

**BAAL BONE
UNDERGROUND**
GLENCORE

Table 1: Baal Bone Colliery - Response to Audit Recommendations relating to non-compliances

Reference	Audit Recommendation	Response/Action	Proposed Completion
Project Approval 09_0178			
Schedule 2, Condition 11	Include reference to AS 2601-2001 Standard and summary of requirements for demolition in relevant documentation for Mine Closure phase.	Reference to AS 2601-2001 to be included in relevant documentation for Mine Closure phase.	Ongoing
Schedule 3, Condition 21	Revisit the zinc trigger levels for BBPB3 in consultation with DPIE for the closure stage.	Consultant to be engaged to further investigate. Consideration to be given to calibrating the groundwater triggers to site specific conditions if appropriate.	30 March 2021
Environment Protection Licence 765			
P1.3	Although current monitoring plan appears consistent with the current EPL text, at next EPL Variation, update 2012 figure for 2019/2020 plan.	EPL 765 was varied on 21 February 2020. The varied licence now refers to an updated monitoring plan.	Complete
Consolidated Coal Lease (CCL749)			
Condition 33	DSCL is consulted six-monthly for site-wide rehabilitation or written exemption sought from DRG if it can be justified.	An action is in place. Consultation recommenced in December 2019 prior to this audit occurring.	Ongoing.

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Table 2: Baal Bone Colliery - Response to Audit Recommendations for continual improvement

Reference	Audit Recommendation	Response/Action	Proposed Completion
Project Approval 09_0178			
Schedule 2, Condition 11	Add a note in future Annual Reviews regarding demolition undertaken in the period.	To be included in 2019 Annual Review.	31st March 2020
Schedule 3, Condition 1	Create a single register for all known existing subsidence repairs and a clear process for sign-off of each occasion and actions to be documented to completion.	Register and process to be established for any known existing subsidence impacts.	30 October 2020
Schedule 3, Condition 10	Consider reduction in the number of air quality monitoring points during Mine Closure. Potential to relocate monitor DM2 to be representative of closest residence and remove others.	Consideration to be given to a reduction in the number of air quality monitoring points during the next management plan review.	31 July 2020
Schedule 3, Condition 16 (a)	“By 31 December 2019, the licensee must cease all mine water discharge from licenced discharge point 11 (LDPO011)”. Update water balance in the Water Management Plan to reflect the change in discharge regime.	Discharge ceased on 17 December 2019. Water balance to be updated as appropriate at next management plan review.	31 July 2020
Schedule 3, Condition 16 (b)	It is understood that the groundwater model will be updated in early 2020 to incorporate the abovementioned change in discharge. Recommend that following receipt of 2020 report and confirmation of any water take or ongoing discharge required (considered unlikely), confirmation that no security and relinquishment of a relevant groundwater licences under the Water Management Act 2000 is required.	Groundwater model to be reviewed and reflect this change. Identify whether there are any changes required in regards to relevant groundwater licences.	30 September 2020.
Schedule 3, Condition 16 (c)	Although the Water Management Plan was approved, recommend that for future updates where consultation with other regulators is required, that regulators are offered an opportunity to comment for a duration of at least 30 days prior to submission to DPIE for approval.	Future Management Plan updates to allow for thirty day response period by regulators.	Ongoing

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Schedule 3, Condition 19 (a)	Minesoils recommends the site forms a register of water management structures with locations shown on Geographic Information Systems (GIS) and linked to original design drawings and maintenance inspections. This should include drop structures, banks, dams, diversion drains and Ben Bullen creek diversion.	To be considered at next management plan review.	31 July 2020
Schedule 3, Condition 19 (b)	The site visited identified an area requiring bunding between Jews and Baal Bone Creek in the Northern Rehabilitation Area (Plate 10). Recommend this area be urgently reviewed and bunded as required.	This area has now had the bund reinstated.	Complete
Schedule 3, Condition 23	Include a discussion within relevant documentation on bushfire management, specifically in and/or near the Wolgan Escarpment.	To be considered at next review of Bushfire Preparedness System.	31 December 2020
Schedule 3, Condition 24 (a)	Surface water structures including banks, drop structures and dams need to be inspected and any failures or high-risk items should be repaired.	Monthly Rehabilitation Inspection form has been expanded to include further detail on inspecting dams and other structures as required in Erosion and Sediment Control Plan.	Complete
Schedule 3, Condition 24 (b)	It was noted on Thistle Hill, one contour drain was not repaired following a track to the top was installed to bring in and place soil material on the top section. This drain requires immediate attention so water can be transferred to the designed drop structure (Plate 4).	Repairs to be made to this contour drain.	30 April 2020
Schedule 3, Condition 24 (c)	Weeds were evident onsite including blackberry. It is understood weed maintenance occurs regularly onsite and should continue, an especially high risk period will be following decent rain.	Weed management will continue to occur.	Ongoing
Schedule 3, Condition 24 (d)	REA5 showed two areas of complete failure. Minesoils recommends soil tests for Electrical Conductivity (EC), pH, Cation Exchange Capacity (CEC) and Exchangeable	Consideration to be given to soil testing being undertaken. This area will be subject to rehabilitation efforts as part of the closure	Ongoing

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	Sodium Percentage. It appears these two areas have received and pooled saline water from irrigation which has resulted in an area too salty for most vegetation. Some simple soil tests will indicate if this is true. In the event salinity is the limiting factor it is recommended to either leach the salts through the primary root zone via natural rainfall (slow) or irrigate with non-saline water. Alternatively, bring in additional material suitable for growth medium, subject to relevant approvals.	phase of the operation.	
Schedule 3, Condition 24 (e)	REA5: The remainder of REA5 showed no acacia species established (Plate 6). This is believed to have occurred due to the tree seed not being treated prior to sowing. Most acacia species require a mechanism to break the seedcoat such as boiling, scarifying or low heat fire. It is recommended that low depth (<300mm surface ripping be strategically undertaken to avoid areas already establishing with Eucalypts. Additional seed mix (especially Acacia species) should then be treated, brought in and sown in the newly ripped areas. Recommended REA 5 repair mix includes Capertee Stringybark (as per SoC 31)	This area will be subject to rehabilitation efforts as part of the closure phase of the operation. Capertee Stringybark is listed in the Project Closure Plan Revegetation Species List.	Ongoing
Schedule 3, Condition 24 (f)	Overall the rehabilitation is establishing adequately in most areas (Plate 5,7), however recommend additional intervention is required to meet target species composition (especially the lower storey species) within a timeframe suitable for lease relinquishment.	Additional intervention will occur throughout the closure phase of the operation to ensure compliance with completion criteria associated with species composition.	Ongoing
Schedule 3, Condition 24 (g)	Recommend that the stockpiles identified in the 2016 IEA (Ref 6.1b of the 2016 IEA Action Plan) be seeded as per 2016 IEA recommendation during rehabilitation / closure period if not used within three months.	Stockpiles to be seeded where required.	28 May 2020

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Schedule 3, Condition 31	Consistent with previous IEA recommendation, site inspection reviewed significant capacity for ongoing scrap steel recycling and general waste clean-up which should be continued as part of closure, as Glencore indicated is proposed (Plate 15 and Plate 16).	Occurring as part of closure activities.	Ongoing.
Schedule 5, Condition 2 (a)	Recommend for closure, re-approve specialists where required.	To be considered at next management plan review.	31 July 2020
Schedule 5, Condition 2 (b)	Consideration of combining all relevant management plans from this consent into single, reduced Closure Management Plan relevant to closure (Noise, Air Quality, Aboriginal Cultural Heritage, Biodiversity and Land Management, Rehabilitation, Erosion and Sediment Control, Groundwater Monitoring, Surface Water Monitoring, Waste and Water, Road Haulage) (with approval from DPIE) and/or include single document as appendix to draft Mine Closure MOP.	To be considered at next management plan review.	31 July 2020
Schedule 5, Condition 2 (c)	In management plan update: <ul style="list-style-type: none"> • Tabulate condition showing where each point is addressed; • Ensure that all agencies are consulted with during preparation of management plan; and • All technical specialists, where required by conditions of consent to be approved by the Secretary. 	To be considered at next management plan review.	31 July 2020

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Schedule 5, Condition 3 (a)	Consider request to DPIE to reduce the content of the Annual Review commensurate with closure status	To be considered for 2020 Annual Review.	31 March 2021
Schedule 5, Condition 3 (b)	b) replace “comprehensive” with “relevant” and not address i to iii which are not included in the EA;	Consideration to be given to seeking consent to have the recommended changes made to the Project Approval.	31 March 2021
Schedule 5, Condition 3 (c)	d and e) not address as trends during operations cannot be compared to trends during closure.	Consideration to be given to seeking consent to have the recommended changes made to the Project Approval.	31 March 2021
Consolidated Coal Lease (CCL) 749			
Condition 5	Going forward, ensure the Domain’s listed table in Section 7.4.2 of the Annual Review correlate to Section 6 of the draft Closure MOP.	To be considered for 2020 Annual Review.	31 March 2021
Condition 32	Warragamba Outer Catchment Area be shown on a draft Closure MOP figure to ensure that work in relation to rehabilitation is completed before termination of the authority.	Consideration to be given to having a figure reflect information that is currently available in relation to the Warragamba Outer Catchment Area at the next review of the current MOP.	Ongoing
Previous IEA Recommendations			
21	6.7a) Recommend at next review, that 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, consistent with previous audit recommendation.	To be completed at next management plan review.	31 July 2020
23	6.7c) The copy of the Biodiversity Management Plan should be provided to OEH for consultation.	To be completed at next management plan review.	31 July 2020