate 37 – Operational area – demarcated non-disturbance zone “golden area”**



**Plate 38 – Operational area extraction area from the north**





**Plate 39 – Rehabilitation east with rock drains constructed and under construction**



**Plate 40 – Rehabilitation sediment Dam 3 signage with eastern face rehabilitation in the background**





**Plate 41 – Rehabilitation sediment Dam 3 with rehabilitation in the background**



**Plate 42 – Bioremediation area in preparation**





Plate 43 – Onsite tiger Orchid relocation

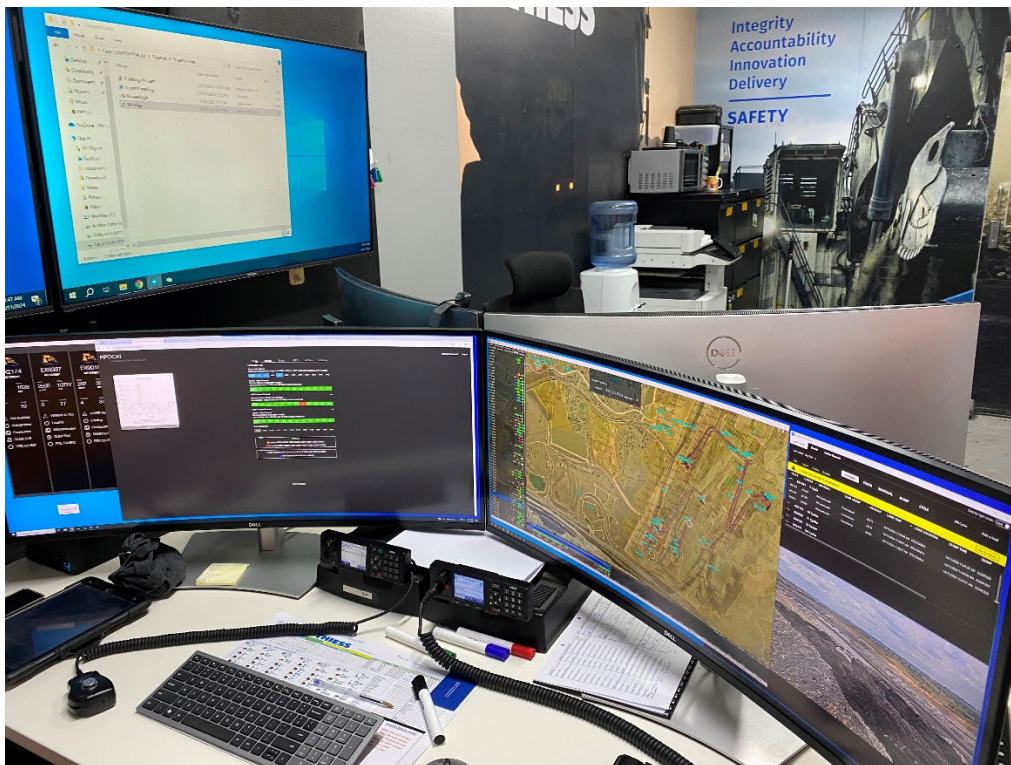


Plate 44 – Tailings dam





**Plate 45 – New workshop with pit in background**



**Plate 46 – Thiess operational control / dispatch room with CAT tool and machinery GPS tracking on screen**





**Plate 47 – Electric vehicle charging station on site and fleet vehicle charging**



**Plate 48 – Admin building extension**





**Plate 1: General view of wooden fence protecting Aboriginal cultural heritage sites 5876-A01 (AHIMS ID# 37-2-6092) and 5876-A02 (AHIMS ID# 37-2-6091), facing east.**



**Plate 2: Close up of reinforced wooden fence and signage, facing north-west.**

**Plate 49 – Excerpt from ‘Mount Pleasant Operations (MPO) - Annual Aboriginal Heritage Site Inspection Report, December 2023’ (Niche E&H) showing wooden fencing around Aboriginal heritage sites**



**Plate 50 – Gum Ridge offset site**





Plate 51 – Gum Ridge offset site



Plate 52 – Gum Ridge offset site ground habitat features

## Appendix E

### Regulatory Correspondence



Our ref: OUT24/15996

Luke Wiggins  
RPS Consulting  
Email: [luke.wiggins@rpsconsulting.com](mailto:luke.wiggins@rpsconsulting.com)

18 October 2024

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Subject: Mount Pleasant Coal Mine - (SSD-10418) - IEA

Dear Luke Wiggins,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
  - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
  - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW - Water Assessments at [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au)

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Z. Baker".

Tim Baker  
Senior Project Officer  
Water Assessments  
NSW Department of Climate Change, Energy, the Environment and Water

**From:** [Theresa Folpp](#)  
**To:** [Wiggins, Luke](#)  
**Cc:** [Sharon Pope](#); [Munro, Dianne](#)  
**Subject:** Mount Pleasant IEA Consultation - MSC Staff Comments  
**Date:** Monday, 28 October 2024 1:05:29 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

Some people who received this message don't often get email from [theresa.folpp@muswellbrook.nsw.gov.au](mailto:theresa.folpp@muswellbrook.nsw.gov.au). [Learn why this is important](#)

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Hi Luke,

Please see comments below.

1. Staff provided comments on the Traffic Management Plan (TMP) in April 2024, which are included in Appendix B of the approved TMP. Although the TMP has been approved by DPHI, it remains unclear whether comments have been incorporated or addressed. Staff regularly encounter this issue with proponents of State Significant Development in the Shire, where consultation does not always allow for sufficient engagement. This often results in proponents not providing feedback on the comments submitted, limiting Staff's ability to assess whether key concerns have been addressed.
2. The Environmental Impact Statement (EIS) for SSD 10418 outlined key social commitments, listed below (EIS, Section 7.17.4). However, it is unclear how progress on these commitments is being reported. Staff would welcome a status update, including any relevant recommendations, as part of the Independent Environmental Audit (IEA).
  - a. *Working with the main contractors on site (i.e. mining services and coal processing) to identify ways to prioritise local employment (existing population) and develop strategies for people to relocate to Muswellbrook, Singleton, and Upper Hunter LGAs;*
  - b. *Include local residential workforce as a Key Performance Indicator in procurement processes for main contractors with associated management, monitoring and reporting; and*
  - c. *Continue to deliver positive social impacts for Aboriginal people with connections to the land and waters on which the Project is located by supporting on-country land management (such as cool burns) and involvement in rehabilitation programs.*
3. Note - Condition B103 of SSD 10418 requires the Proponent to maintain a section of the existing Bengalla Link Road, which is approved for relocation under SSD 5170 for the Bengalla Mine. Staff note that maintenance responsibilities may need to be adjusted during the construction of the realigned Bengalla Link Road, particularly if Bengalla Mine needs to use the existing road for construction purposes.
4. In its response to the EIS for SSD 10418, Council Staff raised concerns about mining-induced seismic activity and recommended the consideration of adaptive management measures. These recommendations were not incorporated by MACH Energy. There has been a notable increase in seismic activity within the Shire recently and although not explicitly included in the Mount Pleasant approval, Staff are keen to understand whether MACH Energy is implementing any adaptive management in response to this issue.

Regards,  
Theresa



**Muswellbrook Shire Council | Theresa Folpp | Environmental Planning Officer | Available Tue - Fri**  
**T:** 02 6549 3700 **E:** [theresa.folpp@muswellbrook.nsw.gov.au](mailto:theresa.folpp@muswellbrook.nsw.gov.au) | [www.muswellbrook.nsw.gov.au](http://www.muswellbrook.nsw.gov.au) |  
*I respectfully acknowledge the local Aboriginal people who are the Traditional Owners and Custodians of the land on which I work*  
Please consider the environment before printing this email

**From:** Wiggins, Luke <[Luke.Wiggins@rpsconsulting.com](mailto:Luke.Wiggins@rpsconsulting.com)>

**Sent:** Friday, October 11, 2024 5:00 PM  
**To:** Theresa Folpp <[Theresa.Folpp@muswellbrook.nsw.gov.au](mailto:Theresa.Folpp@muswellbrook.nsw.gov.au)>  
**Cc:** Munro, Dianne <[Dianne.Munro@rpsconsulting.com](mailto:Dianne.Munro@rpsconsulting.com)>  
**Subject:** Mount Pleasant IEA Consultation

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good day,

RPS has been approved by the Department of Planning and Environment to conduct the 2024 Independent Environmental Audit (IEA) for Mount Pleasant Coal Mine in accordance with SSD10418 and DA92/97. We wish to seek your input into the IEA.

Condition D13 (c) of SSD10418 requires the audit to be carried out in consultation with relevant agencies and the Community Consultative Community (CCC).

*D13. Within one year of commencement of development under this consent, 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:*

- (a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;*
- (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;*
- (c) be carried out in consultation with the relevant agencies and the CCC;**
- (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);*
- (e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent;*
- (f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and*
- (g) be conducted and reported to the satisfaction of the Planning Secretary.*

**In accordance with Condition D13, could you please provide comment on any specific environmental issues you would like covered as part of the IEA.**

We look forward to your response. If you could respond by **24 October** to give us time to implement your input to the IEA it would be appreciated.

Please do not hesitate to call Dianne Munro - Lead Auditor as required on:

Email: [Dianne.Munro@rpsconsulting.com](mailto:Dianne.Munro@rpsconsulting.com)  
Phone: 0437 898 884

Regards,  
**Luke Wiggins**  
Environmental Scientist  
RPS | Australia Asia Pacific  
Unit 2A, 45 Fitzroy Street  
Carrington NSW 2294, Australia  
**T** +61 2 4940 4200 **M** 0456420958  
**E** [luke.wiggins@rpsconsulting.com](mailto:luke.wiggins@rpsconsulting.com)



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We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and community. We pay our respect to them and their cultures and to Elders past and present.  
[Click here](#) to find out more about our Reconciliation Action Plan.

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23 October 2024

**Mr Luke Wiggins**  
**RPS | Australia Asia Pacific**  
**Unit 2A, 45 Fitzroy Street**  
**Carrington NSW 2294**  
**By Email: [Luke.Wiggins@rpsconsulting.com](mailto:Luke.Wiggins@rpsconsulting.com)**

---

Re: Mount Pleasant Coal Mine – Independent Environmental Audit

Dear Mr Wiggins,

Thank you for your email dated 11 October 2024 (our reference: AREQ0058569) requesting consultation on the independent audit to be undertaken of the Mount Pleasant Coal Mine which is covered by mining leases ML1645 (1992), ML1708 (1992), ML1709 (1992), ML1713 (1992), ML1750 (1992) and ML1808 (1992).

The independent environmental audit is required to assess compliance against the relevant environmental management conditions of the mining leases up to 1 July 2022, including implementation of the mining operations plan for the site.

From 2 July 2022, the independent environmental audit should provide an assessment of compliance with the requirements of Schedule 8A Standard conditions of mining leases, Part 2 Standard conditions, as set out in the Mining Regulation 2016. It is noted that the 6 mining leases that comprise the Mount Pleasant Coal Mine have been approved by the Regulator to be treated as a single lease for the purposes of Part 2 of Schedule 8A.

The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice. It would be appreciated if a copy of the final audit report could be sent to the Regulator at [nswresourcesregulator@service-now.com](mailto:nswresourcesregulator@service-now.com) upon completion of the audit.



Sincerely

**Jenny Ehmsen**

Principal Compliance Auditor  
NSW Resources Regulator

## Appendix F

### Audit Guidelines

## AUDIT GUIDELINES

This IEA report has also been prepared in accordance with the Audit Guidelines (DPE, 2020). The table below lists key requirements from the Audit Guidelines, the relevant section of the Guidelines which references the requirement and indicates where each is addressed in this report.

### Audit Guideline Requirements

Section	Description	Where addressed
3.1	<p>Independent Audits must only be undertaken by a suitably qualified, experienced and independent auditor. The independent lead auditor may be supported by a provisional auditor subject to the Planning Secretary's agreement.</p> <p>Conditions of consent may require Independent Audits to be undertaken by auditor and one or more technical specialists. The appointment of the auditor and technical experts must be agreed in writing by the Planning Secretary before each audit is commissioned. Each member of the audit team must receive the Department's agreement.</p> <p>Every audit will require the audit team to be endorsed, unless otherwise agreed by the Planning Secretary i.e. – this is not a one-off approval.</p>	<p><b>Appendix B</b> <b>Appendix C</b> <b>Appendix E</b></p>
3.2	<p>The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.</p> <p>Comments received during such consultation must be recorded and reported in the Independent Audit Report. Specific environmental issues raised during consultation should be investigated and findings of the investigation must be reported in the Independent Audit Report. There may be instances where the consulted parties requests are not reasonable and are outside of scope. In these situations, the auditor must provide justification of how they have considered the matters raised during consultation in the audit report. This justification may be provided in a table format.</p>	<p><b>Section 3.3</b> <b>Appendix E</b></p>
3.3	<p>An Independent Audit must include:</p> <ol style="list-style-type: none"> <li>1. an assessment of compliance with: <ol style="list-style-type: none"> <li>(a) all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;</li> <li>(b) all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and</li> </ol> </li> </ol>	<p><b>Appendix C</b></p>
3.3	<ol style="list-style-type: none"> <li>2. a review of the environmental performance of the development, including but not necessarily limited to, an assessment of: <ol style="list-style-type: none"> <li>(a) actual impacts compared to predicted impacts documented in the environmental impact assessment;</li> <li>(b) the physical extent of the development in comparison with the approved boundary;</li> <li>(c) incidents, non-compliances and complaints that occurred or were made during the audit period;</li> <li>(d) the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and</li> <li>(e) feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during</li> </ol> </li> </ol>	<p><b>Appendix C</b></p>

Section	Description	Where addressed
	the audit period;	
3.3	The status of implementation of previous Independent Audit findings, recommendations and actions (if any);	<b>Section 5.1 Appendix C</b>
3.3	A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and	<b>This IEA Report</b>
3.3	Any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.	<b>Appendix C</b>
3.3	Audits must commence with an opening meeting and conclude with a closing meeting. The meetings must be attended by a representative of the proponent at manager level or above, the auditor and technical specialists (if any). During the opening meeting the objectives of the audit, the scope of the audit, the resources required and methodology to be applied must be discussed. At the closing meeting, preliminary audit findings must be presented, recommendations (if appropriate) must be made, and any post-audit actions must be confirmed. A register of attendees (including their name and position title) for the opening and closing meetings is to be recorded and a copy of the registers provided with the audit report	<b>Appendix A</b>
3.5	Independent Audits must include interviews with key personnel involved in project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. However, note that interviews are generally not sufficient evidence to verify compliance with a condition of consent and additional supporting evidence should be provided. Auditors must be provided with reasonable access to the key site personnel as required by an Independent Audit scope.	<b>Appendix A Appendix C</b>
3.6	Independent Audits must include a physical site inspection. The site inspection must cover all development areas and environmental aspects that form part of the scope of the audit. The proponent must provide the auditor with reasonable access to all requested development areas and activities, understanding that the inspections must be accompanied by the designated site representative and that some areas may not be physically accessible for safety or operational reasons. If the auditor considers restricted access has limited their ability to adequately undertake the audit as scoped, it must be noted in the Independent Audit Report. Recommendations to overcome the restricted access (where feasible) must be proposed for subsequent independent audits	<b>Appendix C Appendix D</b>

Mt Pleasant Coal  
Summary of 2024 Independent Environmental Audit Recommendations and MACH Energy Responses

Source	Ref	Document	Recommendation	MPO Response	Forecast Completion
2023 Audit Ongoing	REC 19		Include the waste management requirements of EPL 20850 Condition O6.1 in the Thiess Mount Pleasant Handling and Disposal of Waste Procedure.	Ongoing This recommendation will be addressed with the next version of the Thiess Mount Pleasant Handling and Disposal of Waste Procedure.	Jun-25
2023 Audit Ongoing	REC 9		Update Table 2-1 of the RMP to include Schedule 3, Condition 54 of DA 92/97.	Ongoing Reviewed RMP Version 2, no references to Condition 54 are made. DA scheduled for relinquishment Feb26.	Jun-25
2023 Audit Ongoing	REC 8		Ensure all chemicals/hydrocarbons are appropriately stored in bunded areas.	Ongoing MACH Energy have commissioned a capital expenditure project to upgrade the MIA infrastructure. This will be completed in early 2025. The new design will address issues with chemical and hydrocarbon storage by increasing bunded storage areas.	Jun-25
2024 Audit Non-Compliance Recommendation	B27 S3 C18	SSD 10418 DA 92/97	<p>2 odour complaints received via EPA:</p> <p>1. 25/06/2024 – spontaneous combustion. Heated area identified by OCE at the time of the complaint, but management measure not identified. Information on off-site PM10 concentrations provided.</p> <p>2. 5/07/2024 – spontaneous combustion. Heated area identified by OCE but management measures not identified. Information on off-site PM10 concentrations provided.</p> <p>Offensive Odours</p> <p>The POEO Act defines an offensive odour as “offensive odour means an odour—</p> <p>(a) that, by reason of its strength, nature, duration, character or quality, or the time at which it is emitted, or any other circumstances—</p> <p>(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or</p> <p>(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, or</p> <p>(b) that is of a strength, nature, duration, character or quality prescribed by the regulations or that is emitted at a time, or in other circumstances, prescribed by the regulations.”</p> <p>The two complaints were potentially triggered by aii in the definition (unable to be confirmed). MACH argued that no evidence was provided by the complainants to demonstrate “unreasonable interference”. MACH was unable to provide evidence to the contrary, resulting in the identified non compliance.</p> <p><b>Recommend that should MACH intend to rely on this argument in future (should complaints / incidents occur), evidence is prepared to demonstrate.</b></p>	<p>MPO continues to proactively manage all spontaneous combustion in accordance with the MPO Spontaneous Combustion Principal Hazard Management Plan (SCPHMP) and the Protection of the Environment Operations Act 1997 (POEO Act)</p> <p>As part of MPO commitment to review its processes and make ongoing improvements, updates have been made to the daily dust management inspection TARP to include checks for odour since the two complaints identified in June and July.</p> <p>Further updates to the TARP will be undertaken following recommendations from the IEA.</p>	Jun-25
2024 Audit Non-Compliance Recommendation	B52 S3 C28	SSD 10418 DA 92/97	<p>The GWMP commits to including reporting on elevation at each bore with water levels being presented in Australian Height Datum (AHD) and depth in the Annual Review. Water levels are presented in depth (as meter below ground level) only.</p> <p><b>Recommendation: Present water levels in both depth and AHD in the Annual Review. Alternatively, with justification seek to remove this requirement from the GWMP (2024).</b></p>	<p>Water levels will be presented in both depth and AHD in future Annual Reviews where the condition remains in the GWMP.</p> <p>Further consideration will be made at the time of the next GWMP review to determine if it is appropriate to remove this requirement. There is <b>not</b> time frame associated with this action.</p>	Mar-25
2024 Audit Continuous Improvement Recommendation	B22 & B24	SSD 10418	Update Blast Management Plan at next review to provide correct MSC website and provide Blasting Hotline number.	The recommendation is noted and the Blast Management Plan will be updated at the next review to provide correct MSC website and provide Blasting Hotline number.	Jun-25
2024 Audit Continuous Improvement Recommendation	B27	SSD 10418	<p>Viewed letter dated 3 July 2024 where MACH responded to the EPA regarding the 25 June 2024 complaint. Action was taken to remediate the spontaneous combustion issue with material utilised to manage it.</p> <p>Viewed letter dated 17 July 2024 where MACH responded to the EPA regarding the 5 July 2024 complaint. The community complainant reported smelly air pollution with the strong smell of rotten egg gas and visible smoke from spontaneous combustion. The complainant was on Wybong Road at the time 500m west of the rail overpass.</p> <p>Improvements have been made to dust management TARP since the incident. The TARP did not previously include a section relating to odour observed offsite. Reviewed dust tarp which now includes the question "Is there any heated material and/or Odour?" Recommend ongoing management of spontaneous combustion and revision of TARP in next audit period to ensure continuous improvement.</p>	<p>MPO continues to proactively manage all spontaneous combustion in accordance with the MPO Spontaneous Combustion Principal Hazard Management Plan (SCPHMP) and the Protection of the Environment Operations Act 1997 (POEO Act)</p> <p>As part of MPO commitment to review its processes and make ongoing improvements, updates have been made to the daily dust management inspection TARP to include checks for odour since the two complaints identified in June and July.</p> <p>Further updates to the TARP will be undertaken following recommendations from the IEA.</p>	Jun-25



Mt Pleasant Coal

Summary of 2024 Independent Environmental Audit Recommendations and MACH Energy Responses

Source	Ref	Document	Recommendation	MPO Response	Forecast Completion
2024 Audit Continuous Improvement Recommendation	B40	SSD10418	Water taken under all water licences (including unregulated river and groundwater licences) should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.	Noted water taken under all water licences (including unregulated river and groundwater licences) be recorded in future Annual Reviews. MPO will ensure that volumes of water taken presented in the Annual Review are consistent and accurate.	Mar-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	<p>Monitoring bores have been in place since 2018 and monitoring is undertaken quarterly. The GWMP commits to establishment of trigger levels for these bores once sufficient monitoring data has been recorded.</p> <p>Current monitoring data is considered sufficient but trigger levels have not been established. Triggers should be established for the Melody and MPBH5 monitoring bores.</p>	<p>There were only two bores that no triggers were set for in the 2024 GWMP, MPBH5 and Melody.</p> <p>Of the 24 possible sampling events MPBH5 has been dry or had insufficient water to sample for all sampling events.</p> <p>Of the 25 Possible sampling events Melody there were only 9 samples of a standard to be sent to the laboratory for analysis. The site was not able to be sampled 3 times due to lack of access, the remainder of the samples were contaminated by fines so unable to be analysed.</p> <p>The suitably qualified expert for the 2024 GWMP (Bryce Mackay of AGE) concluded that there was still a lack of sufficient data to establish trigger levels for MPBH5 and Melody and this position was accepted by DCCEEW-Water in its consultation review of the GWMP and by DPHI in its approval of the GWMP.</p> <p>The GWMP will be reviewed following the submission of the 2024 Annual Review part of this review will include consideration for any changes in trigger levels as a result of the review of the 2024 monitoring results, including MPBH5 and Melody.</p>	Jun-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	Results for annual laboratory analyses of analytes listed in Table 19 of the GWMP (MPO, 2024) should be included in the Annual Review.	Results for annual laboratory analysis of analytes listed in table 19 of the GWMP will be presented in future Annual Reviews	Mar-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	Water taken under all water licences should be recorded in the Annual Review. If no water is taken, this should be stated. MPO should ensure that values for water taken presented in Section 6.4 and 6.5 of the Annual Review are consistent and accurate.	Noted: water taken under all water licences (including unregulated river and groundwater licences) be documented in future Annual Reviews. MPO will ensure that values for water taken presented in the Annual Review are consistent and accurate.	Mar-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	Comparison between the predicted groundwater levels and observed levels is not included in the 2023 Annual Review. This should be included in future Annual Reviews. No evidence was provided to indicate that a suitably qualified hydrogeologist undertook assessment of the modelled and observed water levels. This should also be provided in future.	Noted - A comparison between the predicted groundwater levels and observed levels will be in future Annual Reviews and a suitably qualified hydrogeologist will undertake an assessment of the modelled and observed water levels and this assessment will be included in future Annual Reviews.	Mar-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	The GWMP 2024 commits to privately-owned bores (shown in Figure 8a to 8c and listed in Table 10) being monitored regularly (subject to landholder access) to detect if mining-related drawdown of greater than 2 m occurs or is likely to occur. No evidence was provided to indicate that monitoring of privately-owned bores was undertaken during the audit period and no evidence provided to compare drawdown extents in existing monitoring network with the groundwater model predictions. Now that the GWMP 2024 is in force, this will need to occur. Land access for privately owned bores should be arranged.	Where land access for privately owned bores can be arranged, bores (shown in Figure 8a to 8c and listed in Table 10) will be monitored regularly to detect if mining-related drawdown of greater than 2 m occurs or is likely to occur.	Jun-25
2024 Audit Continuous Improvement Recommendation	B52	SSD 10418	The groundwater model was developed by AGE Consultants in 2020. As per the GWMP 2024, it should undergo review every three years. There was no evidence provided during the audit that the groundwater model has been refined with results from the groundwater monitoring program and no revised groundwater model is reported in the Annual review. There was no evidence to indicate a peer review has occurred. Now that the GWMP 2024 is in force, the MPO groundwater model (AGE Consultants, 2020) should be refined with results from the site groundwater monitoring program and undergo peer review as soon as possible and every three years henceforth.	<p>A review of the numerical groundwater model was conducted by AGE in 2024 as part of a proposed application to modify Development Consent DA 92/97 (known as MOD 7 subsequently withdrawn). This modelling was peer reviewed by Dr Noel Merrick.</p> <p>Ongoing Reviews of the model will be undertaken as required every 3 years with the results to be included in the Annual Review.</p>	NA
2024 Audit Continuous Improvement Recommendation	B81	SSD 10418	<p>Some errors in waste sorting occurring in bins around site and 44 gallon drum with grease inappropriately stored.</p> <p>Recommend refresher training on waste management and clear signage on waste bins following finalisation of new workshop area.</p> <p>Old truck wash also requires regular cleanout was full at time of inspection.</p>	Recommend refresher training on waste management will be undertaken and where deemed appropriate signage on waste bins improved.	Jun-25

**Mt Pleasant Coal**  
**Summary of 2024 Independent Environmental Audit Recommendations and MACH Energy Responses**

Source	Ref	Document	Recommendation	MPO Response	Forecast Completion
2024 Audit Continuous Improvement Recommendation	B93	SSD 10418	The coal transport register in the Annual Review should be updated to track daily amounts of coal transported for next period.	The coal transport register in the Annual Review will be updated to track daily amounts of coal transported for next period.	Mar-25
2024 Audit Continuous Improvement Recommendation	B104	SSD 10418	As the Road Maintenance Plan predates this consent, it is recommended this plan is reviewed and updated (if required) in the next audit period in consultation with Council.	The Road Maintenance Plan will be reviewed and updated (if required).	Jun-25
2024 Audit Continuous Improvement Recommendation	D4	SSD 10418	Potential cause of electrical conductivity should be further investigated in next audit period and considered further.	Noted, potential cause of electrical conductivity will be further investigated in next audit period and considered further.	Mar-26
2024 Audit Continuous Improvement Recommendation	S3 C5	DA 92/97	Check transcription errors in Monthly Environmental Monitoring Reports where exceedances are identified in text but not in numbers.  Check measured cumulative noise is measured as Nil when MPO is inaudible for future exceedance reports.	Noted, future transcription errors in Monthly Environmental Monitoring Reports will be reviewed.  Noted, MPO will check measured cumulative noise is measured as Nil when MPO is inaudible for future exceedance reports.	NA
2024 Audit Continuous Improvement Recommendation	P1.2	EPL 20850	At next EPL variation, the monitoring requirement for Point 14 should be sought to be removed. LR advised on 6 February 2025 that Point 14 has been removed with EPL variation approved 4 December 2024.	Noted	NA
2024 Audit Continuous Improvement Recommendation	P1.4	EPL 20850	Recommend Noise Assessment Groups (NAGs) are updated when EPL is varied in future for SSD consent	Noted	NA
2024 Audit Continuous Improvement Recommendation	L3.1	EPL 20850	Recommend plan is developed for appropriate tyre disposal when use is finished in line with Waste Tyre Disposal Procedure as large volume of tyres was observed on site	Noted, The MPO Handling and Disposal of Waste Procedure will be reviewed in line with the audit recommendation.	Mar-25
2024 Audit Continuous Improvement Recommendation	L4.4	EPL 20850	There is no condition L3.3. At next variation, this should be fixed to L4.3	Noted	NA
2024 Audit Continuous Improvement Recommendation	O3.2	EPL 20850	Ongoing training for controlling dust generation especially during loading to trucks in the pit.	Refresher training will be undertaken.	Jun-25
2024 Audit Continuous Improvement Recommendation	O3.9	EPL 20850	Recommend refresher training for key personnel in dry weather.	Refresher training will be undertaken.	Jun-25
2024 Audit Continuous Improvement Recommendation	O4.1	EPL 20850	There is no discharge utilisation area as such this condition could be updated or deleted at next variation.	Noted	NA
2024 Audit Continuous Improvement Recommendation	M2.1	EPL 20850	Investigate to understand if any practical changes can be made to capture all data.	Management and maintenance practices are in place to ensure high data capture rates, these will continue to be reviewed and updated where required.	NA
2024 Audit Continuous Improvement Recommendation	7	ML Standard Conditions	Since a new final landform is required under SSD 10418, the risk assessment should be reviewed and a new rehabilitation risk assessment performed if required in next audit period.	The risk assessment will be reviewed and a new rehabilitation risk assessment performed if required in next audit period.	Dec-27
2024 Audit Continuous Improvement Recommendation	10(4)(b)	LM Standard Conditions	The Fines Emplacement Area Rehabilitation Strategy should be completed as soon as possible in 2025 as it was committed to be done in 2024.	The Fines Emplacement Area Rehabilitation Strategy will be completed.	Jun-25
2024 Audit Continuous Improvement Recommendation	16 (3)	ML Standard Conditions	The standard conditions of Schedule 8A of the Mining Regulation 2016 should be added to MPO's compliance register to ensure compliance actions are recorded against all of the conditions.	The standard conditions of Schedule 8A of the Mining Regulation 2016 will be added to MPO's compliance register (or similar system) to ensure compliance actions are recorded against all of the conditions.	Dec-25
2024 Audit Continuous Improvement Recommendation	17	ML Standard Conditions	The standard conditions of Schedule 8A of the Mining Regulation 2016 should be added to MPO's compliance register to track compliance actions against all of the conditions	The standard conditions of Schedule 8A of the Mining Regulation 2016 will be added to MPO's compliance register (or similar system) to ensure compliance actions are recorded against all of the conditions.	Dec-25
2024 Audit Continuous Improvement Recommendation	19 (2)	ML Standard Conditions	Contact person and details the Secretary can communicate with in relation to the mining leases for the purposes of the Act should be updated early in 2025.	Noted, Contact person and details the Secretary can communicate with in relation to the mining leases for the purposes of the Act will be updated early in 2025.	Feb-25

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Summary of 2024 Independent Environmental Audit Recommendations and MACH Energy Responses

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2024 Audit Continuous Improvement Recommendation	1	Regulatory Issues	The updated WMP should be lodged for approval in 2025.	Noted, a revised WMP was submitted in December 2024 and approved on 7 February 2025.	Complete
2024 Audit Continuous Improvement Recommendation	2	Incidents	Include a column in its incident summary reporting to indicate if an incident is a complaint for each of interpretation and to assist in identifying any patterns requiring remediation.	Noted, A review of the incident summary report will be undertaken in consideration of the IEA recommendations.	NA
2024 Audit Continuous Improvement Recommendation	3	Incidents	<div>The October 2023 Monthly Environmental Monitoring Report does not mention any adverse weather conditions, even though an adverse weather shutdown was reported on 25 October 2023. Table 6.1 and Table 6.2 mentions that 'results in bold indicate elevated readings during adverse weather conditions', however no results are provided in bold in the report.</div> <div>Adverse weather events are mentioned in future monitoring reports</div>	Noted, Adverse weather events will be mentioned in future monitoring report	NA