

LIDDELL

GLENCORE

17 April 2025

The Secretary
Department of Planning, Housing and Infrastructure
PO Box 3145
SINGLETON NSW 2330

Att: Ms Ann Hagerthy

RE: Liddell Coal Operations Pty. Limited – Development Consent 305-11-01 Independent Environmental Audit

Dear Ann,

Please find included the Liddell Coal Operations Pty Limited (LCO) Independent Environmental Audit Report (Audit Report) prepared by AECOM Australia Pty Ltd for the Secretary's review and acceptance. The audit period to which this audit applies is inclusive of the period 12 February 2022 to 14 February 2025.

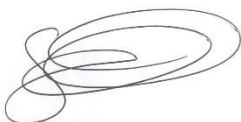
The audit was conducted in accordance with Condition 4 of Schedule 5 of the LCO Development Consent, DA 305-11-01, as issued by the NSW Department of Planning, Housing and Infrastructure (the Department) and the Independent Audit Post Approval Requirements (May 2020).

DA305-11-01 Schedule 5 Condition 5 requires the audit report to be submitted within 6 weeks of completing the audit, or as otherwise agreed by the Secretary. LCO sought approval to extend the submission date till 18 April 2025 at the request of the auditor, with the Department granting approval for this on 7 March 2025.

There are several recommendations and opportunities for improvement (OFI) arising from the compliance audit. For reference these are summarised in Section 8 of the Audit Report and are reproduced in the Tables attached to this letter, along with LCO's response to the matters identified.

Thank you for your consideration of this matter. If you require any further information, please contact me on 0400 238 506.

Yours sincerely,



Sean Pigott
Environment and Community Manager
Liddell Coal Operations Pty Ltd

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Audit Recommendation	Liddell Response	Timeframe
2025 IEA REC001 - It is recommended that LCO undertake a comprehensive review and update of the WMP to ensure it accurately reflects the site's transition from an operational mine to a post-mining and rehabilitation phase. The updated WMP should: • Reflect the cessation of mining and associated changes to water demands and storage requirements; • Incorporate the revised 2024 site water balance model that accounts for closure conditions; • Update water management objectives to align with post-closure environmental protection and rehabilitation goals; • Reassess and revise monitoring programs (surface water, groundwater, discharge) to ensure relevance and efficiency; • Update references to rehabilitation, removing reference to the mining operations plan, to ensure consistency with the rehabilitation management plan and associated rehabilitation objectives and completion criteria. • Document changes in infrastructure, landform, and catchment management that influence water flows and quality.	LCO will include this recommendation in the next update of the Water Management Plan in accordance with DA305-11-01 Schedule 5 Condition 10(c).	18 July 2025

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Audit Recommendation	Liddell Response	Timeframe
2025 IEA REC002 - LCO must make publicly available on its website the current version of the mining and coal leases and the EA for MOD 8, in accordance with Schedule 5 Condition 9 of DA305-11-01. The redundant MOP should also be removed and all references made to the current Rehabilitation Management Plan.	LCO to upload all documents as required to the public website and remove the MOP. LCO will include this recommendation in the next update of the Rehabilitation Management Plan in accordance with DA305-11-01 Schedule 5 Condition 10(c).	Website updates complete. RMP updates due 18 July 2025
2025 IEA REC003 - It is recommended LCO confirm the submission dates of annual reports are entered and tracked into LCOs compliance monitoring database, with appropriate site personnel assigned to each action.	LCO will raise an action in CMO to address this recommendation.	31 July 2025

Opportunities for Improvement (OFI)	Liddell Response	Timeframe
2025 IEA OFI001 - Update the AQMMP to reflect the mines transition to the LCCP and the current and proposed activities occurring on site	LCO will include this recommendation in the next update of the Rehabilitation Management Plan in accordance with DA305-11-01 Schedule 5 Condition 10(c).	18 July 2025
2025 IEA OFI002 - Update the EMS to remove reference to the monthly noise monitoring report in Table 5-1.	LCO will include this recommendation in the next update of the Environmental Management System in accordance with DA305-11-01 Schedule 5 Condition 10(c).	18 July 2025
2025 IEA OFI003 - Update the EMS Section 4.6 to reflect actual process occurring. LCO no longer develop annual objectives and targets that consider cumulative impacts as targets are aimed at closure criteria.	LCO will include this recommendation in the next update of the Environmental Management System in accordance with D305-11-01 Schedule 5 Condition 10(c).	18 July 2025
2025 IEA OFI004 - It is suggested LCO review the internal recycling targets to ensure they are achievable, particularly with regards to demolition works scheduled to occur in future.	LCO to review recycling target and update internal documents as required.	31 July 2025
2025 IEA OFI005 - Provide a copy of the rehabilitation risk assessment in Appendix A of the Rehabilitation Management Plan, alternatively remove reference to Appendix A.	LCO will remove the reference to Appendix A in the next update of the Rehabilitation Management Plan in accordance with DA305-11-01 Schedule 5 Condition 10(c).	18 July 2025

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Opportunities for Improvement (OFI)	Liddell Response	Timeframe
2025 IEA OFI006 -During the next revision of the Rehabilitation Management Plan the following is recommended: - The monitoring outlined in the rehabilitation management plan should align with current practices occurring on site and those planned to occur. Details in the plan should align with those outlined in other management plans such as the Biodiversity Management Plan. - Ensure domain names are consistent throughout - Address recommendations made by the NSW Resource Regulator	LCO will include this recommendation in the next update of the Rehabilitation Management Plan in accordance with DA305-11-01 Schedule 5 Condition 10(c).	18 July 2025
2025 IEA OFI007 - It is suggested the Annula Review include reference to the rehabilitation report card.	The rehabilitation report card is an internal reporting tool and not proposed to be included in future Annual Reviews. The Annual Reviews contain sufficient detail on rehabilitation monitoring and how the rehabilitation is tracking towards rehabilitation objectives.	NA
2025 IEA OFI008 - Review the rehabilitation objectives to ensure they remain current. Remove reference to MOD 7 where appropriate.	LCO has reviewed the objectives and confirmed that they are still current, as no changes to were made in MOD 8. LCO will consult with the NSWRR regarding updating the existing Rehabilitation Objectives Statement.	31 July 2025