

Table 1: Baal Bone Colliery – Response to Audit Recommendations

Ref	Audit Recommendation	Response/Action	Proposed Completion
Project Approval PA 09_0178			
Sch. 3, Cond. 12.	Ensure that air quality is assessed for future proposed rehabilitation activities. Implement necessary air quality controls.	To be added as requirement in Air Quality Monitoring Plan at next review.	30 June 2017
Sch. 3, Cond. 22.	Ensure consistency with the TARPSs between the Surface and Groundwater Response Plan and the Annual Review.	To be revised at next review.	30 June 2017
	Management and reporting as per the TARPs.	As per recommendation.	As required.
Sch. 5, Cond. 1.	Additional details regarding dispute resolution for the projects.	Reference HSEC Conflict Resolution Procedure (BBN SD PRO 0032) in EMS	30 June 2017
	A cross referencing table should be developed in the EMS outlining where conditions/requirements have been met in the EMS document.	Addition of table to be considered at next review.	30 June 2017
Sch. 5, Cond. 2.	All management plans required under the Project Approval are to have input or be prepared by a qualified expert who has been endorsed by the Secretary of the DP&E. Depending on the management plan the qualified expert could be either a specialist or a qualified Glencore employee.	Seek endorsement of experts that have had input in preparing all management plans required under the Project Approval.	30 June 2017
	All management plans should have contingency plans as per sub condition e).	To be included at next review.	30 June 2017
Sch. 5, Cond. 3.	Next Annual Review is to be prepared in accordance with the DP&E guidelines.	The 2016 Annual Review has been completed as per the current DP&E Guidelines.	Complete
	Additional detail required to assess compliance against the MOP (see recommendation from Condition 5 - MPL 261). Section 8 of the Annual Review Guidelines outlines the requirement for a comparison of reporting during the Annual Review period, including a summary of performance against the rehabilitation targets in the MOP. Include a comparison against key rehabilitation criteria from the MOP in the Annual Review to meet this condition.	To be included in 2017 Annual Review as no rehabilitation targets were set for 2016.	31 March 2018
Sch. 5, Cond. 4.	Assess the condition in the Annual Review every year and show that Management Plans have been reviewed. There may not be a requirement to update the management plans annually, however there should be a process	Management Plan reviews occur when required by this condition and are documented in correspondence to DP&E. For future reviews,	As required.

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	documented to meet this condition and identify potential areas of annual improvement. This could include the development of a Management Review Form (component of the Environmental Management System), which would assess key changes to the Environmental Management System every year.	this correspondence shall include a list of management plans which did not require material content changes to be made.	
Sch. 5, Cond. 5.	Ensure any incidents or exceedances are outlined to the DP&E and EPA and any other government agency as per this condition.	As per recommendation.	As required.
Mining Purpose Lease 261			
Cond. 5.	For the next Annual Review the current Annual Review Guidelines should be used. Section 8 of the Annual Review Guidelines outlines the requirement for a comparison of reporting during the Annual Review period, including a summary of performance against the rehabilitation targets in the MOP. Include a comparison against key rehabilitation criteria from the MOP in the Annual Review to meet this condition.	As for PA 09_0178 Sch. 5, Cond. 3 above.	
Mining Lease ML (1302) and Coal Lease (CL 391)			
ML1302 Cond. 4f and CL931 Cond. 3f.	Include a comparison against key rehabilitation criteria from the MOP in the Annual Review to meet this condition.	As for PA 09_0178 Sch. 5, Cond. 3 above.	
Mining Lease ML (1607)			
Cond 5.	Include a comparison against key rehabilitation criteria from the MOP in the Annual Review to meet this condition.	As for PA 09_0178 Sch. 5, Cond. 3 above.	
Additional Recommended Actions for Compliant Conditions			
6.1a	There is a requirement to continue rehabilitation maintenance in established rehabilitation as well as areas recently rehabilitated. The REA5 area which currently is dominated by weeds will need additional weed management if native species do not start to compete against the exotic species. If weed cover is still very high in April 2017, SLR recommends further weed management work.	Baal Bone will engage a suitably qualified expert to provide advice on the best method of weed management in the REA5 area.	31 August 2017

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	Where possible, seed for rehabilitation activities should be sourced from site or the local area.		
6.1b	SLR noted during the site inspection that some topsoil stockpiles are very close to the 3 metre height requirement. SLR recommends that these stockpiles are seeded as material appears to have high erodibility and is dispersive. This material should also be tested prior to use in rehabilitation, with other ameliorants possibly required to treat the topsoil stockpiles.	As Baal Bone plans to commence rehabilitation activities using this material, it has been deemed unnecessary to seed it. Testing of material has already occurred to determine ameliorant requirements for rehabilitation.	N/A
6.2a	Additional detail should be included in the Water Management Plan (WMP) including a figure of the water management system. A delineation between the dirty water management system and clean water management should be outlined in the figure and further defined within the management plan.	There is no distinct clean water management system at Baal Bone. All water on site is captured and treated in a similar manner.	N/A
6.2b	Additional water management could be completed in the area of REA5. Currently water leaves the REA5 area, with most of the water draining into a sediment dam. Eventually this water leaves site via the overshoot weir after traversing the length of Ben Bullen creek on site, including passing through the overshoot dam. SLR recommends making defined drainage line/bank which is long-term stable (eg. shaped and grassed) which flows into the sediment dam. This would assist in reducing sediment flowing into Ben Bullen Creek. It was noted that the haybales which are used for erosion and sediment control have been installed incorrectly and should be installed as per the requirement of the Blue Book.	Modifications to water flow across REA5 will be considered during the preparation of Baal Bone's Closure MOP which is scheduled for completion in August 2017.	31 August 2017
6.3a	For future channel stability and stream health monitoring, completion criteria from the Ben Bullen Creek Rehabilitation Plan and the MOP should be used. Review whether these criteria are also relevant for other creeks including monitoring of Cox's River, Baal Bone Creek and Jews Creek. Additional details of monitoring should be included in the Annual Review.	Completion Criteria from the Ben Bullen Creek Rehabilitation plan will be incorporated into Baal Bone's Closure MOP. Once approved, these criteria will be used in future channel stability and stream health monitoring and a review will be conducted as to their relevance for other creeks.	31 August 2018

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6.3b	SLR recommends that Baal Bone develop a schedule outlining proposed rehabilitation activities for Ben Bullen Creek and provide these details in the Annual Review. Baal Bone to report against these proposed activities in subsequent Annual Reviews.	This will occur as a part of the development of Baal Bone's Closure MOP which is scheduled for completion in August 2017.	31 August 2017
6.4a	Subsidence repair of the shallow cover area is required. Additional detail should be provided for subsidence repair based on the issues outlined in the risk assessment. This should include proposed dimensions of impacts eg. length of cracks, area covered, proposed volume to fill cracks. The Review of Environmental Factors (REF) which is to be submitted in 2017 should outline all proposed subsidence remediation areas as per the agreement with DRE and Forests NSW. Subsidence impacts should be repaired unless repair would cause further damage within the area. The cost of these repairs should be calculated prior to commencing works and the rehabilitation cost estimate updated based on these estimated costs. All repairs should be completed in consultation with DRE and Forests NSW.	All repairs of cracks on Forestry Corporation of NSW land were completed in February 2017.	Complete
6.4d	SLR recommends the subsidence inspections in the future could be designed to assess against performance measures in the Project Approval table (Schedule 3 Condition 1). Some may not be applicable for the site being in care and maintenance, however a review of results against these conditions would assist in determining any unexpected impacts. Additional detail is required in subsidence inspections such as improved figures differentiating between high, low and medium risk subsidence areas.	No further subsidence inspections will be undertaken by Baal Bone as all subsidence areas have been inspected and remediated.	N/A
6.4e	Additional detail regarding subsidence impacts and remediation should be outlined within the Annual Review.	To be included in 2017 Annual Review as remediation works were carried out in February 2017.	31 March 2018
6.5	In future noise reports should identify the source of the meteorological data utilised to confirm the occurrence of temperature inversion conditions.	To be included by noise monitoring contractor in future reports.	Ongoing
6.6	There is an opportunity to remove some unwanted equipment on site. This should be identified in an equipment register.	Equipment register to be developed identifying all equipment on site.	30 December 2017

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6.7a	All management plans should include a table cross referencing the requirements in Schedule 5 Condition 2 of the Project Approval, with the relevant sections of management plans.	To be included at next review.	30 June 2017
6.7b	SLR recommends that one document should be prepared to cover the overall Water Management Plan, with chapters for each component required under Schedule 3 Condition 16 - 22. This would reduce the repetition for each of the component plans required under the overall Water Management Plan. Ensure consultation with NSW Fisheries for the latest update of Water Management Plan.	Consider amalgamation of Water Management Plans into one document. Consult with DPI Fisheries on next review.	30 June 2017 30 June 2017
6.7c	The copy of the Biodiversity Management Plan should be provided to OEH.	Biodiversity Management Plan to be sent to OEH.	30 June 2017
6.8	SLR recommends sending off a copy of the MOP to OEH, DPI Water and Council as they may not currently have a copy of the document. This relates to Schedule 3 Condition 25 of the Project Approval.	MOP to be sent to OEH, DPI Water and Lithgow City Council.	30 June 2017