

### Abel Coal Mine (PA 05\_0136) Independent Environmental Audit Response to Recommendations

Abel Coal Mine hold Project Approval 05\_0136. Conditions 9 and 10 of Schedule 6 outlines the requirement for an Independent Environmental Audit (IEA). The recommendations of the audit are provided in Tables 5.1 and 5.2 of the report. Abel Coal have reviewed these recommendations and provide the following responses.

#### Corrective Actions

Number	Condition	Corrective Action	Donaldson Coal Response	Timeframe
<b>EPL12856</b>				
CA1	Schedule 6 Condition 1	Ensure the Integrated Environmental Management Program, which has not been revised since 2007, is updated to reflect the current status of mining operations and associated monitoring on site.	The Abel Project Approval 05_0136 previously required a standalone Environmental Management Program. This condition has since been removed. Schedule 6 Condition 1 of Project Approval 05_0136 requires the implementation of an Environmental Management Strategy (EMS) that includes a plan depicting all monitoring required. Donaldson Coal will update the EMS to remove the existing Appendix D – 'Integrated Environmental Monitoring Plan and include all monitoring conducted under Project Approval 05_0136 in Chapter 12 of the EMS.	29 July 2022
CA2	Schedule 6 Condition 11	Whilst the mining lease has been uploaded following the audit, noise monitoring results for 2021 should be uploaded to the website as soon as practicable.	All noise monitoring reports for 2021 have been uploaded to the Donaldson Coal website.	Completed

## Recommendations

Number	Condition	Recommendation	Donaldson Coal Response	Timeframe
<b>EPL12856</b>				
R1	P1.1, P1.3	As management plans prepared for the project were prepared prior to approval of the EPL variation on 1 October 2021, a review of the relevant management plans should be undertaken to ensure monitoring location names are updated to either be consistent with the EPL or ensure location names identified in the EPL are identified in relevant plans. As an example, reduction of noise monitoring from quarterly to biannually should be captured in the NMP.	Donaldson Coal will review and update all relevant Management Plans required under the Abel Development Consent to ensure consistency with the current version of the Abel Environmental Protection Licence.	29 July 2022
R2	P1.3	Ensure the licensed discharge point is provided appropriate signage to identify it as an EPL discharge point.	Donaldson Coal will install signage at the discharge point by the 30 June 2022	30 June 2022
R3	P1.4	Provide an update to the NMP and AQGGMP to provide relevant location of meteorological Station relied upon for monitoring purposes.	Donaldson Coal will review and update the Noise Management Plan and Air Quality and Greenhouse Gas Management Plan to include the location of the Abel meteorological Station .	29 July 2022
<b>DA05_0136</b>				
R4	Schedule 3, Condition 1	If mining is to recommence, ensure monitoring frequency of surface water and groundwater is determined in consultation with NRAR and DPE.	The environmental monitoring schedule will be updated in consultation with relevant stakeholders prior to the commencement of mining.	Prior to the commencement of mining
R5	Schedule 4, Condition 5	Ensure the NMP is updated to identify times where relevant noise limits do not apply, as identified in Condition L4.4 of EPL 12856.	Donaldson Coal will review and update the Noise Management Plan to include times when relevant noise limits do not apply.	29 July 2022
R6	Schedule 4, Condition 5	Discuss additional measures of noise mitigation during times where noise limits do not apply due to meteorological conditions.	Donaldson Coal will review and update the Noise Management Plan to include additional measures of noise mitigation during times where noise limits do not apply due to meteorological conditions.	29 July 2022
R7	Schedule 4, Condition 6	A process should be documented in relevant plans (i.e. AQGGMP and NMP) for both Bloomfield Colliery and Abel Coal Mine to ensure that Abel personnel are formally notified as soon as possible by Bloomfield in relation to any potential exceedances due to operations at the CHPP, rail loadout facility, rail loop and rail spur.	Donaldson Coal will review and update all relevant Management Plans to include the agreed process for communicating potential exceedances and incidents at the Bloomfield CHPP, rail loadout facility, rail loop and rail spur.	29 July 2022

R8	Schedule 4, Condition 27	The previous audit recommended that at next review of MOP (now known as an RMP and Annual Rehabilitation Report and Forward Program) to remove any requirements that are not required for care and maintenance status. This should be considered during the updates currently being completed. In addition, this update should consider the need for a rehabilitation care and maintenance program in consultation with the NSW Resources Regulator.	The Abel Rehabilitation Management Plan is currently being compiled. This document will be a contemporary management plan that covers the site being in care and maintenance as well as account for the possibility of the recommencement of mining.	2 July 2022
R9	Schedule 4, Condition 27	Ensure the RMP required by DA 05_0136 is updated to consider the requirements of the RMP and Annual Rehabilitation Report and Forward Program currently being prepared (as now required by the NSW Resources Regulator instead of a MOP) and documents where topsoil will be stored and the estimated volumes required for rehabilitation.	The Abel Rehabilitation Management Plan (RMP) currently being developed will comply with the NSW Resources Regulator's RMP Guidelines as well as including topsoil storage locations.	2 July 2022
R10	Schedule 4, Condition 29	Ensure consultation is undertaken with all prescribed parties during the next revision of the RMP.	Consultation for the RMP will occur and be in accordance with the NSW Resources Regulator's RMP Guidelines.	Noted
R11	Schedule 6, Condition 1	The previous audit recommended adding links to EMS attached documents or including as appendix to EMS. This has not been addressed during this audit period, and this recommendation still remain open.	The Abel and Donaldson Environmental Management Strategy (EMS) has recently been updated to include links to Management Plans as required by relevant approvals.	29 July 2022
R12	Schedule 6, Condition 2	It is recommended that other plans prepared under this consent implement the tabular condition list as per the 2019 IEA Recommendation.	All management plans required by both the Abel and Donaldson Development Consents are currently being updated and will be resubmitted to the relevant authorities. The updated management plans all have a commitments table that outline the commitments made within the management plan	29 July 2022