

NSW Planning ref: DA504-00-PA-96

Matt Ribas  
Environment & Community Coordinator  
Centennial Coal Company Limited  
Clarence Colliery Clarence Colliery Road  
Clarence New South Wales 2790

23/02/2024

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**Subject: Clarence Coal – Independent Environmental Audit - 2020 to 2023**

Dear Mr Ribas

Reference is made to your post approval matter, DA504-00-PA-96, Independent Environmental Audit (IEA) report [and Response to Audit Recommendations (RAR)] for the period 12 October 2020 to 26 October 2023, submitted as required by Schedule 5, Condition 6 of DA 504-00 (MOD 9) as modified (the consent) to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 24 January 2024.

NSW Planning considers the IEA report to generally satisfy the reporting requirements of the consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). As required by Schedule 5, Condition 11 of the consent, please make publicly available a copy of the IEA Report on the company/project website.

Please note that NSW Planning's acceptance of this IEA report is not an endorsement of the compliance status of the project.

Non-compliances identified in the IEA have been assessed by NSW Planning in accordance with its Compliance Policy, with NSW Planning on this occasion determining to record the breaches with no further enforcement action proposed at this stage. However, NSW Planning notes the actions from the "*Response to Independent Environmental Audit Recommendations*" and will monitor the following timeframes for completion of these specific actions:

1. NC REC01 (Schedule 3 Condition 4) - 19 Water discharge exceedances. Upgrading water treatment infrastructure to eliminate ongoing exceedances. Provide updated Water Management Plan (WMP) within 3 months of the upgrade.
2. NC REC03 (Schedule 3 Condition 5) - include information on surface flow and groundwater baseflows to the nominated creeks and whether mining is causing any impacts in the annual groundwater assessment. This is to be included in the next Annual Review.

3. NC REC04 (Schedule 3 Condition 5) - include triggers for groundwater/ surface water baseflows in the WMP. To be completed by **24 May 2024**.
4. NC REC05 (Schedule 3 Condition 9) - implement an automatic trigger on the monthly monitoring spreadsheet to identify triggers for the Wollangambe downstream. To be completed by **24 May 2024**.
5. NC REC05 (Schedule 3 Condition 9) - implement an internal recording of reviews of the trigger and the rationale behind decision making. To be completed by **24 May 2024**.
6. NC REC07 (Schedule 3 Condition 14) - Annual Review needs to reflect current air quality monitoring. It incorrectly refers to the HVAS PM10 as a TEOM. To be completed by **31 March 2024**.
7. NC REC08 (Schedule 3 Condition 14) update to the AQMP to dictate in what time frame a TEOM will be established. To be completed by **24 May 2024**.
8. NC REC10 (Schedule 5 Condition 4) EMP to be updated within 3 months of the submission of this IEA. To be completed by **24 April 2024**.

Please note that recording a breach does not preclude NSW Planning from taking an alternative enforcement action, should it become apparent that an alternative response is more appropriate.

NSW Planning also notes that Centennial are working closely with the Environment Protection Authority (EPA) as part of a Pollution Reduction Program (PRP) focused on discharges into the Wollangambe River and a cessation of discharges via LDP002.

Please include a status update for all actions provided in the RAR in the next Annual Review, until all actions are completed.

The 5 non-compliances identified with the Subsidence Management Plan and the Mining Act will be referred to the relevant authority.

Lastly please ensure that you review, and if necessary, revise, the strategies, plans and programs required under this approval to the satisfaction of the Planning Secretary.

Should you wish to discuss the matter further, please contact Michael Wood on 0459890661 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly".

Katrina  
Team  
Compliance

Leader

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O'Reilly  
Compliance

As nominee of the Planning Secretary