



MAJOR PROJECT ASSESSMENT: Glennies Creek Coal Mine Surface Facilities Project



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

January 2007

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1. EXECUTIVE SUMMARY

Glennies Creek Coal Management Pty Limited (GCCM) is seeking approval for surface facilities associated with the Glennies Creek underground coal mine, located near Singleton in the Upper Hunter Valley.

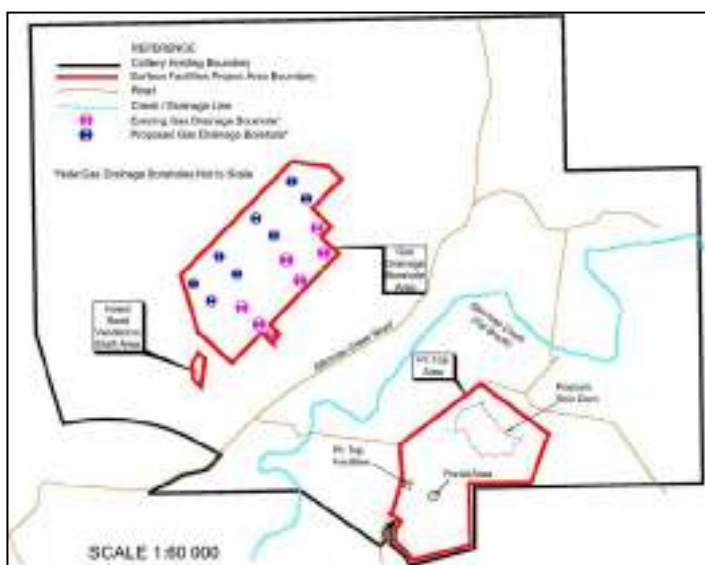
The proposal involves two elements, including:

- continued use of all existing mine-related surface facilities and infrastructure; and
- construction and operation of additional surface facilities, including:
 - various facilities at the Pit Top Area;
 - ballast delivery and stockpile area at the Forest Road Ventilation Shaft Area; and
 - additional gas drainage boreholes at the Gas Borehole Drainage Area.

The proposal constitutes a 'major project' under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and the Minister is the approval authority. In August 2006 GCCM lodged an Environmental Assessment (EA) for the proposal, and the Department has publicly exhibited the project application and EA. In response to the public exhibition, the Department

received 11 submissions on the proposal: 5 from government authorities and 6 public submissions. 4 of the public submissions objected to the project.

Key environmental issues raised in the submissions included noise, dust, traffic, visual amenity and water resources. A submission from Minter Ellison Lawyers (on behalf of interests associated with Xstrata Coal) also questioned the ability for the Minister to approve the existing surface facilities under Part 3A of the EP&A Act.



The Department has assessed these and other issues associated with the proposal, and is satisfied that:

- the existing surface facilities are operating at an acceptable level of environmental performance;
- the proposed additional surface facilities are unlikely to result in any significant environmental impact; and
- there is no impediment to the Minister's determination of the proposal under Part 3A.

Consequently, and in consideration of the benefits of the proposal –

including securing employment for around 150 people, and consolidating the mine's existing and proposed surface facilities into one contemporary approval – the Department believes that the proposal is in the public's interest, and should be approved, subject to conditions.

2. BACKGROUND

The Glennies Creek underground coal mine is located about 10 kilometres northwest of Singleton in the Upper Hunter Valley (see Figure 1).

The mine was approved by the Minister for Planning in 1991 following a Commission of Inquiry, and is owned by AMCI Holdings Australia Pty Ltd and operated by Glennies Creek Coal Management Pty Ltd (GCCM)(the Proponent). The mine currently employs around 150 people.



Figure 1: Regional Context

The Minister's consent allowed the Proponent to extract up to 3 million tonnes of run-of-mine (ROM) coal a year, using underground mining methods, transport the product coal by rail to Newcastle for export, and establish a range of surface facilities including (see Figure 2):

- two underground entry points;
- a coal handling and preparation plant (CHPP);
- rail loop and loading facilities;
- coal stockpiles;
- coal rejects emplacement area; and
- various ancillary buildings (offices, workshops, etc.).

The consent has been modified a number of times, as outlined in Table 1 below.

Table 1: Modifications to the Glennies Creek Colliery development consent (DA 105/90)

Modification	Description
1998 - Section 96(2) Modification	• development of underground entry from the highwall of the adjacent Camberwell open cut coal mine; • temporary processing of coal at the Camberwell CHPP for 3 years; • temporary dispatch of coal via Camberwell coal mine's rail loading facility for 3 years; and • temporary surface facilities adjacent to the Camberwell open cut pit.
2001 - Section 96(2) Modification	• approval for long term use of temporary features of the development in lieu of establishing facilities on greenfield sites approved in the original consent
2002 - Section 96(2) Modification	• development of the Forest Road ventilation shaft and associated facilities
2005 - Section 96(1A) Modification	• relocation and replacement of a number of existing surface facilities at the pit top area
2005 - Section 96(2) Modifications (February and December - see below)	• an increase of ROM coal production from 3 million to 4.5 million tonnes per year; • continuing use of existing mine-related surface facilities, including the continued use of certain surface facilities which had not been built strictly in accordance with the Minister's consent as modified; • development of certain additional surface facilities; and • certain administrative changes to the consent.

The consent as modified allows GCCM to use a range of infrastructure at the adjacent Camberwell coal mine (see Figure 2).

This has meant that the mine has not needed to develop its own CHPP and rail loading facilities, and has been able to contain the majority of its coal stockpiles and surface facilities within areas previously disturbed by open cut mining at the Camberwell coal mine.

During the Department's assessment of the February 2005 Section 96(2) modification application, Glendell Tenements Pty Ltd (a wholly owned subsidiary of Xstrata Coal (NSW) Pty Ltd) commenced proceedings in the Land and Environment Court seeking:

- a declaration from the Court that the proposed modification is not substantially the same development for which consent was originally granted by the Minister in 1991;
- a declaration from the Court that the Minister is not entitled to consider the application by reason of the fact that the development as modified is not substantially the same development for which consent was originally granted; and
- restrain the Minister from further considering or determining the modification application.

However, the Court did not grant the requested injunction and adjourned further consideration of the matter until the Minister determined the application.

Accordingly, the Minister determined the February 2005 application in November 2005, by approving the modification subject to conditions.

Subsequently, Glendell Tenements Pty Ltd amended its Court application to include a claim that the application for modification had not been properly notified by the Department.

To address this issue, GCCM lodged a fresh section 96(2) modification application with the Department in December 2005, which was similar to the February 2005 application. The Minister approved the December 2005 application in September 2006, after satisfying himself that the proposed modification was substantially the same development for which consent was originally granted. The LEC proceedings are currently before the Court.

GCCM is now proposing to consolidate approvals for the mine's surface facilities through an application under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). An approval under Part 3A would also address the potential risks associated with the 'substantially the same development' argument raised by Glendell Tenements in the current LEC proceedings.

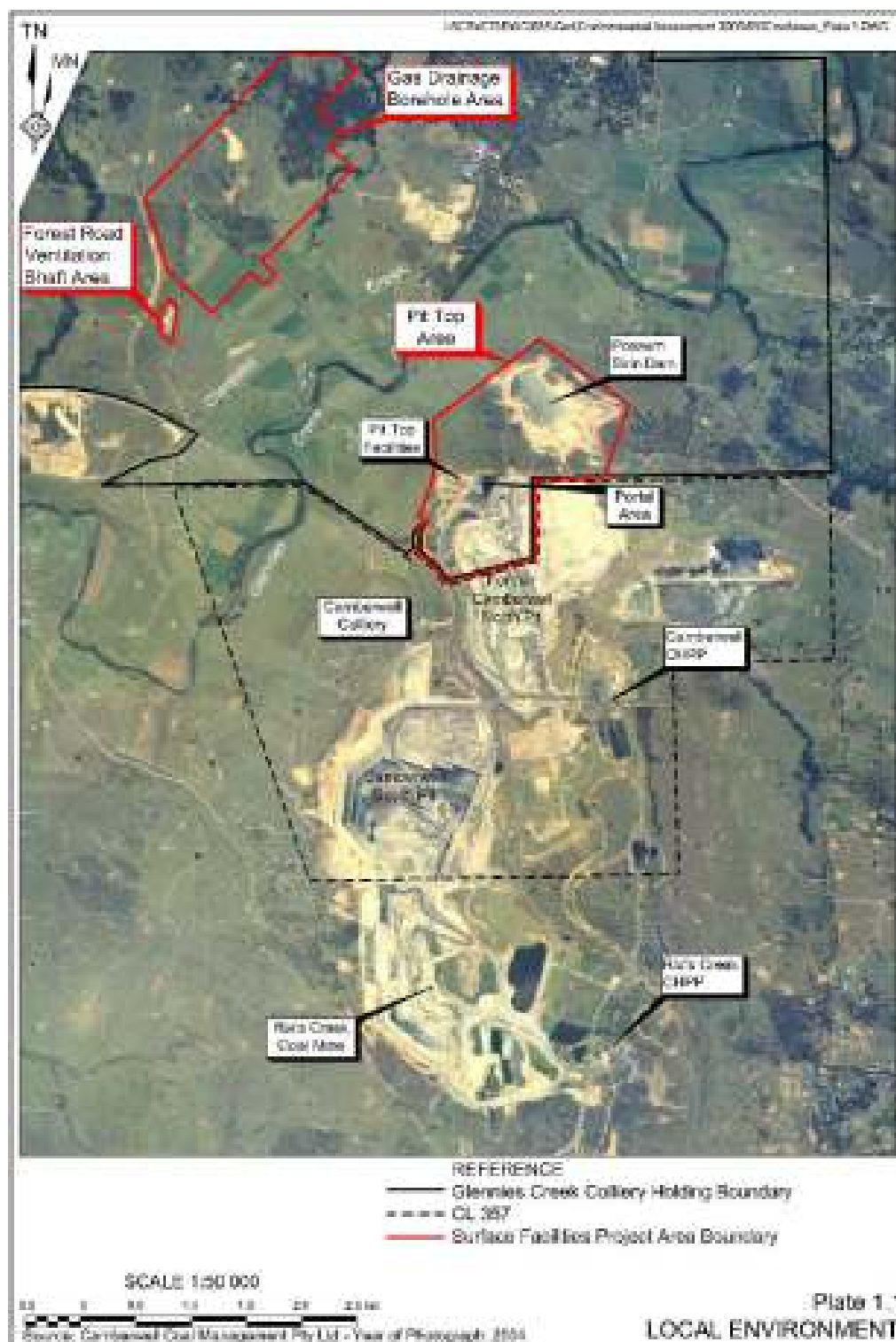


Figure 2: Layout of Surface Facilities

3. PROPOSED PROJECT

GCCM is seeking approval for the construction and/or use of surface facilities associated with the Glennies Creek underground coal mine.

The proposal involves two elements, including:

- continued use of all existing mine-related surface facilities and infrastructure; and
- construction and operation of additional surface facilities, including:
 - various facilities at the Pit Top Area, including:
 - demountable bathhouse building;
 - sealed extension of the car park;
 - coal handling system;
 - stores compound;
 - additional underground water supply tank;
 - extension of the existing electrical substation;
 - demountable office and crib room buildings and associated facilities; and
 - extension to coal stockpile areas;
 - ballast delivery and stockpile area at the Forest Road Ventilation Shaft Area; and
 - additional gas drainage boreholes at the Gas Drainage Borehole Area.

The 3 main surface facilities areas – Pit Top Area, Forest Road Ventilation Shaft Area, and Gas Drainage Borehole Area – are shown together on Figure 2, and in detail on Figures 3, 4 and 5.

The proposal would allow the consolidation of all existing and proposed surface facilities associated with the Glennies Creek underground coal mine into a single, contemporary approval.

3.1 Amendments to the Proposal

Subsequent to publicly exhibiting the environmental assessment, GCCM made a small number of minor amendments to the proposal, specifically relating to the coal transportation contractor's area (see Facility No.23 on Figure 3). The amendments include:

- clarification of the existing facilities within the contractor's area;
- addition of a transportable toilet block; and
- installation of a portal-framed workshop building.

4. STATUTORY CONTEXT

4.1 Major Project

The proposal is classified as a major project under Part 3A of the *Environmental Planning & Assessment Act 1979* (EP&A Act), because it complies with clause 5 of schedule 1 of *State Environmental Planning Policy (Major Projects) 2005*, as it is for the purpose of coal mining.

Consequently the Minister for Planning is the approval authority for the project.

4.2 Permissibility

The land subject to the application is zoned 1(a) Rural under the *Singleton Local Environmental Plan 1996*, and coal mining is permissible with consent in this zone.

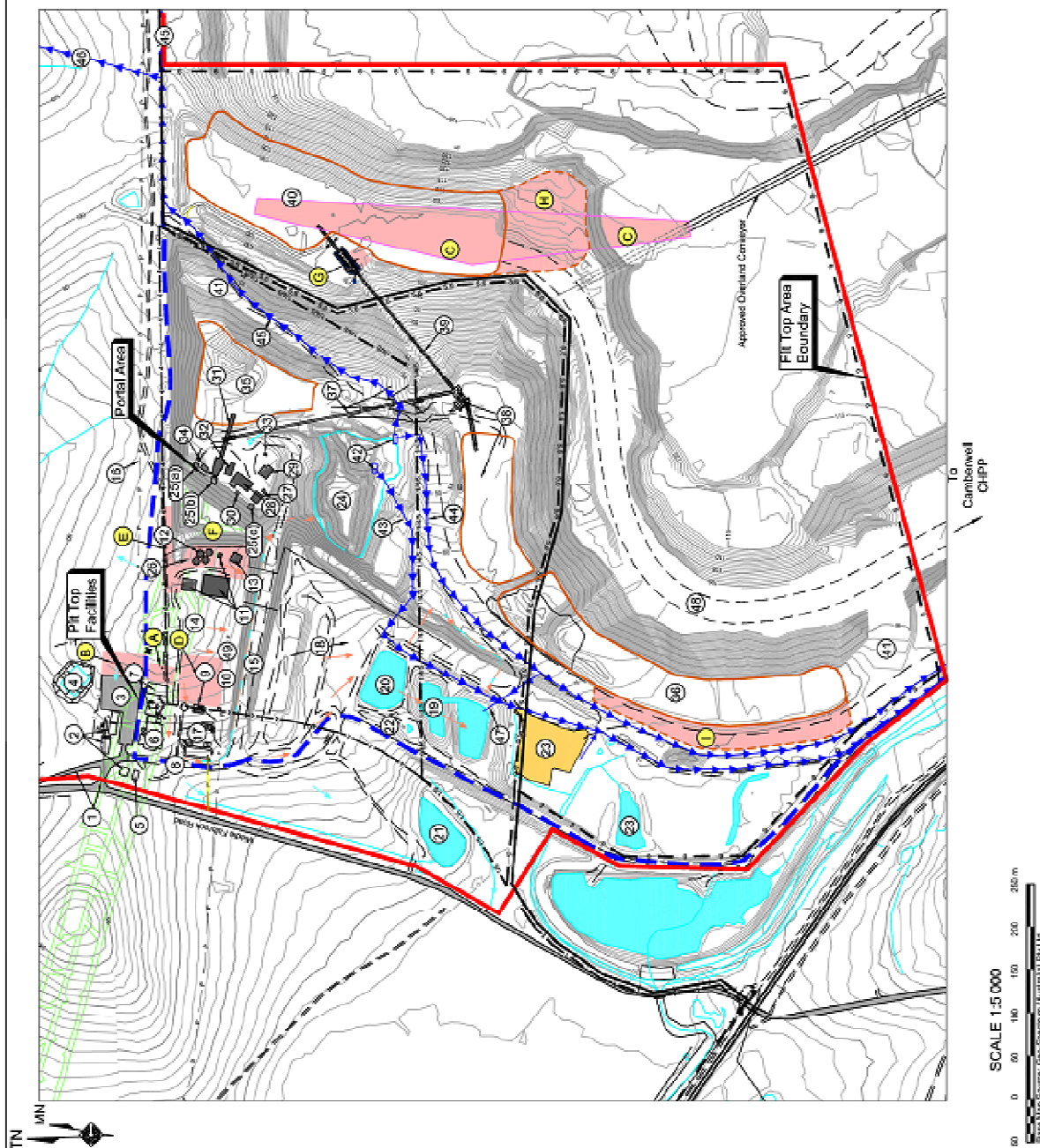


Figure 3: Existing and Proposed Facilities at the Pit Top Area (excluding Possum Skin Dam)

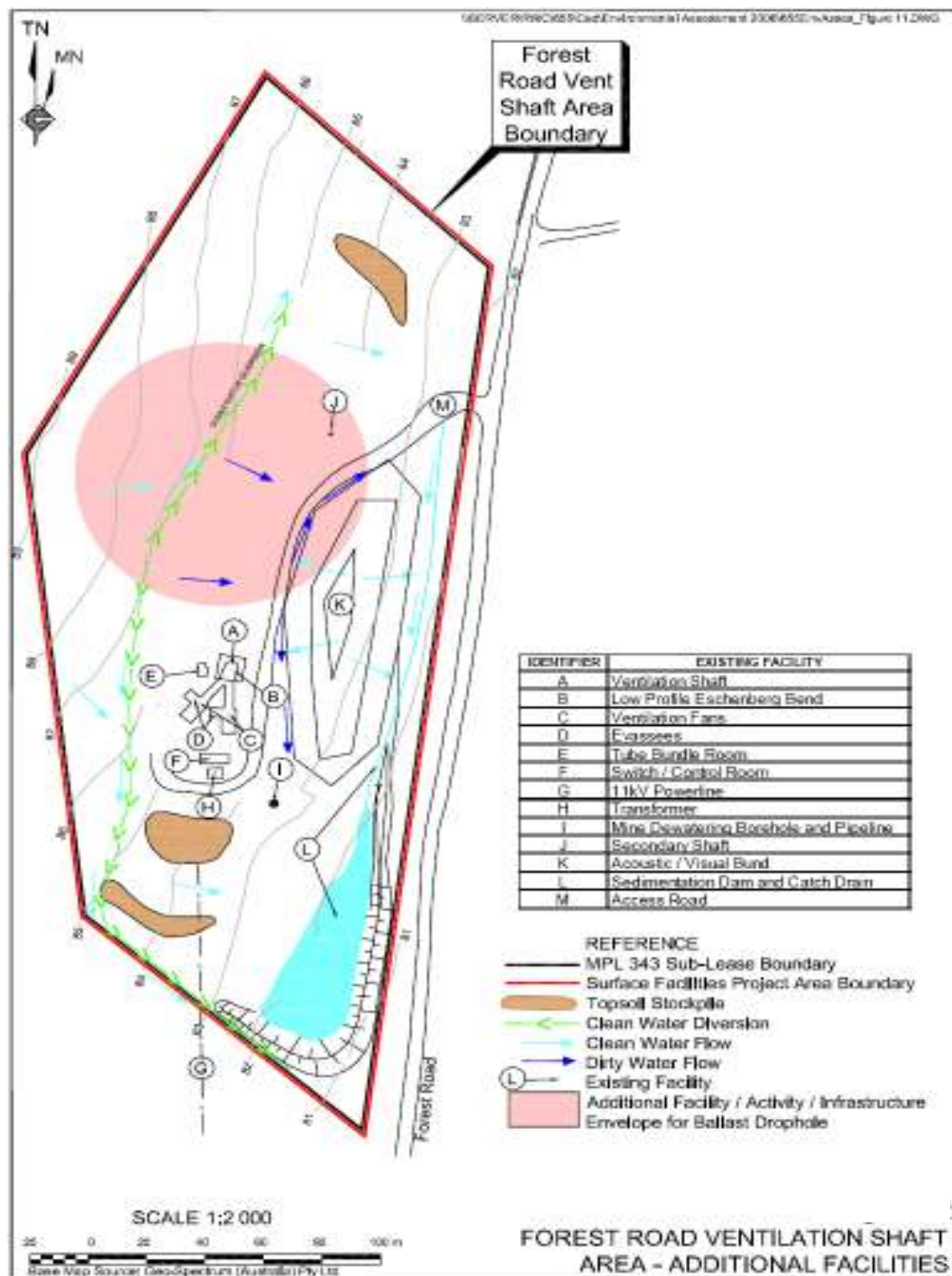
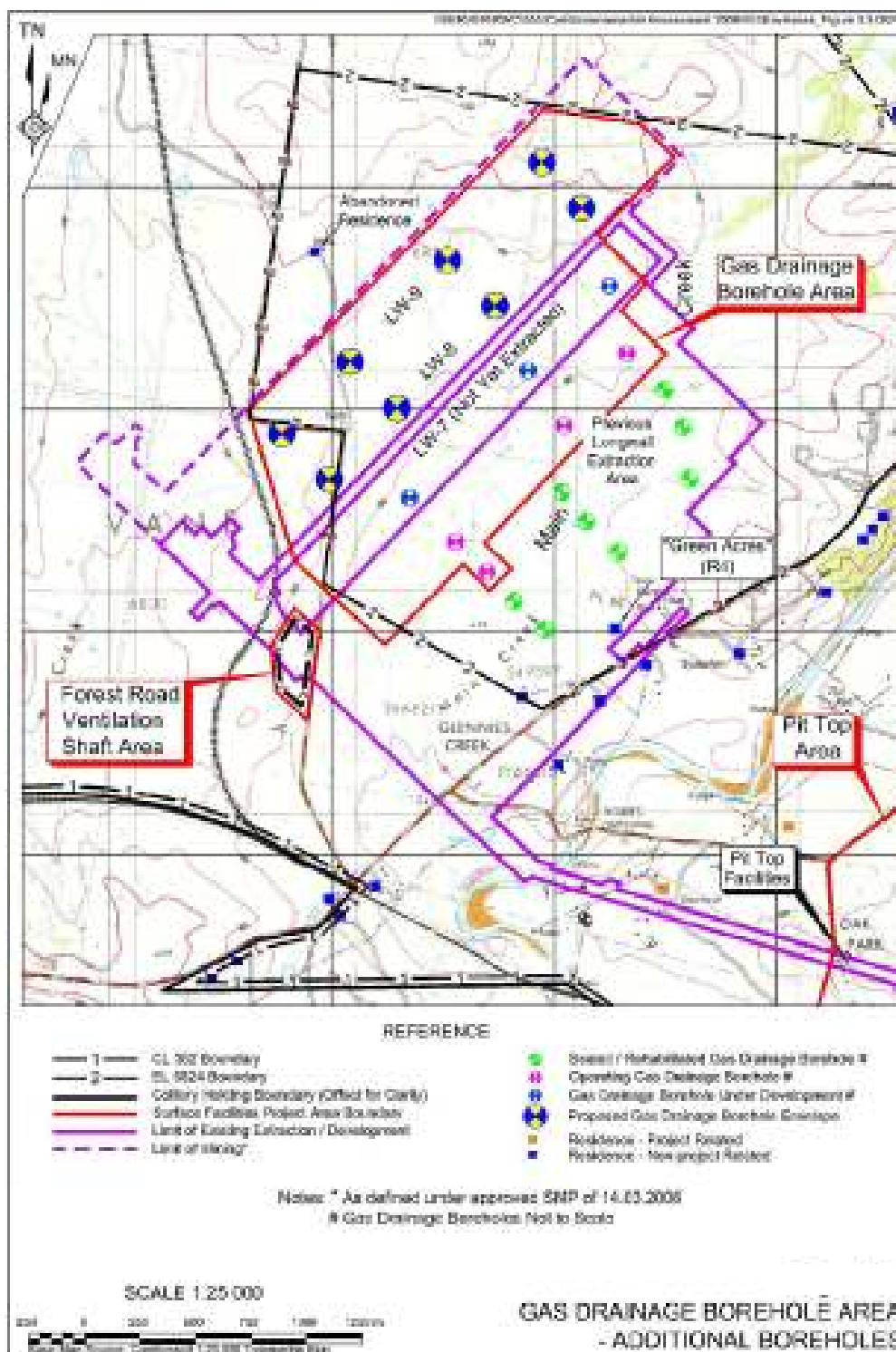


Figure 4: Forest Road Ventilation Shaft Area



4.3 Exhibition

Under Section 75(3) of the EP&A Act, the Director-General is required to make the environmental assessment of a project publicly available for at least 30 days.

After accepting the environmental assessment for this proposal, the Department:

- made it publicly available from 29 August until 2 October 2006:
 - on the Department's website, and
 - at the Department's Information Centre and the offices of Singleton Council;

- notified landowners in the vicinity of the site about the exhibition period by letter;
- notified relevant State government authorities and Singleton Shire Council by letter; and
- advertised the exhibition in the Singleton Argus.

This satisfies the requirements in Section 75H(3) of the EP&A Act.

As discussed in Section 3.1, GCCM amended the proposal following exhibition of the EA. The Department believes that the amendments are relatively minor, would be of minimal environmental impact, and that the proposal as amended differs in only minor respects from that placed on public exhibition. As such, the Department is satisfied that further public exhibition is not required. Notwithstanding, the Department notified and sought comments from relevant government authorities on the amended proposal.

4.4 Environmental Planning Instruments

Under Section 75I(2) of the EP&A Act, the Director-General's report is required to include a copy of or reference to the provisions of any *State Environmental Planning Policy* (SEPP) that substantially governs the carrying out of the project.

The Department has considered the proposal against the relevant provisions of several SEPPs (including SEPPs 11, 33, 44, and 55), and is satisfied that none of these SEPPs substantially govern the carrying out of this project. Nevertheless, it has considered the relevant provisions of these SEPPs in Appendix C.

5. ISSUES RAISED IN SUBMISSIONS

During the exhibition period, the Department received 11 submissions on the proposal, including:

- 5 from public authorities:
 - Department of Primary Industries (DPI);
 - Department of Environment and Conservation (DEC);
 - Department of Natural Resources (DNR);
 - Mine Subsidence Board (MSB); and
 - Hunter Regional Development Committee/Roads and Traffic Authority (RTA); and
- 6 public submissions, including 1 submission from Minter Ellison Lawyers representing the interests of Hunter Valley Coal Corporation Pty Ltd and Glendell Tenements Pty Ltd (both wholly owned subsidiaries of Xstrata Coal (NSW) Pty Ltd).

4 of the 6 public submissions objected to the proposal, however all public submissions raised concerns. None of the public authority submissions objected to the proposal.

The **DPI** does not object to the proposal, and considers that the environmental impacts are adequately covered in the EA.

The **DEC** does not object to the proposal, but recommends that the noise limits prescribed by the existing development consent (105/90) be applied to this proposal. The Department notes that the criteria in the existing consent are based on the criteria of the adjacent Camberwell mine, which were updated in 2005. Accordingly, the Department has incorporated these updated (more stringent) noise limits into its recommended conditions of approval. Given the integrated nature of the Glennies Creek and Camberwell coal mines, the Department believes that consistent noise criteria for both mines would assist in the ongoing regulation of noise generated by the mines.

The **DNR** does not object to the proposal, and notes that no additions or amendments to existing water licences are required for the proposal. The DNR requests that any project approval requires the Proponent to comply with its existing water licences. However, the Department notes that such compliance is required under the *Water Act 1912* and therefore any additional requirement via the approval is redundant.

The **MSB** does not object to the proposal, but notes that any new surface facilities associated with the proposal would require approval from the MSB before they could be carried out.

The **RTA** (c/- Hunter Regional Development Committee) has no objections or requirements for the proposal.

The key issues raised in the public submissions include noise, dust, traffic, visual and water resource impacts. The Department has considered these and other potential impacts in its assessment of the proposal, and is satisfied that they are unlikely to be significant.

In addition to the environmental issues, the submission from Minter Ellison (on behalf of Hunter Valley Coal Corporation and Glendell Tenements) claims that there is no power under Part 3A of the EP&A Act to retrospectively approve the use of the existing mining facilities in which there has been no prior development consent. This issue is discussed further in Section 6.2.

GCCM has prepared a response to the issues raised in the submissions (see Appendix D). The Department has considered both the issues raised in submissions, and GCCM's response to those issues, in its assessment of the proposal.

6. CONSIDERATION OF KEY ISSUES

6.1 Environmental Impacts

The Department has considered the environmental impacts of the proposal, associated with:

- the continued use of existing facilities; and
- the proposed additional surface facilities.

The findings are presented in the following table.

Aspect	Continuing Use	Proposed Additions	Comment on Impacts
Pit Top Area – General Surface Facilities	• Mine entry and existing roads and carparks • Office and administration buildings • Sewage and water treatment facilities • Bathhouses • Utilities and services • Hardstands and storage areas etc. (see Table 2.2 in EA for full list)	• Demountable bathhouse building • Sealed extension of the car park • Storage compound • Additional underground water supply tank and pump • Extension of the existing electrical substation • Demountable office and crib room buildings and amenities • Coal transport contractor's area – transportable toilet block and portal-frame workshop building.	The Proponent has assessed the environmental impacts of the existing and proposed pit top facilities. The assessment concludes that, with the existing and proposed management and mitigation measures at the mine, these facilities would not have any significant environmental impacts (including impacts on noise, air quality, groundwater, surface water, threatened species, Aboriginal heritage and visual amenity). The Department is satisfied that the proposed changes to the pit top facilities are unlikely to result in any significant environmental impacts as they are generally located within the approved envelope for surface development at the mine in areas well removed from any privately owned residences that have been largely cleared of vegetation and disturbed by the former Oak Park School facilities and previous mining activities. Noise concerns raised in some submissions are understood to relate mainly to the Camberwell CHPP and rail loader. These operations, as well as coal haulage to the CHPP, are regulated under separate (Camberwell mine) development consents. Notwithstanding the above, the Department believes the Proponent should be required to comply with noise criteria that are similar to the criteria for the adjacent Camberwell coal mine. The Department also believes the Proponent should be required to comply with contemporary requirements for environmental monitoring, reporting and public consultation.
Pit Top Area - Coal Stockpiles	• RL 48 Coal Stockpile Area • RL 75 Coal Stockpile and Breaker Stone Storage Area • RL 100 Coal Stockpile Area • Breaker Stockpile Area	• Coal handling system including 1,500tph reclaim conveyor and transfer point • Extension to RL 100 coal stockpile • Extension to RL 75 coal stockpile	The stockpiles are located within the former Camberwell open cut pit and the Department believes that the stockpiles are unlikely to result in any significant offsite impacts. This is supported by monitoring data from the Glennies Creek colliery which shows that dust and noise emissions from the mine comply with relevant criteria at all residences surrounding the mine, except for one residence in the affectation zone for the Camberwell coal mine. The Department is satisfied that the proposed stockpile extensions (to provide emergency storage capacity) would not result in any significant additional environmental impact, and would likely assist in reducing the visual impact of the stockpiles by reducing overall stockpile height. The Department is also satisfied that the proposed coal handling system would not result in any significant environmental impacts, and would likely reduce total dust and noise emissions due to a reduction in mobile equipment usage on the RL 100 area and RL 100 haul road once operational. The above ground component of the reclaim conveyor would be covered, and the system would include water sprays, to reduce dust emissions. The Department is also satisfied that the existing water management system at the mine would adequately prevent any surface water impacts from the coal stockpiles and coal handling system.

Aspect	Continuing Use	Proposed Additions	Comment on Impacts
Pit Top Area - Water Storages and Management System	• Portal sump • Process Water Dam • Possum Skin Dam • Other water management dams and structures	• No change	The Department believes that these water storages are an integral part of the mine's water management system that reduce the likelihood of offsite discharges of "dirty" water and are important for the ongoing safe operation of the mine. Because the portal sump is located at the low point of the Camberwell open cut pit and the process water dam is located adjacent to the pit in an area previously disturbed by mining, the Department is satisfied that the environmental impact of these facilities is minimal. The Possum Skin Dam was constructed by the Proponent in 2003 to store excess water accumulating in the portal sump which was threatening the ongoing safe operation of the mine. The dam is located wholly within the footprint of a rejects emplacement area which was approved as part of the original development consent for the mine, and the Proponent has obtained relevant approvals for the dam under the <i>Dam Safety Act 1978</i> from the NSW Dam Safety Committee. Consequently, the Department is satisfied that the dam has not resulted in any significant additional environmental impacts and has been built in accordance with appropriate standards of safety.
Gas Drainage Borehole Area	• 7 operating/under development gas drainage boreholes & associated infrastructure	• 8 additional gas drainage boreholes and associated infrastructure, associated with Longwalls 8 & 9	The Proponent has obtained approval for existing boreholes (as well as additional rehabilitated boreholes) from the Department of Primary Industries under an Exploration Licence (EL5824) issued under the <i>Mining Act 1992</i>, and prepared an assessment of environmental factors for each borehole as part of this process. The Department has considered these environmental assessment reports, and is generally satisfied that the gas drainage infrastructure established by the Proponent has not resulted in any significant impacts. The Department is similarly satisfied that the proposed additional boreholes are unlikely to result in significant environmental impacts. The additional boreholes would require a maximum vegetation clearance of 1,000m², would avoid drainage lines and would not impact any identified Aboriginal objects or sites. It is noted that Envirogen Pty Ltd is proposing to utilise the drained methane gas for power generation, thereby reducing greenhouse gas emissions associated with the mine, and fully utilising the available energy resource (the Envirogen proposal is subject to separate approval).
Forest Road Ventilation Shaft Area	• Ventilation shafts, fans, and associated infrastructure • Mine dewatering borehole and pipeline • Access road • No change	• 300 mm ballast drop hole and stockpile area for underground road maintenance activities	The Proponent has assessed the impacts of the proposed ballast drop hole and stockpile area. This assessment concludes that the proposal would not result in any significant environmental impacts (including noise, air quality, traffic, surface water, Aboriginal heritage, and flora and fauna). The Department notes that the proposed drop hole and stockpile is within the approved envelope for the Forest Road Ventilation Shaft facilities in an area that is more than 1.5 km from the nearest privately owned residence and that has been largely disturbed by the construction of the ventilation shaft facilities. Consequently, the Department is generally satisfied that these facilities would not result in any significant environmental impacts and is unlikely to have any impact on the amenity of local residents. Notwithstanding, the Department has recommended that the Proponent make contributions to Council to assist in the ongoing maintenance of Forest Road.

6.2 Continued Use of Surface Facilities

The submission from Minter Ellison Lawyers claims that there is no power under Part 3A of the EP&A Act to retrospectively approve the use of the existing mining facilities in which there has been no prior development consent.

A number of surface facilities established at the mine had not been built strictly in accordance with the Minister's consent as modified. These discrepancies included:

- the number and layout of buildings at the former Oak Park School;
- the entry and exit road links onto Middle Falbrook Road;
- various ancillary facilities in the pit top area;
- the location and size of coal stockpiles;
- gas drainage infrastructure; and
- the location and size of water storages, including the construction of a 1000 megalitre dam (known as the "Possum Skin Dam") to store the groundwater make from the underground workings and seepage into the Camberwell pit.

GCCM sought to regularise the ongoing use of all of the mine's existing surface facilities as part of the 2005 modification applications under Section 96(2) of the EP&A Act (see Section 2). The Minister approved the [December 2005] modification application in September 2006.

In its response to issues raised in submissions, GCCM has provided legal advice on the issue raised by Minter Ellison. GCCM's legal advice contends that the Part 3A application is not seeking any 'retrospective' approval, and is only seeking an approval which, if granted, will operate from the date it is approved. GCCM also contends that, even if any aspect of the surface facilities were not the subject of valid development approvals (which it denies), there is a well-established line of authority that development consent may be granted to authorise the prospective (or ongoing) use of structures even if they had been unlawfully erected. GCCM's lawyers believe that this line of authority would be directly applicable to the Minister's powers to approve a project under Part 3A.

The Department has sought its own legal advice which supports the advice received by GCCM. Accordingly, the Department is satisfied that the Minister does have the power to approve the project.

7. RECOMMENDED CONDITIONS OF APPROVAL

The Department has prepared recommended conditions of approval for the project (see Appendix B), which are summarised in Appendix A. The conditions contemporise and consolidate the existing conditions of approval for the Glennies Creek coal mine (under DA 105/90), and are required to:

- prevent and minimise adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the project.

GCCM does not object to the recommended conditions of approval.

8. CONCLUSION

The Department has assessed the EA, Statement of Commitments, submissions on the proposal, and the Proponent's response to the submissions. Following this assessment, the Department is satisfied that:

- the existing surface facilities are operating at an acceptable level of environmental performance; and
- the proposed additional surface facilities are unlikely to result in any significant environmental impact and can be managed to ensure an acceptable level of environmental performance.

The proposal would also result in economic, social and administrative benefits in that it would allow GCCM to secure continued employment for around 150 people, and contemporise and consolidate the approval for the various surface facilities at the mine.

Consequently, the Department is satisfied that the proposal is in the public's interest, and recommends the Minister approve the proposal, subject to conditions.

9. RECOMMENDATION

It is RECOMMENDED that the Minister:

- consider the findings of this report;
- approve the project application, subject to conditions, under section 75J of the *Environmental Planning and Assessment Act 1979*; and
- sign the attached project approval (see Appendix B).

David Kitto
Director
Major Development Assessment

Chris Wilson
Executive Director
Major Project Assessments

Sam Haddad
Director General

Frank Sartor MP
Minister for Planning

APPENDIX A – SUMMARY OF CONDITIONS OF APPROVAL

The Department has recommended a number of conditions of approval, including requirements to:

- limit the approval to 1 January 2027 (consistent with the Proponent's mine plan);
- limit ROM coal processing through the surface facilities to 4.5 million tonnes a year;
- not discharge any mine water from the site without DEC or DNR approval;
- prepare and implement a comprehensive Site Water Management Plan for the project to monitor and manage surface and groundwater impacts. The components of the Plan include:
 - a Water Balance;
 - an Erosion and Sediment Control Plan;
 - a Surface Water Monitoring Program; and
 - a Groundwater Monitoring Program;
- comply with strict criteria and develop comprehensive monitoring programs for noise and air quality monitoring;
- conduct ballast delivery only between the hours of 8:00am to 5:00pm, Monday to Friday;
- maintain an Aboriginal Cultural Heritage Management Plan;
- cease truck coal haulage and conduct all haulage via conveyor by 2011;
- contribute to the maintenance of local roads;
- prepare and implement a Mine Closure Strategy;
- establish and maintain a comprehensive Environmental Management Strategy, prepare detailed Annual Environment Management Reports and commission periodic independent audits; and
- maintain a Community Consultative Committee for consultation throughout the life of the mine, and make environmental monitoring and management reports available to the public.

APPENDIX B – CONDITIONS OF APPROVAL

APPENDIX C – ENVIRONMENTAL PLANNING INSTRUMENTS CONSIDERATION

1 State Environmental Planning Policy (SEPP) No.11 – Traffic Generating Development

The project is affected by the provisions of SEPP 11, as an 'extractive industry or mining' (Schedule 1(m)). As such, the application was referred to the RTA, who subsequently (through the Hunter Regional Development Committee) confirmed that it had no objection to the proposal.

2 SEPP No.33 – Hazardous and Offensive Development

The Department is satisfied that the project is not potentially hazardous or offensive, and that the proposal is generally consistent with the aims, objectives, and requirements of SEPP 33.

3 SEPP No.44 – Koala Habitat Protection

The EA states that the project area does not provide core Koala habitat, and that the proposal would not have any impact listed Koala feed trees. The Department agrees that the proposal is unlikely to significantly affect Koala habitat, and as such is satisfied that the proposal is generally consistent with the aims, objectives, and requirements of SEPP 44.

4 SEPP No.55 – Remediation of Land

Clause 7(1) of SEPP 55 requires that a consent authority must not consent to the carrying out of any development on land unless:

- (a) it has considered whether the land is contaminated;*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out; and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

As the proposal essentially relates to the continuation of an existing development, and does not involve a change to a more sensitive land use, a rezoning, or a subdivision, the Department is satisfied that the site is suitable for the proposed use.

APPENDIX D – PROPONENT’S RESPONSE TO SUBMISSIONS

APPENDIX E – SUBMISSIONS

APPENDIX F – ENVIRONMENTAL ASSESSMENT
