

## Duralie Coal Mine - Independent Environmental Audit 2017

### Response to Recommendations

Audit Recommendations				
Audit Reference	Condition	Management Area	Recommendation	Stratford Coal Response
<b>Previous Audit Recommendations</b>				
1	Table 2	Administrative	Recommend a summary report following analysis of the inversion data is forwarded to EPA/OEH for consideration in any EPL variation.	DCPL accepts the recommendation.
<b>PA 08-0203 Non-compliance Recommendations</b>				
2	Sch 3, Con 9	Blasting	Written approval should be obtained from the Secretary for any blasts outside approved hours.	DCPL accepts the recommendation.
3	Sch 3, Con 17	Geochemistry	Strict PAF management must be continued to ensure odour events are minimised.	DCPL accepts the recommendation. PAF management measures have been implemented and are ongoing.
4	Sch 3, Con 43	Biodiversity	The BMP should be updated to outline how measures relating to rehabilitation of creeks and drainage lines seek to ensure no net loss of stream length and aquatic habitat.	DCPL accepts the recommendation. Update with next BMP revision.
5	Sch 3, Con 48	Administrative	Times should be recorded and screenshots taken in the future for updating the website on a fortnightly basis to confirm compliance with this condition and request amendment of condition at next modification.	DCPL accepts the recommendation.
<b>PA 08-0203 Continual Improvement Recommendations</b>				
6	Sch 2, Con 8	Trains	Scheduling of trains should be reviewed to ensure all scheduled train movements occur within the Conditions of Consent. A train was scheduled at 5.50am but did not depart until 6am.	DCPL accepts the recommendation.
7	Sch 2, Con 8A	Administrative	Recommend that times are recorded in the future with screenshot taken for updating the website within 12 hours of operating shuttle trains on the North Coast railway between midnight and 1am in exceptional circumstances to confirm compliance with this condition.	DCPL accepts the recommendation.
8	Sch 3, Con 2	Noise	A review of the NMP is required to ensure that it clearly stipulates internal monitoring sites or where a private Agreement to exceed relevant criteria as advised to DP&E applies; and those sites which are representative of private receivers and as such consent criteria does apply. It needs to be confirmed which noise monitoring sites apply to each closest private receiver. Where noise monitoring sites are representative of private receivers, but the noise monitoring is on mine owned land, the relevant criteria the private house should be stipulated (derived from modelling) and approved by DP&E.	DCPL accepts the recommendation. Revised noise monitoring locations would be proposed in consultation with DP&E to represent private receivers. Update with next NMP revision.
9	Sch 3, Con 7	Noise	Consultation with the EPA should be undertaken for future updates of the NMP or DP&E approval, particularly where plans are being updated for closure status.	DCPL accepts the recommendation.
10	Sch 3, Con 29	Water	Any future updates to the SWMP include additional details on the final void design, Coal Shaft Creek reconstruction, closure objectives and specific performance criteria.	DCPL accepts the recommendation. Update with next WMP revision.
11	Sch 3, Con 32	Administrative	Revision status register in the GBFMP to be updated to indicate if the current version is approved by DP&E and evidence of such approval included within the plan.	DCPL accepts the recommendation. Update with next GBFMP revision.

12	Sch 3, Con 39	Biodiversity	Hollow bearing habitat features should be introduced into revegetated areas.	Action included in the BMP. Hollow bearing habitat features would be installed following the establishment of vegetation in the biodiversity offset revegetation areas.
13	Sch 3, Con 43	Biodiversity	The BMP should be updated to outline how measures relating to rehabilitation of creeks and drainage lines seek to ensure no net loss of stream length and aquatic habitat.	DCPL accepts the recommendation. Update with next BMP revision.
14	Sch 3, Con 44	Biodiversity	Conservation bond is reviewed and revised as required, due to update of BMP in 2017.	DCPL accepts the recommendation. The BMP would be revised and the conservation bond reviewed during 2018.
15	Sch 3, Con 48	Administrative	The audit has no means of determining whether the records of exceptional circumstances have been made available on a fortnightly basis on DCPL's website. It is recommended that times and dates are recorded or screenshot taken to demonstrate compliance with this condition.	DCPL accepts the recommendation.
16	Sch 3, Con 55	Rehabilitation	Recommend Annual Reviews discuss the Rehabilitation objectives in Table 12 of this condition and discuss how each is being met or worked towards.	DCPL accepts the recommendation. Include in next Annual Review.
<b>EPL 11701 Continual Improvement Recommendations</b>				
17	P1	Air Quality	Recommend considering justifying and removal of dust gauges and modify commensurate with closure status. AQMP would also require update for consistency.	DCPL accepts the recommendation. EPL variation to be considered during closure phase.
18	L4.2	Noise	A discussion with the EPA is recommended with the aim of modifying this condition to permit acoustically equivalent locations to be adopted for the noise compliance measurements to minimise disturbance to residents. NMP would also required update.	DCPL accepts the recommendation. Revised noise monitoring locations would be proposed in consultation with DP&E and EPA to represent private receivers. Update with next NMP revision.
19	O5.1	Administrative	Recommend the last sentence of this condition is removed at next variation request, relating to the development of an emergency response plan as the date has been superseded and is no longer relevant.	DCPL accepts the recommendation. Revise with next EPL variation.
20	M9	Noise	Recommend this condition is removed. Condition relates to submitting a noise compliance report within 30 days of the completion of quarterly monitoring.	DCPL accepts the recommendation. Revise with next EPL variation.
<b>ML 1646 Non-compliance Recommendations</b>				
21	5	Administrative	Recommend that any incidents that meet the definition under this condition are reported to DRG in the future	DCPL accepts the recommendation.
<b>General Recommendations</b>				
22		Administration	All approval and consultation letters are appended to management plans appendices in the future.	DCPL accepts the recommendation.
23		Administration	It is recommended that consultation is undertaken for any future revisions to management plans or approval from DP&E sought not to consult.	DCPL accepts the recommendation. DCPL will undertake consultation on all management plans and revisions as required by the Development Consent conditions.
24		Air	Amend sentence in the AQGGMP Section 3.1.1 that states no PM2.5 criteria in NSW to reflect recent legislative changes at next update.	DCPL accepts the recommendation. Update with next AQGGMP revision.
25		Consultation	Recommend that consultation with regulatory departments is undertaken for updates of management plans or approval from DP&E is sought to not consult.	DCPL accepts the recommendation. DCPL will undertake consultation on all management plans and revisions as required by the Development Consent conditions.
26		Ecology	Table 7 of the BMP contains an incorrect reference to Section 6.13 for a discussion on canopy bridges. This should be updated to Section 6.14 when BMP next revised.	DCPL accepts the recommendation. Update with next BMP revision.

27		<b>Ecology</b>	<p>It is recommended that the BMP is updated with the following changes when next revised as suggested by KW:</p> <ul style="list-style-type: none"> <li>• Table 10 of the BMP is updated to include details for the Varied Sittella for consistency. Additionally, given that the BMP addresses multiple offsetting requirements, it is recommended that the BMP includes a summary table indicating the list of threatened fauna species recorded within the surface development area and the areas of habitat (current and future) within each of the different offset areas;</li> <li>• allowance for installation of hollow-bearing habitat features within revegetation areas;</li> <li>• Include clear short, medium and long term measures for the offset areas, or indicate that medium and long term measures have been amalgamated; and</li> <li>• Include the requirement for the submission of records of captured individuals of Threatened species.</li> </ul>	DCPL accepts the recommendation. Update with next BMP revision.
28		<b>Rehabilitation</b>	<p>The following recommendations were made by CR:</p> <ul style="list-style-type: none"> <li>• Continue rehabilitation techniques along eastern edge of mine area and apply upon the final shaping of the overburden emplacements. Continue to monitor and manage weed species as required;</li> <li>• Continue to monitor and manage weed species and species diversity as required in the mine rehabilitation to forest community; and</li> <li>• Continue same process of rehabilitation as per previous efforts in shaped and topsoiled areas to ensure consistent results (CR, 2018).</li> </ul>	DCPL accepts the recommendation.
29		<b>Spontaneous Combustion</b>	<p>Outcomes from the actions in the DCPL response letter (dated 23/09/16) to the Spontaneous Combustion incident on 29 July 2016 should be included in the next Annual Review.</p>	DCPL accepts the recommendation. Include in next Annual Review.
30		<b>Training</b>	<p>Induction (and log on induction) is improved by adding additional detail such as the general management processes used for dust, noise, water, odour and heritage on site as well as identifying any of the sensitive areas in relation to these.</p>	SCPL accepts the recommendation. Review of the Stratford Coal inductions packages commenced in February 2018.
31		<b>Training</b>	<p>Recommend that the induction package includes PIRMP (list of inclusions in Section 11) and an assessment of competency.</p>	SCPL accepts the recommendation. Review of the Stratford Coal inductions packages commenced in February 2018.
32		<b>Waste</b>	<p>Recommend update contractor to JR Richards in Section 5 of the WaMP.</p>	DCPL accepts the recommendation.
33		<b>Waste</b>	<p>Section 7 of the WaMP references a Community Management and separate Coordinator. Recommend this is updated to current.</p>	DCPL accepts the recommendation.
34		<b>Water</b>	<p>Actions should be taken to ensure any outstanding actions from the dams compliance audit are addressed.</p>	DCPL accepts the recommendation.