



Springvale Colliery Response to Independent Environmental Audit Recommendations

SSD 5594

8 September 2025

The 2025 Independent Environmental Audit commenced on 17 June 2025. This document has been prepared to satisfy Schedule 6 Condition 14 of the Springvale Project Approval (SSD 5594).

Table 1 shows the Springvale response to the auditor's recommendations as listed within Table 10 of the 2025 Independent Environmental Audit (IEA) Report relating to Non-Compliance Recommendations while **Table 2** shows the Springvale Response to the IEA Recommendations listed within Table 11 of the 2025 IEA Report relating to Additional Recommended Actions.

Table 1 Response to Non-Compliant Recommendations

Schedule and Condition Number	Details	Recommended Action	Springvale Response	Timeframe for Action Completion
Schedule 4, Condition 12 (part) And EPL O1.1	Non-compliant with relevant hydrocarbon storage standards as observed during site inspection. This is based on seeing some hydrocarbons not stored as per Australian Standards AS 1940, which requires bunding of AS 1940 requires that bunds or secondary containment systems must have a capacity of at least 110% of the volume of the largest tank or container stored within that bunded area. The field inspection noted: 2 x 20L hydraulic oil containers were not stored in bunds. They also showed signs of leakage on the ground. - There was one IBC containing around 300L of lubricant. It was stored on a bund that would only store around 200L of liquid if leakages occurred.	NC REC 1: Ensure hydrocarbons are stored as per AS 1940.	95% of hydrocarbons were stored correctly. Springvale will continue to undertake inspections and enforce Hydrocarbon storage and management requirements.	Ongoing Management recommendation
		NC REC 2: Remove the mobile electrical transformer unit from site and ensure the leakages are handled correctly.	Springvale will confirm whether the transformer can be removed from site by licensed third party contractor and arrange for removal by site if no longer required.	February 2026
		IMP REC 3: Ensure older hydrocarbon stains in the laydown area are scalped up, with material removed from	Springvale will revise Hazardous Spill Response Procedure to capture the material removal collection/disposal	November 2025

Schedule and Condition Number	Details	Recommended Action	Springvale Response	Timeframe for Action Completion
	- There was a leakage from the mobile electrical transformer unit this was stored on the surface with evidence of staining adjacent to the area of the leak. 1 x IBC of what appeared to be hydraulic oil. This had around 600L of material and was not stored on a bund. - Several areas of recent and historical staining on site. Despite noting these issues around 95% of hydrocarbons onsite were stored as per AS 1940 requirements. Chemical and petroleum storage has been separated from other water management requirements of this condition due to a high level of compliance with general water management measures.	site to a licensed facility to handle the contamination.		

Table 2 Response to Additional Audit Recommendations

Aspect	Condition Reference	Improvement REC Number	Recommendations	Springvale Response	Timeframe for Action Completion
Extraction Plan	SSD-5594 Schedule 3 Condition 10	IMP REC 1	Develop an internal register for EP triggers. This would likely be an excel spreadsheet that pulls out triggers, timing, notification requirements. This would be useful for the site team to continue to manage the EP implementation.	Springvale will continue to update the Extraction Plan Trigger Register with new triggers for internal purposes noting the quarterly report and annual review documents triggers relevant to the respective reporting frequencies.	Ongoing updates required as triggered.
Water Management Performance Measures	SSD-5594 Schedule 4 Condition 12 & EPL 3607 O1.1	IMP REC 2	Review the Stream Health and Channel Stability Monitoring Program for the suitability of locations for areas. E.g. Areas that have been subsided many years ago may not need to be monitored. This may require updates to approvals.	Springvale will engage with DPHI regarding the transition of monitoring arrangements with ongoing extraction relevant to the operation.	December 2025 (date nominated to align with 500 series Extraction Plan consultation)

Aspect	Condition Reference	Improvement REC Number	Recommendations	Springvale Response	Timeframe for Action Completion
Mine Access Road Intersection Upgrade	SSD-5144 Schedule 4 Condition 21	IMP REC 4	Follow up with DPHI on the outcome of the intersection letter.	Springvale note the consent currently expires 31 December 2028 Springvale note the presence of both a public sporting oval and electrical infrastructure within the immediate vicinity of the intersection Springvale will undertake a further survey to reflect current traffic conditions at the intersections.	December 2026
Location of monitoring/discharge points and areas	EPL 3607 P1.4	IMP REC 5	In next update to EPL, update EPL figure to remove WNM12 as it is not a noted location in this EPL.	Springvale note this is an additional site rather than a site missing.	Noted to be incorporated with next EPL update.
Rehabilitation management plans for large mines	Mining Amendment Regulation 2021	IMP REC 6	Update the RMP to reference ML 1843.	Springvale will update the RMP to reference ML 1843	June 2026