

**Attachment B: Actions to Address 2018 Independent Environmental Audit Recommendations**

**Table 1 – Actions to Address Non-Compliances against Development Consent SSD-6764**

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
Schedule 3, Condition 19(a)	Implement all reasonable and feasible measures to minimise the off-site odour, fume, spontaneous combustion and dust emissions of the development;	<p>With regards to the generation of dust WCPL received a formal warning letter on 08 February 2018 from the EPA following an unannounced visit to site on 17 January 2018. The EPA officer identified excessive dust emissions from the mine as a result of activities being undertaken in pit 7 and pit 4. The inspection also identified a dust haze in the area around the mine when compared to that of the Ulan area.</p> <p>The EPA contacted the WCPL E&amp;C Manager at the time of the observations and as a result WCPL ceased activities in the areas of concern and increased the use of water carts.</p> <p>The EPA considered the event to be a breach of the sites EPL conditions (Condition O3.1) and as a result issued the site with a formal warning.</p> <p>This condition was found to be non-compliant on the basis that the EPA found WCPL to be in breach of EPL 12425 requirements O3.1 which requires the following, <i>“All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises”</i>.</p> <p>Management measures in place at the time of the audit site inspection were reasonable and feasible and as such no recommendation has been made.</p>	<p>Although no recommendations were made by the Auditors based on WCPL’s current dust management measures considered satisfactory during the IEA, WCPL do however proposed the following additional actions to ensure ongoing improvements in relation to air quality management. These actions include:</p> <ul style="list-style-type: none"> <li>• A review of the existing Air Quality Management Plan (AQMP) and Spontaneous Combustion Management Plan (SCMP) to reflect the current monitoring conducted in relation to spontaneous combustion. Remove reference to monitoring requirements relating to the Keylah Dump Removal.</li> <li>• Refresher training for operational personnel in the form of Tool Box Talks regarding dust management and responsibilities.</li> </ul>	Within 3 months of the DP&E acceptance of this submission of the IEA and actions to address audit recommendations.

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
Schedule 3, Condition 31	The Applicant must implement the approved Water Management Plan for the development.	<p>The audit team's surface water specialist reviewed management measures in place on site at WCPL during the audit site inspection. The surface water specialist concluded that there are some discrepancies between the approved SWMP, and its implementation on site. In particular relating to sediment basins and up-stream diversions that are depicted in the SWMP but have not been constructed.</p> <p>Operations on site appeared to manage water effectively with minimal risk for offsite transport of water, however on the basis that the approved SWMP did not reflect the current operations, this Condition has been assessed as non-compliant.</p>	<p>WCPL propose the following actions to the Water Management Plan (WMP). These actions include:</p> <ul style="list-style-type: none"> <li>• A review of the existing Surface Water Management Plan (SWMP) to include a detailed description of the assessment process for not adopting clean water diversions, based on further specialist reviews that can clearly identify when a clean water diversion is not adopted by WCPL, this decision can demonstrate the least net impact on the environment or presents the lowest longer term risk; and</li> <li>• A review of the Site Water Balance if diversions are not adopted to account for in each annual review of the site water balance and calculation of harvestable right.</li> </ul>	Within 4 months of the DP&E acceptance of this submission of the IEA and actions to address audit recommendations.
Schedule 3, Condition 37	<p>Within 6 months of the commencement of development under this consent, or as otherwise agreed by the Secretary, the Applicant must, in consultation with OEH, the Department and DoEE and to the satisfaction of the Secretary, develop suitable rehabilitation performance and completion criteria for:</p> <p>(a) the BVTs in Tables 8 and 9; and</p> <p>(b) Regent Honeyeater habitat.</p> <p>The performance and completion criteria must</p>	<p>WCPL submitted Draft BVT Performance and Completion Criteria for the BVTs listed in Tables 8 and 9 of the Development Consent and Regent Honeyeater Habitat to OEH, DoEE for consultation on the 19.02.18.</p> <p>DoEE responded by email dated 13.03.18 that it was not commenting on the Draft Performance and Completion Criteria at this time.</p> <p>OEH provided comments on the Draft Performance and Completion Criteria including recommendations by letter dated 14.03.18.</p> <p>WCPL made amendments to its Proposed BVT Performance and Completion Criteria and provided this together with its response to each of the OEH comments to the DPE by letter dated 19.03.18 (within six months of the commencement of development). At the time of writing (October 2018) the DPE was yet to respond.</p> <p>On the basis that confirmation of the satisfaction of the DPE was not received within 6 months of the</p>	<p>WCPL propose the following actions to the Biodiversity Management Plan (BMP). These actions include:</p> <ul style="list-style-type: none"> <li>• Continue to work with DP&amp;E and OEH to finalise the BVT Performance and Completion Criteria;</li> <li>• Update the BMP accordingly to reflect the final and agreed BVT Performance and Completion Criteria once approved by the Secretary; and</li> <li>• Review the Mining Operations Plan (the MOP) to align with the BVT Performance and Completion Criteria once approved by the Secretary and resubmit the MOP for approval by the DRG.</li> </ul>	Within 3 months of the DP&E acceptance of this submission of the IEA and actions to address audit recommendations, subject to DP&E notifying WCPL of the Secretary's satisfaction with the proposed BVT Performance and Completion Criteria.

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
	include consideration of the effect of climatic conditions, such as drought, and the NSW Biodiversity Offsets Policy for Major Projects 2014 and the associated Fact sheet: Mine Site Rehabilitation (OEH, 2014).	<p>commencement of the development (March 2018), this condition is considered noncompliant.</p> <p>It is noted that the DPE has had the revised Draft Criteria for seven months and has not provided further feedback or approval of the Criteria and this has led to the timeframe not being met. WCPL personnel indicated they believed the intent of this Condition was to submit the Draft BVT Performance and Completion Criteria within six months of the commencement of development.</p>		
Schedule 3, Condition 61	Within 6 months of the commencement of development under this consent, unless the Secretary agrees otherwise, the Applicant must prepare a Rehabilitation Strategy to the satisfaction of the Secretary.	A Rehabilitation Strategy (March 2018) was prepared and submitted to the DPE for approval on the 19 March 2018. At the time of writing, (October 2018) WCPL was yet to receive confirmation from the DPE that the Strategy was prepared to its satisfaction and on this basis, this Condition has been assessed as non-compliant. WCPL personnel indicated they believed the intent of this Condition was to submit the Draft Rehabilitation Strategy within six months of the commencement of development.	<p>WCPL propose the following actions to the Rehabilitation Strategy. These actions include:</p> <ul style="list-style-type: none"> <li>• Continue to work with the DP&amp;E to obtain feedback on whether the Rehabilitation Strategy has been prepared to the DP&amp;E's satisfaction; and</li> <li>• Review the Mining Operations Plan (the MOP) to align with the Rehabilitation Strategy, once approved by the Secretary, and resubmit the MOP for approval by the DRG.</li> </ul>	Within 3 months of the DP&E acceptance of this submission of the IEA and actions to address audit recommendations, subject to DP&E notifying WCPL of the Secretary's satisfaction with the proposed Rehabilitation Strategy.

**Table 2 – Actions to Address Non-Compliances against Environmental Protection License 14546**

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
Conditions M2.1 and M2.2	<p>For each monitoring/ discharge point or utilisation area specified below (by a point number), the licensee must 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>	<p>WCPL reported non-compliances against condition M2.2 in the 2017/18 Annual Return. The non-compliances were due to equipment issues which resulted in a gap of continuous monitoring at points 13, 20, 25 and 28.</p> <p>WCPL reported that in response to these failures the site replaced HV1 while repairs were made to the unit, in addition TEOM 3 was reportedly checked monthly on site, remotely each day and as soon as possible when equipment issues are identified. Periodic checking of TEOM data by Dispatch Operators was observed during the site inspection. During the site inspection it was reported that monitors are also checked on a daily basis, Monday to Friday by the E&amp;C team and the Service Provider.</p> <p>No further recommendations are considered necessary.</p>	<p>Although no recommendations were made by the Auditors based on WCPL's current dust management measures considered satisfactory during the IEA, WCPL do however proposed the following additional actions to ensure ongoing improvements in relation to air quality management. These actions include:</p> <ul style="list-style-type: none"> <li>Continuation of daily checking of air quality monitoring equipment via the providers repository website, to minimise monitoring disruptions as a result of equipment failure and/or unplanned power outages.</li> </ul>	<p>Implement after DP&amp;E acceptance of this submission of the IEA and actions to address audit recommendations.</p>
Condition M4.2	<p>For each monitoring point specified in the table below the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency specified opposite in the other columns.</p>	<p>Due to general maintenance or equipment issues in 2017, continuous monitoring for air temperature, wind speed/direction, lapse rate, rainfall and humidity did not occur for 1.6% of the reporting period. This was reported as a non-compliance against Condition M4.2 in the 2017/18 Annual Return.</p> <p>In response to the non-compliance WCPL committed to remotely checking meteorological equipment each day and as soon as possible when equipment issues are identified. It was reported that data was checked daily by the Service Provider, Dispatch Operators and E&amp;C team and if any discrepancies detected they are reported between the teams for actioning.</p> <p>This is considered appropriate and no further recommendations are considered necessary.</p>	<p>Although no recommendations were made by the Auditors based on WCPL's current meteorological management measures considered satisfactory during the IEA, WCPL do however proposed the following additional actions to ensure ongoing improvements in relation to weather monitoring. These actions include:</p> <ul style="list-style-type: none"> <li>Continuation of daily checking of meteorological monitoring equipment via the providers repository website, to minimise monitoring disruptions as a result of equipment failure and/or unplanned power outages.</li> </ul>	<p>Implement after DP&amp;E acceptance of this submission of the IEA and actions to address audit recommendations.</p>

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
Condition O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	<p>WCPL received a formal warning letter on 08 February 2018 from the EPA following an unannounced visit to site on 17 January 2018. The EPA officer identified excessive dust emissions from the mine as a result of activities being undertaken in pit 7 and pit 4. The inspection also identified a dust haze in the area around the mine when compared to that of the Ulan area.</p> <p>The EPA contacted the WCPL E&amp;C Manager at the time of the observations and as a result WCPL ceased activities in the areas of concern and increased the use of water carts. The EPA considered the event to be a breach of the sites EPL conditions (Condition O3.1) and as a result issued the site with a formal warning.</p> <p>This condition was found to be non-compliant on the basis that the EPA found WCPL to be in breach of EPL 12425 requirements O3.1. Management of air quality at the time of the audit site inspection was considered to be adequate at minimising the emission of dust from the premises, as such no recommendation has been made.</p>	<p>Although no recommendations were made by the Auditors based on WCPL's current dust management measures considered satisfactory during the IEA, WCPL do however propose the following additional actions to ensure ongoing improvements in relation to air quality management. These actions include:</p> <ul style="list-style-type: none"> <li>• Refresher training for operational personnel in the form of Tool Box Talks regarding dust management and responsibilities.</li> </ul>	Within 3 months of the DP&E acceptance of this submission of the IEA and actions to address audit recommendations.

**Table 3 – Actions to Address Non-Compliances against Mining Lease 1573**

Reference	Condition Requirement Summary	Audit Finding and Recommendation	Actions Proposed by WCPL to Address Audit Finding and Recommendation	Timetable to Implement Proposed Actions
Conditions 7	<p>The leaseholder must provide an exploration report, within a period of twenty-eight days after each anniversary of the date this lease has effect or at such other date as the Director-General may stipulate, of each year. The report must be to the satisfaction of the Director-General and contain the following:</p> <p>Full particulars, including results, interpretation and conclusions, of all exploration conducted during the twelve months period;</p> <p>Details of expenditure incurred in conducting that exploration;</p> <p>A summary of all geological findings acquired through mining or development valuation activities</p> <p>Particulars of exploration proposed to be conducted in the next twelve months period;</p> <p>All plans, maps, sections and other data necessary to satisfactorily interpret the report.</p>	<p>The anniversary of the Mining Lease is 8 February each year and as such the report is due for lodgement by 07 March each year. The annual exploration report for ML 1573 for the reporting period 08.02.17 - 07.02.18 was lodged on 09 March 2018.</p> <p>The auditors reviewed the email trail with regards to the Annual Exploration Reports submission. WCPL stated that the time delay for submission was caused by the lengthy process associated with uploading the data for the 176 boreholes.</p> <p>On the basis that the exploration was not submitted within the required timeframe, this condition has been assessed as non-compliant.</p>	<p>WCPL propose the following actions to lodgement of the annual exploration report within the 28 day anniversary date. These actions include:</p> <ul style="list-style-type: none"> <li>• WCPL Technical Services Department will account for the time taken to upload borehole data via the internet, to ensure the annual exploration report is lodged by the due date; and</li> <li>• Review the format of the Exploration Report table of contents and report headings and ensure they align in future annual exploration reports as required.</li> </ul>	<p>Within 3 months of the DP&amp;E acceptance of this submission of the IEA and actions to address audit recommendations.</p>