

Independent Environmental Audit

Mangoola Coal Operations - SSD8642

30-Sep-2025
Mangoola Coal IEA 2025

Independent Environmental Audit

Mangoola Coal Operations - SSD8642

Client: Mangoola Coal Operations Pty Ltd

ABN: 54 127 535 755

Prepared by

AECOM Australia Pty Ltd

Awabakal and Worimi Country, Level 8, 6 Stewart Avenue, Newcastle West NSW 2302, PO Box 73, Hunter Region MC NSW 2310, Australia

T +61 1800 868 654 www.aecom.com

ABN 20 093 846 925

30-Sep-2025

Job No.: 60751436

AECOM in Australia and New Zealand is certified to ISO9001, ISO14001 and ISO45001.

Quality Information

Document Independent Environmental Audit
Date 30-Sep-2025
Originators Kate Michelmores & Haley Bates
Verifier/s Orla Ferguson

Revision History

Rev	Revision Date	Details	Approved	
			Name/Position	Signature
0	06-Aug-2025	Draft IEA report for error of fact review	Kate Michelmores Lead Auditor - Principal Environmental Scientist	
1	25-Sep-2025	Final Draft	Kate Michelmores Lead Auditor - Principal Environmental Scientist	
2	30-Sep-2025	Final report for submission to DPHI	Kate Michelmores Lead Auditor - Principal Environmental Scientist	

Independent Audit Report Declaration Form

Project Name	Mangoola Coal Mine 2025 IEA
Consent Number	SSD-8642
Description of Project	The Mangoola Coal Continued Operations (MCCO) Project is an approved continuation of open cut coal mining at the existing Mangoola Coal Mine, located near Wybong in the Upper Hunter Valley of New South Wales. The project allows for the extension of mining activities to the north of the existing operations and north of Wybong Road.
Project Address	Wybong Road, Wybong NSW 2333,
Proponent	Glencore Coal Assets Australia
Type of Audit	Independent Environmental Audit
Date	30-Sep-2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Kate Michelmores
Signature	
Qualification	Bachelor of Science in Environmental Forensics Certified Lead Auditor – Exemplar Global
Company	AECOM Australia Pty Ltd
Company Address	420 George Street, AECOM NSW 2000

Table of Contents

Abbreviations	7
1.0 Introduction	13
1.1 Audit Objectives and Scope	13
1.2 Audit Criteria	14
1.3 Audit Period	14
2.0 Background of the Project	15
2.1 Overview and Approval History	15
2.2 Topography and Surrounding Land Use	15
2.3 Operations	15
2.4 Exploration	15
3.0 Audit Team	18
3.1 Audit Team Selection and Endorsement	18
4.0 Audit Methodology	19
4.1 Audit Process	19
4.1.1 Site Inspection	19
4.1.2 On-site Interviews	20
4.1.3 Audit Evidence	20
4.2 Agency and Community Consultation	20
4.3 Compliance Assessment Criteria	21
5.0 Audit Findings	22
5.1 Compliance Overview	22
5.1.1 Status of the previous IEA Recommendations	22
5.1.2 State Significant Development (SSD) 8642	23
5.1.3 EPL 12894	25
5.1.4 Other Approvals and Licences	28
6.0 Review of Management Plans	29
7.0 Environmental Performance	41
7.1 Noise	41
7.1.1 Operational Controls	41
7.1.2 Review of Monitoring Data and Exceedance Investigation	41
7.1.3 Review of Complaint Received	41
7.2 Blasting and Vibration	42
7.2.1 Operational Controls	42
7.2.2 Review of Monitoring Data and Exceedance Investigation	42
7.2.3 Review of Complaint Received	43
7.2.4 Operational Controls	43
7.2.5 Review of Monitoring Data and Exceedance Investigation	44
7.2.6 Review of Complaints Received	44
7.3 Water	44
7.3.1 Operational Controls	44
7.3.2 Review of Monitoring Data and Exceedance Investigation	45
7.3.3 Review of Complaint Received	46
7.4 Biodiversity	46
7.4.1 Operational Controls	46
7.4.2 Review of Monitoring Data and Exceedance Investigation	46
7.4.3 Review of Complaint Received	46
7.5 Heritage	47
7.5.1 Operational Controls	47
7.5.2 Review of Monitoring Data and Exceedance Investigation	47
7.5.3 Review of Complaint Received	47
7.6 Rehabilitation	47
7.6.1 Operational Controls	47
7.6.2 Review of Monitoring Data and Exceedance Investigation	47
7.6.3 Review of Complaint Received	48
7.7 Waste	48
7.7.1 Review of Complaint Received	48

7.8	Dangerous Goods	49
7.8.1	Review of Complaint Received	49
7.9	Overview of Environmental Management	49
7.9.1	Compliance Monitoring	49
7.9.2	Summary of notices, orders, penalty notices or prosecutions issued	50
7.9.3	Complaints Management	50
8.0	IEA Recommendations and Continual Improvement Opportunities	52
9.0	Limitations	54
Appendix A		
	Compliance Checklists	A
Appendix B		
	DPE Endorsement of the Audit Team	B
Appendix C		
	Photographic Log	C
Appendix D		
	Agency and Communication Consultation	D
Appendix E		
	Audit Plan	E
Appendix F		
	Status of the previous IEA Recommendations	F
List of Tables		
Table 1	SSD8642 IEA Applicable Conditions	13
Table 2	IEA Audit Team	18
Table 3	Compliance assessment criteria	21
Table 4	Compliance Summary	22
Table 5	Non-compliances identified against EPL12894	25
Table 6	Management Plan Review Summary	29
Table 7	2025 opportunities for Improvement	52
Table 8	Agency Consultation Summary	D
Table 9	Summary of previous IEA Findings – Non-Compliance against PA06_0014	F
Table 10	Summary of previous IEA Findings – Non-Compliance against SSD8642	F
Table 11	Summary of previous IEA Findings – Non-Compliance against EPL 12894	F
Table 12	Summary of previous IEA Findings – Non-Compliances against Mining and Exploration Leases	F
Table 13	Summary of previous IEA Findings – General Recommendations	F

Abbreviations

Abbreviation	Description
ACHMP	Aboriginal Cultural Heritage Management Plan
AECOM	AECOM Australia Pty Ltd
AEST	Australian Eastern Standard Time
AHIMS	Aboriginal Heritage Information Management System
AQGGMP	Air Quality and Greenhouse Gas Management Plan
Arch	Archaeology
AS	Australian Standard
AS/NZ	Australian/New Zealand Standard
BC	Biodiversity Conservation Act 2016
BCS	Biodiversity Conservation and Science Directorate
BfMP	Bushfire Management Plan
BMP	Blast Management Plan
BOMPS	Biodiversity Offset Management Plan and Strategy
CCC	Community Consultative Committee
CEEC	Critically Endangered Ecological Community
CEP	Community Enhancement Program
CHPP	Coal Handling and Preparation Plant
CRA	Closure Risk Assessments
CRD	Cumulative Departure from Mean Rainfall
dB	Decibel - is a unit used to measure the intensity or loudness of sound and other physical quantities
DPHI / The Department	NSW Department of Planning, Housing and Infrastructure
E&C	Environment and Community
EA	Environmental Assessment
EIS	Environmental Impact Statement
EC	electrical conductivity
ECRA	Annual Environment and Community Risk Assessments
EEC	Endangered Ecological Community
EL	Exploration Lease
EMD	Environmental Monitoring Database
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EPBC	Environment Protection and Biodiversity Conservation Act 1999

Abbreviation	Description
EPL	Environment Protection Licence
ERS	Evaluated Receipt Settlement
FLRP	Final Landform & Rehabilitation Plan
GCAA	Glencore Coal Assets Australia
GDE	Groundwater Dependent Ecosystem
GDP	MCO Ground Disturbance Permit
GDPS	Ground Disturbance Process
GHGEA	Greenhouse Gas Energy Assessment
GIS	Geographic Information System
GWMP	Groundwater Management Plan
Ha	Hectare
HHMP	Historic Heritage Management Plan
HMP	Heritage Management Plan
Hons	Honors
HRSTS	Hunter River Salinity Trading Scheme
HVAS	High Volume Air Sampler
IEA	Independent Environmental Audit
ITARP	Investigation Trigger Action Response Plan
LDP	Licence Discharge Points
LOX	Limit of Oxidation
mAHD	Metres above Australian Height Datum
MCCO	Mangoola Continued Operations
MCO	Mangoola Coal Operations Pty Ltd
ML	Mining Lease
MOD	Modification to Development Consent
MOP	Mining Operations Plan
MSC	Muswellbrook Shire Council
Mtpa	Mega Tonnes Per Annum
NGER	National Greenhouse and Energy Reporting
NGERS	National Greenhouse and Energy Reporting Scheme
NHVR	National Heavy Vehicle Regulator
NMG	Noise Monitoring Groups
NMP	Noise Management Plan
NSW	New South Wales

Abbreviation	Description
NSW RR	NSW Resources Regulator
NSWD Water	Formerly NSW Department of Water now NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)
OEH	Office of Environment and Heritage
OFI	Opportunity for Improvement
OSOM	Oversize and/or Overmass
PA	Project Approval
PAR	Post Approval Requirements
PIRMP	Pollution Incident Response Management Plan
PM10	Particulate matter with a diameter of 10 micrometers or less
PM2.5	Particulate matter with a diameter of 2.5 micrometers or less
RAP	Registered Aboriginal Parties
RAR	Response to Audit Recommendations
RFS	NSW Rural Fire Services
RMP	Rehabilitation Management Plan
ROBJ	Rehabilitation objectives
ROM	Run of Mine Coal
RPS	Consultant, RPS Group (of Tetra Tech). Author of the 2022 MCO IEA Report
SAP	Systems, Applications, and Products in Data Processing
SC	Science
Secretary	Secretary of the Department of Planning and Environment or delegate
SIMP	Social Impact Management Plan
Spon com	Spontaneous combustion
SSD	State Significant Development
STP	Sewage Treatment Plant
SWMP	Surface Water Management Plan
TARP	Trigger Action Response Plan
TEOM	Tapered Element Oscillating Microbalance
The Department (see DPHI)	Department of Planning, Housing and Infrastructure (formerly the Department of Planning, Industry and Environment)
TSP	Total suspended particulate
TSS	Total Suspended Solids
VCA	Voluntary Conservation Agreement
VDS	Vehicle Data Sheets
VIMP	The Visual Impact Management Plan

Abbreviation	Description
WAL	Water Access Licence
WBM	Water Balance Model
WMP	Water Management Plan
WSN	Weather Station North
WSS	Weather Station South

Executive Summary

AECOM Australia Pty Ltd (AECOM) was engaged by Mangoola Coal Operations Pty Ltd (MCO) to conduct the 2025 Independent Environmental Audit (IEA) of Mangoola Coal Mine in accordance with Part D, Conditions 13 and 14 of State Significant Development (SSD) 8642.

Mangoola Coal Mine is an open cut thermal coal operation located in the Upper Hunter Valley, NSW. Operated by MCO (a Glencore subsidiary), mining commenced in 2010, with coal first produced in early 2011. In 2021, Development Consent SSD-8642 was granted for the Mangoola Coal Continued Operations (MCCO) Project, allowing mining to continue north of the existing operation through to 2030. The mine produces up to 13.5 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal, processed on site and transported by rail to the domestic market and the Port of Newcastle. MCO continues to operate under a comprehensive environmental management framework, with progressive rehabilitation and biodiversity offsets integral to ongoing activities.

The 2025 Independent Environmental Audit (IEA) was conducted in accordance with the *Independent Audit Post Approval Requirements* (May 2020) issued by the NSW Department of Planning, Housing and Infrastructure (DPHI). The IEA was conducted by DPHI-approved Lead Auditor Kate Michelmores, with assistance provided by Haley Bates in the role of Auditor and included input from independent specialists in the areas of noise, air quality, and heritage.

The IEA assessed the environmental performance and compliance of MCO over the period from 23 July 2022 – 3 July 2025. The IEA involved consultation with environmental regulatory agencies and the Chair of the Community Consultative Committee (CCC) to identify key issues and focus areas.

A three-day site inspection was undertaken from 1 to 3 July 2025, including interviews with key site personnel and inspection of major operational and environmental aspects. The IEA included a review of the implementation of environmental management strategies, plans and programs, as well as the site's performance in relation to incidents, complaints, regulatory actions, and annual reporting.

Compliance was assessed against all applicable conditions of SSD-8642, Environment Protection Licence (EPL) 12894, and relevant mining leases and exploration licences. The adequacy of the environmental management strategies, plans, and programs required under the consent was also reviewed. This report presents the findings of the audit.

Audit Finding Summary

The 2025 IEA identified a high level of compliance with the conditions of SSD-8642, EPL 12894, and relevant mining and exploration titles. A total of 10 non-compliances were recorded during the audit period:

- 4 non-compliances against conditions of SSD-8642, including an overarching breach of Condition A2 (linked to all consent non-compliances), isolated failures in blast monitoring, incomplete groundwater analyte sampling at MP9a, and exceedances of discharge volume limits under the HRSTS.
- 6 non-compliances against conditions of EPL 12894, relating to a data gap in blast monitoring, intermittent air quality and weather monitoring data capture issues, and exceedances of licensed discharge volumes during two HRSTS events.
- No non-compliances were identified against mining leases or exploration licences.

All non-compliances were administrative or technical in nature, with no evidence of material environmental harm resulting. MCO demonstrated timely and proactive responses, including reporting to regulators, root cause investigation, and implementation of corrective actions.

The audit also identified several Opportunities for Improvement (OFIs) to strengthen management plan consistency, environmental monitoring alignment, infrastructure maintenance, and transparency in reporting. These include updates to the Water Management Plan, Erosion and Sediment Control Plan, Surface Water Management Plan, and Biodiversity Offset Management Plan and Strategy (BOMPS), as well as maintenance actions at hydrocarbon management facilities.

2025 IEA Conclusion

MCO demonstrates strong environmental management practices, effective response to compliance risks, and a commitment to continuous improvement, consistent with the performance benchmark observed across Glencore's NSW coal assets.

MCO underwent a change in Environmental & Community (E&C) Manager during the audit period. Despite this transition and resource limitations, the site continued to demonstrate proactive environmental management, effective compliance management, and a commitment to maintaining strong regulator and community engagement.

The audit confirmed that MCO continues to operate under a robust environmental management framework supported by:

- Effective implementation of management plans and monitoring programs;
- Active engagement with regulators and community stakeholders;
- Clear systems for incident response, reporting, and continuous improvement.

1.0 Introduction

AECOM Australia Pty Ltd (AECOM) was engaged by Mangoola Coal Operations Pty Ltd (MCO) to conduct the 2025 Independent Environmental Audit (IEA) of Mangoola Coal Mine accordance with Part D, Conditions 13 and 14 of State Significant Development (SSD) 8642.

1.1 Audit Objectives and Scope

The core objective of the IEA was to assess compliance with all requirements of the current revisions of the following regulatory approvals:

- State Significant Development (SSD) 8642
- Environmental Protection Licence (EPL) 12894
- Exploration Licence (EL) 5552
- Assessment Lease (AL) 9
- Mining Lease (ML) 1626, 1747, 1815, 1817

The requirements for the IEA are set out in Part D, Conditions 13 and 14 of NSW Department of Planning, Housing and Infrastructure (DPHI) State Significant Development (SSD) 8642 Table 1.

The IEA scope required compliance with the requirements of the Independent Audit Post Approval Requirements (PAR) guideline (NSW Department of Planning, Industry and Environment, 2020).

Table 1 SSD8642 IEA Applicable Conditions

Reference	Condition Requirement	IEA Response
Condition D13	Within one year of commencement of development under this consent, and every three years thereafter (unless otherwise directed by the Planning Secretary), the Applicant must commission and pay the full cost of an Independent Environmental Audit (IEA) of the development. The audit must:	
D13(a)	Be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary.	The Department endorsed appointment of the audit team on 23 May 2025. Refer Appendix B
D13(b)	Be conducted by a suitably qualified, experienced and independent team of experts (including any expert in fields specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary.	Refer Section 3.0 and Appendix B
D13(c)	Be carried out in consultation with the relevant agencies and the Community Consultative Committee (CCC).	Refer Section 4.2
D13(d)	Assess the environmental performance of the development and whether it is complying with the relevant requirements of this consent, water licences and mining leases (including any strategies, plans or programs required under these approvals).	Refer Section 7.0
D13(e)	Review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent.	Refer Section 6.0

Reference	Condition Requirement	IEA Response
D13(f)	Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under the abovementioned approvals and this consent.	This report
D13(g)	Be conducted and reported to the satisfaction of the Planning Secretary.	This IEA report must be submitted to DPHI on or before 1 October 2025.
Condition D14	Within three months of commencing an IEA (or another timeframe agreed by the Planning Secretary), the Applicant must submit a copy of the audit report to the Planning Secretary and any other relevant NSW agency. The report must include the Applicant's response to any recommendations and a timetable for implementing them. The recommendations must be implemented to the satisfaction of the Planning Secretary.	

1.2 Audit Criteria

The audit criteria was developed to achieve the objectives of the audit and to address the request made by the Department, as the lead regulator and feedback received during the consultation process with the relevant environmental regulators.

Compliance with each condition of MCO's Project Approval, EPL and Mining Tenements was assessed as part of the audit. Checklists addressing each condition from these approvals, licenses and leases is provided in **Appendix A**. In addition, the audit also assessed compliance against relevant criteria relating to MCO's environmental assessment documentation, approved management plans, and water licences.

1.3 Audit Period

This IEA covers the audit period from 23 July 2022 to 3 July 2025, inclusive of the date of the final site inspection.

2.0 Background of the Project

2.1 Overview and Approval History

Mangoola Coal Mine is an open cut thermal coal mining operation situated approximately 20 km west of Muswellbrook and 10 km north of Denman in the Upper Hunter Valley, New South Wales (Figure 1). The operation is owned and operated by MCO, a wholly owned subsidiary of Glencore Coal Assets Australia (GCAA).

MCO, formerly known as the Anvil Hill Project, was initially approved under Project Approval PA 06_0014, granted on 7 June 2007. The original approval permitted the construction and operation of an open cut coal mine and associated infrastructure in the Wybong area, with extraction of up to 10.5 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal. Since April 2014, this approval had supported increased extraction rates of up to 13.5 Mtpa. A total of eight modifications to PA 06_0014 were approved between 2008 and 2017, addressing changes to mine layout, infrastructure, water supply, night-time operations, and extraction rates. MCO submitted the notice of surrender of PA 06_014 on 28 September 2022. On 21 November 2022 DPHI responded noting the voluntary surrender of the PA 06_014.

On 26 April 2021, the NSW Independent Planning Commission granted State Significant Development Consent SSD-8642 for the Mangoola Coal Continued Operations (MCCO) Project. This consent enables the continuation of open cut mining operations to the north of the existing mine footprint and allows for the extraction of up to an additional 52 million tonnes of coal through to the end of 2030. Development and construction under SSD-8642 commenced in December 2021. Mining operations officially commenced in Wybong Pit on 1 December 2022 with the first blast conducted on 19 January 2023 and first coal extracted on 28 August 2023. No modifications to SSD-8642 were approved or in progress during the current audit period.

MCO also operates under Environment Protection Licence (EPL) 12894, issued by the NSW Environment Protection Authority (EPA) under the Protection of the Environment Operations Act 1997. The EPL regulates noise, air quality, water discharges, and other key environmental aspects of the operation. Mining and exploration activities are further supported by various mining leases (e.g., ML1626, ML1747) and exploration licences (e.g., EL5552,) that authorise ongoing resource extraction and development activities within the approved project area.

2.2 Topography and Surrounding Land Use

MCO is situated within a predominantly rural landscape in the Upper Hunter Valley of New South Wales, approximately 20 kilometres west of Muswellbrook. The topography of the site and surrounding area consists of gently undulating terrain interspersed with low ridgelines, creek lines, and areas of exposed sandstone escarpment. The mine is located within the Wybong Creek catchment, with key watercourses including Wybong Creek and Big Flat Creek traversing the broader area. Surrounding land uses are primarily agricultural, including livestock grazing and rural residential properties, with pockets of remnant native vegetation and conservation areas.

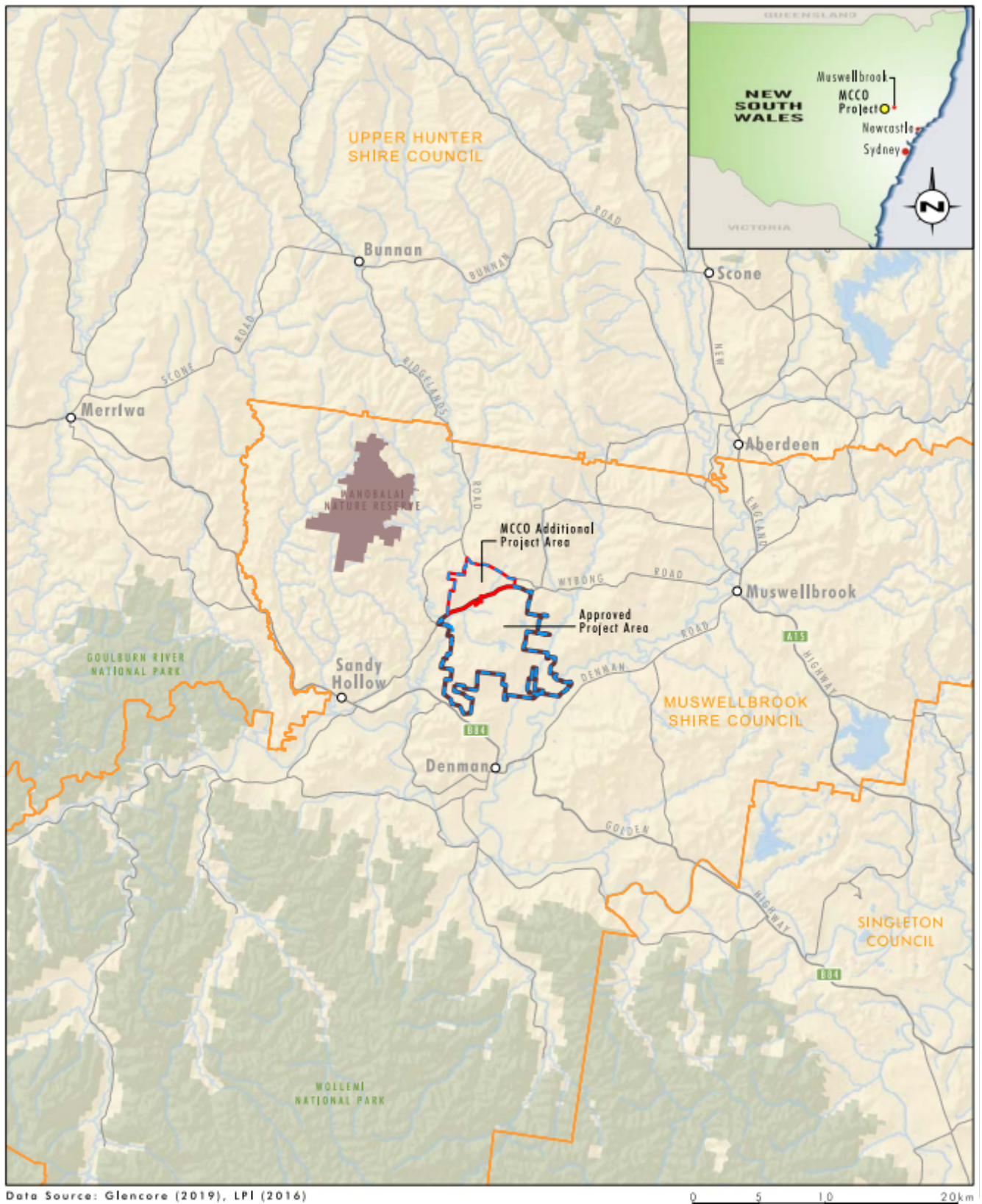
2.3 Operations

Key infrastructure includes haul roads, the coal handling and preparation plant (CHPP), a train load-out facility, water management infrastructure, workshops, administration buildings, and a rail loop. Operations also involve progressive rehabilitation of disturbed land and the ongoing implementation of biodiversity offset strategies across the region. Current mining activities are focused in the Wybong Pit area within ML 1817, which became active following approval and construction of the MCCO Project and the continued mining within ML1626 to the south of Wybong Pit in the areas known as Main Pit and South Pit.

2.4 Exploration

During the audit period (23 July 2022 to 3 July 2025), MCO undertook progressive exploration activities primarily within the Wybong Pit area (ML 1817) and Assessment Lease (AL) 9. In 2022, MCO completed three exploration holes, 24 Limit of Oxidation (LOX) holes, and installed two groundwater

monitoring bores in accordance with MCCO Project EIS commitments. An ESF4 application was submitted in July 2022 for exploration of a further 11 boreholes in AL9. In 2023, exploration works included nine exploration holes, 34 LOX holes, two piezometer holes, and ten groundwater monitoring bores, all within ML 1817. Activity in 2024 expanded to 51 exploration holes drilled in ML 1817 and three in AL9. For 2025, MCO planned to drill approximately 55 boreholes in ML 1817 and 11 in AL9, with three of these to be cored and the remainder completed as open (chip) holes. All exploration was undertaken in accordance with the relevant environmental approvals and commitments.



Legend

- MCO Project Area
- Approved Project Area
- MCO Additional Project Area
- Local Government Area

Figure 1 Regional Context

Source Umwelt (2024)

3.0 Audit Team

3.1 Audit Team Selection and Endorsement

The Audit Team consisted of the following qualified, experienced and independent personnel listed in Table 2.

Table 2 IEA Audit Team

Name	Company	Role	Qualifications & Relevant Experience
Kate Michelmore	AECOM	Lead Auditor	BSc (Environmental Forensics); Exemplar Global certified Lead Auditor; 14+ years' experience in environmental compliance; approved by Government Regulators to manage the delivery of IEAs and EPBC audits for major coal mines, power stations, and industrial facilities across Australia.
Haley Bates	AECOM	Auditor	B Environmental Science (Biology); 18 years' experience in WHS auditing, occupational hygiene, and contaminated land; recent IEA experience at Liddell Coal Mine, Ulan Underground Coal Mine.
Patrick Martinez	AECOM	Noise Specialist	BE (Mechanical); MAAS; 29+ years in acoustics and vibration; extensive mining experience incl. Ravensworth and Bengalla; expert in noise monitoring and modelling.
David Rollings	AECOM	Air Quality Specialist	BEng (Chemical); Certified Air Quality Professional; national lead in air modelling (CALPUFF, AERMOD, etc.); IEA experience at Wilpinjong, Liddell, and Cleanaway.
Dr Darran Jordan	AECOM	Heritage Specialist	PhD (Archaeology); BA (Text & Writing), BArch (Hons); 19+ years' experience in Indigenous and historical heritage; heritage lead on multiple IEA projects.

The Department formally endorsed the AECOM audit team to conduct the 2025 IEA on 23 May 2025. A copy of the Department's approval of the audit team is available in **Appendix B**.

4.0 Audit Methodology

4.1 Audit Process

4.1.1 Site Inspection

An audit plan was prepared for the site component of the IEA. A copy of the audit plan is provided in **Appendix E**. A three-day site inspection was conducted at MCO between 1 to 3 July 2025.

Weather conditions during the site inspection at MCO, conducted between 1 and 3 July 2025, were typical of early winter in the Upper Hunter region, with cool temperatures and variable rainfall. On 1 July, the site experienced rainfall totalling approximately 15.6 mm. Temperatures remained cool, ranging between 9.0°C and 17.9°C across all days. The weather did not adversely impact the conduct of the site inspection.

The following areas of the site were inspected by the audit team. Refer to the photographic log in **Appendix C** for additional context on the auditors site observations:

- Mine Infrastructure Area (MIA) inclusive of the
 - Administration block,
 - maintenance workshop,
 - waste storage area,
 - wash down bay,
 - oil water separator,
 - sewage treatment plant (STP),
 - store warehouse and chemical storage area.
- CHPP
- Heavy vehicle waste tyre storage area
- Product / ROM coal stockpiles
- Train loading facility and conveying structures
- Laydown / storage areas
- Orica Compound (Explosives) Reload Facility and Magazine Area (external)
- Sample of Biodiversity Offset areas
- Water storages
- Hunter River Salinity Trading Scheme (HRSTS) discharge point
- EPL monitoring points
- Select heritage items
- Select rehabilitation areas

In accordance with *ISO 19011:2014 Guidelines for Auditing Management Systems*, an opening meeting was held on 1 July 2025 in person and a closing meeting was held on 10 July 2025 via TEAMS. Attendees at the opening and closing meetings included the MCO leadership team and the MCO E&C Department.

4.1.2 On-site Interviews

Interviews were conducted with the following key personnel:

- Jason Barry – CHPP – CHPP Superintendent
- Luke Sandall-Hay – CHPP – CHPP Control Operations
- Matthew Cox – CHPP – CHPP Manager
- Dayne Collins – Workshop – Maintenance Superintendent
- Damien Foster – Workshop, Scheduler – Logistics of Maintenance
- Duncan Farley – Workshop – Step Up Supervisor – AC Heavy
- Russell Walls – Administration – Pit Services Superintendent
- Heath Purvis – Orica Compound (Explosives) Reload Facility Site Supervisor – Site Supervisor
- Brooke York – Environment & Community (E&C) Department – E&C Officer
- Annemieke Grosser – E&C Department – E&C Officer
- Michelle Fooks – E&C Department – E&C Officer
- Robyn Ellis – E&C Department – E&C Manager
- Luke Dowler – E&C Department – E&C Officer.

4.1.3 Audit Evidence

The auditors undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and site inspections. Records were provided by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information, such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site. The site inspections concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspections and interviews over the three days. The audit involved the review of a significant amount of evidence. Evidence sighted to validate compliance against each audit condition is summarised in the audit checklists in **Appendix A**.

4.2 Agency and Community Consultation

The Lead Auditor requested feedback from the following regulatory agencies and relevant stakeholders:

- NSW Department of Planning, Housing and Infrastructure
- NSW Environment Protection Authority
- Muswellbrook Shire Regional Council
- Department of Climate Change, Energy, the Environment and Water
- NSW Resource Regulator
- Heritage NSW within the Department
- Community Consultative Committee (CCC) Independent Chair

Responses were received from the following Regulatory Agencies and Stakeholders:

- NSW Department of Planning, Housing and Infrastructure (DPHI)
- DPIE Water
- NSW Environment Protection Authority
- Department of Climate Change, Energy, the Environment and Water
- CCC Chair.

A summary of the feedback requests sent and any responses received is provided in **Appendix D**

4.3 Compliance Assessment Criteria

The compliance status for each audit condition was assessed in accordance with the criteria in Table 3.

Table 3 Compliance assessment criteria

Status	Description
Compliant	Currently in compliance. Sufficient verifiable evidence was available to demonstrate that the intent and all elements of the requirement of the regulatory instrument had been complied with within the scope of the audit.
Non-compliant	Currently not in compliance. Sufficient verifiable evidence was available to demonstrate that the intent of one or more specific elements of the regulatory instrument have not been complied with within the scope of the audit.
Not Triggered	Condition not applicable at time of audit or had not been triggered
Noted	A statement or fact, where no assessment of compliance is required.

The terms partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms was not used to verify compliance of an audit condition in this IEA. Should an opportunity for improvement (OFI) be made this has been assigned in addition to the compliance descriptors in Table 3 above.

5.0 Audit Findings

5.1 Compliance Overview

This section includes a specific discussion of the identified non-compliances.

As outlined in the Independent Audit PAR (2020) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period must be provided in the audit report. The Table below provides a summary of the assessment of compliance for each approval document audited.

Table 4 Compliance Summary

Document Audited	Compliant	Non-Compliant	Not Triggered	Noted	Total Conditions
SSD 8642	96	4	31	2	102
EPL12894	47	6	22	12	87
ML	3	0	5	0	11
AL	6	0	3	0	9
EL	5	0	4	1	10

Section 5.1.2-5.1.4 below summarise the non-compliances identified against SSD 8642 and EPL 12894. No non-compliances were identified against MCO's water licences, mining leases, exploration licences or assessment lease. Details include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance.

5.1.1 Status of the previous IEA Recommendations

A review of the previous IEA recommendations was conducted to confirm the status of the actions implementation. All recommendations had been adequately actioned.

The 2022 MCO IEA actions (RPS, 2022) and their status at the time of the 2025 IEA is provided in **Appendix F**.

5.1.2 State Significant Development (SSD) 8642

Identified non-compliances and recommendations against the conditions of MCO's SSD 8642 are presented in Table below.

Table 5 Non-compliances identified against SSD 8642

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation
Schedule 2, Condition A2	NC001	The development may only be carried out: a. in compliance with the conditions of this consent; b. in accordance with all written directions of the Planning Secretary; c. generally in accordance with the EIS; and d. generally in accordance with the Development Layout in Appendix 2.	Non-compliance have been identified against the Conditions of SSD8642. As clause (a) requires compliance with all conditions of consent, any non-compliance elsewhere within the consent necessarily results in non-compliance with this overarching condition. Accordingly, this condition has been assessed as Non-compliant. Recommendation – Non applied.
Schedule 2, Condition B25	NC002	The Applicant must implement the Blast Management Plan as approved by the Planning Secretary	On 18 January 2023, MCO failed to monitor airblast overpressure and ground vibration for a scheduled blast event in the Main Pit due to the automatic triggering function of the monitoring network failing to trigger for the blast event, and an internal administrative failure to recognise this data gap within a 6-week timeframe. This contravened the BMP's requirement for continuous blast monitoring and was reported to the DPHI, who classified the non-compliance as an administrative breach.
Schedule 2, Condition B46	NC003	Water Discharges The Applicant must ensure that all surface discharges from the site comply with: a. discharge limits (both volume and quality) set for the development in any EPL; or b. relevant provisions of the POEO Act and Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	Condition B46 requires MCO to ensure that all surface water discharges from site comply with the discharge limits (both volume and quality) specified in EPL 12894. A non-compliance against EPL Condition E1.3 has been recorded due to MCO exceeding the licensed hourly flow rate during two HRSTS discharge events in August and October 2022. The exceedances specifically related to the volume of water discharged through Monitoring Point 12. Refer to the findings against NC003 in the EPL 12894 audit checklist.

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation
			Condition B46 must therefore be categorised as non-compliant, on the basis that MCO failed to ensure discharges from site complied with the discharge volume limit specified in the site's EPL. Recommendation – Non applied as MCO's response and implemented measures has been deemed adequate.
Schedule 2, Condition B52	NC004	The Applicant must implement the Water Management Plan as approved by the Planning Secretary.	In December 2023, a full suite of analytes was not analysed for MP9a due to an administrative error from the environmental monitoring contractor. Upon investigation it was identified that the monitoring contractor had the incorrect paperwork for the day of sampling. The paperwork outlines the monitoring points and analytes that require sampling (as per the scope as provided by MCO) which then accompanies the sample to the lab for analysis. The non-compliance was reported to DPHI and DCCEEW. MCO implemented corrective actions including: • Earlier sampling schedule (May instead of December) to allow errors to be identified and repeat sampling conducted prior to the end of the reporting year. • New data verification process. • Additional end of month task for QA checks. The auditor sighted 2025 Annual GW Validation Check spreadsheet as evidence of implementation. Recommendation – Non applied as MCO's response and implemented measures has been deemed adequate.

5.1.3 EPL 12894

Identified non-compliances and recommendations against the conditions of EPL 12894 are presented in Table below.

Table 6 Non-compliances identified against EPL12894

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation												
M1.2	NC005	All records required to be kept by this licence must be: - in a legible form, or in a form that can readily be reduced to a legible form; - kept for at least 4 years after the monitoring or event to which they relate took place; and - produced in a legible form to any authorised officer of the EPA who asks to see them.	During the audit period, non-compliances with Conditions M1.2, M7.1 and R5.1 of Environment Protection Licence (EPL) 12894 were identified, relating to the monitoring and retention of blast data for a scheduled blast event in the Main Pit on 18 January 2023. MCO failed to capture monitoring data for the 18 January 2023 blast due to the automatic triggering function of the monitoring network failing to trigger for the blast event, and an internal administrative failure to recognise this data gap within a 6-week timeframe, resulting in the omission of this event from the 2022–2023 Blast Monitoring Report. The issue was identified during an internal review on 5 March 2024, and subsequently confirmed as a non-compliance following advice from ACOEM on 7 March 2024. The EPA was formally notified on 14 March 2024, and MCO submitted a detailed investigation report on 8 May 2024.												
M7.1	NC006	To determine compliance with conditions L4.1, L4.2, L4.3 and L4.4: - Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 16, 21 and 32 for the parameters specified in Column 1 of the table below; and - The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the other columns. <table border="1"> <thead> <tr> <th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Sampling Method</th></tr> </thead> <tbody> <tr> <td>Airblast Overpressure</td><td>Decibels (Linear Peak)</td><td>All Blasts</td><td>Australian Standard AS 2187.2-2006</td></tr> <tr> <td>Ground Vibration Peak Particle Velocity</td><td>millimetres/second</td><td>All Blasts</td><td>Australian Standard AS 2187.2-2006</td></tr> </tbody> </table>	Parameter	Units of Measure	Frequency	Sampling Method	Airblast Overpressure	Decibels (Linear Peak)	All Blasts	Australian Standard AS 2187.2-2006	Ground Vibration Peak Particle Velocity	millimetres/second	All Blasts	Australian Standard AS 2187.2-2006	On 17 June 2024, the EPA issued a Formal Warning to MCO, having determined that the failure to monitor and retain the required data constituted a breach of both Conditions M1.2 and R5.1, and therefore an offence under Section 64 of the <i>Protection of the Environment Operations Act 1997</i> .
Parameter	Units of Measure	Frequency	Sampling Method												
Airblast Overpressure	Decibels (Linear Peak)	All Blasts	Australian Standard AS 2187.2-2006												
Ground Vibration Peak Particle Velocity	millimetres/second	All Blasts	Australian Standard AS 2187.2-2006												
R5.1	NC007	Reporting of Blast Monitoring The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: the date and time of the blast;	The non-compliance related to a single blast event. It was identified internally by MCO and promptly reported to both the DPHI and the EPA. MCO implemented updates to internal blast monitoring procedures to prevent recurrence. No similar issues were identified for the remainder of the reporting period.												

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation								
		b. the location of the blast on the premises; c. the blast monitoring results at each blast monitoring station; and d. an explanation for any missing blast monitoring results.	Recommendation – No recommendation has been applied in this case because the non-compliance was isolated to a single blast event, and MCO identified the issue during their own internal review. The non-compliance was reported to DPHI and EPA, and both agencies were informed of the cause and the corrective actions taken. MCO has since updated internal procedures to prevent recurrence, and there's no evidence of similar issues occurring across the rest of the reporting period. Given the administrative nature of the breach and the proactive response by site, further action is not considered necessary.								
M2.2	NC008	Air Monitoring Requirements POINT 19,20 <table border="1"> <thead> <tr> <th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr> </thead> <tbody> <tr> <td>PM10</td><td>micrograms per cubic metre</td><td>Continuous</td><td>Special Method 1</td></tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	Special Method 1	During the audit period, there were occurrences where air quality monitoring data was not captured in accordance with EPL 12894 requirements and the NSW EPA's Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (2022). Despite these occurrences, overall data capture rates remained above 95%, which is broadly consistent with the minimum target adopted by DCCEEW for the Upper Hunter Air Quality Monitoring Network. Intermittent data loss occurred between 2022–2024 due to scheduled maintenance, technical faults, low battery, and flow failures. Field servicing was undertaken in each case, with units replaced where issues persisted. All faults were rectified promptly once identified. Recommendation – MCO response considered adequate, and no recommendation is required.
Pollutant	Units of measure	Frequency	Sampling Method								
PM10	micrograms per cubic metre	Continuous	Special Method 1								
M4.1	NC009	For each monitoring point specified in the table below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period	During the audit period, there were multiple occurrences where weather monitoring data was not adequately captured in accordance with EPL 12894 Condition M4.1 requirements.								

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation
		and sample at the frequency, specified opposite in the other columns: Point 5; and Point 18	There were no recognisable adverse effects of the non-compliance and data capture for the reporting period at Point 5 and Point 18 remained above 95% in 2022-2024. Recommendation – MCO response considered adequate, and no recommendation is required.
E1.3	NC010	This licence authorises the discharge of saline water into the Hunter River Catchment from an authorised discharge point (or points), in accordance with the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	During the audit period, exceedances of the licensed hourly discharge volume limits occurred at Monitoring Point 12 during two Hunter River Salinity Trading Scheme (HRSTS) events: 5 August 2022 – hourly exceedances between 18:00 and 20:00. 23–24 October 2022 – hourly exceedances between 15:00 on 23 October and 08:00 on 24 October. These exceedances contravene EPL Condition E1.3 and constituted potential offences under s64(1) of the POEO Act, as confirmed by the NSW EPA. The EPA issued MCO a Show Cause Notice on 17 April 2024, and after receiving MCO's response on 15 May 2024, a Formal Warning Letter was issued by the EPA on 15 July 2024. Additional discharge exceedance On 15 March 2022, prior to the end of an allocated discharge block, MCO also exceeded the maximum daily discharge volume authorised under the River Register (10.9 ML discharged against a 10.07 ML allowance). Pumping was immediately ceased, and the exceedance was reported in the Annual Return. While this event was not included in the EPA's

Reference	Non-Compliance ID	Condition Requirement	Details of non-compliance and Recommendation
			subsequent regulatory action, it was reviewed as part of this audit. Recommendation – MCO response considered adequate, and no recommendation is required.

5.1.4 Other Approvals and Licences

No non-compliances were identified against MCO's water licences, mining leases, exploration licences or assessment lease.

6.0 Review of Management Plans

Condition D13(e) requires the IEA to conduct a review of the adequacy of each management plan required under SSD 8642. In addition, the 2020 Independent Audit PAR requires the IEA report include a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement.

The results of the review conducted against each plan, strategy and program required by SSD 8642 are detailed in the corresponding conditions in the SSD 8642 Audit Checklists in **Appendix A**. A summary of the findings from the reviews is provided in Table 7 below.

Table 7 Management Plan Review Summary

Management Plan	2025 IEA Management Plan Review Summary
Noise Management Plan Version: 24 Date: 20 December 2024	Adequacy Review Findings The Noise Management Plan (NMP) was assessed against Condition B8 of SSD 8642. The NMP was prepared by a qualified and endorsed acoustical consultant and includes measures to ensure compliance with noise criteria, best practice management, and specific provisions to manage noise-enhancing meteorological conditions. The NMP outlines road traffic noise mitigation, defines management systems, roles, and training, and includes a robust monitoring program using real time and attended monitoring, with calibration and validation protocols. A noise response protocol, incident procedures, and stakeholder notification processes are also provided. Overall, the NMP satisfies the requirements of Condition B8 of SSD 8642. Implementation Review Findings The NMP was found to be effectively implemented during the audit period. Key observations include: • Implementation of operational noise controls, including enclosed conveyors, 8 m high haul road noise bund along the southern side of Wybong Road, silent in cab horns for diggers and broadband reversing alarms on equipment. • Implementation of noise mitigation measures, including routine air conditioning maintenance, in consultation with landowners to mitigate mine and road traffic noise impacts. • Meteorological forecasts, noise risk model and Airen weather alerts are used prior to shifts to identify and manage noise enhancing conditions. • Real-time monitoring with continuous unattended units with automated alarms for rapid response and operational adjustments. • Monthly attended monitoring at representative locations to verify compliance and assess mine noise characteristics. • Noise monitoring reports published monthly on the MCO public website and summarised in Annual Reviews. Noise monitoring during the audit period recorded no exceedances of noise criteria. Minor non-compliances were self-reported in the EPL Annual Return due to brief weather monitoring interruptions at Monitoring Points 5 and 18, primarily from technical issues and maintenance, but overall data availability exceeded 99.6% and no adverse impacts were identified. Opportunities for Improvement Nil identified.

Management Plan	2025 IEA Management Plan Review Summary
Blast Management Plan Version: 21 Date: 23 January 2025	Adequacy Review Findings The Blast Management Plan (BMP) was reviewed against the requirements of Schedule 2, Condition B23 of SSD 8642. The plan was last updated to Version 21 following a full review, which clarified how blast overpressure exceedances are determined at representative private property monitors (for context, this was done in response to a high overpressure result recorded at BM09 in March 2024). The BMP was prepared by EnviroStata Consulting Pty Ltd and endorsed by the Department (29 June 2021) and was found to address all requirements of Schedule 2, Condition B23. Supporting procedures include the standalone Blast Fume Management Procedure (Appendix E) and the Closing Public Roads – Mining Procedure (Appendix D). An agreement with TransGrid for alternative vibration limits is detailed in Section 4.4.4 and Appendix C. The plan outlines blast monitoring and reporting, notification processes, and complaint response mechanisms. The Blast Management Plan was verified to contain the required information, as outlined in Schedule 2, Condition B23. Implementation Review Findings Mangoola Coal has implemented key aspects of its approved Blast Management Plan (Version 21, dated 23 January 2025), including: • Operation of a comprehensive blast monitoring network with fixed and portable monitors at sensitive receptors; • Real-time data capture via the ACOEM Dynamaster system, with validated data stored in the EMD; • Routine reporting of results through Blasting Reports and Annual Reviews; and • Ongoing refinements to monitoring, including the planned relocation of monitor BM09 and investigation of meteorological influences on blast outcomes. However, the condition was assessed as non-compliant due to a failure to monitor airblast overpressure and ground vibration for a scheduled blast event on 18 January 2023. This contravened the blast monitoring requirement under Section 4.2 of the BMP. MCO responded with procedural and system improvements, including enhanced data validation within EMD, cross-checks against blast designs, a monthly validation action within CMO, and updates to the Blast Field Sheet. The non-compliance was isolated, and no further issues were identified, with MCO's response deemed proactive and adequate. A recorded exceedance of blast overpressure at BM09 in March 2024 triggered a review and updated of the BMP. Terrock Consulting were engaged to review the BMP to address the adequacy of weather monitoring and representative blast results at sensitive receivers. Following the review and recommendations received MCO committed to consider the options associated with relocating blast monitor BM09 further north to better represent the nearest private receptors and improve the accuracy of compliance monitoring 4. At the time of the audit, a nearby sensitive receptor granted permission for BM09 to be relocated to their property. Note: the revised BMP, approved on 1 July 2025, reflects this relocation. Opportunities for Improvement

Management Plan	2025 IEA Management Plan Review Summary
	OFI-001: Following landholder permission being granted, MCO is to finalise the blast monitor relocation in the next audit period.
Air Quality and Greenhouse Gas Management Plan Version: 2 Date: 26 March 2025	Adequacy Review Findings The Air Quality and Greenhouse Gas Management Plan (AQGGMP) was reviewed against the requirements of Schedule 2, Condition B31 of SSD 8642. The AQGGMP commenced with mining north of Wybong Road and was revised once during the audit period following an independent review by Katestone Environmental, with recommendations incorporated into the version approved by DPHI on 26 March 2025. The plan was prepared by an endorsed, suitably qualified consultant and developed in consultation with the Community Consultative Committee, meeting clauses (a) and (b) of Condition B31. It details measures to ensure compliance with air quality criteria, incorporates best practice dust and greenhouse gas controls, and includes provisions for managing adverse weather and extraordinary events. A comprehensive air quality management system is outlined, covering design and operational controls, training, community mitigation, and management of odour, spontaneous combustion, and blast fume. The monitoring program aligns with NSW Approved Methods, includes real-time and high-volume sampling, meteorological data, and diesel emissions baselines, and supports operational planning and compliance evaluation. Protocols for exceedances, incidents, and stakeholder notifications are also provided. The AQGGMP was found to meet the requirements of Condition B31 of SSD 8642. Implementation Review Findings Mangoola Coal Operations has effectively implemented the approved AQGGMP, to manage air quality and greenhouse gas emissions associated with mining activities. The AQGGMP outlines comprehensive proactive and reactive control measures, including: • Real-time particulate monitoring (PM₁₀ and PM_{2.5}) using TEOMs and Sentinex alerts. • High Volume Air Sampling (HVAS) • Meteorological forecasting and risk prediction using Airen and onsite weather stations. • Operational controls such as water cart use, minimising fall distance during loading as far as practica, and haul road maintenance. • Odour and fume controls, guided by the Spontaneous Combustion Principal Hazard Management Plan and Blast Fume Management Procedure. • Greenhouse gas minimisation through optimised haulage, efficient equipment use, and ongoing performance reviews. Air quality data is managed through the Environmental Monitoring Database (EMD), supported by maintenance and calibration services from C-Based Environmental. During the audit period (July 2022 – July 2025), exceedances of the 24-hr criteria in Table 4 of SSD-8642, Condition B27 were recorded by MCO's air quality monitoring network (which monitors all particulate matter sources). In accordance with Condition B27, Note 'b', the 24-hour criterion only applies to the development on its own. Investigations were completed which confirmed that the

Management Plan	2025 IEA Management Plan Review Summary
	Mangoola component of the dust was below the 24-criterion. Other influencing sources noted included regional bushfire smoke, dust storm, localised gypsum spreading on neighbouring farm or dust generated by sources not attributable to MCO operations. On this basis, the exceedances (elevated results) were not deemed non-compliances.. MCO's contributions were below regulatory thresholds, and no non-compliances were recorded against Condition B27. No odour complaints or offensive odour emissions were recorded. The AQGGMP was found to be compliant with SSD 8642, including the requirements of Condition B31. Its implementation was confirmed through document review, site inspection, and interviews, demonstrating a proactive and effective system that adapts operations during adverse weather conditions and minimises emissions in line with best practice. An administration discrepancy was identified in the reporting of air quality non-compliance dates between the Annual Review and the EPL Annual Return. While all required non-compliances were reported, the two statutory reports presented differing dates and descriptions of events, particularly for EPL Monitoring Point 20. MCO advised that some inconsistencies were due to character limitations within the EPA's eConnect portal, which truncated the full list of dates entered in the "Cause of non-compliance" field. This does not represent a failure to report non-compliances; all relevant events were documented across the statutory reports, but the presentation was not fully aligned. Although these discrepancies had no impact on operational response or equipment availability, maintaining consistency between statutory documents is critical to regulatory transparency. This issue is noted as an opportunity for improvement. Opportunities for Improvement OFI-002: MCO should ensure that data reported is consistent between Annual Review and Annual Return reporting, regarding reporting exceedances of air quality criteria.
Water Management Plan Version 1.0 Date: 02/12/2022	Adequacy Review Findings The Water Management Plan (WMP), Version 1.0 was approved by the DPHI on 2 December 2022. Evidence of consultation with DPIE Water, dated September 2022, was sighted by the auditors. In addition to the overarching WMP, MCO has prepared standalone management plans for surface water, groundwater, and erosion and sediment control, which together comprise the site's integrated water management system. The Water Management Plan and associated standalone components address all requirements of Condition B50. The plans are approved and have been developed in consultation with relevant agencies. However, the WMP and some components of the sub-plans are due for review and update to reflect current operations on site, water balance review findings, groundwater model review as well as trigger level updates. Review of the WMP against the requirements of SSD8642 and EPL12894 identified that the correlation between EPL monitoring points and MCO's internal site references is not consistently clear in the WMP or across the monitoring reports published on the MCO website. For example, while most EPL points are cross-referenced (e.g., EPL 7 = SW16, EPL 8 = SW03), Monitoring Point 42 (Raw Water Dam) is not referenced in the WMP or Surface Water Management Plan (SWMP), despite EPL 12894 requiring daily grab sampling during

Management Plan	2025 IEA Management Plan Review Summary
	discharge events. No discharges from this location occurred during the audit period. Implementation Review Findings The WMP was found to have been adequately implemented during the audit period with the exception of those findings captured under the groundwater management plan below. Opportunities for Improvement OFI-004: During the next review of the WMP, it is recommended that Table F be updated to explicitly include both the EPL monitoring point numbers and the corresponding MCO internal site reference names. This would improve transparency and ensure consistency across the WMP, sub-plans, and published monitoring reports.
Erosion and Sediment Control Plan Version 2.0 Dated 30/10/2023	Adequacy Review Findings The Erosion and Sediment Control Plan ESCP (Version 2.0), approved by the DPHI on 30 October 2023, addresses the relevant requirements of SSD-8642 and is consistent with the broader objectives of the Water Management Plan. The ESCP aligns with contemporary best practice, referencing the Blue Book (Landcom, 2004) and detailing controls such as sediment dams, clean/dirty water separation, and site drainage management. The ESCP is generally reflective of MCO's operations at the time of the audit with the following exceptions: • Section 4.4 of the ESCP refers to the design and future construction of Clean Water Diversion 1 (CWD1) and its associated culvert. However, this infrastructure has been constructed and has been operational since early 2023, with inspections confirming it is functioning as designed. This section of the plan should be updated during the next review of the ESCP to reflect the current status. • the ESCP includes reference to the Mining Operations Plan (MOP), which has been superseded by the new Rehabilitation Management Plan framework. Implementation Review Findings The ESCP was found to have been adequately implemented during the audit period. Opportunities for Improvement OFI-005: During the next review of the ESCP it is suggested to update the ESCP to remove references to the MOP. During the update Section 4.4 of the ESCP should be updated to reflect that the culvert associated with Clean Water Diversion 1 (CWD1) has been constructed and upgraded.
Surface Water Management Plan Version 2.0 Date: 26/10/2023	Adequacy Review Findings Version 2.0 of the Surface Water Management Plan (SWMP) was approved by the DPHI on 26 October 2023. The Plan outlines surface water management controls applicable to the site and reflects current operational arrangements at MCO. The SWMP appropriately integrates requirements for pollution prevention, monitoring, clean water diversions, sediment control, and discharge management, consistent with industry good practice.

Management Plan	2025 IEA Management Plan Review Summary
	The SWMP was reviewed and found to adequately address all requirements of SSD-8642. Several areas for improvement were identified where minor updates to the SWMP would improve alignment with current site operations: • Figure 2.2 – Water Management Schematic should be updated to remove reference to transfer of decant water from Tailings Dam 4 (TD4) to TD2, as this pathway is no longer in use. TD4 now discharges to the Pit Water Dam. • The SWMP should be revised to reflect that new channel stability monitoring sites were established in 2024, including upslope diversions, Big Flat Creek near the MCCO Additional Mining Area, and downstream of the haul road crossing. Current wording refers to this as a future action. The SWMP should be updated to note that a new stream health monitoring site was established on the Hunter River downstream of the HRSTS discharge point during the autumn 2022 monitoring event. This remains described in the Plan as a future commitment. Implementation Review Findings Evidence demonstrates that MCO has implemented the surface water monitoring and management controls outlined in the SWMP. Opportunities for Improvement OFI-006: Figure 2.2 – During the next review of the SWMP it is suggested that the Water Management Schematic be updated to remove reference to transfer of decant water from Tailings Dam 4 (TD4) to TD2, as this pathway is no longer in use. TD4 now discharges to the Pit Water Dam. OFI-007: During the next review of the SWMP it is suggested that the SWMP be revised to reflect that new channel stability monitoring sites were established in 2024, including upslope diversions, Big Flat Creek near the MCCO Additional Mining Area, and downstream of the haul road crossing. Current wording refers to this as a future action. OFI-008: During the next review of the SWMP it is suggested that the SWMP be updated to note that a new stream health monitoring site was established on the Hunter River downstream of the HRSTS discharge point during the autumn 2022 monitoring event. This remains described in the Plan as a future commitment.
Groundwater Management Plan Version 14 Date: 02/12/2022	Adequacy Review Findings The Groundwater Management Plan (GWMP), Version 14, was approved by the DPHI in October 2022. While Version 15 of the GWMP was submitted for review on 19 December 2024, and incorporate updated groundwater modelling and revised trigger levels, it had not been approved at the time of the audit. Accordingly, MCO implemented Version 14 of the GWMP during the audit period. Version 14 of the GWMP addresses the requirements of SSD-8642 and includes defined management measures, trigger levels for groundwater level and quality, monitoring programs, investigation protocols, and escalation pathways. While Version 14 remains current and approved, the groundwater model on which it was based was reviewed and updated by AGE in 2024. Version 15 of the GWMP reflects the new model predictions and includes revised trigger levels. Implementation Review Findings

Management Plan	2025 IEA Management Plan Review Summary
	MCO implemented Version 14 of the GWMP during the audit period. Multiple groundwater level exceedances were recorded and investigated in line with the GWMP's Trigger Action Response Plan (TARP), including repeated Level 2 exceedances at GW26. Exceedances at other bores (e.g. BFC05, VW2-2, VW2-4) also triggered appropriate Level 1 responses (refer Section 7.5 below for further details). pH exceedances at Wybong 1b and 1c were attributed to grout contamination and these bores were removed from trigger assessments in the draft GWMP V15. A non-compliance occurred in December 2023 when a full analyte suite was not collected at MP9a due to an administrative error from the monitoring contractor (incorrect paperwork). MCO reported the non-compliance and implemented corrective actions, including an earlier sampling schedule and strengthened QA processes. Overall, groundwater monitoring, exceedance response, and adaptive management were consistent with the GWMP requirements. Opportunities for Improvement Nil identified.
Biodiversity Offset Management Plan and Strategy	Adequacy Review Findings The Biodiversity Offset Management Plan and Strategy (BOMPS, Version 13, 10 August 2022) functions as the primary instrument fulfilling the requirements of Condition B57. Overall, the BOMPS generally meets the content requirements of Condition B57. It was prepared by suitably qualified personnel endorsed by the DPHI in consultation with the BCS, and includes most of the required biodiversity management, monitoring, and offset delivery components. However, the following gaps and limitations were identified in the adequacy review: • The BOMPS was partially outdated at the time of the audit and requires revision to fully align with the executed Biodiversity Stewardship Agreements (BSAs) and current site responsibilities. In particular, while Highfields and Mangrove are United Wambo offsets, MCO required credits from these sites as part of its 100% like-for-like offset strategy. The BOMPS should be updated to clarify this point. • The BOMPS has reliance on PA 06_0014 biodiversity commitments. • The short-term performance indicators outlined in the BOMPS expired at the end of Year 14 (2024). From 2025 (Year 15) onwards, the medium-term performance indicators are now applicable. However, the current version of the BOMPS has not been updated to reflect this transition, and the short-term indicators remain in place. • The BOMPS includes references in the body of the document to "short-term" and "long-term" performance indicators. However, in Appendix E, the performance indicators are described as "short-term" and "medium-term", with no explicit mention of "long-term" indicators. This inconsistency may cause confusion when interpreting the applicable monitoring and assessment timeframes. Condition B57(c) requires the description of short, medium, and long-term measures. The current approach of updating the BOMPS every three years means there is always overlap in short- and medium-term goals, with the long-term goal being protection of the offsets in perpetuity. Implementation Review Findings

Management Plan	2025 IEA Management Plan Review Summary
	The BOMPS has been substantially implemented during the audit period, with evidence of regular ecological monitoring, targeted weed and pest control, pre-clearance and salvage protocols and site-specific management actions. However, several gaps were identified which support the need for a comprehensive update of the BOMPS. Monitoring of nest boxes is conducted in batches in accordance with the BOMPS. However new nest boxes have not undergone additional monitoring in accordance with Section D6 of the BOMPS, which states that <i>“additional nest-box monitoring surveys will be undertaken where new nest boxes are installed as habitat enhancement measures. These will be undertaken annually commencing the year after installation.”</i> Opportunities for Improvement OFI-009: During the next review of the BOMPS it is suggested to update and remove obsolete short-term performance measures and confirm the applicability of medium-term indicators. OFI-010: During the next review of the BOMPS it is suggested to revise the requirement to undertake additional nest-box monitoring surveys for new nest boxes. OFI-011: During the next review of the BOMPS it is suggested to remove reliance on PA 06_0014 and clearly articulate how legacy biodiversity commitments have been integrated under SSD-8642. OFI-012: To avoid retrospective goal-setting, future BOMPS updates could define the short-term period as the upcoming three-year cycle (e.g. 2026–2028) to align with approval timeframes.
Historic Heritage Management Plan Version: 1 Date: 30 August 2022	Adequacy Review Findings The Historic Heritage Management Plan (HHMP), prepared by Umwelt and endorsed by the Planning Secretary on 22 October 2021, consolidated heritage management for the MCO continued operations, superseding the former Conservation Management Strategy. The HHMP addressed all requirements of Schedule 2, Condition B71, including heritage item listings and mapping, monitoring and archival recording measures, induction and awareness programs, blasting impact monitoring, and strategies for managing new discoveries and salvaged relics. Implementation Review Findings MCO effectively implemented the HHMP during the audit period. Heritage items were recorded in the internal GIS system for inclusion in the GDP process, and no historically significant items were located within the approved disturbance footprint. Archival recordings were completed in 2021, with no new heritage items identified or relics salvaged during the audit period. Blasting impacts on heritage items, including Anvil Hill Rock and The Book, were managed through vibration monitoring outlined in the Blast Management Plan, with data recorded in the EMD system and monthly summaries published online. Heritage awareness was incorporated into site inductions, and Castle Hill remained subject to ongoing consultation with the landholder. Opportunities for Improvement

Management Plan	2025 IEA Management Plan Review Summary
	Nil issued
Aboriginal Cultural Heritage Management Plan Version: 12.0 Date: 28 February 2025	Adequacy Review Findings MCO operated under the Aboriginal Cultural Heritage Management Plan (ACHMP) Version 12, approved by DPHI on 28 February 2025 following its scheduled three-year review. The plan, prepared by a suitably qualified heritage consultant and developed in consultation with Registered Aboriginal Parties and Heritage NSW, outlines on-site and offset area heritage management measures, training requirements, processes for new site discoveries and human remains, supervised RAP access to heritage areas, and long-term care of salvaged artefacts. The ACHMP was confirmed to meet the requirements of Condition B68. Implementation Review Findings The ACHMP was found to be effectively implemented during the audit period. Key observations include: • All cultural heritage sites listed on the MCO Aboriginal archaeological sites layer within the internal GIS system, used to identify and manage sites before ground disturbance. • All proposed disturbance areas subject to the Ground Disturbance Permit (GDP) process and assessed in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW. • Cultural Heritage Surveys undertaken by OzArk prior to works, referencing AHIMS site cards to confirm registered site locations near proposed activities. • No breaches of Condition B65 relating to direct impacts on cultural heritage were identified during ground disturbance activities. • A potential non-compliance in the Aboriginal Cultural Heritage Offset Area (February 2023) was investigated and determined by the Department (October 2024) to not be a breach or non-compliance. Following the potential non-compliance, MCO strengthened the GDP process by: - Delivering targeted GDP training for supervisors; - Increasing supervision of all offsite work areas; - Developing an internal GDP management plan; - Requiring E&C representatives to conduct field-based reviews using updated maps and procedures; and - Adding GIS buffers around AHIMS centroid coordinates to trigger broader assessments. • No human remains were discovered during the audit period. Procedures are in place requiring immediate cessation of work, area security, and notification to NSW Police Force and Heritage NSW if suspected remains are found. Opportunities for Improvement Nil Applied
Visual Impact Management Plan Version 2.0 Date: 28/09/2022	Adequacy Review Findings The Visual Impact Management Plan (VIMP) was a new requirement under SSD-8642 and was prepared in 2022 by suitably qualified professionals. Based on a review of the approved VIMP, relevant correspondence with the Department, and site inspection findings during the audit inspection the VIMP is

Management Plan	2025 IEA Management Plan Review Summary
	considered to have been adequately prepared to address the requirements of Condition B76. Implementation Review Findings Based on the evidence reviewed (refer SSD8642 audit checklist, MCO has implemented the VIMP in accordance with the approved version. Opportunities for Improvement Nil identified
Bushfire Management Plan Version 2.0 Date:	Adequacy Review Findings A Bushfire Management Plan (BfMP) (Version 2.0, dated April 2025) has been prepared for Mangoola Coal Mine. The BfMP was provided to the NSW Rural Fire Service (RFS), and Section 5.2.2 of the BfMP outlines the importance of ongoing engagement with the RFS to support site familiarisation and preparedness. Implementation Review Findings Evidence reviewed during the audit indicates that the Bushfire Management Plan (Version 2.0, April 2025) has been implemented across MCO and associated offset areas. Asset Protection Zones (APZs) have been established and maintained around key infrastructure in accordance with the BfMP, with slashing and fuel reduction activities routinely undertaken. Opportunities for Improvement Nil identified
Rehabilitation Management Plan Version 2.0 Date:29/11/2024	Adequacy Review Findings The Rehabilitation Management Plan (RMP), Version 10, effective 1 August 2023 was prepared in accordance with the NSW Resources Regulator's ESG3 Guideline, the Form and Way Rehabilitation Guidelines, and standard mining lease conditions and Condition -B91 of SSD8642. The RMP was updated on 29 November 2024 (after initial preparation in 2021). The RMP includes: • Clear performance indicators and domain-based completion criteria (completion criteria still being finalised); • Monitoring and adaptive management programs to track progress and support continuous improvement; • An assessment of risks to successful rehabilitation, including drought, erosion, weed invasion, and access; • A description of progressive rehabilitation strategies to meet the objectives of Table 9 of SSD 8642; Measures for adaptive management and triggers for remedial actions. No gaps identified against the requirements of Condition B91 Implementation Review Findings The RMP was considered to have been adequately implemented during the audit period. Opportunities for Improvement Nil Identified

Management Plan	2025 IEA Management Plan Review Summary
Traffic Management Plan Version 2.0 Dated 20/12/2024	Adequacy Review Findings A review of the approved MCO Traffic Management Plan – Version 2.0 (December 2024) confirms that it satisfies all requirements of Condition B104 of SSD-8642. Implementation Review Findings The TMP was considered to have been actively implemented during the audit period. Opportunities for Improvement Nil identified
Social Impact Management Plan Version: 1.0 Date: 07/07/2021	Adequacy Review Findings A review of the approved MCO Social Impact Management Plan (SIMP) confirms that it satisfies all requirements of Condition B108 of SSD-8642. Implementation Review Findings Implementation of the SIMP appears active and aligned with the commitments outlined in the approved plan. Opportunities for Improvement Nil identified
Environmental Management Strategy Version 12 Date: 30/06/2022	Adequacy Review Findings The Environmental Management Strategy (EMS) was revised and updated in 2025 and submitted to the DPHI for review on 27 June 2025. At the time of the audit the EMS was still under review by DPHI. The revised EMS removes outdated references to the Mining Operations Plan (MOP) and incorporates updated information regarding Biodiversity Stewardship Agreements (BSAs) now in effect. Once approved, further alignment with the Biodiversity Offset Management Plan and Strategy (BOMPS) will be required during the next review period to ensure consistency between the EMS and offset documentation. Implementation Review Findings Overall, the EMS is being implemented in accordance with SSD-8642 Condition B1, but targeted improvements are recommended to ensure inspections fully address high-risk areas and to improve internal consistency across management plans and reporting protocols. This is in relation to the audit identifying a recurring issue regarding the effectiveness of inspections. Signs of historical staining were observed by auditors at the train loading area during the site inspection, however, no corresponding records of the staining were found in routine inspection documentation. Evidence of previous staining from hydrocarbons had also been raised during the 2025 AS1940 audit. Evidence of fuel-stained soil was also visible at the Orica explosives compound, outside the bunded zone, and an overflow pipe showed evidence of discharging hydrocarbon laden water onto ground. The mine water management system ensures that any spills are contained within the mine disturbance area, however, this should not be relied upon as the where bunding or sump systems do not adequately capture hydrocarbon

Management Plan	2025 IEA Management Plan Review Summary
	material at the point of spill. Additional detail in relation to site inspection observations is provided in in Section 7.7.
	Opportunities for Improvement OFI-003: It is recommended that MCO assess and, if contaminated, remove stained and hydrocarbon-impacted soils at the train loading facility and Orica compound, with management in the on-site bioremediation area or in accordance with NSW EPA requirements under the <i>Contaminated Land Management Act 1997</i> and relevant waste classification guidelines. Where overflow or discharge pathways exist, the effectiveness of containment should be periodically reviewed to confirm hydrocarbons are being appropriately managed.

7.0 Environmental Performance

The following section is prepared to address the requirements of SSD 8642 Condition D13 and the 2020 Independent Audit PAR. This section is delivered in the following sections:

- **Sections 7.1 – 7.11** – Specific environmental topics including feedback received from the appointed specialists and feedback on the status of compliance between actual and predicted impacts documented in the environmental impact assessment (under condition S2 A2 of the SSD8642) referenced within the Consent.
- **Section 7.12** – General environmental management inclusive of the following:
 - A review of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period.
 - A review of incidents and incident investigation results during the audit period including review of the adequacy of the response to, and management of such incidents.
 - A review of community complaints received during the audit period and the adequacy of the response to and management of complaints.
 - A review of relevant operating systems, risk management approach, management interaction as well as training and competencies of staff, contractors and visitors at MCO.

7.1 Noise

7.1.1 Operational Controls

MCO operates under the approved NMP which outlines measures to minimise noise impacts from construction and operational activities, including predictive meteorological forecasting, monitoring programs and noise attenuation measures.

MCO implements a range of operational noise controls, including silent in-cab horns for diggers and broadband reversing alarms on equipment, conveyor covers to reduce mechanical noise, and annual sound power level testing. Real-time and monthly attended noise monitoring support proactive and reactive noise management.

The site inspection confirmed the presence of real-time offsite noise monitors, enclosed conveyors, and an 8 m high haul road noise bund along the southern side of Wybong Road.. Meteorological forecasts, noise risk model and Airen weather alerts are used prior to shifts to identify and manage noise enhancing conditions, enabling operational adjustments to minimise impacts on surrounding sensitive receivers.

Section 6.6 of the NMP outlines corrective actions to maintain compliance with consent conditions, including a three-yearly review and validation of the real-time noise monitoring network. The E&C team also reviews all data captured in the EMD and associated reports before they are published on the MCO Public Website.

7.1.2 Review of Monitoring Data and Exceedance Investigation

A review of the monitoring data and noise monitoring reports for the audit period indicated that no exceedances of noise impact assessment criteria were recorded.

7.1.3 Review of Complaint Received

A total of 94 complaints were received during the audit period in relation to noise. As shown in Figure 3, complaint numbers rose notably from 2022, peaking in 2024, before declining towards 2025, noting that the audit period ends on 3 July 2025. The rise in noise complaints in 2023 and 2024 correlates with the commencement and escalation of activities within the Wybong Pit, including blast activities which commenced in January 2023 in Wybong Pit..

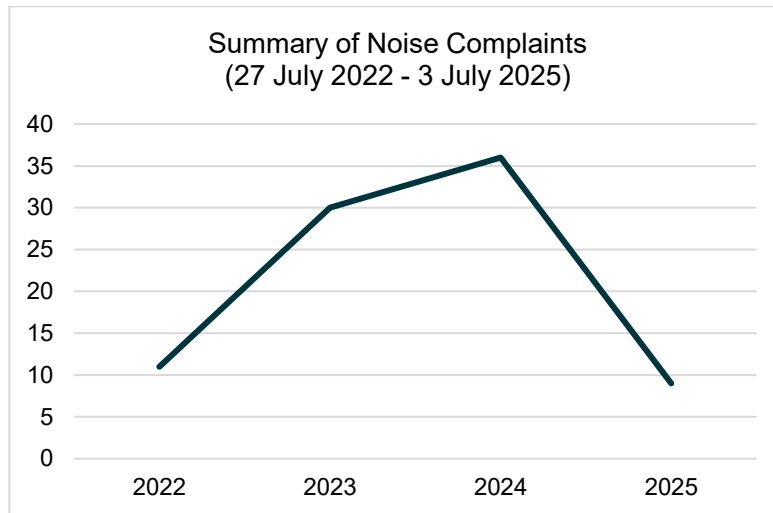


Figure 1 Noise complaints received in the audit period

No exceedances of noise criteria were identified during any of this targeted monitoring. Complaints were typically received between the evening and mid-morning, consistent with periods of increased sensitivity and meteorological conditions conducive to noise propagation. Despite this, supplementary weekly attended noise monitoring conducted across 2022–2024 confirmed that MCO remained within approved noise limits, with no exceedances recorded. In addition, monthly attended compliance noise monitoring was conducted throughout 2022–2024, with no, non-compliances identified.

In response to noise complaints, MCO representatives investigate potential noise sources and operating noise levels which includes a review of realtime monitoring data, operations and may also include field verification in pit or at the complainant location as part of the investigation (noting sometimes complaints are lodged after the period of concern). Noise management controls are then reviewed by the Mining Supervisor or CHPP Supervisor, and where applicable, operational adjustments are made to reduce noise levels. Complaints are tracked in CMO, reviewed in monthly status reports, and summarised in annual community plans, annual reports and annual reviews, which include complaint trends and data analysis. The IEA identified that MCO proactively managed noise complaints during the audit period. Mitigations to noise impacts were deemed adequate as was the transparent communication with affected residents.

7.2 Blasting and Vibration

7.2.1 Operational Controls

Blasting activities at MCO are managed in accordance with the BMP. The auditors, including the noise and vibration specialist, verified the implementation of operational controls, including:

- Clearly defined exclusion zones and public safety controls;
- Road closure protocols during blast events;
- A multi-channel notification system, incorporating advance notice to stakeholders via SMS, email distribution lists, council website updates, hotline recordings, and physical signage.

Evidence confirmed that blasting was limited to approved hours and days (9:00 am to 5:00 pm, excluding Sundays and public holidays), consistent with the BMP, EPL and consent conditions. Auditors reviewed records from the ACOEM platform, Blast Field Sheets, and Monthly Monitoring Reports, all of which confirmed controlled execution of blasting activities.

7.2.2 Review of Monitoring Data and Exceedance Investigation

The audit team reviewed monitoring data stored in the EMD and annual Blasting Reports. All monitored blast events during the audit period were found to be compliant with the relevant airblast overpressure and ground vibration limits, with the exception of a previously reported and investigated isolated monitoring failure in January 2023.

7.2.3 Review of Complaint Received

MCO follows a systematic process when investigating blast related complaints. During the audit period this involved:

- Assessment of monitored blast data;
- Review of geological conditions and potential energy release anomalies;
- Engagement with complainants and adequately address complaints and monitoring results through investigations and additional measures.

Blasting-related complaints received during the audit period (27 July 2022 to 3 July 2025) included:

- 2022: 3 complaints (from 27 July)
- 2023: 3 complaints
- 2024: 14 complaints
- 2025 (to 3 July): 2 complaints

Blasting activities commenced in the Wybong Pit on 19 January 2023, with first coal extraction occurring on 28 August 2023. Complaint numbers remained low throughout 2023, before a notable increase was recorded in 2024. While the auditors found no clear correlation between the spike in complaints and blasting operations, the increase may be associated with heightened community sensitivity following the commencement of mining in Wybong Pit in late 2023 and into 2024. On 11 March 2024, blast monitor BM09 recorded an elevated overpressure result. Three complaints were received regarding this one blast. MCO investigated the blast which concluded that the exceedance was not representative of actual conditions at the nearest receptor. On 3 October 2024, the Department acknowledged the investigation report and noted the updates to be made to the Blast Management Plan. In response, MCO:

- Updated the BMP, including provisions for calibration of overpressure monitoring equipment.
- Adjusted blasting practices where deemed required for example mechanical removal of surface material of this weaker nature in advance of blasting;
- Considered options for relocation of BM09 further north to better reflect conditions at nearby receptors;
- Initiated planning for a portable meteorological station to improve modelling of atmospheric effects on overpressure and fume.

Later in 2024 a resident raised concern that existing monitors (BM07 and BM09) did not reflect conditions at their property. MCO undertook additional verification during the period July–September 2024 to confirm the adequacy of its existing monitoring network. All results were well below relevant criteria, and no changes to the blast monitoring network were considered necessary.

7.2.4 Operational Controls

MCO manage air quality and greenhouse gas emissions in accordance with the approved Air Quality and Greenhouse Gas Management Plan (AQGGMP). The auditors verified that:

- Dust control measures such as water carts, vehicle speed restrictions, progressive rehabilitation, and operational controls (e.g., managing activities during adverse weather) were being implemented as described in the AQGGMP.
- Forecasting and daily air quality reporting were used to inform operational decisions.
- Energy efficiency and GHG minimisation measures, including optimised haulage routes, use of efficient equipment, and annual reviews of GHG performance, were being undertaken.
- Real-time and compliance air quality monitoring infrastructure was in place and maintained.

Controls were found to align with industry best practice and the requirements of SSD-8642.

7.2.5 Review of Monitoring Data and Exceedance Investigation

The auditors reviewed real-time and compliance air quality monitoring records, as well as meteorological data and associated investigation reports. No exceedances of the project-specific air quality criteria were directly attributed to MCO during the audit period.

Where elevated air quality results were recorded, MCO followed a structured investigation process, in accordance with the AQGGMP, which was verified during the audit. This process involved:

- Review of real-time and compliance monitoring data to assess the magnitude and duration of elevated levels.
- Cross-checking against meteorological conditions, including wind direction and speed, to determine the likelihood of onsite contribution.
- Analysis of off-site data and regional air quality bulletins to identify broader influences such as regional dust or bushfire smoke.
- Assessment of operational activity logs, including water cart deployment and equipment movement, to identify potential internal dust sources.

Where investigations confirmed that elevated readings were not attributable to MCO, this was documented with clear justifications. These investigations and conclusions were reported in the Annual Reviews and supported by site records.

MCO did report administrative non-compliances with EPL Condition M4.1 due to 35 short-duration interruptions in continuous weather monitoring at Points 5 and 18 each year during the audit period, mainly from technical faults and routine maintenance. MCO reported that data availability exceeded 99% across the audit period, coverage was maintained between stations, and no adverse impacts were identified, with no further recommendations proposed.

7.2.6 Review of Complaints Received

The auditors reviewed MCO's Community Complaints Registers and associated investigation records. A total of 53 complaints were received during the audit period in relation to air quality or dust. Dust related complaints increased in 2023 and 2024, which may be associated with the commencement of mining in the Wybong Pit and/or prevailing climatic conditions. After 3 above average rainfall years, rainfall was below average between 2023 and early 2024, before shifting to above average during the 2024 reporting period.

MCO's response process was found to be robust, involving review of real-time monitoring data, alarms, and operational adjustments where appropriate (e.g., deploying extra water carts, traffic control). All complaints were recorded, investigated, and closed out in accordance with MCO's procedures.

7.3 Water

7.3.1 Operational Controls

General Water Management

MCO implements water management in accordance with the approved Water Management Plan (WMP), which includes the Surface Water Management Plan (SWMP), Groundwater Management Plan (GWMP), and Erosion and Sediment Control Plan (ESCP). The auditors verified that:

- A site water balance model is maintained and regularly updated.
- Clean and dirty water separation infrastructure (e.g., sediment basins, containment structures) is in place.
- Water reuse and recycling is maximised across the site to reduce reliance on external water sources.

Erosion and Sediment Control

Implementation of the ESCP was verified through inspection of sediment basins, diversion drains, and bunds. The primary control for erosion and sediment management is the Ground Disturbance Permit

(GPD) process. This system ensures that erosion and sediment controls are in place before any disturbance activities commence. The GDP includes site-specific controls, review by the Environment & Community team, and post-implementation inspections. Compliance with the ESCP is achieved through this structured approval mechanism, supported by monthly inspections and drone surveillance for early identification of erosion risks.

Surface Water

MCO implements a robust saline water management system, reusing surplus water for coal washing and dust suppression, and only discharging under the Hunter River Salinity Trading Scheme (HRSTS) during prolonged wet weather events. The 2022 IEA noted that runoff from rehabilitated catchments was being captured into the saline water management system, which assists with water security under dry and average conditions but increases pressure on storages during wet periods, contributing to the need for HRSTS discharges. Early monitoring results from the South Pit Rehabilitation area were encouraging, with water quality suitable for off-site release; however, degraded receiving dam batters were causing erosion and water quality deterioration. The 2022 IEA therefore recommended that MCO upgrade receiving sediment dams to maintain water quality and consider ongoing monitoring of runoff from rehabilitated areas, with regulator consultation to confirm any future off-site release.

It is noted that the previous audit period (to 2022) experienced above-average rainfall, increasing the risk of surplus water storage and HRSTS discharges. In contrast, the 2025 IEA period included two years of below-average rainfall, meaning that surplus water has not been a significant issue in this audit cycle. MCO committed to further investigate the suitability of water from rehabilitated areas for off-site release, including dam improvement works and regulator consultation. Throughout 2023, MCO developed a dam maintenance program, implemented in 2024. This program was ongoing at the time of the audit.

During the audit period the SWMP was found to be effectively implemented. Site inspection confirmed functioning sediment basins, clean water diversions, and appropriate stormwater controls. Discharge from Monitoring Point 12 was carried out in accordance with the HRSTS protocol, though exceedances to discharge volume limits were noted (see below).

Groundwater

The GWMP governs monitoring and management of groundwater levels and quality. Groundwater monitoring infrastructure (including bores and vibrating wire piezometers) was verified to be operational and maintained. MCO maintains a comprehensive monitoring network and database to track trends and inform decision-making.

7.3.2 Review of Monitoring Data and Exceedance Investigation

Erosion and Sediment Control

No significant exceedances or incidents were recorded. Regular inspections, drone monitoring, and maintenance ensured effective erosion control across the site. The GDP process was identified as a strong proactive mechanism for ensuring erosion and sediment risks are considered ahead of disturbance.

Surface Water

The auditors reviewed monitoring data stored in the Environmental Monitoring Database (EMD), Annual Reviews (2022–2024), the 2023–2024 Annual Return, discharge event records, and EPL Monitoring Point 12 results. Two exceedances of the hourly discharge flow limit were identified for HRSTS discharge events in August and October 2022. Investigation reports, EPA notifications, and the River Register were sighted confirming that MCO ceased discharge immediately upon identifying the issue and formally notified the EPA and DPHI. The site's internal response, including a review of discharge procedures and training, was considered adequate.

Groundwater

Groundwater monitoring results and exceedance records were reviewed for all monitoring bores, with a focus on GW26, where ongoing exceedances of predicted drawdown levels were recorded. The auditors reviewed the updated 2024 groundwater impact assessment and hydrogeological interpretation by AGE, which confirmed that drawdown at GW26 remained within revised model predictions. The

Groundwater Trigger Action Response Plan (TARP), bore condition assessments, and the CMO groundwater validation spreadsheet were also reviewed.

A missed suite of analytes at MP9a in December 2023 was verified via laboratory chains of custody, contractor correspondence, and the 2025 QA Validation Check. Corrective actions implemented by MCO, including bringing forward the sampling schedule and adding QA checks to the CMO system, were confirmed.

7.3.3 Review of Complaint Received

No community complaints related to surface water, groundwater, erosion, or sediment were recorded during the audit period. Routine monitoring and site inspections support ongoing proactive management.

7.4 Biodiversity

7.4.1 Operational Controls

MCO manages biodiversity values through the implementation of the Biodiversity Offset Management Plan and Strategy (BOMPS, Version 13, August 2022), supported by executed Biodiversity Stewardship Agreements (BSAs) and Conservation Agreements (CA's). Operational controls verified during the audit include:

- Defined procedures for pre-clearing surveys, habitat salvage, and vegetation clearing controls.
- Active weed and pest management within rehabilitation and offset areas.
- Quarterly inspections and scheduled ecological monitoring in accordance with the BOMPS.
- Use of drone surveillance by the E&C team to monitor erosion and vegetation condition, observed during the site inspection and noted as a proactive best practice.
- Fencing upgrades and cattle exclusion across offset areas to protect remnant and regenerating vegetation.
- Management responsibilities aligned with approved BSAs

7.4.2 Review of Monitoring Data and Exceedance Investigation

Annual ecological monitoring was consistently completed across rehabilitation and offset areas, with standardised assessment of vegetation structure, floristics, fauna habitat, and species presence.

Tiger Orchid (*Cymbidium canaliculatum*) and Terrestrial Orchid translocation programs continued to be monitored through to 2023 and 2024 respectively, despite formal monitoring periods concluding in 2021. Monitoring confirmed plant health and survival with no exceedances or adverse trends noted.

Weed control and vertebrate pest programs were implemented and adapted based on monitoring outcomes and site inspections.

Nest box monitoring was undertaken in line with the BOMP, though newly installed nest boxes had not yet been monitored as required. An OFI was raised to revise the requirement to undertake additional nest-box monitoring surveys for new nest boxes.

No biodiversity performance exceedances or ecological thresholds were triggered. Performance against BOMPS objectives and rehabilitation criteria showed positive trends in groundcover development, species recruitment, and floristic similarity to reference communities.

7.4.3 Review of Complaint Received

No complaints relating to biodiversity values (e.g., flora, fauna, offset lands, or rehabilitation) were received during the audit period. Community feedback focused on noise, blasting, and dust impacts.

7.5 Heritage

7.5.1 Operational Controls

MCO manages Aboriginal and European heritage through the ACHMP and the HHMP respectively.

The ACHMP outlines the management measures to be implemented to ensure MCO operates in accordance with relevant legislation, in consultation with Registered Aboriginal Parties (RAPs) and to satisfy Development Consent requirements. The HHMP identifies known European heritage sites associated with MCO and any relevant monitoring required to be completed to assess potential impacts (primarily from blasting or clearing activities).

7.5.2 Review of Monitoring Data and Exceedance Investigation

There were no audit findings or recommendations relating to the management of historic heritage or Aboriginal cultural heritage, however, a potential non-compliance with Conditions 65 and B70 of SSD8642 was notified to the Department by MCO on 22 March 2023, concerning activities in the Aboriginal Cultural Heritage Offset Area between 6 and 16 February 2023. Following an investigation, the Department confirmed in a letter dated 18 October 2024 that no breach or non-compliance had occurred.

Following the potential non-compliance, MCO implemented the following measures to strengthen the GDP process: Targeted GDP training for supervisors, increased supervision of all offsite work areas, and the development of an internal management plan to guide GDP activities. E&C representatives are now required to conduct field-based reviews using updated maps and procedures. Additionally, GIS buffers have been added around AHIMS registered centroid coordinates in the internal GIS system so that larger areas are considered in relation to proposed worksite pins. This is to trigger the assessment of AHIMS sites across increased areas to reduce the risk of future issues.

7.5.3 Review of Complaint Received

There were no complaints regarding Historic or Aboriginal Heritage during the audit period.
Rehabilitation

7.6 Rehabilitation

7.6.1 Operational Controls

Rehabilitation at MCO is guided by the RMP. Rehabilitation efforts have focused primarily on former mining disturbance areas, including reshaped overburden emplacements and decommissioned haul roads. Final land uses are split into the following categories:

- Native Vegetation Community
- Rehabilitation Biodiversity Offset Areas; and
- Final Void

Rehabilitation onsite has incorporated direct seeding techniques, with target species aligned to local native vegetation communities. Rehabilitation work and monitoring is conducted through a combination of:

- Specialist consultancies undertaking rehabilitation monitoring, vegetation surveys, and erosion risk assessments.
- Providers delivering pasture and erosion monitoring, weed and pest management, soil and landform analysis, and biodiversity monitoring of rehabilitation and offset areas.
- Independent experts contributing to risk assessments, management plan updates, and technical reviews.
- MCO's Environment & Community (E&C) Team, who manage implementation and conduct routine inspections.

7.6.2 Review of Monitoring Data and Exceedance Investigation

Key findings from review of monitoring reports and the audit site inspection include:

- **Progressive Rehabilitation:** Rehabilitation is occurring progressively across available disturbance areas. At the time of the audit no rehabilitation had reached certification status by the NSW RR however MCO has achieved a cumulative total of over 1,000 ha of rehabilitation.
- **Groundcover and Vegetation:** Monitoring results indicate improving native species richness, floristic structure, and groundcover density over time. However, ongoing maintenance was recommended by Ausecology to support floristic diversity, mitigate erosion, and manage woody weed re-emergence.. IEA observations of groundcover, weed control, and floristic diversity in rehabilitation and offset areas were consistent with performance targets and indicative of positive progress toward final land use outcomes.
- **Erosion and Stability:** Most rehabilitation areas were stable; however, localized erosion issues were identified in Block 487 of the South Pit Rehabilitation Area. This was confirmed during the site inspection and in Ausecology's 2024 rehabilitation monitoring report. The 2023 monitoring, undertaken by Umwelt, also noted general stability across rehabilitation areas. Remediation works were in progress at the time of the audit.
- **Weed Control:** Weed presence was generally low and effectively managed. Some minor infestations (e.g, Galenia) were noted and treated.
- **Ecological Monitoring:** Data collected from photo-point and quadrat surveys across rehab and offset areas showed continued alignment with floristic benchmarks.

7.6.3 Review of Complaint Received

There were no complaints received during the audit period in relation to rehabilitation activities at Mangoola Coal.

In addition, a rehabilitation risk assessment workshop was conducted on 20 November 2024 (following an initial 2021 assessment). Attendees included representatives from Mine Operations, Maintenance, Technical Services, the Environment & Community (E&C) team, and an external consultant from IEMA.

The Rehabilitation Objectives (ROBJ) were formally approved on 12 December 2023. The Final Landform and Rehabilitation Plan (FLRP0001236) was also confirmed as approved. At the time of the audit, MCO was in the process of finalising its completion criteria in accordance with the requirement to submit at least three years before the completion of mining.

7.7 Waste

Mangoola Coal Operations (MCO) has implemented systems for managing various waste streams generated on site, with practices guided by internal procedures and partially supported by external reporting mechanisms. MCO has developed an internal Waste Management Plan (Version 8.0, dated 30 May 2024). Although not a requirement of SSD 8642, the plan references relevant legislative obligations.

MCO engages JR Richards as its licensed waste contractor. Waste collection data is tracked through:

- Weekly EPA service dockets, reviewed by the Environment & Community (E&C) team; and
- Monthly summary spreadsheets from JR Richards, which outline volumes of waste collected and include the licensed disposal locations (landfills), supporting traceability and compliance with EPA waste tracking requirements.

MCO holds Council Approval 5/2010 for the operation of an on-site sewage treatment plant located at the Mine Infrastructure Area (MIA) and CHPP. Treated effluent is discharged to the MIA Dam. Monitoring of Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) is required by Council Approval 5/2010, and faecal coliforms and pH is required to be monitoring under EPL 12894.

Reports are submitted to Council if exceedances occur. Records confirming compliance and exceedance management were sighted during the waste management review.

7.7.1 Review of Complaint Received

No complaints were received during the audit period in relation to waste.

7.8 Dangerous Goods

MCO has established and implemented a structured system for the management of dangerous goods on site, including hydrocarbons and explosives. This system is supported by regular inspections, proactive third-party audits, and the integration of corrective actions into the site's environmental management system via the CMO platform.

During the site inspection, some observations were identified relating to the storage and handling of hydrocarbons and dangerous goods that may not align with best practice under AS 1940:

- **Rail Loading Area Diesel Fill Point:** Stained soil was observed adjacent to the diesel fill point, indicating previous fuel/hydrocarbon spills (refer photo below). Although the area is on a concrete hardstand, the slope and lack of bunding or drainage allow spills to migrate off the pad (within the mine catchment).
It is recommended MCO remove the impacted soil and assess the need for containment improvements.
- **Bulk Fuel Storage Area – Sump Maintenance:** At the time of the audit inspection, the sump adjacent to the bulk fuel storage fill point was heavily silted with soil, sediment, and water, reducing effective bund capacity (refer below photo). >15mm of rain had fallen on the day of the site inspection, contributing to the sump filling. The auditors note that inspection of the sump is captured in the workplace supervisor inspection forms and E&C inspections.
It is recommended MCO clean out the sump to restore function.
- **Bund Integrity – Fuel Farm:** Soil and small vegetation growth was observed within the bunded areas at the bulk fuel storage area. It is recommended the soil be removed and soil build up reviewed in future inspections.
- **Orica Explosives Compound – Diesel Refill Point:** Fuel-stained soil was visible outside the bunded zone, and an overflow pipe showed evidence of discharging hydrocarbon laden water onto ground. It is recommended MCO remove any hydrocarbon-stained soil, inspect the sump system and ensure containment in future.

The presence of a proactive auditing program, scheduled inspections, and the implementation of corrective actions demonstrates that reasonable and effective systems are in place to manage dangerous goods in accordance with applicable standards. However an OFI was raised to assess and, if contaminated, remove stained and hydrocarbon-impacted soils at the train loading facility and Orica compound, with management in the on-site bioremediation area or in accordance with NSW EPA requirements under the *Contaminated Land Management Act 1997* and relevant waste classification guidelines. MCO should also restore sump and bund functionality through cleaning and vegetation removal, and review the effectiveness of spill containment at the Orica Compound and train loading facility.

Management of explosives on site is the responsibility of licensed contractor, Orica, and storage and handling activities are regulated and monitored by the NSW Resources Regulator. No issues were identified during the audit period relating to the management of explosives.

7.8.1 Review of Complaint Received

No complaints were received during the audit period in relation to dangerous goods.

7.9 Overview of Environmental Management

7.9.1 Compliance Monitoring

Environmental compliance at MCO is overseen through both corporate audit programs managed by GCAA and regular internal inspections conducted by MCO E & C Department and outlined in the EMS.

GCAA runs an internal audit program in line with Glencore's corporate procedure for auditing, which includes both internal and external components. Compliance audits occur every three years and are scheduled prior to any Independent Environmental Audit (IEA). These reviews focus on checking compliance with Development Consent obligations and other regulatory approvals. All conditions are stored in the CMO Compliance Management database, and MCO uploads supporting documentation for each one, enabling transparent and evidence-based auditing.

CMO Compliance Software is the primary tool for tracking and managing obligations across GCAA sites. The system records approvals from development consents, mining leases, licences and other regulatory instruments. It is updated whenever approvals change or after tasks are completed, and is also relied upon to plan inspections, manage complaints, and log actions arising from audits or stakeholder consultations.

During the audit, MCO demonstrated how CMO functions in practice. The system included requirements from SSD8642, EPL 12894, mining leases and other regulatory approvals. The system is routinely updated in response to new or amended approvals or following completion of relevant actions. It is also used to schedule inspections and to manage complaints, as well as to track follow-up actions from audits or consultations.

Monthly environmental inspections are conducted by the E&C team. Any issues observed are actioned, and where necessary, follow-up tasks are entered into CMO for tracking.

MCO also operates a Ground Disturbance Permit (GDP) process to manage risks from land-disturbing works. This process requires site-specific risk assessments before work starts and includes post-disturbance inspections to verify compliance and adequate site restoration.

A comprehensive suite of monitoring programs for air quality, surface water, groundwater, noise and biodiversity operates alongside these systems. Monitoring results are regularly reviewed against regulatory criteria. In addition, any community complaints or environmental incidents are logged directly into CMO. Investigations, corrective measures and closure of these matters are all managed within the system to ensure timely resolution and compliance assurance.

7.9.2 Summary of notices, orders, penalty notices or prosecutions issued

A review of information available on the Department's and EPA's public register as well as consultation with regulatory agencies and information provided by MCO was conducted to identify and review any notices, orders, penalty notices or prosecutions which may have been issued in relation to the site's operation during the audit period.

Two Formal Warning letters and one Show Cause was issued by the EPA to MCO during the audit period. These were issued in relation to the following:

- Show Cause and Formal Warning – A Show Cause letter was issued to MCO by the EPA on 17 April 2024 in response to MCO exceeding the licensed hourly flow rate during two HRSTS discharge events in August and October 2022. MCO were required to provide a response by 13 May 2024. The EPA issued a formal warning letter to MCO on 15 July 2024 in response to the investigation report issued. No further actions were required.
- Formal Warning – A formal warning was issued to MCO by the EPA on 17 June 2024. The EPA determined that failure to retain monitoring data required by Condition M7.1 for at least four years was a contravention of licence condition M1.2 and also breached licence condition R5.1, both of which constitute an offence under section 64 of the Act. No further regulatory action was recommended as the non-compliance related to a single blast event, was identified by MCO through its own internal review, and was promptly reported to DPHI and the EPA, along with details of the cause and corrective actions taken. Internal procedures have since been updated to prevent recurrence, and no similar issues were identified for the remainder of the reporting period, with the proactive site response considered adequate

7.9.3 Complaints Management

MCO has a formal Complaints Management Procedure (MANOC-1772150304-825) in place which outlines the steps for recording and responding to complaints and providing a dedicated community hotline (1800 014 339) along with email contact (mangoolaenquiries@glencore.com.au). The auditors called the telephone complaints line on Thursday 31 July at 10.36am and verified it was operating at the time of the audit.

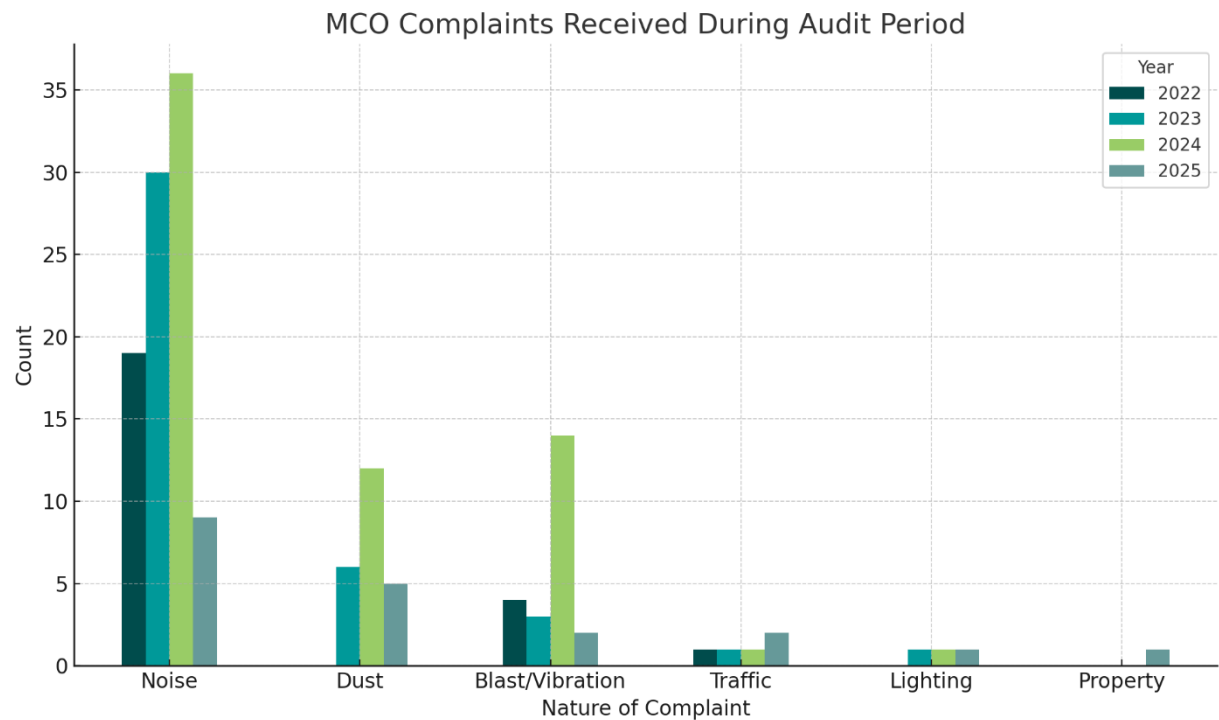
MCO maintains a documented complaint tracking process, which was reviewed by auditors. Noise complaints were observed to be decreasing. Complaints are logged in the CMO system and reviewed through monthly status reports, the Annual Community Plan (which includes complaint trends), and the Annual Reviews, which document Environment and Community performance summaries and complaint trends. Data can be filtered and graphed for trend analysis.

When a complaint is lodged, it is automatically sent via text message to the E&C team, CHPP personnel and mining team for immediate investigation.

The publicly available Community Complaints Registers for the audit period was reviewed and verified. A total of 149 complaints were received in the audit period. A summary of the complaints received during the audit period is provided in Figure 2. The auditors reviewed MCO’s complaint management records and monitoring responses and were satisfied that all complaints had been appropriately investigated and managed.

A review of complaint records confirmed the process was implemented adequately during the audit period.

Figure 2 Analysis of complaints



8.0 IEA Recommendations and Continual Improvement Opportunities

This section satisfies the requirement for the IEA to identify recommendations and continual improvement opportunities identified as part of the audit. As outlined above, no recommendations have been applied to the identified non-compliances, as the auditors were satisfied that MCO had implemented appropriate and adequate actions to prevent their reoccurrence.

Table 8 below summarises the opportunities for improvement applied from the IEA.

Table 8 2025 opportunities for Improvement

Reference	Topic	2025 Opportunity for Improvement
OFI-001	Blasting	Following landholder permission being granted, MCO is to finalise the blast monitor relocation in the next audit period.
OFI-002	Air Quality	MCO should ensure that data reported is consistent between Annual Review and Annual Return reporting, in regards to the loss of data capture (15 minute gaps in data set for EPL monitoring points).
OFI-003	Dangerous Goods	It is recommended that MCO assess and, if contaminated, remove stained and hydrocarbon-impacted soils at the train loading facility and Orica compound, with management in the on-site bioremediation area or in accordance with NSW EPA requirements under the <i>Contaminated Land Management Act 1997</i> and relevant waste classification guidelines. Where overflow or discharge pathways exist, the effectiveness of containment should be periodically reviewed to confirm hydrocarbons are being appropriately managed.
OFIs to consider during next revision of management plans:		
OFI-004	Water Management Plan	During the next review of the WMP, it is recommended that Table F be updated to explicitly include both the EPL monitoring point numbers and the corresponding MCO internal site reference names. This would improve transparency and ensure consistency across the WMP, sub-plans, and published monitoring reports.
OFI-005	Erosion and Sediment Control Plan	During the next review of the ESCP it is suggested to update the ESCP to remove references to the MOP. During the update Section 4.4 of the ESCP should be updated to reflect that the culvert associated with Clean Water Diversion 1 (CWD1) has been constructed and upgraded.
OFI-006	Surface Water Management Plan	Figure 2.2 – During the next review of the SWMP it is suggested that the Water Management Schematic be updated to remove reference to transfer of decant water from Tailings Dam 4 (TD4) to TD2, as this pathway is no longer in use. TD4 now discharges to the Pit Water Dam.
OFI-007	Surface Water Management Plan	During the next review of the SWMP it is suggested that the SWMP be revised to reflect that new channel stability monitoring sites were established in 2024, including upslope diversions, Big Flat Creek near the MOCO Additional Mining Area, and downstream of the haul road crossing. Current wording refers to this as a future action
OFI-008	Surface Water Management Plan	During the next review of the SWMP it is suggested that the SWMP be updated to note that a new stream health monitoring site was established on the Hunter River downstream of the HRSTS discharge

Reference	Topic	2025 Opportunity for Improvement
		point during the autumn 2022 monitoring event. This remains described in the Plan as a future commitment.
OFI-009	Biodiversity Offset Management Plan and Strategy	During the next review of the BOMPS it is suggested to update and remove obsolete short-term performance measures and confirm the applicability of medium-term indicators.
OFI-010	Biodiversity Offset Management Plan and Strategy	During the next review of the BOMPS it is suggested to revise the requirement to undertake additional nest-box monitoring surveys for new nest boxes.
OFI-011	Biodiversity Offset Management Plan and Strategy	During the next review of the BOMPS it is suggested to remove reliance on PA 06_0014 and clearly articulate how legacy biodiversity commitments have been integrated under SSD-8642.
OFI-012	Biodiversity Offset Management Plan and Strategy	To avoid retrospective goal-setting, future BOMPS updates could define the short-term period as the upcoming three-year cycle (e.g. 2026–2028) to align with approval timeframes.

9.0 Limitations

AECOM Australia Pty Limited (AECOM) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of MCO and only those third parties who have been authorised in writing by AECOM to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work and for the purpose outlined in AECOM's proposal. Where this report indicates that information has been provided to AECOM by third parties, AECOM has made no independent verification of this information except as expressly stated in the Report. AECOM assumes no liability for any inaccuracies in or omissions to that information.

This Report was prepared between 3 July and 30 September 2025 and is based on the conditions encountered and information reviewed at the time of preparation. AECOM disclaims responsibility for any changes that may have occurred after this time.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this report unless otherwise agreed by AECOM in writing. Where such agreement is provided, AECOM will provide a letter of reliance to the agreed third party in the form required by AECOM.

To the extent permitted by law, AECOM expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report. AECOM does not admit that any action, liability or claim may exist or be available to any third party. Except as specifically stated in this section, AECOM does not authorise the use of this report by any third party. It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

Appendix A

Compliance Checklists

Appendix A Compliance Checklists

2025 IEA Audit Checklist – State Significant Development (SSD) 8642

Audit Checklist – Project Approval SSD-8642

Contents

PART A ADMINISTRATIVE CONDITIONS	3
Obligations to Minimise Harm to the Environment	3
Terms of Consent	4
Limits on Consent	5
Notification of Commencement	8
Surrender of Existing Consents of Approvals	9
Planning Agreement	9
Community Consultative Committee	10
Evidence Of Consultation	11
Application Of Existing Management Plans	11
Staging, Combining and Updating Strategies, Plans or Programs	11
Protection Of Public Infrastructure	13
Demolition	13
Structural Adequacy	13
Operation of Plant and Equipment	14
Applicability Of Guidelines	15
PART B SPECIFIC ENVIRONMENTAL CONDITIONS	16
Noise	16
Blasting	25
Air Quality & Greenhouse Gas	38
Meteorological Monitoring	50
Water	52
Water Management Performance Measures	59
Water Management Plan	64
Biodiversity	74
Heritage	86
Visual	95
Waste	99
Dangerous Goods	100
Bushfire Management	103
Rehabilitation	106
Transport	114
PART C ADDITIONAL PROCEDURES	126
Acquisition Upon Request	126
Additional Mitigation Upon Request	126

Notification of Landowners/Tenants	127
Notification of Exceedances	129
Land Acquisition	130
PART D ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING	133
Environmental Management	133
Revision of Strategies, Plans and Programs	138
Reporting and Auditing	140
Access to Information	145

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
PART A ADMINISTRATIVE CONDITIONS					
Obligations to Minimise Harm to the Environment					
S2 A1	In addition to meeting the specific performance measures and criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	As detailed throughout the audit checklists	During the audit period, the auditors and relevant specialists reviewed incident and non-compliance records, community complaints, and overall environmental performance in the context of Mangoola Coal Operations (MCO) Environmental Management Strategy (EMS) and associated management plans. Except where specific issues were identified, MCO was found to be compliant with its obligations to implement all reasonable and feasible measures to prevent, or where not possible, minimise, material harm to the environment arising from construction, operational and rehabilitation activities. The EMS and supporting procedures have been established and largely implemented to identify and manage environmental risks associated with site operations. For the purposes of assessing compliance with SSD-8642, the following key project milestones are noted: - Commencement of development and construction: 6 December 2021 - Commencement of mining activities within the Wybong Pit: 1 December 2022 - First blast within the Wybong Pit: 19 January 2023 - First coal extraction from the Wybong Pit: 28 August 2023 These dates have been used to inform the assessment of relevant conditions throughout the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Terms of Consent					
S2 A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 2.	As detailed throughout the audit checklists	The audit assessed compliance against conditions A2(a) – (g). Findings from the review are detailed below: - A detailed assessment of compliance of the conditions of SSD8642 was conducted as part of the 2025 IEA. The results are documented through this checklist. Non-compliance have been identified against the Conditions of SSD8642. As clause (a) requires compliance with all conditions of consent, any non-compliance elsewhere within the consent necessarily results in non-compliance with this overarching condition. Accordingly, this condition has been assessed as Non-Compliant. - No evidence was identified to indicate that MCO has failed to comply with any written directions issued by the Planning Secretary during the audit period. - The <i>Mangoola Continued Operations Project Environmental Impact Statement</i> (Umwelt, 2019), which accompanied the SSD 8642 development application, has been implemented in accordance with its commitments. Relevant mitigation measures and commitments have been incorporated into the conditions of consent and supporting management plans. - No evidence was observed to suggest that MCO has operated inconsistently with the Development Layout as shown in Appendix 2 of the consent.	Non-compliant	NC001
S2 A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:	Discussion with MCO E&C Department	Based on discussions with representatives from the MCO Environment and Community (E&C) Department and a review of available correspondence registers and compliance documentation, no written directions were issued by	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	- the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and - the implementation of any actions or measures contained in any such document referred to in condition A3(a).		the Planning Secretary, under Schedule 2 Condition A3, during the audit period.		
S2 A4	The conditions of this consent prevail to the extent of any inconsistency, ambiguity or conflict between them and a document/s listed in condition A2(b), (c) or (d). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(b), (c) or (d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		This is noted.	Noted	
Limits on Consent					
S2 A5	Mining operations may be carried out on the site until 31 December 2030. Notes: <i>Under this consent, the Applicant is required to decommission and rehabilitate the site and carry out other requirements in relation to mining operations. Consequently, this consent will continue to apply in all respects other than to permit the carrying out of mining operations until the rehabilitation of the site and other requirements have been carried out to the required standard.</i> <i>Mining operations and rehabilitation are also regulated under the Mining Act 1992.</i>	Discussion with MCO E&C Department	At the time of the audit (2025), mining operations were occurring in accordance with the approved timeframe and operating to a 31 December 2030 date.	Compliant	
S2 A6	Coal Extraction and Transportation A maximum of 13.5 million tonnes of ROM coal may be extracted from the site in any calendar year.	- Mangoola Daily Complex Report, 31/12/2024 - MCO Production Statistics spreadsheet	Run-of-mine (ROM) coal extraction is monitored daily via the MINVU system at the CHPP, and annual totals are reported in the Annual Review. The following extraction figures were verified for the audit period: 2022: 7,686,725 tonnes 2023: 10,093,439 tonnes	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		- Discussion with the E&C Department - Annual Reviews 2022, 2023, 2024	2024: 11,473,234 tonnes These figures confirm that coal extraction remained within the approved annual limit of 13.5 million tonnes of ROM coal for each year of the audit period.		
S2 A7	A maximum of 13.5 million tonnes of ROM coal from the site may be processed in any calendar year.	- MCO Production Statistics spreadsheet - Mangoola Daily Complex Report, 31/12/2024 - Discussion with the E&C Department - Annual Reviews 2022, 2023, 2024	Coal processed through the CHPP is tracked by the CHPP via the MINVU system. Product coal annual totals are reported in the Annual Reviews. During the audit period the following quantities of coal was processed through the CHPP: 2022: 5.7 Mt 2023: 8.2 Mt 2024: 9.1 Mt These figures confirm that coal processed remained within the approved annual limit of 13.5 million tonnes for each year of the audit period.	Compliant	
S2 A8	Product coal may only be transported from the site by rail.	- Annual Reviews 2022, 2023, and 2024 - Train Haulage Summaries (including coal volumes and ship IDs) - CHPP records and E&C Department reporting - Site inspection observations	During the audit period, the Annual Reviews for 2022, 2023, and 2024 confirmed that all product coal was transported exclusively by rail. This was verified by the audit team through review of train haulage records, which detailed train movements, coal volumes, and shipping information, including associated ship IDs for export. Observations during the site inspection, combined with review of haulage documentation, confirmed that all product coal was transported by rail to the Port of Newcastle for export. No evidence was identified to suggest that any other coal transport method was used during the audit period.	Compliant	
S2 A9	A maximum of 10 laden trains may leave the site in any 24 hour period.	Mangoola Daily Production	Train movements are monitored and recorded by the Coal Handling and Preparation Plant (CHPP) using the MinVu system. Train haulage summaries are also	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		Report, MinVu, dated 6/7/2025 MCO Production Productivity Summary, dated 06/07/2025	appended to the Annual Reviews. As part of the audit, train haulage records and associated internal reporting were reviewed. No evidence was identified to indicate that the 10-train daily limit was exceeded during the audit period.		
S2 A10	Hours of Operation The Applicant may undertake the development 24 hours a day, 7 days a week, except for: (a) gravel screening and crushing as described in condition A11; and (b) blasting operations as described in condition B13.	- Discussion with MCO E&C Department - Complaints Register	During the audit period, site operations were observed to be consistent with 24/7 scheduling for standard mining, coal processing, and transportation activities, with the exception of Christmas Day and Boxing Day associated shut-down period. Review of operational records, site inspection observations, and consultation with site personnel confirmed: There was no mobile crusher on site during the audit period. Blasting activities were undertaken in accordance with the approved hours specified in Condition B13, as verified through blast logs and blast monitoring reports. No complaints, incidents, or non-compliances were reported or identified in relation to out-of-hours activities.	Compliant	
S2 A11	The Applicant may only undertake gravel screening and crushing operations on the site between 7 am and 6 pm Monday to Friday, and between 8 am and 1 pm on Saturdays. No gravel screening and crushing operations are allowed on Sundays, public holidays, or at any other time without the written approval of the Planning Secretary.	Discussion with MCO E&C Department	During the audit period, no gravel screening or crushing operations were conducted on site. MCO advised that while a trial was undertaken in 2017, these activities were discontinued due to economic unviability. No evidence was observed or reported to suggest that gravel screening or crushing has occurred in breach of the approved hours or without the necessary written approval.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
S2 A12	Identification of Approved Disturbance Area Within three months of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must provide to the Department a survey plan of the boundaries of the approved disturbance areas.	Letter to DPHI with survey plans attached, dated 3/3/2022	Evidence of portal submission from DPHI was sighted showing survey plans uploaded on 3 March 2022. The requirements of this condition have been met and no further action is required. The condition is considered closed for the purposes of future IEAs, unless reactivated by a modification or directive from DPHI.	Compliant	
Notification of Commencement					
S2 A13	The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least two weeks before that date: - commencement of development under the consent; - commencement of construction under the consent; - commencement of mining operations under the consent; - cessation of mining operations (i.e. mine closure); and - any period of suspension of mining operations (i.e. care and maintenance).	- Letter from MCO to DPHI, Notification – Commencement of Mining, dated 10/11/2022 - Email from DPHI acknowledging submission via Major Projects Ports, dated 10/11/2022	a. Commencement of Development and Construction – Notification was provided to the Department on 19 November 2021, advising of the intention to commence on 6 December 2021, satisfying the two-week notification requirement. b. As per above. c. Commencement of Mining – Occurred on 1 December 2022. Notification to DPHI was made on 10 November 2022, which meets the required timeframe. d. Cessation of Mining Operations – Not Triggered during the audit period. e. Suspension of Mining Operations – Not Triggered during the audit period	Compliant	
S2 A14	If the phases of the development are to be further staged, the Department must be notified in writing at least two weeks prior to the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Discussion with MCO E&C Department	During the audit period, no further staging of development beyond that already approved was undertaken. As such, the condition was not triggered.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Surrender of Existing Consents of Approvals					
S2 A15	Within 12 months of the date of commencement of development under this consent, or other timeframe agreed by the Planning Secretary, the Applicant must surrender the existing project approval for the Mangoola Coal Project (PA 06_0014) in accordance with the EP&A Regulation.	- Letter from MCO to DPHI, subject - of Surrender of PA 06_0014, dated 28/9/2022 - Letter from DPHI to MCO, Receival letter, dated 21/11/2022	Development under SSD 8642 commenced on 6 December 2021. A notice of surrender of PA 06_0014 was submitted by MCO to the Department on 28 September 2022, within the required 12-month timeframe. The Department issued a formal response acknowledging the voluntary surrender on 21 November 2022.	Compliant	
S2 A16	Upon the commencement of development under this consent, and before the surrender of existing development consents or project approvals required under condition A15, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals. <i>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under the former Part 4A of the EP&A Act or Part 6 of the EP&A Act as applies from 1 September 2018. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>		This is a legal transitional provision rather than an action-based compliance requirement. It was noted that: - Development under SSD 8642 commenced on 6 December 2021. - PA 06_0014 was formally surrendered on 21 November 2022, in accordance with Condition A15. - No inconsistencies between the two approvals were identified during the transition period, and no compliance issues were observed in relation to this clause. - Accordingly, this condition has been noted and is considered Compliant by virtue of proper procedural transition.	Compliant	
Planning Agreement					
S2 A17	Within six months of the date of commencement of development, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a PA with Council in accordance with: Division 7.1 of Part 7 of the EP&A Act; and	Planning Agreement between MSC and MCO, executed 4/4/2022	Development commenced on 6 December 2021, and MCO executed the PA with MSC on 4 April 2022, within the required timeframe. The Planning Agreement includes obligations relating to:	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	The terms of the Applicant's offer to Council in Appendix 10.		- Establishment and administration of a community funding initiative; - Support for local employment opportunities; and - Provision of monetary contributions toward local infrastructure, environmental management, and community projects.		
S2 A18	If the Applicant and Council do not enter into a PA within the timeframe under condition A17, then within a further 3 months, the Applicant must make a Section 7.12 of the EP&A Act contribution to Council of \$525,688. The amount to be paid is to be adjusted at the time of the actual payment, in accordance with the provisions of the Muswellbrook Shire Council Section 94A Development Contributions Plan 2010.	Refer evidence against Condition A17	As per Condition A17 a Planning Agreement was entered into therefore this condition is not triggered.	Not Triggered	
S2 A19	If there is any dispute between the Applicant and Council in regard to conditions A17 and A18 then either party may refer the matter to the Planning Secretary for resolution.	Discussion with MCO E&C Department	During the audit period, no disputes were raised or referred in relation to the execution or implementation of the Planning Agreement. Accordingly, this condition has been assessed as Not Triggered.	Not Triggered	
Community Consultative Committee					
S2 A20	Before the commencement of construction, or other timeframe agreed by the Planning Secretary, a Community Consultative Committee (CCC) must be established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2019). The CCC must continue to operate during the life of the development, or other timeframe agreed by the Planning Secretary. <i>Notes:</i> <i>The CCC is an advisory committee only. In accordance with the Guidelines, the Committee should comprise an independent chair</i>	Letter from DPHI, Subject MCOP Combined CCC, dated 9/09/2021	Construction commenced on 6 December 2021. Prior to this, on 9 September 2021, the Department granted approval to combine the CCC for the Mangoola Continued Operations (MCCO) Project with the existing CCC established under the original Mangoola Coal Project. This resulted in a single, consolidated CCC covering the full scope of operations. The CCC is chaired by Lisa Andrews, an independent chairperson who was approved by the DPHI in the same approval letter, dated 9 September 2021.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	<i>and appropriate representation from the Applicant, Council and the local community.</i>				
S2 A21	With the approval of the Planning Secretary, the Applicant may combine the CCC required by this consent with any CCC previously established for the Mangoola Coal Project.	Refer evidence against Condition A20	Refer evidence against Condition A20	Compliant	
Evidence Of Consultation					
S2 A22	Where conditions of this consent require consultation with an identified party, the Applicant must: - consult with the relevant party prior to submitting the subject document; and - provide details of the consultation undertaken to the Department, including: - the outcome of that consultation, matters resolved and unresolved; and - details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	- Discussion with MCO E&C Department - MCO Approved Environmental Management Plans	MCO systematically records all consultation with external agencies and the community. For each management plan requiring consultation, evidence of engagement with relevant stakeholders was included as appendices or supporting documentation. Plans reviewed during the audit included records outlining who was consulted, when the consultation occurred, responses received, and how any feedback or unresolved matters were addressed. No unresolved disagreements were identified during the audit period.	Compliant	
Application Of Existing Management Plans					
S2 A23	Prior to the approval of management plans under this consent, the Applicant must continue to implement any equivalent or similar management plan/s required under PA 06_0014, to the satisfaction of the Planning Secretary.	- Discussion with MCO E&C Department - MCO Approved Environmental Management Plans	All relevant management plans required under SSD 8642 were approved prior to the commencement of the audit period. Approval letters are appended to each respective plan as evidence. The requirements of this condition have been met and no further action is required unless reactivated by a modification or directive from the Department.	Compliant	
Staging, Combining and Updating Strategies, Plans or Programs					
S2 A24	With the approval of the Planning Secretary, the Applicant may:	Letter from DPHI letter to MCO	On 15 July 2021, MCO submitted a formal request to the DPHI outlining its proposed approach for the	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); (c) combine any strategy, plan, program or Annual Review required by this consent with any similar strategy, plan, program or Annual Review required under the Mangoola Coal Project (PA 06_0014); and (d) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	response to combined reporting, dated 15/2/2022 Letter to DPHI from MCO outlining mgt plan consolidation, dated 15/07/2021	consolidation and staged updating of management plans under SSD 8642. On 15 February 2022, the Department issued a response confirming support for combined reporting of management plans across Mangoola Coal Project and MCO.		
S2 A25	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated with minor administrative amendments without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Discussion with MCO E&C Department	During the audit period, no requests were made to the Planning Secretary under this clause, and no staging or administrative amendments were undertaken that required the application of this condition.	Not Triggered	
S2 A26	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	Discussion with MCO E&C Department	During the audit period, no requests were made to the Planning Secretary under this clause, and no staging or administrative amendments were undertaken that required the application of this condition.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Protection Of Public Infrastructure					
S2 A27	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: - repair, or pay the full costs associated with repairing, any public infrastructure* that is damaged by carrying out the development; and - relocate, or pay the full costs associated with relocating, any public infrastructure* that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by condition A17 or A18, or to damage that has been compensated under the Mining Act 1992.	Discussion with MCO E&C Department	No damage to or relocation of public infrastructure was identified during the audit period. No action under this condition was required.	Not Triggered	
Demolition					
S2 A28	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).	Discussion with MCO E&C Department	Based on discussion with the MCO E&C Department, site inspection findings, and review of the Annual Reviews, no demolition activities were undertaken during the audit period; as such, this condition is not triggered.	Not Triggered	
Structural Adequacy					
S2 A29	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Discussion with MCO E&C Department	Based on discussion with the MCO E&C Department, site inspection findings, and review of the Annual Reviews, no new buildings or structural works were undertaken during the audit period; as such, this condition is not triggered.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Operation of Plant and Equipment					
S2 A30	All plant and equipment used on site, or to monitor the performance of the development must be: a. maintained in a proper and efficient condition; and b. operated in a proper and efficient manner.	• CBased Environmental HVAS Calibration form, dated 26/05/2025 • SAP system, including work order review • Interview with Maintenance Planner • Pre-Planning Work Request Form, dated 19/06/2025 • Sound Testing – Excavator, dated 08/04/2025 • Maintenance work order 104596720, dated 04/04/2025	MCO has a robust and well-documented maintenance system in place, managed through the SAP work order system. SAP supports all aspects of maintenance management, including planning and scheduling, work order creation and tracking, equipment history recording, inventory and spare parts management, and compliance reporting. This ensures maintenance activities are systematic and aligned with both operational needs and regulatory requirements. During the audit, the auditor interviewed a Maintenance Planner and reviewed maintenance records and site introduction processes for selected equipment. System maintenance plans were sighted for key assets. Only qualified and inducted personnel are permitted to operate specific plant and equipment on site. MCO engage suitably qualified contractors to maintain and operate environmental monitoring equipment. Samples of calibration records, training records and maintenance logs were sighted by the auditors. No evidence of plant or equipment being operated or maintained in an improper or inefficient manner was observed during the audit.	Compliant	
Compliance					
S2 A31	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	• Discussion with MCO E&C Department • Site Induction • Mangoola site familiarisation	All employees, contractors, and sub-contractors are required to complete site familiarisation training, which includes environmental compliance content. Access through the Damstra terminal is restricted until this training is completed. Visitors must complete a visitor induction that also includes environmental	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		(PDF and description of slides)	compliance requirements and are escorted while on site.		
Applicability Of Guidelines					
S2 A32	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of inclusion (or later update) in the condition.		This is an administrative condition that clarifies how references to guidelines, protocols, Australian Standards or policies within the consent are to be interpreted, specifically, as referring to the version in force at the time of inclusion in the consent. No discrepancies or issues were identified during the audit regarding the application or interpretation of referenced documents.	Noted	
S2 A33	Notwithstanding Condition A32, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, in respect of ongoing monitoring and management obligations, agree to or require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		During the audit period, no evidence was identified to indicate that DPHI had exercised this discretion in relation to MCO's monitoring or management obligations.	Not Triggered	
S2 A34	The Applicant must consult with DPIE – Crown Lands prior to undertaking any development on Crown roads.		No development occurred, or is planned to occur, on Crown roads. As such, this condition is not triggered.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																																																								
PART B SPECIFIC ENVIRONMENTAL CONDITIONS																																																																													
Noise																																																																													
S2 B1	Noise Criteria The Applicant must ensure that the noise generated by the development does not exceed the criteria in Table 1 at any residence on privately-owned land. <i>Table 1: Noise criteria dB(A)</i> <table> <tr> <th>Noise Assessment Location *</th><th>Day LAeq (15 min) (Years 1 and 2)</th><th>Day LAeq (15 min) (Year 3 onward)</th><th>Evening LAeq (15 min)</th><th>Night LAeq (15 min)</th><th>L_{A1} (1 min)</th></tr> <tr><td>171, 176, 144</td><td>40</td><td>40</td><td>40</td><td>40</td><td>52</td></tr> <tr><td>25, 128, 154, 193, 125A, 182B</td><td>40</td><td>40</td><td>38</td><td>38</td><td>52</td></tr> <tr><td>261</td><td>42</td><td>40</td><td>38</td><td>38</td><td>52</td></tr> <tr><td>54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190, 157</td><td>40</td><td>40</td><td>37</td><td>37</td><td>52</td></tr> <tr><td>165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B</td><td>40</td><td>40</td><td>36</td><td>36</td><td>52</td></tr> <tr><td>134A</td><td>44</td><td>40</td><td>39</td><td>39</td><td>52</td></tr> <tr><td>109A - F</td><td>43</td><td>40</td><td>39</td><td>39</td><td>52</td></tr> <tr><td>263</td><td>42</td><td>40</td><td>39</td><td>39</td><td>52</td></tr> <tr><td>164</td><td>40</td><td>40</td><td>35</td><td>39</td><td>52</td></tr> <tr><td>Other privately-owned residences</td><td>40</td><td>40</td><td>35</td><td>35</td><td>52</td></tr> <tr><td>Wybong Hall and Anglican Church</td><td>48</td><td>48</td><td>48</td><td>48</td><td>-</td></tr> </table> * The Noise Assessment Locations referred to in Table 1, are shown in Appendix 5. Noise generated by the development must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017). The noise enhancing meteorological conditions determined by monitoring at the meteorological station required under condition B35 and as defined in Part D of the Noise Policy for Industry (EPA, 2017) apply to the noise criteria in Table 1.	Noise Assessment Location *	Day LAeq (15 min) (Years 1 and 2)	Day LAeq (15 min) (Year 3 onward)	Evening LAeq (15 min)	Night LAeq (15 min)	L _{A1} (1 min)	171, 176, 144	40	40	40	40	52	25, 128, 154, 193, 125A, 182B	40	40	38	38	52	261	42	40	38	38	52	54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190, 157	40	40	37	37	52	165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B	40	40	36	36	52	134A	44	40	39	39	52	109A - F	43	40	39	39	52	263	42	40	39	39	52	164	40	40	35	39	52	Other privately-owned residences	40	40	35	35	52	Wybong Hall and Anglican Church	48	48	48	48	-	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website. - Annual Reviews, 2022, 2023 2024. - EMD attended noise monitoring records. - MCO RFI Response, Low Frequency Response Explanation, July 2025. - EMM noise prediction tool - CMO Portal - CMO Complaint Form, 14/10/2024 - Annual Community Plan - Community Consultative	As part of the approved Noise Management Plan (NMP) MCO implements a noise monitoring program which consists of both attended and unattended (real-time) noise monitoring. Attended Noise Monitoring - Attended noise monitoring is conducted monthly at monitoring locations detailed in Table 6.1 of the NMP. - Monthly attended noise monitoring is undertaken at night by Global Acoustics (now EMM Consulting), - Monitoring locations have been selected to represent the nearest private receptors, and noise limits determined from modelled mine emissions and the applicable night-time limits in Table 1, Condition B1 of SSD 8642. - Results from attended noise monitoring are published monthly on the MCO public website and summarised in Annual Reviews. - Attended monitoring is only considered valid under specific meteorological conditions, namely: - Wind speed at microphone height less than 5 m/s - No rainfall - No temperature inversion greater than 3°C/100m, unless otherwise specified in the conditions of consent - It was confirmed by the Noise specialist that the methodology employed by the company undertaking the monthly attended noise	Compliant	
Noise Assessment Location *	Day LAeq (15 min) (Years 1 and 2)	Day LAeq (15 min) (Year 3 onward)	Evening LAeq (15 min)	Night LAeq (15 min)	L _{A1} (1 min)																																																																								
171, 176, 144	40	40	40	40	52																																																																								
25, 128, 154, 193, 125A, 182B	40	40	38	38	52																																																																								
261	42	40	38	38	52																																																																								
54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190, 157	40	40	37	37	52																																																																								
165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B	40	40	36	36	52																																																																								
134A	44	40	39	39	52																																																																								
109A - F	43	40	39	39	52																																																																								
263	42	40	39	39	52																																																																								
164	40	40	35	39	52																																																																								
Other privately-owned residences	40	40	35	35	52																																																																								
Wybong Hall and Anglican Church	48	48	48	48	-																																																																								

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Committee – Annual Report 2023 Community Complaints Registers, 2022, 2023, 2024, 2025, MCO Public Website	monitoring is in line with the NSW Noise Policy for Industry (NPfI), i.e. excluding extraneous noise sources from the analysis. A review of the monitoring data and Noise monitoring reports for the audit period indicated that no exceedances of noise impact assessment criteria were recorded. Unattended (Real-Time) Noise Monitoring - Real-time noise monitoring is used for proactive and reactive noise management of day-to-day operations at MCO, rather than a tool to monitor compliance. - Alerts from real-time monitors are linked with meteorological conditions to assess the potential risk of noise propagation and trigger operational responses such as shut-downs or relocation of equipment. - MCO obtains meteorological data from its Weather Station North (WSN) or Weather Station South (WSS) to determine the applicable noise limits. Review of noise complaints To assess compliance, noise complaints received during the audit period were reviewed. According to the Annual Reviews, 36 noise complaints were received in 2024, 30 in 2023, and 19 in 2022. MCO's public website reports nine noise complaints to date in 2025. Complaints are managed through the CMO system and the Community Complaint Management procedure, which includes a 24-hour hotline. Complaints are automatically dispatched		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			to E&C and CHPP teams via text for immediate investigation. For noise complaints, the EMM noise prediction tool and real-time monitoring units provide information for review. MCO representatives attend the complaint location, assess weather conditions, and check operational activities to identify potential sources. Operational noise management controls were reviewed by the Mining Supervisor or CHPP Supervisor, and where applicable operations are reviewed with changes made as required to reduce noise levels. Supplementary weekly attended noise monitoring was undertaken northwest of the site during winter periods from 2022 to 2024 (five locations in 2024 and four locations in 2022–2023). No elevated noise levels were recorded in any year. In addition, monthly attended compliance noise monitoring was conducted throughout 2022–2024, with no, non-compliances identified. All complaints are tracked in CMO, reviewed in monthly status reports, and summarised in annual community plans, annual reports and annual reviews, which include complaint trends and data analysis. The auditors reviewed MCO's complaint management records and monitoring responses and were satisfied that all noise-related complaints had been appropriately investigated and managed.		
S2 B2	The noise criteria in Table 1 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the noise criteria, and the	Email from DPHI to MCO, Mangoola Coal Continued	In line with Condition B2, the noise criteria in Table 1 did not apply to one receptor during the audit period due to an existing agreement with the landowner. Monitoring at this location continued	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Applicant has advised the Department in writing of the terms of this agreement.	Operations Project - Post Approval Document Received - Impact Mitigation and Compensation Agreement (SS D-8642-PA-81), 21/11/2024 • Letter from MCO to DPHI, re. state significant Development SSD8642 – Schedule 2 Condition B2 and B28 Impact Mitigation and Compensation Agreement, 21/11/2024 • Noise Management Plan, Version 24, dated 20/12/2024 • EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website.	throughout. The noise agreement and notification to DPHI was sighted during the audit.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B3	Temporary Construction Noise Limits With the written agreement of the Planning Secretary, the Applicant may seek temporary construction noise limits above the noise criteria in Table 1, including for construction works outside of standard hours. In order to seek a temporary construction noise limit, the Applicant must develop a Construction Noise Protocol to the satisfaction of the Planning Secretary. This protocol must: - be prepared in consultation with the EPA and any residents who may be affected by the noise generated by these works; - specify the construction works to which the temporary construction noise limits would apply and provide justification for these limits; and - address the relevant requirements of the Interim Construction Noise Guideline (DECC, 2009).	Discussion with E&C Department	MCO have not requested temporary construction limits during the audit period. As such this has not been triggered.	Not Triggered	
S2 B4	The Applicant must continue to operate in accordance with the noise criteria in Table 1 until and unless a Construction Noise Protocol for the specified construction works is approved by the Planning Secretary.	Refer evidence against Condition B1.	At the time of the audit, no Construction Noise Protocol had been developed or approved. Therefore, MCO was required to comply with the standard operational noise criteria outlined in Table 1. Evidence from monthly attended noise monitoring reports and Annual Reviews confirms that MCO has continued to operate in accordance with the operational noise limits in Table 1.	Compliant	
S2 B5	The Applicant must implement any Construction Noise Protocol approved by the Planning Secretary.	Discussion with E&C Department	At the time of the audit, no Construction Noise Protocol had been prepared, submitted, or approved by DPHI. As such, there were no protocol requirements in effect during the audit period and this condition had not been triggered.	Not Triggered	
S2 B6	Road Traffic Noise Upon receiving a written request from the owner of a residence listed in Table 2, (except where a negotiated	MCO Air conditioner servicing form,	MCO issued notification letters to eligible residents within one month of approval of SSD-8642, advising them of their right to request mitigation	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference				
	noise agreement is in place for road traffic noise), the Applicant must implement noise mitigation measures such as double glazing, insulation, and/or air conditioning at any residence on the land in consultation with the landowner to minimise the impacts of road traffic noise. These additional mitigation measures must be reasonable and feasible, directed at mitigating the traffic noise impacts of the Project and must consider any existing mitigation installed under the Mangoola Coal Project (PA 06_0014). If within 3 months of receiving this request from the landowner, the Applicant and the landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution. <i>Table 2: Receivers subject to Road Noise Mitigation upon request</i> <table><thead><tr><th>Mitigation Basis</th><th>Receiver ID</th></tr></thead><tbody><tr><td>Road Traffic Noise</td><td>R246^a, R249 and R251</td></tr></tbody></table> ^aMitigation works have been implemented at this receiver under PA 06_0014	Mitigation Basis	Receiver ID	Road Traffic Noise	R246 ^a , R249 and R251	- signed by resident, 23/10/2023 - MCO Mitigation Register	for road traffic noise. This occurred prior to the audit period. During the audit period, one resident (R251) submitted a written request for mitigation on 18 October 2023. In response, MCO arranged for the servicing of existing air conditioning units to enable windows to remain closed while maintaining internal thermal comfort. This approach aligns with the intent of the condition by mitigating mine and road traffic noise impacts. Evidence of the mitigation works, including a signed air conditioning servicing form dated 23 October 2023, was sighted during the audit, along with supporting records in the MCO Mitigation Register. It is also noted that one additional resident had exercised their rights and received mitigation prior to the current audit period. A third resident was aware of their rights but had not submitted a written request at the time of the audit. No disputes regarding implementation were identified during the audit period.		
Mitigation Basis	Receiver ID								
Road Traffic Noise	R246 ^a , R249 and R251								
S2 B7	Noise Operating Conditions The Applicant must: - take all reasonable steps to minimise noise from construction and operational activities, including low frequency noise and other audible characteristics, as well as road and on-site rail noise associated with the development; - implement reasonable and feasible noise attenuation measures on all plant and equipment that will operate in noise sensitive areas; - take all reasonable steps to minimise the noise impacts of the development in noise sensitive areas during the evening and night; - operate a comprehensive noise management system that uses a combination of predictive	- EMM, Noise prediction tool (excel) - Airen consulting Environmental forecast system Website, email alert, 2/7/2025 - Noise risk model - Environmental Protection Licence, 21368, Rolling Stock Operated on a	MCO operates under an approved NMP which outlines measures to minimise noise impacts from construction and operational activities, including predictive meteorological forecasting, monitoring programs and noise attenuation measures. Operational controls in place to manage noise during the audit period included: MCO has real-time noise monitoring systems with alarm levels to continuously monitor noise and react to noise levels that present a risk to compliance, including site area designation and low frequency.	Compliant					

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	meteorological forecasting and real-time noise monitoring data to guide the day to day planning of mining operations, and the implementation of both proactive and reactive noise mitigation measures to ensure compliance with the relevant conditions of this consent; e. take all reasonable steps to minimise the noise impacts of the development during noise-enhancing meteorological conditions; f. only use locomotives and rolling stock that are approved to operate on the NSW rail network in accordance with the noise limits in any relevant rolling stock operator's EPL and use reasonable endeavours to ensure that rolling stock is selected to minimise noise; g. carry out regular attended noise monitoring (at least once a month, unless otherwise agreed by the Planning Secretary) to determine whether the development is complying with the relevant conditions of this consent; and h. regularly assess the noise monitoring data and modify operations on the site to ensure compliance with the relevant conditions of this consent.	Licensed Rail Network, OneRail Australia Pty Ltd 16/05/2025 - Environmental Protection Licence, 21379, Rolling Stock Operated on a Licensed Rail Network, Aurizon Operations Limited-Mayfield 25/06/2025 - Aurizon EPL 21379 Condition R4.2 – Annual Rolling Stock Performance Report (2024) 5 February 2025 - One Rail Australia, Condition R4.2 – Annual Rolling Stock Performance Report, 05/04/2024	- MCO implements a range of operational noise controls, including silent in cab horns for diggers and broadband reversing alarms on equipment, conveyor covers to reduce mechanical noise, and annual sound power level testing. - The site inspection confirmed the presence of real-time offsite noise monitors, enclosed conveyors, and an 8 m high haul road noise bund along the southern side of Wybong Road, with the mobile crushing plant operating only during daytime hours. - Realtime and monthly attended noise monitoring support proactive and reactive noise management. Noise monitoring reports are published monthly on the MCO public website and summarised in Annual Reviews. Refer findings against Condition B1. - Meteorological forecasts, noise risk model and Airen weather alerts are used prior to shifts to identify and manage noise enhancing conditions, enabling operational adjustments to minimise impacts on surrounding sensitive receivers. - MCO uses only locomotives and rolling stock approved for operation on the NSW rail network, in compliance with noise limits specified in Aurizon Operations Limited EPL 21379 and OneRail Australia Pty Ltd EPL 21368. Section 6.6 of the NMP outlines corrective actions to maintain compliance with consent conditions, including a three yearly review and validation of the real-time noise monitoring network. The E&C team also reviews all data captured in the EMD		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			and associated reports before they are published on the MCO Public Website. Based on the evidence reviewed and implementation observed, MCO is compliant with all aspects of Condition B7.		
S2 B8	Noise Management Plan The Applicant must prepare a Noise Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - describe the measures to be implemented to ensure: - compliance with the noise criteria and operating conditions of this consent; - best practice management is being employed; and - noise impacts of the development are minimised during noise-enhancing meteorological conditions; - describe the measures to minimise development related road traffic noise generated on public roads; - describe the noise management system in detail; and - include a monitoring program that: - uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the development; and - monitors noise at locations representative of the most affected residences; - includes a program to calibrate and validate the real-time noise monitoring results with the attended monitoring results over time; - adequately supports the noise management system;	- Noise Management Plan, Version 24, dated 20/12/2024 - Letter from DPHI approving the revised Noise Management Plan, dated 20/12/2024	MCO implement a Noise Management Plan (NMP) to address the requirements of Schedule 2, Condition B8. The NMP was revised and updated once during the audit period, in November 2024. The document was fully reviewed with minor administrative amendments, removal of construction references, and updated figures. The DPHI approved the current version of the NMP on 20 December 2024. The NMP was prepared by a suitably qualified person and endorsed by the Department on 20 May 2021. The NMP was verified to contain the required information, as required by Schedule 2, Condition B8. The plan describes a suite of measures to ensure compliance with noise criteria and operating conditions, and change management processes (Section 4), addressing clause (b)(i). Best practice management is demonstrated with real-time monitoring with automated alarms, predictive meteorological forecasting, proactive operational planning, and ongoing review of mitigation technologies (Sections 4 and 6), satisfying clause (b)(ii). Specific provisions are in place to manage noise-enhancing meteorological conditions, including pre-shift weather forecasts and operational controls such as restricted use of elevated dumps and gear limitations on dozers in sensitive areas at night during noise-enhancing	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- includes a protocol for distinguishing noise emissions of the development from any neighbouring developments; and - includes a protocol for identifying any noise-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of any such event.		weather conditions (Section 4.1), meeting clause (b)(iii). Measures to minimise development-related road traffic noise are outlined (Section 4.6.2), fulfilling clause (c). The plan provides a detailed noise management system, including clear roles, responsibilities, and training (Section 3 and 4.5), satisfying clause (d). The monitoring program uses both real-time and attended monitoring, monitors locations representative of sensitive receivers, and includes protocols for calibration and validation of monitoring results (Section 6.2), fulfilling clauses (e)(i)–(iii). The NMP includes a noise response protocol, distinguishes site noise from other sources, and outlines exceedance, incident, and stakeholder notification procedures (Sections 6.3, 6.6, 6.7), addressing clauses (e)(iv)–(vi). The NMP satisfies the key obligations outlined in Condition B8 of SSD 8642.		
S2 B9	The Applicant must not commence mining operations north of Wybong Road until the Noise Management Plan is approved by the Planning Secretary.	• Noise Management Plan, Version 24, dated 20/12/2024 • Discussion with MCO E&C Department	The approved NMP (Version 24) was prepared by a suitably qualified person and approved by the Department of DPHI on 20 May 2021. Evidence of this approval was sighted during the audit. Mining operations north of Wybong Road formally commenced on 1 December 2022, after the NMP had been approved. As such, MCO has complied with the requirements of this condition.	Compliant	
S2 B10	The Applicant must implement the Noise Management Plan as approved by the Planning Secretary.	• Noise Management Plan, Version 24, dated 20/12/2024	The site inspection, along with the review of noise monitoring reports, consultation with landholders and use of noise data management systems confirmed that MCO is effectively implementing the NMP.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																																			
			Refer to controls outlined in Section 2 Schedule B7.																																																					
Blasting																																																								
S2 B11	Blasting Criteria The Applicant must ensure that blasting on the site does not cause exceedances of the criteria at the locations in Table 3. Table 3: Blasting criteria <table><tr><th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr><tr><td rowspan="2">Residence on privately-owned land</td><td>120</td><td>10</td><td>0%</td></tr><tr><td>115</td><td>5</td><td>5% of the total number of blasts over a calendar year</td></tr><tr><td>Yarlett^a Wybong Cemetery^a Wybong Hall^a Yarraman^a</td><td>133</td><td>5</td><td>0%</td></tr><tr><td>Anvil Rock^a The Book^a</td><td>-</td><td>50</td><td>0%</td></tr><tr><td>Aboriginal Rock Shelter Sites^a</td><td>-</td><td>50</td><td>0%</td></tr><tr><td>500kV transmission line pylons – tension towers</td><td>-</td><td>50</td><td>0%</td></tr><tr><td>500kV transmission line pylons – suspension towers</td><td>-</td><td>100</td><td>0%</td></tr><tr><td>11 kV transmission line – timber poles</td><td>-</td><td>100</td><td>0%</td></tr><tr><td>Prescribed Water Dams</td><td>-</td><td>50</td><td>0%</td></tr><tr><td>Prescribed Tailings Dams</td><td>-</td><td>100</td><td>0%</td></tr><tr><td>Public Roads, Telecommunication infrastructure and cables</td><td></td><td>100</td><td>0%</td></tr><tr><td>All other public infrastructure</td><td></td><td>50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Planning Secretary)</td><td>0%</td></tr></table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Residence on privately-owned land	120	10	0%	115	5	5% of the total number of blasts over a calendar year	Yarlett ^a Wybong Cemetery ^a Wybong Hall ^a Yarraman ^a	133	5	0%	Anvil Rock ^a The Book ^a	-	50	0%	Aboriginal Rock Shelter Sites ^a	-	50	0%	500kV transmission line pylons – tension towers	-	50	0%	500kV transmission line pylons – suspension towers	-	100	0%	11 kV transmission line – timber poles	-	100	0%	Prescribed Water Dams	-	50	0%	Prescribed Tailings Dams	-	100	0%	Public Roads, Telecommunication infrastructure and cables		100	0%	All other public infrastructure		50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Planning Secretary)	0%	• EMD blast database • Dynamaster database • Blast Management Plan, Version 21, 23/01/2025 • Re: Blast Management Plan (inc. Blast Fume Management Strategy) Submission under SSD 8642, 29 July 2022 • Dams Safety Committee Letter, Cessation of Blast Monitoring on Embankment ‘C’ (TD2) Mangoola – 3, 7 January 2020	MCO maintains a comprehensive blast monitoring network as detailed in the approved Blast Management Plan (BMP). The network includes both permanent and portable monitors strategically positioned to measure airblast overpressure and ground vibration at sensitive receptors, infrastructure, and site boundaries. Monitoring locations include private residences, public infrastructure (e.g. TransGrid tension towers), and previously included prescribed dams. MCO engages Acoem, which operate the Dynamaster system, a web-based platform that captures, visualises, and analyses blast vibration and data in real time. Data is validated and stored in the site’s <i>Environmental Monitoring Database</i> (EMD), which also includes built-in exceedance triggers and links to automated notification protocols. Monitoring results are publicly reported via Annual Reviews and Blasting Reports. Updates to monitoring network Monitoring of the prescribed water and tailings dams has been excluded, as blasting no longer occurs in proximity to these areas. In July 2021, the Dam Safety Committee removed the requirement to monitor these dams, with formal notification provided to the Planning Secretary on 29 July 2022. The revised BMP includes updated information regarding the ground vibration limit applicable to the 500kV TransGrid tension towers, which is set	Compliant	
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance																																																					
Residence on privately-owned land	120	10	0%																																																					
	115	5	5% of the total number of blasts over a calendar year																																																					
Yarlett ^a Wybong Cemetery ^a Wybong Hall ^a Yarraman ^a	133	5	0%																																																					
Anvil Rock ^a The Book ^a	-	50	0%																																																					
Aboriginal Rock Shelter Sites ^a	-	50	0%																																																					
500kV transmission line pylons – tension towers	-	50	0%																																																					
500kV transmission line pylons – suspension towers	-	100	0%																																																					
11 kV transmission line – timber poles	-	100	0%																																																					
Prescribed Water Dams	-	50	0%																																																					
Prescribed Tailings Dams	-	100	0%																																																					
Public Roads, Telecommunication infrastructure and cables		100	0%																																																					
All other public infrastructure		50 (or a limit determined by the structural design methodology in AS 2187.2 - 2006, or its latest version, or other alternative limit for public infrastructure, to the satisfaction of the Planning Secretary)	0%																																																					

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			at 60 mm/s in accordance with existing agreements. The BMP confirms that blasting criteria specified in Table 3 of SSD 8642 do not apply to these assets, in line with Condition B12 of the consent. The relocation of blast monitor BM09 is being considered to enhance alignment with nearby receptors. The potential use of a portable meteorological station is also being considered to improve modelling of atmospheric conditions influencing overpressure and fume dispersion. Exceedances Recorded During the audit period, all monitored blast events complied with the relevant criteria for airblast overpressure and ground vibration, except for the following: Two events occurred in 2023 that exceeded the 60 mm/s vibration limit at TransGrid Tension Tower 74T. These events were within the scope of the agreement with TransGrid, which allows for tailored limits and requires post-event investigations. MCO undertook these investigations, confirmed no damage occurred, and reported outcomes directly to TransGrid. On 11 March 2024, blast monitor BM09 recorded an overpressure level of 121.3 dB (Blast ID Wybong Pit 3034A), refer snapshot below showing the blast results from the March 2024 MCO Monthly Monitoring Report.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																																																																																																																							
			Minerals Development Ltd. - Shovelby Mine Licence Report 2. Blasting 2.1 Private residences <table><thead><tr><th>Timestamp</th><th>Blast ID</th><th>BM03 (dB)</th><th>BM04 (dB)</th><th>BM07 (dB)</th><th>BM08 (dB)</th><th>BM09 (dB)</th><th>BM10 (dB)</th><th>BM11 (dB)</th></tr></thead><tbody><tr><td>06/03/2024 11:34:05</td><td>South Pit 2427</td><td>88.2</td><td>0.02</td><td>94.2</td><td>0.02</td><td>87.3</td><td>0.04</td><td>87.1</td><td>0.02</td><td>82.3</td><td>0.02</td><td>84.9</td><td>0.02</td></tr><tr><td>06/03/2024 11:35:35</td><td>Main Pit 1645</td><td>85.6</td><td>0.04</td><td>94.5</td><td>0.04</td><td>96.9</td><td>0.15</td><td>89.8</td><td>0.03</td><td>87.9</td><td>0.05</td><td>88.8</td><td>0.08</td></tr><tr><td>08/03/2024 13:30:46</td><td>Wybong pit 3040</td><td>107.4</td><td>0.05</td><td>114.6</td><td>0.06</td><td>100</td><td>0.03</td><td>111.7</td><td>0.09</td><td>103.6</td><td>0.05</td><td>103.9</td><td>0.1</td></tr><tr><td>11/03/2024 11:21:59</td><td>Wybong pit 3034A</td><td>98.2</td><td>0.26</td><td>106.2</td><td>0.32</td><td>85.7</td><td>0.04</td><td>121.3</td><td>0.66</td><td>113.9</td><td>1.08</td><td>101.5</td><td>1.28</td></tr><tr><td>12/03/2024 12:29:02</td><td>South Pit 2427A</td><td>86.3</td><td>0.03</td><td>88.3</td><td>0.03</td><td>90.3</td><td>0.08</td><td>84.9</td><td>0.05</td><td>83.7</td><td>0.04</td><td>84.8</td><td>0.07</td></tr><tr><td>13/03/2024 15:21:39</td><td>Main Pit 1648</td><td>88</td><td>0.03</td><td>100</td><td>0.05</td><td>93.2</td><td>0.03</td><td>94.3</td><td>0.02</td><td>102.8</td><td>0.03</td><td>93.2</td><td>0.04</td></tr><tr><td>15/03/2024 12:17:59</td><td>Main Pit 1646</td><td>103.4</td><td>0.03</td><td>109.3</td><td>0.03</td><td>79.2</td><td>0.06</td><td>98.3</td><td>0.02</td><td>89.3</td><td>0.02</td><td>79.9</td><td>0.05</td></tr><tr><td>18/03/2024 12:58:13</td><td>Wybong 3043</td><td>83.7</td><td>0.05</td><td>88.9</td><td>0.09</td><td>81.4</td><td>0.02</td><td>97.3</td><td>0.2</td><td>91.5</td><td>0.15</td><td>85.5</td><td>0.11</td></tr><tr><td>21/03/2024 13:19:08</td><td>Main Pit 1644</td><td>107.4</td><td>0.05</td><td>108.8</td><td>0.05</td><td>103.5</td><td>0.12</td><td>95.2</td><td>0.03</td><td>97.6</td><td>0.05</td><td>92.1</td><td>0.09</td></tr></tbody></table> MCO investigated the event and concluded that the raw reading of 121.3 dB was not representative of conditions at the nearest private receptor, and when calibrated to account for localised geological conditions, the adjusted overpressure was 119 dB, within the allowable exceedance limit. On 3 October 2024, DPHI acknowledged the investigation findings and noted planned updates to the BMP. The BMP was subsequently updated to clarify how blast overpressure exceedances are determined at representative private property monitors. These updates were approved by DPHI. Two locations, the prescribed water dams and tailings dams were excluded from monitoring, as blasting did not occur in proximity to these areas. In July 2021, the then Dam Safety Committee (DSC) removed the requirement to monitor declared (prescribed) dams for blasting activities, given that blasting was no longer taking place within the dam notification area. The Planning Secretary was notified of this change on 29 July 2022.	Timestamp	Blast ID	BM03 (dB)	BM04 (dB)	BM07 (dB)	BM08 (dB)	BM09 (dB)	BM10 (dB)	BM11 (dB)	06/03/2024 11:34:05	South Pit 2427	88.2	0.02	94.2	0.02	87.3	0.04	87.1	0.02	82.3	0.02	84.9	0.02	06/03/2024 11:35:35	Main Pit 1645	85.6	0.04	94.5	0.04	96.9	0.15	89.8	0.03	87.9	0.05	88.8	0.08	08/03/2024 13:30:46	Wybong pit 3040	107.4	0.05	114.6	0.06	100	0.03	111.7	0.09	103.6	0.05	103.9	0.1	11/03/2024 11:21:59	Wybong pit 3034A	98.2	0.26	106.2	0.32	85.7	0.04	121.3	0.66	113.9	1.08	101.5	1.28	12/03/2024 12:29:02	South Pit 2427A	86.3	0.03	88.3	0.03	90.3	0.08	84.9	0.05	83.7	0.04	84.8	0.07	13/03/2024 15:21:39	Main Pit 1648	88	0.03	100	0.05	93.2	0.03	94.3	0.02	102.8	0.03	93.2	0.04	15/03/2024 12:17:59	Main Pit 1646	103.4	0.03	109.3	0.03	79.2	0.06	98.3	0.02	89.3	0.02	79.9	0.05	18/03/2024 12:58:13	Wybong 3043	83.7	0.05	88.9	0.09	81.4	0.02	97.3	0.2	91.5	0.15	85.5	0.11	21/03/2024 13:19:08	Main Pit 1644	107.4	0.05	108.8	0.05	103.5	0.12	95.2	0.03	97.6	0.05	92.1	0.09		
Timestamp	Blast ID	BM03 (dB)	BM04 (dB)	BM07 (dB)	BM08 (dB)	BM09 (dB)	BM10 (dB)	BM11 (dB)																																																																																																																																				
06/03/2024 11:34:05	South Pit 2427	88.2	0.02	94.2	0.02	87.3	0.04	87.1	0.02	82.3	0.02	84.9	0.02																																																																																																																															
06/03/2024 11:35:35	Main Pit 1645	85.6	0.04	94.5	0.04	96.9	0.15	89.8	0.03	87.9	0.05	88.8	0.08																																																																																																																															
08/03/2024 13:30:46	Wybong pit 3040	107.4	0.05	114.6	0.06	100	0.03	111.7	0.09	103.6	0.05	103.9	0.1																																																																																																																															
11/03/2024 11:21:59	Wybong pit 3034A	98.2	0.26	106.2	0.32	85.7	0.04	121.3	0.66	113.9	1.08	101.5	1.28																																																																																																																															
12/03/2024 12:29:02	South Pit 2427A	86.3	0.03	88.3	0.03	90.3	0.08	84.9	0.05	83.7	0.04	84.8	0.07																																																																																																																															
13/03/2024 15:21:39	Main Pit 1648	88	0.03	100	0.05	93.2	0.03	94.3	0.02	102.8	0.03	93.2	0.04																																																																																																																															
15/03/2024 12:17:59	Main Pit 1646	103.4	0.03	109.3	0.03	79.2	0.06	98.3	0.02	89.3	0.02	79.9	0.05																																																																																																																															
18/03/2024 12:58:13	Wybong 3043	83.7	0.05	88.9	0.09	81.4	0.02	97.3	0.2	91.5	0.15	85.5	0.11																																																																																																																															
21/03/2024 13:19:08	Main Pit 1644	107.4	0.05	108.8	0.05	103.5	0.12	95.2	0.03	97.6	0.05	92.1	0.09																																																																																																																															

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Data is collected through Dynamaster, imported into EMD, where it is validated and supplemented with commentary. Average results are reviewed within EMD, which includes predefined trigger levels and automatically issues email notifications in the event of an exceedance. Airblast overpressure results at all monitoring locations for the reporting period were available on the Mangoola website in Blasting Reports and the Annual Reviews. Review of blast complaints Blasting-related complaints received during the audit period (27 July 2022 to 3 July 2025) included: • 2022: 3 complaints (from 27 July) • 2023: 3 complaints • 2024: 14 complaints • 2025 (to 3 July): 2 complaints Blasting activities commenced in the Wybong Pit on 19 January 2023, with first coal extraction occurring on 28 August 2023. Complaint numbers remained low throughout 2023, before a notable increase was recorded in 2024. While the auditors found no clear correlation between the spike in complaints and blasting operations, the increase may be associated with heightened community sensitivity following the commencement of mining in late 2023 and into 2024. A review of blast complaints and associated investigations confirmed that MCO follows a systematic process involving: • Assessment of monitored blast data; • Review of geological conditions and potential energy release anomalies;		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Engagement with complainants and adequately address complaints and monitoring results through investigations and additional measures. On 11 March 2024, blast monitor BM09 recorded an elevated overpressure result, and the same blast triggered three complaints. MCO reported the non-compliance to DPHI as a precaution. The exceedance was attributed to weaker surface geology in part of the blast pattern, which allowed greater atmospheric energy release. Conclusion MCO has complied with the blasting criteria in Condition B11, with all monitored events during the audit period meeting the required airblast and vibration limits. The isolated exceedance at BM09 in March 2024 was investigated, recalibrated within allowable limits, and accepted by DPHI. Monitoring, complaint management, and continuous improvement measures support the MCO's compliance.		
S2 B12	The blasting criteria in Table 3 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or infrastructure to exceed the blasting criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Mangoola Open Cut Blast Management Plan, Version 21, 23/01/2025	An agreement between MCO and TransGrid (dated 2015 and 2020) set specific vibration limits for blasting near the 500 kV transmission line. Copies of these agreements were sighted in Appendix C of the Blast Management Plan. This is outside of the audit period.	Not Triggered	
S2 B13	Blasting Hours The Applicant must only carry out blasting on the site between 9 am and 5 pm (Monday to Saturday inclusive). No blasting is allowed on Sundays, public holidays or any other time without the prior written approval of the Planning Secretary.	- Blast Monitoring Field Sheet, RS Wybong North, 13 June 2025 - EMD database - Ecotech platform	MCO carry out blasting at the Site between 9am and 5pm. The Ecotech platform (which records blast times), Blast Monitoring Field Sheets and Monthly Monitoring Reports were reviewed confirming that blasting activities were conducted within approved	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		MCO Public Website, Monthly Monitoring Reports	hours and days, as tracked in the EMD spreadsheet and reported in the Annual Reviews. Pre-blast environmental assessment guidelines are used to communicate the requirements of the Blast Management Plan to relevant teams, including operations and pit services. The Blast Management Plan outlines the approved blasting framework, including permissible hours and days for blasting.		
S2 B14	Blasting Frequency The Applicant may carry out a maximum of: 2 single blast events^a a day; and 6 single blast events^a a week, averaged over a calendar year.	- Blast Management Plan, Version 21, 23/01/2025 - EMD database - Ecotech platform	The blasting frequency is outlined in Section 2 of the Blast Management Plan. A review of blast data presented in the monthly monitoring reports confirmed that blasting activities did not exceed two events per day or an average of six events per week. The Annual Reviews reported the following: 2024 Annual Review - Average of 2.6 blast events per week. 2023 Annual Review – Average of 3.2 blast events per week. 2022 Annual Review – Average of 3.2 blast events per week.	Compliant	
S2 B15	Condition B14 does not apply to single blast events^a that generate ground vibration of 0.5 mm/s or less at any residence on privately-owned land, or to blast misfires or blasts required to ensure the safety of the mine, its workers or the general public. ^a <i>Within conditions B14 and B15, 'single blast event' means a blast which involves either a single detonation or a number of individual blasts fired in quick succession in a discrete area of the development.</i>		This is noted	Noted	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	<i>Should an additional blast be required after a blast misfire, this additional blast and the blast misfire are counted as a single blast event.</i>				
S2 B16	Property Inspections If the Applicant receives a written request from the owner of any privately-owned land within 3 kilometres of any approved open cut mining pit on the site for a property inspection to establish the baseline condition of any buildings and structures on their land, or to have a previous property inspection updated, then within 2 months of receiving this request, or other timeframe agreed by the Planning Secretary, the Applicant must: - commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to: - establish the baseline condition of any buildings and other structures on the land, or update the previous property inspection report; and - identify measures that should be implemented to minimise the potential blasting impacts of the development on these buildings and structures; and - give the landowner a copy of the new or updated property inspection report.	- Letter from receptor to MCO, 17 September 2024. - Email from MCO to receptor, dated 23 October 2024.	Notification letters were issued to property owners within 3 km of the site prior to the audit period, specifically in May 2021. Therefore, the requirement for initial notifications was met and is not triggered during the audit period. Regarding subsequent property inspections, one landowner exercised their rights and requested an inspection in the context of planned renovations. The request, dated 17 September 2024, was for a post-renovation baseline inspection. A copy of the completed inspection report was provided to the landowner via email on 23 October 2024. The correspondence and report have been sighted.	Compliant	
S2 B17	If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the property inspection report, either party may refer the matter to the Planning Secretary for resolution.	Discussion with E&C Department	As no disputes were raised and the provision was not triggered, referral to the Planning Secretary was not required. MCO ensured that the appointed provider was independent of the person completing the renovation work, thereby avoiding any potential conflict of interest.	Not Triggered	
S2 B18	Property Investigations	Discussion with E&C Department	No written claims of property damage attributed to blasting were received during the audit period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	If the owner of any privately-owned land within 3 kilometres of any approved open cut mining pit on the site or any other landowner where the Planning Secretary is satisfied an investigation is warranted, claims in writing that buildings or structures on their land have been damaged as a result of blasting on the site, then within 2 months of receiving this written claim, or other timeframe agreed by the Planning Secretary, the Applicant must: commission a suitably qualified, experienced and independent person, whose appointment is acceptable to both parties to investigate the claim; and give the landowner a copy of the property investigation report.		Accordingly, this condition was not triggered.		
S2 B19	If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Applicant must repair the damage to the satisfaction of the Planning Secretary.	Discussion with E&C Department	As no property investigations were undertaken during the audit period, this condition was not triggered.	Not Triggered	
S2 B20	If there is a dispute over the selection of the suitably qualified, experienced and independent person, or the Applicant or the landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Planning Secretary for resolution.	Discussion with E&C Department	No property investigations or disputes occurred during the audit period. Therefore, this condition was not triggered.	Not Triggered	
S2 B21	Blast Operating Conditions The Applicant must: - take all reasonable steps to: - ensure the safety of people and livestock from blasting impacts of the development; - protect public and private infrastructure and property in the vicinity of the site from blasting damage associated with the development; and	- Blast Monitoring Field Sheet, RS Wybong North, 13 June 2025 - MCO Public Website, Monthly Monitoring Reports	Blasting activities at Mangoola are managed in accordance with the Blast Management Plan and Blasting Procedures to ensure the protection of people and livestock. This includes the application of defined exclusion zones and adherence to the Closing Public Roads Mining Procedure available publicly on the MCO Public Website. Blasting notifications are issued manually and follow the requirements outlined in site	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- minimise blast-related dust and fume emissions; • ensure that blasting on the site does not result in greater impacts to heritage items^a than those predicted in the document/s listed in condition A2(c), and develop specific measures to protect heritage items from any blasting damage associated with the development; • operate a comprehensive blast management system that uses a combination of meteorological forecasts and predictive blast modelling to guide the planning of blasts to minimise blasting impacts; • minimise the frequency and duration of any public road closures for blasting, and use all reasonable efforts to avoid road closures during peak traffic periods; operate a suitable system to enable interested members of the public to get up-to-date information on the proposed blasting schedule on the site and any associated road closures, including notification via SMS message of the blasting schedule and associated road closures for that day and any variations to that schedule and closures; use all reasonable efforts to co-ordinate the timing of blasting at the site with any nearby mines to minimise cumulative blasting impacts; and carry out regular blast monitoring to determine whether the development is complying with the relevant conditions of this consent. <i>The locations of the heritage items referred to in paragraph (b) are shown in Appendix 7.</i>	• Muswellbrook Shire Council Blasting Notifications page on Public Website. • Closing Public Roads – Mining Procedure, Version 17.0, 23 January 2025 • Blast Management Plan, Version 21, 23/01/2025	procedures. The following measures were confirmed during the audit: • Advance Notification: A minimum of two days' notice is provided prior to any blast. • Blasting Notification Register: Community members can opt in to receive SMS alerts via the register. This option is promoted through community newsletters. • Email Distribution: Notification emails are sent to neighbouring mines (including Bengalla, Mt Pleasant, and Mt Arthur), emergency services, and other relevant stakeholders. These communications are tracked in the Blasting Notification Register. • Community Hotline: The 1800 hotline includes a dedicated option for blasting information, which is updated depending on the blasting schedule. • Public Website Updates: The Muswellbrook Shire Council website is updated for each blast under the "Blasting Notifications" section. • Signage: Blasting signage was sighted during the audit, advising of temporary public road closures in accordance with the relevant procedures. • Where possible, blasting is scheduled during optimal weather conditions to minimise impacts and avoid unnecessary road closures. • The notification process is consistent with operational requirements and evidence was sighted confirming implementation of all key elements.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			The audit found that MCO has complied with the overarching consent condition by implementing procedures to manage blasting safety and notification.		
S2 B22	The Applicant must not undertake blasting on the site within 500 metres of any public road or any land outside the site not owned by the Applicant, unless the Applicant has: - a written agreement with the relevant infrastructure owner or landowner to allow blasting to be carried out closer to the public road or land, and the Applicant has advised the Department in writing of the terms of this agreement; or - demonstrated, to the satisfaction of the Planning Secretary, that the blasting can be carried out closer to the public road or land without compromising the safety of people or livestock or damaging the road or other buildings and structures, and updated the Blast Management Plan to include specific mitigation measures to be implemented while blasting is being carried out within 500 metres of the road or land.	- Discussion with the E&C Department - Blast Management Plan, Version 21, 23/01/2025 - Closing Public Roads – Mining Procedure, Version 17.0, 23 January 2025	During the audit period only Muswellbrook Shire Council property had been triggered within the 500-metre blasting exclusion zone. No other written agreements with external landowners were required. A Closing Public Roads Procedure was developed in consultation with the Roads Authority and is publicly available on MCO Public website. Correspondence and written approval from Muswellbrook Shire Council is included in Appendix C of the procedure document. The Blast Management Plan satisfies Condition B22 by referring to the Closing Public Roads – Mining Procedure in Appendix D, including controls and mitigation measures to be implemented while blasting is being carried out within 500 metres of the road or land and committing to notification and traffic management protocols during blasting near roads.	Compliant	
S2 B23	Blast Management Plan The Applicant must prepare a Blast Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - describe the blast management system and the measures that will be implemented to ensure	- Blast Management Plan, Version 21, 23/01/2025 - Blast Fume Management Procedure, Version 11, 23/01/2025	MCO continues to maintain its Blast Management Plan to ensure compliance with Schedule 2, Condition B23. The Blast Management Plan was updated on two occasions during the audit period: Version 20, July 2022: Full document review undertaken. Updated to reflect the approval of MCCO Project under Development Consent SSD 8642 occasions during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	compliance with the blasting criteria and conditions of this consent; - include a Blast Fume Management Strategy for: - minimising blast fume emissions; - rating and recording blast fume events; and - reporting significant blast fume events to the Department and the EPA; - include a Road Closure Management Plan for any blasting within 500 metres of a public road, that has been prepared in consultation with relevant roads authorities and includes provisions for: - minimising the duration of closures, both on a per event basis and weekly basis; - avoiding peak traffic periods as far as reasonable; and - co-ordinating closures with nearby mines to minimise the cumulative effect of road closures; - identify any agreed alternative ground vibration limits for public or private infrastructure in the vicinity of the site (if relevant); - include a strategy to monitor, mitigate and manage the effects of blasting on heritage items, particularly those identified in Appendix 7, including details of baseline (i.e. pre-blasting) and ongoing risk-based dilapidation surveys (subject to landowner access arrangements); - include a monitoring program for evaluating and reporting on compliance with the relevant conditions of this consent; - include a protocol for identifying any blast-related exceedance, incident or non-compliance and for notifying the Department, the EPA and relevant stakeholders of these events; - include public notification procedures to enable members of the public, particularly surrounding	Closing Public Roads – Mining Procedure, Version 17.0, 23 January 2025	- Version 21, January 2025: A full document review was completed. Key updates included clarification on how blast overpressure exceedances are determined at representative private property monitors, removal of references to the completed MCCO seed hole program, and various administrative updates (e.g. revised figures, wording, and references). The Blast Management Plan was prepared by an experienced and qualified expert from EnviroStata Consulting Pty Ltd which was endorsed by the Department on 29 June 2021, recorded in Appendix A. The following was identified within the BMP: - The Blast Fume Management Strategy is documented as a standalone procedure, referred to as the Blast Fume Management Procedure, Version 11, separate from the Blast Management Plan. However, it is referenced within the plan and included as Appendix E. It includes the requirements of this Condition. - A Road Closure Management Plan is documented as a standalone plan, the Closing Public Roads – Mining Procedure, separate from the Blast Management Plan, and is referenced within the plan and included as Appendix D. It includes the requirements of this Condition. - An agreement with TransGrid for alternative ground vibration limits is detailed in Section 4.4.4 of the Blast Management Plan, with further reference provided in Appendix C, correspondence from TransGrid dated 7 September 2015 and 17 September 2020.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- residents, to get up-to-date information on the proposed blasting schedule; and - include a protocol for investigating and responding to blast-related complaints.		- Section 4, Blast Monitoring and Recording, outlines the monitoring equipment used (including ground vibration, air blast, and fume monitors), identifies monitoring site locations and details the data review and reporting schedule. - Blasting notifications are outlined in Section 5.2, and the Complaint Response process is included in Section 5.3. The Blast Management Plan was verified to contain the required information, as outlined in Schedule 2, Condition B23.		
S2 B24	The Applicant must not undertake any blasting north of Wybong Road until the Blast Management Plan is approved by the Planning Secretary.	Blast Management Plan, Version 21, 23/01/2025	Planning Secretary Approval of the Blast Management Plan is included in Appendix F of the Blast Management Plan, dated 23 January 2025.	Compliant	
S2 B25	The Applicant must implement the Blast Management Plan as approved by the Planning Secretary.	- Blast Management Plan, Version 21, 23/01/2025 - Annual Reviews - Email to DPHI 14/3/2025 email regarding Non-compliance that occurred on 18 January 2023 (sighted). - Blast Monitoring field sheet – validation sign off 19/5/2025 - CMO system validation tracking	The audit reviewed the implementation of the approved Blast Management Plan (BMP), Version 21 (dated 23 January 2025), and associated blast monitoring practices. MCO has implemented the requirements of the BMP, including: - implementation of a comprehensive blast monitoring network, comprising fixed and portable monitors positioned at key sensitive receptors and infrastructure; - Real-time data acquisition and analysis via the Dynamaster system, with validated results stored in the EMD; - Reporting of monitoring results through Blasting Reports and Annual Reviews; - Ongoing refinement of monitoring practices, including planned relocation of monitor BM09 and development of atmospheric modelling improvements.	Non-compliant	NC002

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Terrock Consulting Engineers, Glencore - Mangoola Open Cut Blast Monitor Location Review, January 2025	Terrock Consulting were engaged to review the BMP to address the adequacy of weather monitoring and representative blast results at sensitive receivers. The review was triggered from an initial recorded exceedance of blast overpressure on 11 March 2024. Investigation concluded that the original reading of 121.3 dB was not representative of conditions at the nearest private receptor, and when calibrated to account for localised geological conditions, the adjusted overpressure was 119 dB, within the allowable exceedance limit. Identified Non-Compliance A non-compliance with Section 4.2 of the BMP was identified by MCO and reported to the DPHI. On 18 January 2023, MCO failed to monitor airblast overpressure and ground vibration for a scheduled blast event in the Main Pit due to the automatic triggering function of the monitoring network failing to trigger for the blast event, and an internal administrative failure to recognise this data gap within a 6-week timeframe. This contravened the BMP's requirement for continuous blast monitoring and was reported to the DPHI, who classified the non-compliance as an administrative breach. The non-compliance was isolated, and no further issues were identified, with MCO's response deemed proactive and adequate. In response to the non-compliance, MCO implemented a suite of procedural improvements to prevent recurrence. Internal procedures were updated to include data validation within the Environmental Monitoring Database (EMD), incorporating cross-checks against the Technical		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Services blast design data. A tracking mechanism was introduced in CMO to support monthly validations, and the Blast Field Sheet now includes a dedicated validation step.		
Air Quality & Greenhouse Gas					
S2 B26	Odour The Applicant must ensure that no offensive odours, as defined under the POEO Act, are emitted from the site.	• Discussion with E&C Department • Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025 • Spontaneous Combustion Principal Hazard Management Plan, Version 16.0, dated 28/04/2025 • Blast Fume Management Procedure, Version 11, dated 23/01/2025 • Blast Monitoring field sheet – validation sign off 19/5/2025	Odour risks at the site are primarily associated with spontaneous combustion and blast fume migration. These risks are addressed through a range of proactive management strategies detailed in the site's Air Quality and Greenhouse Gas Management Plan (AQGGMP), Spontaneous Combustion Principal Hazard Management Plan, and Blast Fume Management Procedure. Blast events are closely managed using a fume risk matrix and real-time observation. Field records and blast monitoring sheets, were reviewed during the audit and demonstrated compliance with these management procedures. These are proactively managed through the Air Quality and Greenhouse Gas Management Plan (AQGGMP), Blast Fume Management Procedure and Spontaneous Combustion Principal Hazard Management Plan. No odour complaints have been received in relation to either source during the audit period. No offensive odour emissions, as defined under the POEO Act, were observed or reported during the audit period. Furthermore, no community complaints relating to odour were received during this time.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																
S2 B27	The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Table 4 at any residence on privately-owned land. <i>Table 4: Air quality criteria</i> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td rowspan="2">Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>^{a, c} 25 µg/m³</td></tr><tr><td>24 hour</td><td>^b 50 µg/m³</td></tr><tr><td rowspan="2">Particulate matter < 2.5 µm (PM_{2.5})</td><td>Annual</td><td>^{a, c} 8 µg/m³</td></tr><tr><td>24 hour</td><td>^b 25 µg/m³</td></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>^{a, c} 90 µg/m³</td></tr></table> <i>Notes:</i> ^a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources). ^b Incremental impact (i.e. incremental increase in concentrations due to the development on its own). ^c Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Planning Secretary.	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM ₁₀)	Annual	^{a, c} 25 µg/m ³	24 hour	^b 50 µg/m ³	Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a, c} 8 µg/m ³	24 hour	^b 25 µg/m ³	Total suspended particulate (TSP) matter	Annual	^{a, c} 90 µg/m ³	- Discussion with E&C Department - Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025 - Annual Reviews, 2022, 2023, 2024 - Investigation of elevated result of 128.4ug/m3 at SX86-D2 (D04-DC) on 25/02/25 - Environmental monitoring reports (audit period) - Review of air quality data in EMD	MCO has implemented a comprehensive air quality monitoring program to confirm compliance with the air quality criteria set out in Condition B27 of SSD-8642. The program is detailed in the Air Quality and Greenhouse Gas Management Plan (Version 2.0, approved 26 March 2025) and includes a combination of controls including: - Real-time monitoring: TEOMs used to measure 24-hour PM₁₀ at multiple boundary locations. Sentinex alerts notify site personnel of elevated dust levels for proactive response. - Periodic monitoring: High Volume Air Samplers (HVAS) used for TSP, PM₁₀ and PM_{2.5}. - Meteorological data: On-site weather station records wind speed/direction, temperature and humidity to inform dust risk and source analysis. - Blasting controls: Blast Fume Management Procedure followed for each blast. Blast Monitoring Field Sheets record fume classification, weather, and direction. - Data review and validation: Environmental monitoring data managed in EMD. The MCO E&C Department validates data and investigates exceedances. - External support: CBased Environmental are engaged by MCO to conduct routine sampling. Air Quality Criteria Exceedances During the audit period (July 2022 – July 2025), the following air quality exceedances were recorded at MCO:	Compliant	
Pollutant	Averaging period	Criterion																			
Particulate matter < 10 µm (PM ₁₀)	Annual	^{a, c} 25 µg/m ³																			
	24 hour	^b 50 µg/m ³																			
Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a, c} 8 µg/m ³																			
	24 hour	^b 25 µg/m ³																			
Total suspended particulate (TSP) matter	Annual	^{a, c} 90 µg/m ³																			

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			2022: No exceedances of air quality criteria were recorded. 2023: 24-hour PM₁₀ (TEOM readings): 8 exceedances of 50 µg/m³. Investigations concluded that the cause of these exceedances were not due to MCO operations. Causes included localised off-site dust, regional smoke events (e.g. bushfires in NW), not attributable to MCO based on wind direction and incremental analysis. 24-hour PM_{2.5} (TEOM): 2 exceedances of 25 µg/m³ occurring on 19 December 2023. Cause: Smoke from regional fires with MCO's contribution deemed negligible. TSP & PM₁₀ (HVAS): 4 exceedances occurring on 2 October and 19 December 2023. Investigations concluded the cause was off-site dust sources and regional smoke events. 2024: 24-hour PM₁₀: 1 exceedance of 24-hr PM10 criteria which occurred on 15 December 2024 at D02-DC (50.2 µg/m³). Predominant wind direction indicated an off-site dust source and MCO's incremental contribution was estimated to be below 50 µg/m³. 2025: Between January and April 2025 there were seven instances of elevated air quality readings, however, all exceedances were investigated and determined not to be attributable to MCO. These include TEOM PM10 exceedances on:		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			- January 2025 – 2 elevated values. Investigations found off-site dust sources were responsible. - February 2025 – 1 elevated value. Localised off-site activity identified as the cause. - March 2025 – 1 elevated value. Wind direction and dust trajectory confirmed an external source. - April 2025 – 1 elevated value. Smoke from regional fires identified. HVAS PM10 exceedances on: - March 2025 – 1 elevated value. Regional dust and non-MCO related sources confirmed. - April 2025 – 1 elevated value. Source identified as regional bushfire smoke; not attributable to MCO. A sample of reports demonstrating the analysis of off-site contributions were reviewed and considered reasonable. Investigations confirmed that these exceedances were the result of other influencing sources including regional bushfire smoke, dust storm, localised gypsum spreading on neighbouring farm or dust generated by sources not attributable to MCO operations. In accordance with Condition B27, Notes a–c, such events may be excluded when determining compliance. On this basis, the exceedances were not deemed non-compliances. MCO's contributions were below regulatory thresholds, and no non-compliances were recorded against Condition B27.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B28	The air quality criteria in Table 4 do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to exceed the air quality criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Discussion with E&C Department	There is currently one agreement in place with resident, reference R130.	Compliant	
S2 B29	Mine Owned Land Particulate matter emissions generated by the development must not exceed the criteria listed in Table 4 at any occupied residence on mine-owned land (including land owned by another mining company) unless: - the tenant and landowner (if the residence is owned by another mining company) have been notified of any health risks associated with such exceedances in accordance with the notification requirements under PART C of this consent; - the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving 14 days notice; - air quality monitoring is regularly undertaken to inform the tenant and landowner (if the residence is owned by another mining company) of the likely particulate matter emissions at the residence; and - data from this monitoring is presented to the tenant and landowner in an appropriate format for a medical practitioner to assist the tenant and landowner in making informed decisions on the health risks associated with occupying the property.	Discussion with E&C Department	As noted in Schedule 2 Condition B27 above, all exceedances were due to external factors such as off-site dust or regional smoke events and were not attributable to site operations.	Not Triggered	
S2 B30	Air Quality Operating Conditions The Applicant must: take all reasonable steps to:	Air Quality and Greenhouse Gas Management Plan, Version	MCO have a range of design and operational measures to manage air quality impacts in line with that detailed in the AQGGMP, and these controls were observed to be implemented during the audit.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- minimise odour, fume and particulate matter (including PM₁₀ and PM_{2.5}) emissions of the development, paying particular attention to minimising wheel-generated haul road emissions; - manage and minimise the risk of spontaneous combustion; - improve energy efficiency and reduce greenhouse gas emissions of the development; - minimise visible off-site air pollution generated by the development; and - minimise the extent of potential dust generating surfaces exposed on the site at any given point in time; • ensure that all 'non-road' mobile diesel equipment used in undertaking the development includes reasonable and feasible diesel emissions reduction technology; • operate a comprehensive air quality management system that uses a combination of predictive meteorological forecasting and real-time air quality monitoring data to guide the day to day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent; • minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note c to Table 4 above); • minimise air quality impacts of the development on air quality-affected land referred to in Table 10 and Table 11 for as long as the land remains privately-owned (i.e. until it is acquired); a. make all reasonable efforts to co-ordinate air quality management on the site with the air quality	2.0, Dated 26/03/2025 • Airen alert email. Subject: AQCS Forecast - Mangoola 1/7/2025 • Annual Reviews 2022, 2023, 2024 • Site inspection • Sentinex daily meteorological forecast reports (sample dated 1/7/2025) • Live dispatch camera system • Review of EMD • Dust exceedance investigations and reports for 2023–2025	• Refer to findings under Condition B23 in relation to spontaneous combustion and odour management. • Particulate matter controls include regular watering of haul roads, use of real-time dust monitors (PM10 and PM2.5), and predictive forecasting to proactively manage emissions. • During the audit site inspection, wheel-generated dust emissions were observed to be low, and road conditions were well-maintained. Wheel-generated dust assessments were completed outside of the audit period. • Equipment is procured with emissions performance considered. Discussion with maintenance department revealed the process MC's reliability engineers go through when procuring new plant and equipment which includes an emissions performance review. • MCO uses Airen forecasting and an extensive network of real-time monitors. Refer findings against Condition B27. • MCO demonstrates a robust system for adapting operations based on real-time and forecasted meteorological data to minimise air quality impacts. Implementation of Air Quality Dust TARP. • During the audit, a site inspection was conducted at the CHPP control room, where live dispatch camera feeds were observed. These allow operators to visually assess dust levels across the site in real time. Air quality TARP protocols are in place and implemented proactively, for instance, if visible dust is observed via camera (even		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	management at nearby mines to minimise cumulative air quality impacts; b. carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent; and c. regularly assess meteorological and air quality monitoring data, and modify operations on the site to ensure compliance with the relevant conditions of this consent		without a Sentinex alarm), site personnel are authorised to trigger response actions. The Airen system provides a daily meteorological risk forecast based on data from onsite weather stations. This forecast is used during pre-start meetings and shift planning to inform operational decisions. Interviews with CHPP control room staff confirmed a strong understanding of dust risk management and the use of air quality TARP protocols. A separate dispatch room for mining operations functions similarly, with proactive dust monitoring and management. Review of dust exceedances during the audit period (2022–2025) determined that all were attributable to off-site sources (e.g., bushfire smoke or regional dust) and not MCO operations. As such, no additional mitigation measures were deemed necessary at the time of the audit. • Evidence of collaborative dust management strategies sighted. MCO participate in regional forums and coordination with adjacent mine operations is outlined in the AQGGMP. • Regular air quality monitoring - Refer findings against Condition B27. • Assess meteorological data - Refer findings against B30(d). MCO utilises Airen, that provides daily site specific weather forecasts, which are reviewed during pre shift meetings. Where adverse weather conditions are forecast, operational activities are adjusted as necessary. MCO's air quality management systems and operational responses are responsive, proactive, and effective during adverse meteorological conditions and extraordinary events.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Additional site inspection findings: A site inspection was undertaken, covering the CHPP area, main pit, haul roads, and the meteorological and ambient air quality monitoring stations. A water truck was operating during the inspection. Road maintenance activities were observed, with only low levels of dust generated by the grader. Dust emissions from haul trucks were observed to be minimal, and minimising fall distance during excavator loading as far as practical. Non-haul roads were in good condition. Minor deposits of fresh dirt were noted from recently moved large trucks, but these areas are typically cleaned promptly. The remainder of the roads were clean, with no significant evidence of trackout. Evidence of the air quality monitoring system operating was observed during the audit. The D09-PM10 air quality monitoring station and the WSN1 meteorological monitoring station were inspected and found to be in good condition. Air quality data and meteorological calibration records are saved in EMD which was reviewed during the inspection, demonstrating data availability for multiple locations.		
S2 B31	Air Quality and Greenhouse Gas Management Plan The Applicant must prepare an Air Quality and Greenhouse Gas Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Air Quality and Greenhouse Gas Management Plan, Version	The AQGGMP came into effect with the commencement of mining north of Wybong Road and was revised once during the audit period. An independent review, commissioned by DPHI and undertaken by Katestone Environmental, resulted in recommendations that were incorporated into	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - prepared in consultation with the CCC; - describe the measures to be implemented to ensure: - compliance with the air quality criteria and operating conditions of this consent; - best practice management is being employed to: - minimise the development's air quality impacts; - minimise the development's Scope 1 and 2 greenhouse gas emissions; and - improve the development's energy efficiency; and - the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events; - describe the air quality management system in detail; and - include an air quality monitoring program, undertaken in accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007), that: - establishes a diesel combustion emissions baseline; - uses monitors to evaluate the performance of the development against the air quality criteria in this consent and to guide day to day planning of mining operations; - adequately supports the air quality management system; and - includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.	2.0, Dated 26/03/2025 - Letter approving the AQGGMP by DPHI, dated 19/05/2022 - Letter approving the AQGGMP by DPHI, dated 26/03/2025	the updated plan, which was approved by DPHI on 26 March 2025. The AQGGMP was verified to contain the required information, as required by Schedule 2, Condition B31 The AQGGMP plan was prepared by Todoroski Air Sciences, a suitably qualified and experienced consultant, whose appointment was endorsed by the Planning Secretary, satisfying clause (a). The plan was also prepared in consultation with the Community Consultative Committee (CCC), with evidence of consultation provided (Appendix B), addressing clause (b). The AQGGMP describes a range of measures to ensure compliance with air quality criteria and operating conditions (Sections 4.2 and 4.3), meeting clause (c)(i). Best practice management is demonstrated through proactive dust mitigation controls, real-time particulate monitoring with automated alarms, predictive meteorological forecasting, adaptive operational responses, and continuous improvement processes for minimising Scope 1 and 2 greenhouse gas emissions and improving energy efficiency (Sections 4.2, 4.7, and 4.8). Specific provisions are included for managing air quality during adverse meteorological conditions and extraordinary events, including operational modification triggers and contingency actions (Sections 4.2.2 and 6.4), fulfilling clause (c)(iii). A detailed air quality management system is described, including design controls, operational controls, training, community mitigation measures, and spontaneous combustion, odour, and blast		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			fume management (Sections 4.1–4.6 and 4.9), satisfying clause (d). The air quality monitoring program is consistent with the NSW Approved Methods for Sampling and Analysis of Air Pollutants (DEC, 2007) and includes high-volume samplers (TSP and PM10), real-time PM10 and PM2.5 monitors, meteorological stations, and diesel emissions baseline data (Sections 2.3 and 5.2). The monitoring network supports day-to-day operational planning and evaluation of compliance with consent criteria. Protocols are also included for identifying exceedances, incidents, and non-compliances, with clear incident notification and stakeholder communication procedures (Sections 5.2, 6.3.1, 6.3.2 and 6.5), addressing clause (e)(i)–(iv). The Air Quality and Greenhouse Gas Management Plan adequately addresses all key obligations of Condition B31 of SSD 8642.		
S2 B32	The Applicant must not commence mining operations north of Wybong Road until the Air Quality and Greenhouse Gas Management Plan is approved by the Planning Secretary.	Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025	Section 1.2 of the AQGGMP notes that the plan was prepared as Stage 3 of a staged implementation, prior to the commencement of mining north of Wybong Road, and was endorsed by the Planning Secretary on 2 December 2022. A record of this endorsement is provided in Appendix C of the AQGGMP. The mining phase north of Wybong Rd was triggered on 1 December 2022.	Compliant	
S2 B33	The Applicant must implement the Air Quality and Greenhouse Gas Management Plan as approved by the Planning Secretary.	Air Quality and Greenhouse Gas Management Plan, Version	The site inspection and document review confirmed implementation of the approved AQGGMP, with effective dust controls (water carts, road maintenance, low-height loading), operational air quality monitoring infrastructure	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		2.0, Dated 26/03/2025 • Novecom Pty Ltd Work Order History 1/6/2025-30/6/2025 assets Sentinex Noise Modules and monitors, Dust Modules and Monitors • CBased Environmental Pty Ltd, HVAS Calibration Forms various units, 26/05/2025. • Novecom Pty Ltd. Sentinex Dust Unit Maintenance and Calibration Reports: • WO 49806. 2 Monthly – 11/06/2025 (86 D1 TEOM 1405) • WO 49070. 2 Monthly – 2/04/2025 (86 D3 TEOM 1405) • WO 49070. 2 Monthly – 12/06/2025 (86	and data management, and weather forecasting informing daily planning. • Energy efficiency and greenhouse gas reduction measures, including optimised haulage, efficient equipment use, and annual performance reviews, were also being implemented. • Refer to controls outlined in Section 2 Schedule B30. • Air Quality data is recorded and available in the Sentinex platform, and saved in EMD, which is maintained by Novecom (Sentinex) and Mangoola (EMD). During the audit period, there were occurrences where air quality monitoring data was not adequately captured in accordance with EPL 12894 requirements and the <i>NSW EPA's Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> (2022). This was recorded as a non-compliance against Condition M2.1 of EPL 12894. • Annual inspection and calibration reports were stored in EMD and were sighted by the auditors. • Calibration, maintenance and inspection is conducted by C-Based Environmental twice a year (or as per manufacturer specs/identified need). The auditor sighted records of inspection and calibrations. Inconsistencies Between Annual Review and Annual Return exceedance Reporting Review of Annual Reviews against EPL Annual Returns and raw data highlighted inconsistencies with regulatory reporting for non-compliances.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		D6 BAM 1020 PM10-2.5))	A comparison with the 2023 Annual Review (reporting period: 1 January – 31 December 2023) identified several discrepancies in the reporting of non-compliance events for EPL Monitoring Point 20, including: • 1 October 2023 is referenced in the Annual Return, but not in the 2023 Annual Review. • 14–18 December 2023, listed in the 2023 Annual Review, is not included in the Annual Return. • 26 and 29 April 2024, noted in the 2024 Annual Review, are not referenced in the 2023–24 Annual Return. • The replacement of Monitoring Point 20 is recorded as 17 July 2024 in the Annual Return, whereas the 2023 Annual Review notes the unit was replaced between 9 August and 14 December 2023. In response, MCO advised that these discrepancies were the result of a transcription error, attributed to text character limitations in the eConnect portal. While the full list of dates was included in the “Cause of non-compliance” field, it was not fully transposed to the corresponding “Date(s) when the non-compliances occurred” field. MCO also noted that the EPA was provided with a copy of the relevant Annual Review to clarify the reporting detail. Additionally, it was clarified that Monitoring Point 20 continued to operate above the 95% uptime requirement, and that a temporary monitoring unit was deployed following a diagnostic fault, pending installation of a permanent replacement. While the operational response and availability of monitoring equipment appear adequate, accurate		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			transcription of non-compliance dates across reports is critical for regulatory transparency. MCO should ensure that data reported is consistent between statutory reports, particularly where system limitations (e.g. character count) may affect data integrity.		
S2 B34	Monitoring and Reporting The Applicant must: - monitor the greenhouse gas emissions generated by the Project; - investigate ways to reduce greenhouse gas emissions generated by the project; and - report on greenhouse gas monitoring and abatement measures in the Annual Review, to the satisfaction of the Planning Secretary.	- Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025 - Annual Reviews 2022, 2023, 2024	Greenhouse gas management at Mangoolia focuses on minimising Scope 1 (direct emissions from on-site fuel combustion and industrial processes) and Scope 2 (indirect emissions) sources, as these can be directly influenced by operational controls. Emission reduction measures outlined in Section 4.7 of MCOs AQGGMP include optimising haul routes, maximising equipment efficiency, reducing idling times, and considering energy efficiency in procurement and mine planning. Emissions are monitored and reported annually in accordance with the National Greenhouse and Energy Reporting Scheme (NGERS), with energy use data for electricity, diesel and other fuels recorded in the SAP ERS system to support accurate calculation. The greenhouse gas performance for each annual period is reported in Section 6.15 of the Annual Review. Scope 3 emissions, such as product transport, are considered within Glencore's corporate reduction targets, site-level management is focused on Scope 1 and 2.	Compliant	
Meteorological Monitoring					
S2 B35	Prior to the commencement of construction and for the life of the development, the Applicant must ensure that	Mangoolia Planned Maintenance	Construction for the MCOP commenced on 6 December 2021. Two meteorological stations have been in continuous operation on site since	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	there is at least one suitable meteorological station operating in the vicinity of the site that: - complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007); and - is capable of measuring meteorological conditions in accordance with the NSW Noise Policy for Industry (EPA, 2017), unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA.	Scheduling table, 9/07/25 - Met One Instruments, Inc, Certificate of Calibration, E-Sampler, Ambient particulate monitor, 88D9, 21-5-2024 - Site Inspection - Review of real time meteorological data - Review of EMD	prior to the commencement of SSD 8642, in accordance with Condition M4 of EPL 12894. These include: - Weather Station North (WSN1), located on Wybong Road and identified as EPL Point 5 in EPL 12894, and - Weather Station South (WSS) located adjacent to the CHPP and identified as EPL Point 18 in EPL 12894. Each station complies with the requirements of the <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> (DEC, 2007) and are capable of measuring parameters consistent with the <i>NSW Noise Policy for Industry</i> (EPA, 2017). The auditors sighted continuous real time stability class data accessed from the two meteorological stations including wind speed and direction, sigma-theta, temperature (2 m and 10 m), solar radiation, and rainfall. Live continuous data was observed during the audit, and meteorological data is logged and stored in the site's Environmental Monitoring Database (EMD). Calibration and maintenance are conducted biannually by C-Based, with current calibration and inspection records sighted. During the audit period, there were isolated instances of missing 15-minute average meteorological data at both weather stations across 2023 and 2024 which resulted in a non-compliance of EPL 12894 Condition M4.1. These outages did not span entire days and overall data availability remained high (99.7% for Point 5, and 99.6% for Point 18). The non-compliances were reported in accordance with EPL obligations.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Despite the EPL non-compliance, the intent of Condition B35, to ensure suitable, continuous meteorological monitoring capability, is considered to have been met.		
Water					
S2 B36	Water Supply The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, reduce the scale of the development to match its available water supply.	• Mangoola Water Management Plan (MANOC-1772150304-6221, Rev 1, effective 2 December 2022) • Water Balance Review 2023 and 2024, prepared by Engeny • 2025 Water Balance Update, prepared by Engeny • Site Water Storage Report, dated 30 June 2025 • CITEC System Weekly Water Level Reports (as described in site interviews) • Annual Water Usage Returns • Interview with MCO E&C Department	The approved Water Management Plan (WMP) outlines the site's integrated approach to water security, which includes surface water harvesting under harvestable rights, dewatering, reuse of mine water, and supplementary extraction from the Hunter River in accordance with relevant Water Access Licences (WMP Section 5.1-5.4). Site Water Balance Model MCO has adopted a neutral water balance strategy across the site, which has been independently validated through Water Balance Reviews conducted by Engeny in 2023 and 2024. A comprehensive update to the water balance model was finalised in 2025, also by Engeny, confirming that site water needs are reliably met through internal storages and licensable sources, without requiring water sharing arrangements. Water Needs Assessment Water availability is actively monitored on a weekly basis using real time monitoring systems, which provides dam level data to the Environment & Community (E&C) Department each Monday morning. Water levels in key storages (e.g. Raw Water Dam, Pit Water Dam) are assessed against Trigger Action Response Plans (TARPs) and the site water inventory, ensuring that any risk to supply is identified and managed early.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Water Extraction from Hunter Review In response to reduced water levels within the CHPP, licensable water was extracted from the Hunter River in February 2024 under a valid Water Access Licence. This extraction was undertaken in accordance with regulatory requirements and subsequently reported in the 2024 Annual Water Usage Return. The Site Water Storage Report, dated 30 June 2025, confirmed that sufficient water volumes were maintained across site storages at the time of the audit.		
S2 B37	The Applicant must not use any licensable water from the Wybong Creek Water Source for mining purposes. <i>Note: This restriction does not apply to water used outside the project disturbance area for revegetation purposes associated with implementation of the Biodiversity Offset Strategy, or to any licensable water within the project disturbance area that is collected as an incidental result of approved mining activities.</i>	• Mangoola Water Management Plan (MANOC-1772150304-6221, Rev 1, effective 2 December 2022) • Water Balance Review 2023 and 2024, prepared by Engeny • 2025 Water Balance Update, prepared by Engeny • Site Water Storage Report, dated 30 June 2025 • Site Inspection	The following verified compliance with this condition: Review of WMP The WMP clearly states that MCO does not extract water from Wybong Creek other than that incidentally collected by approved mining operations which is managed under harvestable rights. Review of Water Licences No Water Access Licence pertaining to this water source has been obtained or relied upon. Water Balance Reviews Independent water balance reviews prepared by Engeny confirmed that site water needs were met through internal storages, harvestable rights, and Hunter River extraction. These reviews made no reference to water extracted from Wybong Creek. Site Inspection	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			During the site inspection, the audit team confirmed that no infrastructure exists for active extraction from Wybong Creek.		
S2 B38	The Applicant must report on water extracted from the site each year (direct and indirect) in the Annual Review, including water taken under each water licence. <i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain all necessary water licences for the development, including during rehabilitation and post mine closure.</i>	• CITEC System Weekly Water Level Reports (as described in site interviews) • Annual Water Usage Returns • Interview with MCO E&C Department • MCO Annual Review 2022, 2023, 2024	Section 7.0 of the 2022, 2023 and 2024 Annual Reviews outline the status of water access licences and reports annual water usage under each relevant licence, including extraction from the Hunter River. This includes identification of water licences held, volumes extracted, and compliance with entitlements. During the site inspection and audit interviews, MCO advised that: • Water usage is tracked via metered infrastructure (e.g. pumps and extraction points). • Data is compiled and submitted annually via the Water NSW Annual Water Usage Return process. • Usage across all three years was within licensed limits, and there is no evidence to suggest inaccuracy in the Annual Reviews. CITEC system, used to monitor water storage levels and extraction events in real-time, supports the validity of reported figures.	Compliant	
S2 B39	Prior to commencing construction, the Applicant must notify the owners of the bores listed in Table 5^a that they may request monitoring of the listed bore to determine the level of drawdown from the development. In the event that monitoring data records drawdown of more than 2 metres as a result of the development, the Applicant must provide compensatory water in accordance with conditions B41 to B45.	• Notification Letter from MCO to requires landholders, dated 17/05/2021 • Picture showing logger and work conducted to bore at R157,	Notification to landholders Construction of the Mangoola Continued Operations (MCCO) Project commenced on 6 December 2021. On 17 May 2021, MCO formally notified all landholders associated with bores listed in Table 5 of the development consent of its intention to install groundwater loggers and undertake monitoring.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference													
	<i>Table 5: Private bore monitoring</i> <table><tr><th>Bore ID^a</th><th>Receiver ID</th></tr><tr><td>Bore 1</td><td>R261</td></tr><tr><td>Bore 2</td><td>R157</td></tr><tr><td>Bore 3</td><td>R130</td></tr><tr><td>GW080507</td><td rowspan="2">R144</td></tr><tr><td>GW201589</td></tr><tr><td>GW078502</td><td>R83</td></tr></table> ^a The receiver ID's and bore locations referred to in Table 5 are shown in Appendix 3.	Bore ID ^a	Receiver ID	Bore 1	R261	Bore 2	R157	Bore 3	R130	GW080507	R144	GW201589	GW078502	R83	dated 22/06/2025	Monitoring of private bores Groundwater loggers have been installed at receivers R130 and R144, with an additional logger placed at R157 on 16 June 2025, as evidenced by site photos and audit interviews. Monitoring data reviewed during the audit shows that no mining-induced drawdown exceeding 2 metres has occurred at any of the monitored bores. Minor declines in groundwater levels were attributed to normal landholder use, and no compensatory actions were triggered. No complaints have been received from landholders in relation to bore performance or groundwater impacts during the audit period.		
Bore ID ^a	Receiver ID																	
Bore 1	R261																	
Bore 2	R157																	
Bore 3	R130																	
GW080507	R144																	
GW201589																		
GW078502	R83																	
S2 B40	Prior to the commencement of mining operations north of Wybong Road under this consent, the Applicant must notify owners of licensed privately-owned groundwater bores that are predicted to have a drawdown of greater than 2 metres as a result of the development that they may be eligible for compensatory water under conditions B41 to B45.	AGE (2020). Groundwater Impact Assessment – Mangoola Coal Continued Operations Project. Prepared for Mangoola Coal Operations Pty Ltd. Included as Appendix 12 of the Environmental Impact Statement submitted with SSD-8642.	This condition has not been triggered, as neither the original EIS groundwater modelling (AGE, 2019) nor the updated groundwater model prepared by AGE predicts any drawdown exceeding 2 m at licensed privately-owned groundwater bores located north of Wybong Road.	Not Triggered														

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		AGE Groundwater Model Review, 2024			
S2 B41	The Applicant must provide a compensatory water supply to any landowner of privately-owned land whose rightful water supply is adversely and directly impacted (other than an impact that is minor or negligible) as a result of the development, in consultation with DPIE Water, and to the satisfaction of the Planning Secretary.	- Groundwater Monitoring reports - Review of EMD Groundwater monitoring data - Complaints register	No privately-owned landholder has experienced an adverse or direct impact to their rightful water supply as a result of the MCCO Project. Groundwater monitoring data from bores at Receivers R130, R144, and R157 confirms that no mining-induced drawdown exceeding 2 m has occurred, and no complaints or requests for compensatory water have been received. Therefore, this condition has not been triggered during the audit period.	Not Triggered	
S2 B42	The compensatory water supply measures must provide an alternative long term supply of water that is equivalent, in quality and volume, to the loss attributable to the development. The burden of proof that the impact on water supply is not due to mining, rests with the Applicant. Equivalent water supply should be provided (at least on an interim basis) as soon as practicable after the loss is identified, unless otherwise agreed with the landowner.	Refer Condition B41	Refer evidence against Condition B41Not Triggered	Not Triggered	
S2 B43	If the Applicant and the landowner cannot agree on whether the impact on water supply is attributed to the development or the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.	Refer Condition B41	Refer evidence against Condition B41Not Triggered	Not Triggered	
S2 B44	If the Applicant is unable to provide an alternative long term supply of water, then the Applicant must provide compensation, to the satisfaction of the Planning Secretary.	Refer Condition B41	Refer evidence against Condition B41Not Triggered	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	<i>The Water Management Plan (see condition B50) is required to include trigger levels for investigating potentially adverse impacts on water supplies.</i>				
S2 B45	In the event of any complaint relating to a privately-owned licensed groundwater bore which may, in the opinion of the Planning Secretary, have been adversely and directly impacted as a result of the development (other than an impact that is minor or negligible), the Applicant must, as soon as practicable, facilitate the provision of a temporary water supply, pending the outcome of any groundwater investigation and/or the provision of an alternative long term supply of water as required under conditions B41 and B42, to the satisfaction of the Planning Secretary.	Refer Condition B41	Refer evidence against Condition B41Not Triggered	Not Triggered	
S2 B46	Water Discharges The Applicant must ensure that all surface discharges from the site comply with: (a) discharge limits (both volume and quality) set for the development in any EPL; or (b) relevant provisions of the POEO Act and Protection of the <i>Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i> .	- HRSTS Discharge Record Sheet, Annual Return 2022/23 - Refer EPL 12894 checklist, Condition E1.4	MCO is licensed under EPL 12894, which permits discharge via Monitoring Point 12 under the Hunter River Salinity Trading Scheme (HRSTS). Only electrical conductivity (EC) is required to be monitored, as per the HRSTS Regulation. However, discharges are restricted by a licensed hourly flow rate limit, and a flow meter installed at Point 12 records real-time discharge volumes to verify compliance with this requirement. Water discharged originates from Monitoring Point 41 (Pitwater Dam) and Monitoring Point 42 (Raw Water Dam), which are subject to monitoring for Total Suspended Solids (TSS) and pH. Online telemetry and grab samples are used to verify compliance. All surface water discharges during the audit period were undertaken exclusively from Pitwater Dam (Monitoring Point 41). No discharges occurred from Raw Water Dam (Monitoring Point 42) during the audit period.	Non-compliant	NC003

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Non-compliance of EPL 12894 Condition E1.3 Condition B46 requires MCO to ensure that all surface water discharges from site comply with the discharge limits (both volume and quality) specified in EPL 12894. A non-compliance against EPL Condition E1.3 has been recorded due to MCO exceeding the licensed hourly flow rate during two HRSTS discharge events in August and October 2022. The exceedances specifically related to the volume of water discharged through Monitoring Point 12. Refer to the detailed assessment of EPL Condition E1.3 in the EPL 12894 audit checklist. Condition B46 must therefore be categorised as non-compliant, on the basis that MCO failed to ensure discharges from site complied with the discharge volume limit specified in the site's EPL. Previous IEA Recommendation In response to a recommendation from the previous IEA, MCO installed six NALGENE bottle samplers across rehabilitated areas to evaluate runoff quality and assess the potential to bypass the water management system for future discharges. However, only a limited number of samples were collected during the audit period and no regulatory change has been pursued at this stage.		
S2 B47	The Applicant must implement all reasonable and feasible measures on the site to minimise the need to discharge saline water to the Hunter River under the Hunter River Salinity Trading Scheme.	2023 Water Balance Review (Engeny)	MCO has implemented a range of operational measures to minimise the need to discharge saline water to the Hunter River under the HRSTS. These include:	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		2024 Water Balance Review (Engeny) 2025 Site Water Balance Update - Internal Weekly Water Review Records (CITEC water inventory reports) - Operational Water Management TARP - MCO Water Management Plan (v6) - Auditor Site Inspection Notes (June 2025) - HRSTS Discharge Record Sheet 2022, 2023 and 224 Annual Reviews - EPL 12894 Annual Returns	Proactive water balance monitoring and weekly water inventory reviews to maintain appropriate storage levels and manage site demand; Application of a site-specific Trigger Action Response Plan (TARP), which guides decisions on discharge events and prioritises reuse and internal transfers over external discharge; A neutral water balance across the site, meaning MCO typically operates without a water surplus and has limited need to discharge. Evidence reviewed indicates that only two HRSTS discharge events occurred during the audit period (August and October 2022), both undertaken during high rainfall conditions when on-site storage capacity was limited. These events were managed under the operational water management framework. The low discharge frequency, coupled with the site's water inventory controls and the decision-making framework set out in the WMP, supports the conclusion that reasonable and feasible measures are in place to minimise saline discharge to the Hunter River.		
Water Management Performance Measures					
S2 B48	The Applicant must ensure that the development complies with the performance measures in Table 6.	- Mangoola WMP, - Operational Water Balance Review (Engeny, 2023 & 2024)	Water Management – General The site has a categorised water management system, comprising clean and dirty water diversion drains, pumps, mine water storages, and sediment basins. These	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																														
	Table 6: Water management performance measures <table><tr><th>Feature</th><th>Performance Measure</th></tr><tr><td>Water management – General</td><td> - Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems - Minimise the use of clean and potable water on the site - Maximise water recycling, reuse and sharing opportunities - Minimise the use of make-up water from external sources - Design, install, operate and maintain water management systems in a proper and efficient manner - Minimise risks to the receiving environment and downstream water users </td></tr><tr><td>Alluvial aquifers</td><td> - Negligible impacts to alluvial aquifers as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: - negligible change in groundwater levels; - negligible change in groundwater quality; and - negligible impact to other groundwater users; - Maintain appropriate setbacks in accordance with the <i>Aquifer Interference Policy</i> (DPI, 2012) </td></tr><tr><td>Erosion and sediment control works</td><td> - Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) - Design, install and maintain any creek crossings in accordance with the <i>Fisheries NSW Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013) and <i>Why Do Fish Need To Cross The Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) - Design, install and maintain any new infrastructure within 40 metres of watercourses in in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPI Water, 2012) </td></tr><tr><td>Clean water diversions and storage infrastructure</td><td> - Design, install and maintain the clean water system to capture and convey the 100 year ARI flood - Maximise, as far as reasonable, the diversion of clean water around disturbed areas on the site, except where clean water is captured for use on the site </td></tr><tr><td>Flood protection works</td><td> - Design, install and maintain flood levees to protect mining areas from a 100 year ARI flood event and ensure no increased flooding impacts on roads or privately-owned land beyond that predicted in the document/s listed in condition A2(c) - Design the Wybong Road haul road overpass to include drainage measures to maintain appropriate flood management of Wybong Road, as described in the document/s listed in condition A2(c) </td></tr><tr><td>Sediment dams</td><td> - Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) and the requirements </td></tr></table> <table><tr><th>Feature</th><th>Performance Measure</th></tr><tr><td></td><td>under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i></td></tr><tr><td>Mine water storages</td><td> - Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water - New storages designed to contain the 100 year ARI storm event and minimise permeability - Ensure adequate freeboards within all mine water storage dams and voids at all times to minimise the risk of discharge to surface waters </td></tr><tr><td>Raw water dam</td><td> - Water levels must be managed so that the Raw Water Dam does not discharge water from the premises except in a 1 in 250 Annual Exceedance Probability 72-hour rainfall event or greater </td></tr><tr><td>Chemical and hydrocarbon storage</td><td> - Chemical and hydrocarbon products must be stored in bunded areas in accordance with the relevant Australian Standard </td></tr><tr><td>Tailings storages</td><td> - Design and maintain tailings storage areas to encapsulate and prevent the movement of tailings seepage/leachate </td></tr><tr><td>Overburden emplacements</td><td> - Design, install and maintain emplacements to encapsulate and prevent migration of acid forming and potentially acid forming materials, and saline and sodic material - Design, install and maintain out-of-pit emplacements to prevent and/or manage long term saline seepage </td></tr><tr><td>Aquatic and riparian ecosystems</td><td> - Ensure negligible environmental consequences beyond those predicted in the document/s listed in condition A2(c) - Maintain or improve baseline channel stability of Big Flat Creek - Develop site-specific in-stream water quality objectives in accordance with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC & ARMCANZ, 2000) and Using the ANZECC Guidelines and Water Quality Objectives in NSW (DEC, 2006) </td></tr></table>	Feature	Performance Measure	Water management – General	- Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems - Minimise the use of clean and potable water on the site - Maximise water recycling, reuse and sharing opportunities - Minimise the use of make-up water from external sources - Design, install, operate and maintain water management systems in a proper and efficient manner - Minimise risks to the receiving environment and downstream water users	Alluvial aquifers	- Negligible impacts to alluvial aquifers as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: - negligible change in groundwater levels; - negligible change in groundwater quality; and - negligible impact to other groundwater users; - Maintain appropriate setbacks in accordance with the <i>Aquifer Interference Policy</i> (DPI, 2012)	Erosion and sediment control works	- Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) - Design, install and maintain any creek crossings in accordance with the <i>Fisheries NSW Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013) and <i>Why Do Fish Need To Cross The Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) - Design, install and maintain any new infrastructure within 40 metres of watercourses in in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPI Water, 2012)	Clean water diversions and storage infrastructure	- Design, install and maintain the clean water system to capture and convey the 100 year ARI flood - Maximise, as far as reasonable, the diversion of clean water around disturbed areas on the site, except where clean water is captured for use on the site	Flood protection works	- Design, install and maintain flood levees to protect mining areas from a 100 year ARI flood event and ensure no increased flooding impacts on roads or privately-owned land beyond that predicted in the document/s listed in condition A2(c) - Design the Wybong Road haul road overpass to include drainage measures to maintain appropriate flood management of Wybong Road, as described in the document/s listed in condition A2(c)	Sediment dams	Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) and the requirements	Feature	Performance Measure		under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i>	Mine water storages	- Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water - New storages designed to contain the 100 year ARI storm event and minimise permeability - Ensure adequate freeboards within all mine water storage dams and voids at all times to minimise the risk of discharge to surface waters	Raw water dam	Water levels must be managed so that the Raw Water Dam does not discharge water from the premises except in a 1 in 250 Annual Exceedance Probability 72-hour rainfall event or greater	Chemical and hydrocarbon storage	Chemical and hydrocarbon products must be stored in bunded areas in accordance with the relevant Australian Standard	Tailings storages	Design and maintain tailings storage areas to encapsulate and prevent the movement of tailings seepage/leachate	Overburden emplacements	- Design, install and maintain emplacements to encapsulate and prevent migration of acid forming and potentially acid forming materials, and saline and sodic material - Design, install and maintain out-of-pit emplacements to prevent and/or manage long term saline seepage	Aquatic and riparian ecosystems	- Ensure negligible environmental consequences beyond those predicted in the document/s listed in condition A2(c) - Maintain or improve baseline channel stability of Big Flat Creek - Develop site-specific in-stream water quality objectives in accordance with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC & ARMCANZ, 2000) and Using the ANZECC Guidelines and Water Quality Objectives in NSW (DEC, 2006)	- Site Water Inventory Reports (weekly CITEC outputs) - Site Water Storage Report (30 June 2025) - Internal Water Management TARPs - ArkHill Engineering – Clean Water Diversion Design Report (Sighted onsite) - Construction Completion Sign-off for Clean Water Diversion Drain 1 and 2 (2023) - Drainage Drawings showing Big Flat Creek diversion and culvert upgrades - Erosion and Sediment Control Inspections (Monthly inspections by E&C team)	were verified through site inspection and review of the WMP. - Potable water is brought to site via tanker; all other water needs (e.g., CHPP, dust suppression) are supplied from on-site storages. - No excess discharge requirement observed during the audit period, indicating effective internal water reuse and storage practices. - The auditors sighted the 2023 and 2024 Water Balance Reviews (Engeny) and the Site Water Storage Report dated 30 June 2025, confirming the system is operated to maintain neutral site water balance Alluvial Aquifers - MCO implements the Groundwater Management Plan which forms part of the approved WMP. - Monitoring results across three consecutive events triggered internal TARPs; however, investigations concluded no exceedance or mining-related impacts. - Setbacks to alluvial aquifers were maintained, and no extraction from Wybong Creek or alluvial groundwater was identified. - The audit team verified groundwater bore performance via monitoring logs, water monitoring reports and interviews with Environment Team staff. Erosion and Sediment Control Works - No new creek crossings were constructed during the audit period. - Culverts installed in Big Flat Creek (associated with the Wybong Rd Overpass) in 2021 were inspected monthly, as verified		
Feature	Performance Measure																																		
Water management – General	- Maintain separation between clean, dirty (i.e. sediment-laden) and mine water management systems - Minimise the use of clean and potable water on the site - Maximise water recycling, reuse and sharing opportunities - Minimise the use of make-up water from external sources - Design, install, operate and maintain water management systems in a proper and efficient manner - Minimise risks to the receiving environment and downstream water users																																		
Alluvial aquifers	- Negligible impacts to alluvial aquifers as a result of the development, beyond those predicted in the document/s listed in condition A2(c), including: - negligible change in groundwater levels; - negligible change in groundwater quality; and - negligible impact to other groundwater users; - Maintain appropriate setbacks in accordance with the <i>Aquifer Interference Policy</i> (DPI, 2012)																																		
Erosion and sediment control works	- Design, install and maintain erosion and sediment controls in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction</i> including <i>Volume 1: Blue Book</i> (Landcom, 2004), <i>Volume 2A: Installation of Services</i> (DECC, 2008), <i>Volume 2C: Unsealed Roads</i> (DECC, 2008), <i>Volume 2D: Main Road Construction</i> (DECC, 2008) and <i>Volume 2E: Mines and Quarries</i> (DECC, 2008) - Design, install and maintain any creek crossings in accordance with the <i>Fisheries NSW Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013) and <i>Why Do Fish Need To Cross The Road? Fish Passage Requirements for Waterway Crossings</i> (NSW Fisheries 2003) - Design, install and maintain any new infrastructure within 40 metres of watercourses in in accordance with the guidance series for <i>Controlled Activities on Waterfront Land</i> (DPI Water, 2012)																																		
Clean water diversions and storage infrastructure	- Design, install and maintain the clean water system to capture and convey the 100 year ARI flood - Maximise, as far as reasonable, the diversion of clean water around disturbed areas on the site, except where clean water is captured for use on the site																																		
Flood protection works	- Design, install and maintain flood levees to protect mining areas from a 100 year ARI flood event and ensure no increased flooding impacts on roads or privately-owned land beyond that predicted in the document/s listed in condition A2(c) - Design the Wybong Road haul road overpass to include drainage measures to maintain appropriate flood management of Wybong Road, as described in the document/s listed in condition A2(c)																																		
Sediment dams	Design, install and maintain sediment dams in accordance with the guidance series <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004) and <i>2E Mines and Quarries</i> (DECC, 2008) and the requirements																																		
Feature	Performance Measure																																		
	under the POEO Act or <i>Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002</i>																																		
Mine water storages	- Design, install and maintain mine water storage infrastructure to avoid unlicensed or uncontrolled discharge of mine water - New storages designed to contain the 100 year ARI storm event and minimise permeability - Ensure adequate freeboards within all mine water storage dams and voids at all times to minimise the risk of discharge to surface waters																																		
Raw water dam	Water levels must be managed so that the Raw Water Dam does not discharge water from the premises except in a 1 in 250 Annual Exceedance Probability 72-hour rainfall event or greater																																		
Chemical and hydrocarbon storage	Chemical and hydrocarbon products must be stored in bunded areas in accordance with the relevant Australian Standard																																		
Tailings storages	Design and maintain tailings storage areas to encapsulate and prevent the movement of tailings seepage/leachate																																		
Overburden emplacements	- Design, install and maintain emplacements to encapsulate and prevent migration of acid forming and potentially acid forming materials, and saline and sodic material - Design, install and maintain out-of-pit emplacements to prevent and/or manage long term saline seepage																																		
Aquatic and riparian ecosystems	- Ensure negligible environmental consequences beyond those predicted in the document/s listed in condition A2(c) - Maintain or improve baseline channel stability of Big Flat Creek - Develop site-specific in-stream water quality objectives in accordance with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC & ARMCANZ, 2000) and Using the ANZECC Guidelines and Water Quality Objectives in NSW (DEC, 2006)																																		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- Site GDP process documentation - Construction Drawings and inspection records for Wybong Road Overpass and associated Big Flat Creek culvert a. Hydro Engineering & Consulting – Updated Flood Modelling Report (18 October 2021) b. CITEC water level monitoring reports c. Tailings Dam 4 Operations and Maintenance Plan (ATC Williams) d. Annual Environment and Community Risk Assessments (ECRA) and Closure Risk Assessments (CRA), May 2025	via erosion and sediment control inspection records maintained by the E&C Department. - Auditors reviewed inspection reports and observed the culverts in the field, confirming they remain free of sediment and debris. - No infrastructure was built within 40 m of a watercourse during the audit period, satisfying design setback requirements. - The GDP process was implemented adequately during the audit period. Clean Water Diversions and Storage Infrastructure - Construction of the Clean Water diversion drains 1 and 2 was finalised and signed off in early 2023. The clean water diversion was designed and signed off by ArkHill Engineers. Drainage from the clean water diversion is diverted to Big Fat Creek via under-road culverts which were upgraded as part of the design. - Design report for the clean water diversion prepared by ArkHill. - Sighted drawings showing clean water diversion was signed off and executed as per the design. Flood Protection Works - Flood levee and Wybong road overpass were designed as part of the EIS and installed. - MCO committed to conduct further flood modelling as part of the EIS Statement of Commitments. Additional flood modelling was completed by Hydro Engineering and Consulting on 18 October 2021, accounting for the installation of the flood levee and Wybong Road Overpass.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			- No further flood protection works were required or constructed during the audit period. Sediment Dams - No new sediment dams were constructed during the audit period. - Monthly erosion and sediment control inspections include dam freeboard checks; records from these inspections were reviewed. - All inspected sediment dams had adequate freeboard and no visible signs of failure or uncontrolled release. Mine Water Storages - As part of the monthly erosion and sediment inspections conducted by the MCO E&C Department mine water storage dams are inspection and freeboard is reviewed to ensure it is adequate. - No new mine water storages were installed during the audit period. - The audit team confirmed, through CITEC-generated water reports and site inspections, that Raw Water Dam and Pitwater Dam levels are routinely monitored. Raw Water Dam - No discharges occurred from the Raw Water Dam during the audit period. - The audit team confirmed, through CITEC-generated water reports and site inspections, that Raw Water Dam and Pitwater Dam levels are routinely monitored. Chemical and hydrocarbon storages		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			- Addressed under Condition B81 findings, chemical s and hydrocarbon products were stored in bunded areas. Tailings storages - Groundwater monitoring is undertaken around tailings storage to track seepage; results confirm no adverse trends. - Only tailings dam 4 (TD4) was active during the audit period. - No changes to tailings storage during the audit period. - Operations & Maintenance Plan (ATC Williams) was reviewed. Overburden Emplacements - There are three emplacement areas on site - Wybong Pit Emplacement Area - South Pit emplacement area - Main Pit emplacement area. - MCO confirmed the site is a low-risk site for acid forming materials. This was supported by: - EIS findings. - Annual Environmental and Closure Risk Assessments (ECRA and CRA). - Audit team reviewed the May 2025 Risk Assessment, which rated the acid formation risk as low and noted no PAF or NAF encountered. Aquatic and riparian ecosystems - Refer to findings under the Surface Water Monitoring Program in Condition B50. - No new infrastructure works were conducted within aquatic ecosystems.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B49	The performance measures in Table 6 apply to the entire site, including all landforms constructed under previous development consents. However, these performance measures do not require any additional earthmoving works to be undertaken for landforms that have been approved and constructed under previous consents, except where those earthworks are required for the establishment of a stable and non-polluting landform.		This context was considered during the audit when assessing compliance across water management infrastructure, erosion controls, sediment dams, flood protection works, tailings storage, and overburden emplacement areas constructed under earlier consents.	Not Triggered	
Water Management Plan					
S2 B50	The Applicant must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with DPIE Water; - describe the measures to be implemented to ensure that the Applicant complies with the water management performance measures (see Table 6); - utilise existing data from the Mangoola Coal Project, existing monitoring programs and, where practicable, other nearby mines; - include a: - Site Water Balance that includes details of: - predicted annual inflows to and outflows from the site; - sources and security of water supply for the life of the development (including authorised entitlements and licences); - water storage capacity;	- Letter from NSW DPIE, Approval 2 Dec 2022 - Letter from NSW DPIE, Water Management Plan, Version 1.0, dated 22/09/2022	The Water Management Plan (WMP), Version 1.0 was approved by the DPHI on 2 December 2022. Evidence of consultation with DPIE Water, dated September 2022, was sighted by the auditors. In addition to the overarching WMP, MCO has prepared standalone management plans for surface water, groundwater, and erosion and sediment control, which together comprise the site's integrated water management system. Adequacy Review The Water Management Plan and associated standalone components address all requirements of Condition B50. The plans are current, approved, and have been developed in consultation with relevant agencies. Site Water Balance Section 4.2 and Appendix C of the WMP detail the site water balance. This has been subject to independent review by Engeny in 2023 and 2024, with an updated balance model completed in 2025. Erosion and Sediment Control Plan		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- water use and management on the site, including any water transfers or sharing with neighbouring mines; - licensed discharge points and limits; and - reporting procedures, including the annual preparation of an updated site water balance; • Salt Balance that includes details of: - sources of saline material on the site; - saline material and saline water management on the site; - measures to minimise discharge of saline water from the site; • Erosion and Sediment Control Plan that: - is consistent with the requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) and Volume 2E: Mines and Quarries (DECC, 2008); - identifies activities that could cause soil erosion, generate sediment or affect flooding; - includes a program to review the adequacy of existing flood protection works, and ensure they comply with the relevant performance measures listed in Table 6; - describes measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, and manage flood risk; - describes the location, function, and capacity of all erosion and sediment control structures and flood management structures; and - describes what measures would be implemented to maintain (and if necessary decommission) the structures over time; • Surface Water Management Plan that includes: - detailed baseline data on surface water flows and quality of watercourses and/or water		The ESCP (Version 2.0), approved by DPHI on 30 October 2023, addresses the relevant requirements of SSD-8642 and is consistent with the broader objectives of the Water Management Plan. The ESCP aligns with contemporary best practice, referencing the Blue Book (Landcom, 2004) and detailing controls such as sediment dams, clean/dirty water separation, and site drainage management . The ESCP is reflective of MCO's operations at the time of the audit with the following exceptions: Section 4.4 of the ESCP refers to the design and future construction of Clean Water Diversion 1 (CWD1) and its associated culvert. However, this infrastructure has been constructed and has been operational since early 2023, with inspections confirming it is functioning as designed. This section of the plan is therefore out of date and should be updated to reflect the current status. the ESCP includes reference to the Mining Operations Plan (MOP), which has been superseded by the new Rehabilitation Management Plan framework. Surface Water Management Plan Version 2.0 of the Surface Water Management Plan (SWMP) was approved by the DPHI on 26 October 2023. The Plan outlines surface water management controls applicable to the site and reflects current operational arrangements at MCO. The SWMP appropriately integrates requirements for pollution prevention, monitoring, clean water diversions, sediment control, and discharge management, consistent with industry good practice.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	bodies potentially impacted by the development, including: - stream and riparian vegetation health; - channel stability (geomorphology); and - water supply for other surface water users; - a detailed description of the surface water management system; - details of the water licensing requirements for all water storages (i.e. exempt, harvestable rights or licenced); - detailed plans, design objectives and performance criteria for water management infrastructure, including: - any approved creek diversions or restoration works associated with the development; - water run-off diversions and catch drains; - water storages and sediment dams; - emplacement areas; - backfilled pits and any final voids for the development; and - reinstated drainage networks on rehabilitated areas of the site; - an erosion and scour monitoring and maintenance program for the Big Flat Creek riparian corridor; - surface water performance criteria, including trigger levels for identifying and investigating any potentially adverse impacts (or trends) associated with the development, for: ▪ water supply for other water users; ▪ downstream surface water flows and quality; ▪ downstream flooding impacts; ▪ stream and riparian vegetation health; and ▪ post-mining water pollution from rehabilitated areas of the site;		The SWMP was reviewed and found to adequately address all requirements of SSD-8642. Several areas for improvement were identified where minor updates to the SWMP during the next review period would improve alignment with current site operations: • Figure 2.2 – Water Management Schematic should be updated to remove reference to transfer of decant water from Tailings Dam 4 (TD4) to TD2, as this pathway is no longer in use. TD4 now discharges to the Pit Water Dam. • The SWMP should be revised to reflect that new channel stability monitoring sites were established in 2024, including upslope diversions, Big Flat Creek near the MCO Additional Mining Area, and downstream of the haul road crossing. Current wording refers to this as a future action. • The SWMP should be updated to note that a new stream health monitoring site was established on the Hunter River downstream of the HRSTS discharge point during the autumn 2022 monitoring event. This remains described in the Plan as a future commitment. Groundwater Management Plan The Groundwater Management Plan (GWMP), Version 14, was approved by the DPHI in October 2022. While Version 15 of the GWMP was submitted for review on 19 December 2024, and incorporate updated groundwater modelling and revised trigger levels, it had not been approved at the time of the audit. Accordingly, MCO		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- a program to monitor and evaluate: - compliance with the relevant performance measures listed in Table 6 and the performance criteria in this plan; - controlled and uncontrolled discharges and seepage/leachate from the site; - impacts on water supply for other water users; - surface water inflows, outflows and storage volumes, to inform the Site Water Balance; and - the effectiveness of the surface water management system and the measures in the Erosion and Sediment Control Plan; - reporting procedures for the results of the monitoring program, including notifying other water users of any elevated results; and - a trigger action response plan to respond to any exceedances of the relevant performance measures or performance criteria, and repair, mitigate and/or offset any adverse surface water impacts of the development; - Groundwater Management Plan that includes: - detailed baseline data of groundwater levels, yield and quality for groundwater resources and groundwater dependent ecosystems potentially impacted by the development, including groundwater supply for other water users; - a detailed description of the groundwater management system; - groundwater performance criteria, including trigger levels for identifying and investigating any potentially adverse groundwater impacts (or trends) associated with the development, on: - regional and local aquifers (alluvial and hard rock); and		implemented Version 14 of the GWMP during the audit period. Version 14 of the GWMP addresses the requirements of SSD-8642 and includes defined management measures, trigger levels for groundwater level and quality, monitoring programs, investigation protocols, and escalation pathways. While Version 14 remains current and approved, the groundwater model on which it was based was reviewed and updated by AGE in 2024. Version 15 of the GWMP reflects the new model predictions and includes revised trigger levels. Reporting and Review Protocols Section 6 of the WMP covers the reporting framework, including incident reporting, review triggers, and adaptive management. Performance data is included in Annual Reviews and returns. Conclusion The WMP and associated standalone components address all requirements of Condition B50. The plans are current, approved, and have been developed in consultation with relevant agencies.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- groundwater supply for other water users such as licensed privately-owned groundwater bores; • a program to monitor and evaluate: - compliance with the relevant performance measures listed in Table 6 and the performance criteria in this plan; - water loss/seepage from water storages into the groundwater system, including from any final voids; - groundwater inflows, outflows and storage volumes, to inform the Site Water Balance; - the hydrogeological setting of any nearby alluvial aquifers and the likelihood of any indirect impacts from the development; - impacts on groundwater dependent ecosystems; - impacts on groundwater supply for other water users; and - the effectiveness of the groundwater management system; • a contingency plan for isolating the Big Flat Creek alluvium from Anvil Creek alluvium and mining areas in the event that it is required; • reporting procedures for the results of the monitoring program, including notifying other water users of any elevated results; • a trigger action response plan to respond to any exceedances of the relevant performance measures and groundwater performance criteria, and repair, mitigate and/or offset any adverse groundwater impacts of the development; and • a program to periodically validate the groundwater model for the development, including an independent review of the model every 3 years (unless otherwise agreed by the Planning				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Secretary), and comparison of monitoring results with modelled predictions; and a protocol to report on the measures, monitoring results and performance criteria identified above, in the Annual Review referred to in condition D11.				
S2 B51	The Applicant must not commence mining operations north of Wybong Road until the Water Management Plan is approved by the Planning Secretary.	Refer evidence against Condition B50	Correspondance from DPHI shows the WMP was approved on 1 December 2022, prior to mining commencing on 2 December 2022. Formal signature from the Planning Secretary was received on 2 December 2022. The auditors consider the WMP to have been adequately endorsed by the Planning Secretary prior to mining operations north of Wybong Road commencing.	Compliant	
S2 B52	The Applicant must implement the Water Management Plan as approved by the Planning Secretary.	- Ground Disturbance Permit, Wybong Road Culvert, GD-23-11-14 - AGE, Mangoola pH Trigger Exceedance in Wybong 1b and 1c Report, 5 April 2024 - Refer evidence against Condition B36 - GD-24-08-21-09 (Visual Fence) - GD24-08-19-08-49 (BFC ESC) - GD25-01-06-12-55 (Wybong Pit stripping)	Implementation Review Water Balance Refer findings against Condition B36. Water Licence Compliance As part of the IEA, MCO's compliance with relevant Water Access Licences (WALs) and water licence conditions was reviewed. The following observations were made: - Annual usage reports for 2022, 2023, and 2024 were reviewed for both groundwater and surface water take. MCO submits required Annual Records of Groundwater Take under EL5552, consistently reporting zero groundwater extraction during the audit period. All reports were submitted in accordance with the due dates (28 or 30 July, depending on licence type). - Water Take Summary:	Non-compliant	NC004

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- Monthly ESC Inspection Checklists - Weekly desktop erosion and sediment control inspections - Channel Stability Monitoring by HLM (including new 2024 sites) - Stream Health Monitoring Reports by Biosis - AGE Groundwater Level Exceedance Investigation Reports: Feb 2024, Sep 2024, March 2025 - Letter to DPHI regarding MP9a monitoring gap, dated 21 March 2024 - DPHI response, dated 14 November 2024, acknowledging actions taken	- Telemetry is installed at active extraction points, allowing remote and accurate tracking of water take. - Flow meters used are compliant with AS4747, and calibration records (e.g. ABB verification report dated 24/09/2024) were sighted. - Groundwater: No groundwater take occurred during the audit period. - Surface Water: Water was only extracted from the Hunter River under 20WA211008. All other WALs (e.g. relating to Wybong Creek or Big Flat Creek) were not active. - In February 2024, 400 ML of water was imported, recorded in the site's Water Order Register (FY25–26). - Data capture is integrated via the CITEC system. Flow meter data and telemetry readings feed directly into this system, which MCO uses for both compliance and operational monitoring. - Purpose of water use is logged in the Water Order Register, e.g. for CHPP supply. - A Water Accounting Non-Metered Usage Confirmation Report, dated 24/07/2024, confirms that actual use is tracked and reconciled with telemetry data annually. - A transfer of 1,000 ML of water licence units was made to Bulga Coal in the 2025–26 water year in accordance with licence conditions. Erosion and Sediment Control Plan MCO has a well-established GDP process through which erosion and sediment control measures are planned, implemented, and verified for each disturbance activity. A sample of GDPs from the		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			audit period (including Wybong Road culvert upgrades and new disturbance in the Wybong Pit) demonstrated application of this process. Supporting documentation included ESC plans, photographic evidence, and inspection reports. Monthly and rainfall-triggered inspections are conducted by the E&C team, and records confirm the inspection regime aligns with the ESCP and addresses sediment dams, diversions, culverts, and dewatering infrastructure. Surface Water Management Plan Environmental water quality sampling is conducted by CBased Environmental, stream health monitoring by BIOSIS, and channel stability monitoring by HLM. The sampling program includes monthly and event-based monitoring. Water samples are submitted to ALS Laboratories, with results uploaded into Glencore's Environmental Monitoring Database (EMD). Auditors sighted the EMD database and associated monthly reports provided by CBased Environmental. The Plan also references the Pollution Incident Response Management Plan (PIRMP), which was confirmed as not having been activated during the audit period. Evidence demonstrates that MCO has implemented the surface water monitoring and management controls outlined in the SWMP: • Surface water quality sampling is routinely conducted by CBased Environmental with laboratory analysis performed by ALS and uploaded into the EMD. • Stream health and channel stability monitoring has been implemented by specialist contractors (BIOSIS and HLM		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			respectively), with updated sites established in 2024 to reflect changes to drainage and infrastructure associated with the MCCO Additional Mining Area. - Water discharges via the HRSTS have been monitored and reported in accordance with EPL 12894 (refer findings against Condition B46). - Visual inspections at the Anvil Creek/Big Flat Creek junction are conducted monthly, supported by drone flyovers by MCO's Survey Department and incorporated into erosion and sediment control inspections. - The PIRMP is current and reviewed as required, though no activation was recorded during the audit period. - Audit evidence included sighted monitoring data, contractor reports, and monthly performance summaries. Groundwater Management Plan MCO is operating in accordance with Version 14 of the GWMP. Findings from the implementation review are summarised below: - Groundwater level exceedance investigations: - Groundwater levels at multiple bores triggered exceedances during the audit period. These exceedances were investigated under the GWMP's TARP. Level 1 and Level 2 investigations were undertaken as required. - GW26 triggered Level 2 investigations repeatedly during the audit period. Reports prepared by external groundwater specialists from AGE in		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			February 2024, September 2024, and March 2025 (dated 9 May 2025) concluded that drawdown was consistent with the current but outdated model and not causing material environmental harm. - The monitoring frequency at GW26 was increased to fortnightly from December 2023 in line with recommendations from AGE. - Level 1 investigations were triggered at BFC05, VW2-2, and VW2-4, and these were also undertaken by AGE. - Wybong 1b and 1c triggered pH exceedances during the audit period. AGE determined these exceedances were caused by cement grout contamination around the bore casing rather than aquifer water quality. These bores have been removed from trigger assessments in the submitted Version 15 of the GWMP (under review by DPHI at the time of the audit). Non-Compliance: In December 2023, a full suite of analytes was not analysed for MP9a due to an administrative error from the environmental monitoring contractor. Upon investigation it was identified that the monitoring contractor had the incorrect paperwork for the day of sampling. The paperwork outlines the monitoring points and analytes that require sampling (as per the scope as provided by MCO) which then accompanies the sample to the lab for analysis. This administrative error resulted in the below analytes being missed for MP9a:		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference														
			- Dissolved iron (Fe), Silver (Ag), Arsenic (As), Boron (B), Barium (Ba), Cadmium (Cs), Copper (Cu), Dissolved Manganese (Mn), Lead (Pb), Selenium (Se), Zinc (Zn), Mercury (Hg), Fluoride (Fl). The non-compliance was reported to DPHI and DCCEEW. MCO implemented corrective actions including: - Earlier sampling schedule (May instead of December) to allow errors to be identified and repeat sampling conducted prior to the end of the reporting year. - New data verification process - Additional end of month task for QA checks.																
Biodiversity																			
S2 B53	Biodiversity Credits Required Prior to the commencement of mining operations north of Wybong Road, or other timeframe agreed by the Planning Secretary, the Applicant must retire the biodiversity credits specified in Table 7 below. The retirement of credits must be carried out in consultation with BCS and in accordance with the Biodiversity Offsets Scheme of the BC Act, to the satisfaction of the BCT. <i>Table 7: Biodiversity credit requirements</i> <table><tr><th>Credit Type</th><th>Credits Required</th></tr><tr><td colspan="2">Ecosystem Credits</td></tr><tr><td>HU812 Forest Red Gum grassy open forest on floodplains of the lower Hunter</td><td>1,874</td></tr><tr><td>HU816 Spotted Gum – Narrow-leaved Ironbark shrub – grass open forest of the central and lower Hunter</td><td>369</td></tr><tr><td>HU817 Narrow-leaved Ironbark – Bull Oak – Grey Box shrub – grass open forest of the central and lower Hunter</td><td>13,457</td></tr><tr><td>HU821 Blakely's Red Gum – Narrow-leaved Ironbark – Rough-barked apply shrubby woodland of the Hunter</td><td>253</td></tr><tr><td>HU906 Bull Oak grassy woodland of the central Hunter Valley</td><td>1,597</td></tr></table>	Credit Type	Credits Required	Ecosystem Credits		HU812 Forest Red Gum grassy open forest on floodplains of the lower Hunter	1,874	HU816 Spotted Gum – Narrow-leaved Ironbark shrub – grass open forest of the central and lower Hunter	369	HU817 Narrow-leaved Ironbark – Bull Oak – Grey Box shrub – grass open forest of the central and lower Hunter	13,457	HU821 Blakely's Red Gum – Narrow-leaved Ironbark – Rough-barked apply shrubby woodland of the Hunter	253	HU906 Bull Oak grassy woodland of the central Hunter Valley	1,597	2024 Annual Conservation Agreement Monitoring Report Dec 2024, Biodiversity Australia, dated 06/12/2024 - Highfields BSA signed, dated 14/02/2024 - Credit retirement report, C-017582, dated 28/06/2024 - Credit Register ID Report for BS0106 (Highfields)	The following summary outlines MCO's compliance with the requirement to retire biodiversity credits in accordance with the Biodiversity Offsets Scheme (BOS) under the Biodiversity Conservation Act 2016 (BC Act). During the audit period, MCO executed the relevant Biodiversity Stewardship Agreements (BSAs) and submitted a Statement of Reasonable Equivalence to reconcile remaining offset credit obligations. Evidence of the following executed BSAs was sighted: - Highfields (BS0106) BSA, signed 14 February 2024 - Mangoola (BS0150) BSA, signed 19 February 2024 - Mangrove (BS0138) BSA, signed 14 February 2024, signed 14 February 2024 - Wybong Heights (BS0134), signed 14 February 2024)	Compliant	
Credit Type	Credits Required																		
Ecosystem Credits																			
HU812 Forest Red Gum grassy open forest on floodplains of the lower Hunter	1,874																		
HU816 Spotted Gum – Narrow-leaved Ironbark shrub – grass open forest of the central and lower Hunter	369																		
HU817 Narrow-leaved Ironbark – Bull Oak – Grey Box shrub – grass open forest of the central and lower Hunter	13,457																		
HU821 Blakely's Red Gum – Narrow-leaved Ironbark – Rough-barked apply shrubby woodland of the Hunter	253																		
HU906 Bull Oak grassy woodland of the central Hunter Valley	1,597																		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference														
	<table><tr><th>Credit Type</th><th>Credits Required</th></tr><tr><td>HU945 Swamp Oak – Weeping Grass grassy riparian forest of the Hunter Valley</td><td>168</td></tr><tr><th colspan="2">Species Credits</th></tr><tr><td>Wybong Leek Orchid (<i>Prasophyllum petilum</i>))</td><td>8,983</td></tr><tr><td>Pine Donkey Orchid (<i>Diuris tricolor</i>)</td><td>17,238</td></tr><tr><td>Southern Myotis (<i>Myotis Macropus</i>)</td><td>20</td></tr><tr><td>Large-eared pied bat (<i>Chalinolobus dwyeri</i>)</td><td>27</td></tr></table> <i>Note: The credits in Table 7 were calculated in accordance with Framework for Biodiversity Assessment of the NSW Biodiversity Offset Policy for Major Projects (OEH, 2014) and may need to be converted to reasonably equivalent ‘biodiversity credits’, within the meaning of the BC Act, if the credits are to be retired in accordance with the Biodiversity Offsets Scheme of the BC Act.</i>	Credit Type	Credits Required	HU945 Swamp Oak – Weeping Grass grassy riparian forest of the Hunter Valley	168	Species Credits		Wybong Leek Orchid (<i>Prasophyllum petilum</i>))	8,983	Pine Donkey Orchid (<i>Diuris tricolor</i>)	17,238	Southern Myotis (<i>Myotis Macropus</i>)	20	Large-eared pied bat (<i>Chalinolobus dwyeri</i>)	27	- Mangoola BSA signed, 19/04/2024 - Credit retirement report for credit (C-024665) (Mangoola), dated 24/06/2024 - Mangrove BSA signed, 14/02/2024 - Credit retirement report for credit C-017582, dated 17/06/2024 - Wybong Heights BSA, signed 14/02/2024 - Statement of reasonable equivalence, executed 25/06/2024 - Statement confirming payment into Biodiversity Conservation Fund for an offset obligation, SCCEEWdated 31/05/2024	A statement of reasonable equivalence (SRE) was issued by NSW DCCEEW on 25 June 2024 which included final Biodiversity Credits created at Highfields, Mangoola, Mangrove, and Wybong Heights BSAs. The SRE confirms that the final number and class of BAM credits from the above BSAs are reasonably equivalent to those required under the SSD8642. Notable credit retirements include: <i>Forest Red Gum grassy open forest:</i> 112 credits (Mangoola BSA) <i>Narrow-leaved Ironbark – Bull Oak – Grey Box forest:</i> over 2,200 credits across Mangoola and Wybong Heights BSAs <i>Blakely’s Red Gum woodland:</i> 282 (Mangoola) and 315 (Wybong Heights) <i>Pine Donkey Orchid and Prasophyllum sp.</i> Wybong: 2,919 (Mangoola) and 526 (Mangrove) credits each Another SRE was issued by NSW DCCEEW on 29 February 2024. This statement determined that the number of biodiversity credits required to be retired under the Threatened Species Conservation Act 1995 (TSC Act) as part of the development consent listed in Part 1, are reasonably equivalent to the number and class of biodiversity credits under the Biodiversity Conservation Act 2016 (BC Act) set out in Part 2. This included: <i>Large-eared Pied Bat:</i> 27 TSC Act credits deemed equivalent to 106 BC Act credits <i>Southern Myotis:</i> 20 TSC Act credits deemed equivalent to 201 BC Act credits MCO has met the intent of Condition B53 by:		
Credit Type	Credits Required																		
HU945 Swamp Oak – Weeping Grass grassy riparian forest of the Hunter Valley	168																		
Species Credits																			
Wybong Leek Orchid (<i>Prasophyllum petilum</i>))	8,983																		
Pine Donkey Orchid (<i>Diuris tricolor</i>)	17,238																		
Southern Myotis (<i>Myotis Macropus</i>)	20																		
Large-eared pied bat (<i>Chalinolobus dwyeri</i>)	27																		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			• Executing BSAs for the required offset properties; • Obtaining and implementing Statements of Reasonable Equivalence; • Demonstrating retirement of biodiversity credits in accordance with BOS requirements; • Consulting with the Biodiversity Conservation Trust (BCT) and DCCEE; • Aligning final credit retirements with approved equivalency determinations.		
S2 B54	The Applicant must implement the Biodiversity Offset Strategy for the development as described in the document/s listed in condition A2(c) and shown conceptually in Appendix 6.	• Refer findings against Condition B59.	The Biodiversity Offset Strategy (BOS) for the development is implemented through the Biodiversity Offset Management Plan and Strategy (BOMPS, Version 13, 10 August 2022). The implementation of the BOMPS was reviewed against Condition B59. Key findings in relation to the Biodiversity offset areas include: • The current version (Version 13) of the BOMPS pre-dates the execution of the BSAs and does not accurately reflect the finalised offset areas, management responsibilities, or the monitoring and reporting obligations under the registered BSAs. • The BOMPS makes references to offset properties no longer under MCO's responsibility • Section 2.2, which outlines monitoring locations and responsibilities, has not been updated to reflect the actual sites and arrangements under the executed BSAs. At the time of the audit MCO were preparing to review the BOMPS. The following should be considered in the review:	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			- Incorporate the finalised and executed BSA requirements; - Clarify MCO's current offset responsibilities; - Align monitoring and management programs with actual practice and agreement conditions.		
S2 B55	Threatened Species The Applicant must continue to implement the mitigation and management measures described in the approved Translocation Plan for Orchids and Other Threatened Flora, dated September 2012 and prepared by Umwelt for the Mangoola Coal Project disturbance area, to the satisfaction of the Planning Secretary.	- Umwelt (2012). Translocation Plan for Orchids and Other Threatened Flora, Mangoola Coal Project. Prepared for Mangoola Coal. - Future Harvest (2022–2024). Annual Terrestrial Orchid Monitoring Reports. - Mangoola Coal Operations (2024). <i>Cymbidium canaliculatum</i> Monitoring Report – October 2023. - Annual Reviews (2022, 2023, 2024).	No new translocations occurred during the audit period. However, MCO continued to monitor the previously translocated Tiger Orchid (<i>Cymbidium canaliculatum</i>), in line with the long-term objectives of the Translocation Plan. While formal monitoring was only required for five years post-translocation (i.e., until 2021), MCO voluntarily completed a final round of monitoring in October 2023 to verify the condition and status of remaining individuals. Key findings from the 2023 Tiger Orchid monitoring included: 11 plants monitored, with the majority found to be in good health, exhibiting new leaf growth and flowering activity; - Minor browsing disturbance noted on a small number of individuals; - One plant loss recorded due to dislodgement and smothering; - Monitoring program now concluded, with positive indications of medium- to long-term survival and establishment Terrestrial Orchid Annual monitoring of translocated Terrestrial Orchids has continued throughout the audit period, as required under the Translocation Plan.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Monitoring has been undertaken by Future Harvest, with a new monitoring plot established in a rehabilitation area in 2024. Soil analysis for the new plot had not been completed at the time of the audit, but other monitoring parameters (growth, reproduction, survival) have been implemented in line with the Plan.		
S2 B56	Rehabilitation Offsets Within 10 years of the cessation of mining operations, or other timeframe agreed by the Planning Secretary, the Applicant must make suitable arrangements for the long term protection of the ecological mine rehabilitation and offset areas described in the document/s listed in condition A2(c), including appropriate covenants to the satisfaction of the BCT. If the rehabilitation area does not meet the listing criteria of the targeted Plant Community Type or the completion criteria, then the Applicant must retire the relevant deficient biodiversity credits in accordance with the Biodiversity Offsets Scheme of the BC Act, to the satisfaction of the BCT. <i>Note: The rehabilitation offset performance and completion criteria form a component of the Rehabilitation Management Plan required under condition B91.</i>		This condition was not triggered as operations were still ongoing at the time of the audit.	Not Triggered	
S2 B57	The Applicant must prepare a Biodiversity Management Plan to the satisfaction of the Planning Secretary. This plan must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with BCS;	- Offset Area Inspection Form, Northern Corridor, dated 31/3/25 - GD-25-01-06-12-55 GDP 4	The Biodiversity Offset Management Plan and Strategy (BOMPS, Version 13, 10 August 2022) functions as the primary instrument fulfilling the requirements of Condition B57. Overall, the BOMPS generally meets the content requirements of Condition B57. It was prepared by suitably qualified personnel endorsed by the DPHI	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- describe the short, medium, and long term measures to be undertaken to manage the remnant vegetation and fauna habitat on the site and in any offset areas; - describe how biodiversity management would be integrated with similar measures within other management plans, including the Rehabilitation Management Plan referred to in condition B91; - include detailed performance and completion criteria for evaluating the performance of the Biodiversity Offset Strategy and include triggers for remedial action, where these performance or completion criteria are not met; - include strategy that describes how the biodiversity credits in Table 7 will be identified, secured and retired; - describe the measures to be implemented within the approved disturbance areas to: - minimise the amount of clearing; - minimise impacts on fauna habitat resources such as hunting and foraging areas, habitat trees, fallen timber and hollow-bearing trees; - enhance the quality of vegetation, vegetation connectivity and wildlife corridors including through the assisted regeneration and/or targeted revegetation of appropriate canopy, sub-canopy, understorey and ground strata; - introduce naturally scarce fauna habitat features such as nest boxes and salvaged tree hollows and promote the use of these introduced habitat features by threatened fauna species; - manage any potential conflicts with Aboriginal heritage values; - protect vegetation and fauna habitat outside of the approved disturbance areas;	Letter from DPHI approving the appointment of Umwelt as suitably qualified persons to prepare the BMP, dated 15/11/2021	in consultation with the BCS, and includes most of the required biodiversity management, monitoring, and offset delivery components. However, the following gaps and limitations were identified in the adequacy review: - The BOMPS was partially outdated at the time of the audit and requires revision to fully align with executed Biodiversity Stewardship Agreements (BSAs) and current site responsibilities. Refer Condition B53 for details. - The Plan should be updated during the next review to remove reliance on PA 06_0014 and clearly articulate how legacy biodiversity commitments have been integrated under SSD-8642. - The short-term performance indicators outlined in the BOMPS expired at the end of Year 14 (2024). From 2025 (Year 15) onwards, the medium-term performance indicators are now applicable. However, the current version of the BOMPS has not been updated to reflect this transition, and the short-term indicators remain in place. To ensure ongoing compliance with Condition B57, the BOMPS should be updated during the next review to remove obsolete short-term performance measures and confirm the applicability of medium-term indicators. - The BOMPS includes references in the body of the document to “short-term” and “long-term” performance indicators. However, in Appendix E, the performance indicators are described as “short-term” and “medium-term”, with no explicit mention of “long-term” indicators. This inconsistency may cause		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- manage the collection and propagation of seed from the local area; - control weeds, including measures to avoid and mitigate the spread of noxious weeds; - control feral pests with consideration of actions identified in relevant threat abatement plans; - control erosion; - manage any grazing and agriculture; - control access to vegetated or revegetated areas; and - manage bushfire hazards; • include a seasonally-based program to monitor and report on the effectiveness of the above measures, against the detailed performance indicators and completion criteria, and identify improvements that could be implemented to improve biodiversity outcomes; • identify the potential risks to the successful implementation of the biodiversity offset requirements, and include a description of the contingency measures to be implemented to mitigate these risks, including provisions for alternative direct and/or supplementary offset measures where regeneration of EECs and/or the propagation/translocation of threatened flora do not meet performance and completion criteria; and • include details of who would be responsible for monitoring, reviewing, and implementing the plan; and • identify the measures that would be implemented to ensure the continued implementation of the biodiversity offset and rehabilitation requirements identified under the Mangoola Coal Project (PA 06_0014), with a particular focus on the re-establishment of:		confusion when interpreting the applicable monitoring and assessment timeframes. Condition B57(c) requires the description of short, medium, and long-term measures. The current approach of updating the BOMPS every three years means there is always overlap in short- and medium-term goals, with the long-term goal being protection of the offsets in perpetuity. To avoid retrospective goal-setting, future BOMPS updates could define the short-term period as the upcoming three-year cycle (e.g. 2026–2028) to align with approval timeframes.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- significant and/or threatened plant communities, including: - Ironbark Woodland Complex; - Bulloak Woodland; - Paperbark Woodland; - Salty Box Woodland; - Forest Red Gum Riparian Woodland; - Rough Barked Apple Woodland; - Swamp Oak Riparian Forest; and - Weeping Myall Woodlan - significant and/or threatened plant species, including: - Goodenia macbarronii; - Diuris tricolor; - Prasophyllum petilum; - Pterostylis praetermissa; - Cymbidium canaliculatum; - Bothriochloa biloba; - Acacia pendula; - Androcalva rosea; and - Pomaderris queenslandica; and - significant and/or threatened animal species, including molluscan fauna.				
S2 B58	The Applicant must not commence mining operations north of Wybong Road until the Biodiversity Management Plan is approved by the Planning Secretary.		The latest version of the BMP was approved on 10 August 2022. Mining commenced 1 Dec 2022.	Compliant	
S2 B59	The Applicant must implement the Biodiversity Management Plan as approved by the Planning Secretary.	- Letter from DPHI approving the BP, Version 13.0, dated 10/08/2022 - Quarterly BOA inspection forms (sighted in E&C	Monitoring and Inspections Quarterly inspections of the Biodiversity Offset Areas (BOAs) were conducted consistently throughout the audit period by either the E&C team or ecology consultants. Completed inspection forms and photographic evidence were sighted and stored in the E&C drive. These inspections are tracked as actions in CMO.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- folder, includes photos and records) • 2024 BOMPS Monitoring Report by Biodiversity Australia • CMO system – actions and inspection records logged and tracked • 2023 BOMPS Monitoring Report by Atlantic • 2022 BOMPS Monitoring Report by Umwelt • 2024 Fauna Monitoring Report • Tiger Orchid Monitoring Report – Cymbidium canaliculatum (October 2023) • 2024 GDE Monitoring Report by Atlantic • 2024 Weed Management Action Plan	Ecological monitoring was conducted annually by qualified consultants: • 2022 – Umwelt • 2023 – Atlantic • 2024 – Biodiversity Australia While monitoring was implemented consistently, the monitoring framework outlined in the BOMPS has not been updated to reflect changes in offset responsibilities. These areas are still referenced in the BOMPS despite being outside MCO's current responsibilities under SSD-8642. Groundwater Dependent Ecosystem (GDE) monitoring was completed in accordance with the Plan. Reports from 2022 and 2023 were included in the main BOMPS monitoring reports, with the 2024 GDE monitoring reported separately. Weed and Feral Animal Management • Daily weed control reports were prepared by HLA in line with Biodiversity Conservation Agreement (BCA) requirements. • Annual Weed Management Action Plans were prepared internally and informed by rehabilitation walkovers and monitoring findings. • Feral animal control targeted pigs, deer, goats, and wild dogs, in accordance with BCA and Conservation Agreement requirements. Wild dog baiting was also implemented. Pathogen and Habitat Management • No detections of Phytophthora cinnamomi were reported. No pathogen-specific management actions were triggered.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- Pest Management Action Plan V7 - GDP 4 Pre-clearance Inspection Record - Biodiversity Stewardship Agreements	- Over 1,600 nest boxes are installed across the site, Monitoring is conducted in batches in accordance with the BOMP. However new nest boxes have not undergone additional monitoring in accordance with Section D6 of the BOMP, which states that <i>“additional nest-box monitoring surveys will be undertaken where new nest boxes are installed as habitat enhancement measures. These will be undertaken annually commencing the year after installation.”</i> This requirement should be revised and amended to address actual monitoring conducted. - Clearing associated with the Wybong Pit was subject to GDP pre-clearance surveys. Salvage of habitat trees, features (e.g., bark, rocks), and weed control of topsoil stockpiles was documented, with evidence sighted (e.g., GDP 4 form GD-25-01-06-12-55). Fencing and Land Access - Cattle were appropriately restricted to buffer lands and excluded from BOAs. - Fauna-friendly fencing was in place or being progressed. Internal fencing removal was ongoing at Mangoola BSA (not yet complete), while Wybong Heights BSA fencing removal was nearly finalised. Mangoola BSA also required removal of legacy structures and rubbish, with works in planning at the time of audit. The BOMPS has been substantially implemented during the audit period, with evidence of regular ecological monitoring, targeted weed and pest control, pre-clearance and salvage protocols and site-specific management actions. However, several gaps were identified which support the		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			need for a comprehensive update of the BOMPS. While this condition is compliant a number of OFIs have been made against the BOMPS.		
S2 B60	Conservation Bond Within 6 months of the approval of the Biodiversity Management Plan referred to in condition B57 above, or other timeframe agreed by the Planning Secretary, the Applicant must lodge a Conservation Bond with the Department to ensure that the Biodiversity Offset Strategy is implemented in accordance with the performance and completion criteria in the Biodiversity Management Plan. The sum of the bond must be determined by: - calculating the full cost of implementing the Biodiversity Offset Strategy at third party rates (other than land acquisition costs); and - employing a suitably qualified, independent and experienced person to verify the calculated costs.	- Approval of revised conservation bond, dated 19/06/2023 - MCO submission of conservation bond, 2/2/2023 - Revised Conservation Bond costs, letter to DPHI dated 02/02/2023	Biodiversity Offset Management Plan and Strategy (BOMPS) was approved on 10 August 2022. In accordance with Condition B60, MCO engaged Umwelt as the suitably qualified, independent, and experienced person to review and verify the cost estimate for implementing the BOMPS. On 9 November 2022, MCO submitted a letter to the DPHI providing a revised conservation bond calculation. Following a request for additional information, the bond estimate was updated and resubmitted on 2 February 2023, with a detailed explanation of the costing methodology. DPHI reviewed the revised submission and on 19 June 2023 confirmed it was satisfied with the calculation methodology and cost estimate. The Department required the Conservation Bond to be lodged by 15 September 2023. MCO subsequently lodged the bond as a bank guarantee on 25 August 2023, with DPHI confirming receipt on 29 August 2023.	Compliant	
S2 B61	The calculation of the Conservation Bond must be submitted to the Department for approval at least 2 months prior to the lodgement of the bond.	Email from DPHI, dated 29/08/2023	MCO lodged the bond via bank guarantee on 25 August 2023. DPHI responded via email on 29 August 2023 confirming the guarantee had been received.	Compliant	
S2 B62	The Conservation Bond must be reviewed and if required, an updated bond must be lodged with the Department within 3 months following:	Conservation Discussion with E&C Department	A review of the Conservation Bond was conducted following approval of the BOMP. No other reviews have been triggered.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- any update or revision to the Biodiversity Management Plan; - the completion of an Independent Environmental Audit in which recommendations relating to the implementation of the Biodiversity Offset Strategy have been made; or - in response to a request by the Planning Secretary.				
S2 B63	If the Biodiversity Offset Strategy is completed generally in accordance with the performance and completion criteria in the Biodiversity Management Plan, to the satisfaction of the Planning Secretary, or if alternate funding arrangements are provided under a long term security arrangement, the Planning Secretary will release the Conservation Bond.		This condition was not triggered at the time of the audit.	Not Triggered	
S2 B64	If the Biodiversity Offset Strategy is not completed generally in accordance with the completion criteria in the Biodiversity Management Plan, the Planning Secretary will call in all, or part of, the Conservation Bond, and arrange for the completion of the relevant works. Notes: - The sum of the Conservation Bond may be reviewed in conjunction with any revision to the Biodiversity Offset Strategy. - Offset areas secured via a Conservation Agreement and credits retired by way of payment into the BCT do not require lodgement of a conservation bond.	- BCT Offset Conservation Agreement Monitoring, 2024 - Big Flat Creek Eastern Conservation Offset	During the audit period, there were no identified failures to implement the Biodiversity Offset Strategy (BOS) in accordance with the performance and completion criteria outlined in the approved Biodiversity Management Plan (BOMPS). As such, there has been no trigger for the Planning Secretary to call in the Conservation Bond. A review of the offset areas subject to Conservation Agreements was undertaken by the Biodiversity Conservation Trust (BCT) in 2024. This review confirmed that the conditions of the agreements were being met, with no corrective actions or compliance concerns raised in relation to: - Eastern Conservation Offset – VCA0508 - Southern Conservation Offset – VCA0517 - Big Flat Creek Offset – VCA0507 - Western Corridor and Anvil Hill Offset – VCA0526	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
Heritage					
S2 B65	Protection of Aboriginal Heritage B65. The Applicant must ensure that the development does not cause any direct or indirect impact on any identified heritage items located outside the approved disturbance area, beyond those predicted in the document/s listed in condition A2(c). <i>Note: Identified heritage items are shown in the figures in Appendix 7.</i>	• Discussion with E&C Department • Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025 • Letter from DPIE to MCO Mangoola Continued Operations (SSD-8642) - Non-compliance Notification, acknowledgement of notification lodgement from MCO, 30/03/2023 • Letter from DPIE to MCO. NSW Planning ref: INV-56974207, dated 18 October 2024 • GDP Sample. Southern Offset 2024 Planting Area, GD-24-12-10-07-52, 10 December 2024 • OzArk, Aboriginal Due	All cultural heritage sites are listed on the MCO Aboriginal archaeological sites layer that forms part of the internal GIS system. Where ground disturbance is proposed, the area is subject to scrutiny and managed in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, and MCO Ground Disturbance Permit (GDP) Procedure, with a GDP completed. Cultural Heritage Surveys are undertaken by OzArk ahead of works and relevant Aboriginal Heritage Information Management System (AHIMS) site cards are also referenced and used to determine registered site locations in proximity to any proposed works. The requirements are outlined in Section 3.4.1 of the Aboriginal Cultural Heritage Management Plan. During the audit period, no breaches of Condition B65 relating to direct impacts on cultural heritage were identified during ground disturbance activities. On 22 March 2023, MCO notified the Department of a potential non-compliance with Condition 65 (and Condition B70) in the Aboriginal Cultural Heritage Offset Area between 6 February 2023 and 16 February 2023. Following an investigation, the Department, in a letter dated 18 October 2024, determined that there was no breach or non-compliance. In response to the potential non-compliance, MCO implemented the following measures to strengthen the GDP process:	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Diligence Assessment Report - Mangoola Offset Revegetation Activities: So-1 And Acho-5, Version 2.0, 18 November 2024	- Targeted GDP training for supervisors; - Increased supervision of all offsite work areas, and - the development of an internal management plan to guide GDP activities which requires E&C representatives to conduct field-based reviews using updated maps and procedures. - GIS buffers have also been added around AHIMS registered centroid coordinates in the internal GIS system so that larger areas are considered in relation to proposed worksite pins. This is to trigger the assessment of AHIMS sites across increased areas in order to reduce the risk of future issues.		
S2 B66	If suspected human remains are discovered on the site, then all work surrounding the area must cease, and the area must be secured. The Applicant must immediately notify NSW Police Force and Heritage NSW, and work must not recommence in the area until authorised by NSW Police Force and Heritage NSW.	- Discussion with E&C Department - Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025	This requirement is not applicable, as no human remains have been discovered on site. Relevant procedures are outlined in Section 3.5 of the Aboriginal Cultural Heritage Management Plan, which states that if suspected human remains are identified, all work in the vicinity must cease, the area must be secured, and immediate notification must be made to the NSW Police Force and Heritage NSW.	Not Triggered	
S2 B67	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, and those records are kept up to date, in the Aboriginal Heritage Information Management System (AHIMS) Register.	- Discussion with E&C Department - Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025	According to the Aboriginal Cultural Heritage Management Plan, following previous archaeological investigations at MCO, the AHIMS register records a total of 178 sites that have been salvaged under permit, five sites partially salvaged, and 390 sites remaining in situ within the landscape. Additionally, Section 3.3.2 of the Management Plan confirms that all newly identified sites will be recorded in AHIMS, in line with Heritage NSW	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			requirements and Section 89A of the National Parks and Wildlife Act. AHIMS records are stored on the server and integrated with the MCO internal GIS system. The GIS includes an Aboriginal archaeological sites layer, which links to individual AHIMS site cards and identifies the location of sites, including those within offset areas.		
S2 B68	Aboriginal Cultural Heritage Management Plan The Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development. The plan must: - be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with Heritage NSW and Registered Aboriginal Parties; - describe the measures to be implemented on the site or within any offset areas to: - comply with the heritage-related operating conditions of this consent; - ensure all workers receive suitable Aboriginal cultural heritage training/inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions; - protect, monitor and manage identified Aboriginal objects and Aboriginal places (including as part of any proposed archaeological investigation of potential subsurface objects and salvage of objects within the approved disturbance area) in accordance with the commitments made in the document/s listed in condition A2(c);	- Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025 - Cultural Heritage Artefact Access Procedure, Version 3, Dated 30/06/2023	MCO work under the Aboriginal Cultural Heritage Management Plan (ACHMP), Version 12 which was approved by DPHI on 28 February 2025. The ACHMP was updated in February 2025 as part of the required three-year review. The update included minor changes, such as the removal of a table and the inclusion of references to the AHIMS database. The ACHMP was prepared by a suitably qualified and experienced person from OzArk Environment and Heritage, with a copy of the endorsement on 20 May 2021 included in the ACHMP in Appendix D. Records of consultation with Registered Aboriginal Parties (RAPs) and Heritage NSW is recorded in Section 2 of the ACHMP. The measures to be implemented on-site and within offset areas are detailed under Section 3, Aboriginal Cultural Heritage Management Strategy. Training requirements are outlined in Section 5.1 of the ACHMP. Section 3.6.4 of the ACHMP states that Mangoola will facilitate supervised access for RAPs to visit	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development; - manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development; - maintain and manage reasonable access for relevant Aboriginal stakeholders to visit Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and - facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site; and • include a strategy for the care, control and storage of Aboriginal objects salvaged on the site, both during the life of the development and in the long term.		sites within the offset areas, including the Cultural Heritage Artefact Storage Container. The management of new Aboriginal objects and the process regarding the discovery of human remains is captured in Section 3.5 the ACHMP. The ACHMP also included the following: • Protection of newly identified sites outside the disturbance footprint (Section 3.3.2); • Ongoing RAP involvement in monitoring and heritage management activities (Section 3.7); and • A strategy for the long-term care and control of salvaged artefacts (Section 3.4). • The ACHMP was found to satisfy the relevant requirements of Condition B68.		
S2 B69	The Applicant must not commence mining operations north of Wybong Road until the Aboriginal Cultural Heritage Management Plan is approved by the Planning Secretary.	• Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025	The ACHMP outlined that following consultation on the draft ACHMP with RAPs and Heritage NSW the ACHMP was formally submitted to DPHI for review and approval on 18 August 2021 and approved in September 2021. The mining phase north of Wybong Road was triggered on 1 December 2022.	Noted	
S2 B70	The Applicant must implement the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary.	• Aboriginal Cultural Heritage Management Plan, Version 12.0, 28/02/2025 • Cultural Heritage Artefact Access	The site inspection, along with the review of managed sites, GDPs, meeting minutes and monitoring reports confirmed that MCO is effectively implementing the ACHMP. All relevant MCO employees and contractors receive training on Aboriginal cultural heritage management, including general inductions,	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Procedure, Version 3, Dated 30/06/2023 • OzArk, 2023 Aboriginal Cultural Heritage Offset Areas Monitoring at Mangoola coal, 20 October 2023 • OzArk, 2024 Aboriginal Cultural Heritage Offset Areas Monitoring at Mangoola coal, August 2024 • OzArk, Aboriginal Heritage Assessment, 2024 Aboriginal Cultural Heritage Offset Areas Monitoring, Mangoola Coal, August 2024 • Aboriginal due Diligence Assessment report, Mangoola Offset Revegetation Activities: SO-1 and ACHO-5, November 2024	targeted sessions, and toolbox talks. Training ensures workers are aware of their responsibilities before undertaking activities that may impact Aboriginal objects or places. Artefact Management and Consultation MCO facilitate ongoing consultation and the involvement of RAPs. Access for RAPs is welcomed and encouraged. This is communicated during the Annual Aboriginal Consultation Meeting held each December and through invitations to participate in the annual Aboriginal Cultural Heritage Offset Area (ACHOA) monitoring program conducted with OzArk. No RAPs have requested access during the current audit period. RAPs are also invited to attend due diligence assessments and other activities throughout the year, such as tree planting events. These invitations are issued via email, and outcomes from these activities are reported back at the annual RAP meeting. Supporting records include presentations, meeting minutes, and ACHOA inspection reports from the past three years. All salvage activities were completed prior to the current audit period. Salvaged Aboriginal artefacts are managed under a care and control agreement and are currently stored in a secure Cultural Heritage Artefact Container located on the north side of the site. Consultation with RAPs has taken place regarding the long-term future of these artefacts. While a formal keeping place has not yet been determined, MCO is seeking further input from RAPs before making a final decision, as required under the EIS. In 2023, all RAP representatives		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		• Invitation from MCO to A1 Indigenous Services to attend the 2024 Aboriginal Cultural Heritage Annual consultation Meeting, 14 November 2024 • Ozark, Minutes of the Mangoola Open Cut, Annual Aboriginal Stakeholder Consultation Meeting, 6 December 2023 • Ozark, Minutes of the Mangoola Open Cut, Annual Aboriginal Stakeholder Consultation Meeting, 11 December 2024 • CMO Report ID 2115173, 2023 ACHOA Monitoring report. Trial using hay bales as opposed to coir logs next	that attended the annual meeting visited the secure storage site to view the artefact container. Monitoring and Protection Measures Annual monitoring of Aboriginal Cultural Heritage Offset Areas (ACHOA) continues to be undertaken, with RAPs invited to participate. Monitoring data is recorded in MCO's Compliance Management System, with recent records sighted. There were no recorded disturbances to culturally modified (scarred) trees during the audit period. Four heritage sites are protected with permanent fencing as outlined in Table 3-1 of the ACHMP. Fencing and signage were confirmed during the site inspection and are reviewed as part of the ACHOA monitoring process. Offset Area Management Quarterly inspections of offset areas are conducted to assess erosion and grazing impacts. These inspections, referred to as Offset Inspections, are coordinated alongside the ACHOA monitoring program.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		time remediation works are deemed necessary at SC10 Management Zone, 29 November 2024 Email from MCO to RAPs, Mangoola Coal - Annual ACHOA Monitoring 23-26 July 2024, dated 15 April 2024			
S2 B71	Historic Heritage Management Plan The Applicant must prepare a Historic Heritage Management Plan for the development, in respect of all non-Aboriginal cultural heritage items, to the satisfaction of the Planning Secretary. This strategy must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with the Heritage NSW, Council and relevant landowners and in accordance with the relevant Heritage NSW guidelines; - build upon the approved Conservation Management Strategy prepared for the Mangoola Coal Project; - describe how historic heritage values of the site would be recorded and preserved; (e) identify all heritage items in the vicinity of the site and include a statement of significance for each item;	- Historic Heritage Management Plan, Version 1, 30/09/2025 - Email from MCO to landowner, Re: Historic Heritage Management Plan for review (comments due 31st August 2022 please), 17/09/2022.	A Historic Heritage Management Plan (HHMP) was prepared by Umwelt for the Mangoola Coal Continued Operations (MCCO) Project (Wybong Road). The HHMP was prepared by a suitably qualified and experienced person, being Tim Adams whose appointment was endorsed by the Planning Secretary on 22/10/2021, with Consultation recorded in Section 2.2, and endorsement records in Appendix A of the HHMP. Consultation via email was also sighted between MCO and the relevant landowner. The Conservation Management Strategy (CMS) was superseded by the HHMP, which incorporated the MCO Additional Project Area into a consolidated management framework. Background information on the CMS was seen in Section 4 of the HHMP. This transition occurred in 2021, prior to the current audit period, with the HHMP building upon the CMS (Glencore 2021).		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	(f) describe the measures to be implemented on the site or within any offset areas to: - ensure all workers on the site receive suitable heritage inductions prior to carrying out any activities which may cause impacts to historic heritage, and that suitable records are kept of these inductions; - protect heritage items located outside the approved disturbance area, particularly 'Castle Hill', from impacts of the development, beyond those predicted in the document/s listed in condition A2(c); - protect Anvil Hill Rock and "The Book" rock formations from the effects of blasting; - undertake photographic/archival recording of any items of heritage significance predicted to be impacted by the development, prior to disturbance; and - manage any new heritage items discovered during the life of the development; - include a program to monitor the effects of blasting on the heritage items; and - include a strategy for the care, control and storage of heritage relics salvaged from the site.		The HHMP included the requirements of Condition B71: - Measures implemented at the site, Section 8.3. Methods include monitoring, archival recording, and site inductions. - Heritage items listed and mapped, with statements of significance in Section 6.1 & Tables 6.1–6.2, Figure 6.1. - Outlines inductions covering heritage awareness, and records maintenance in Section 8.3.1. - Castle Hill noted in Section 8.1.1, 8.2. - Anvil Hill Rock and "The Book" rock discussed in Section 8.2 and covered under the Blast Management Plan, with vibration limits monitored via BMP and reported. - Archival recording conducted in 2021 before the audit period as per Section 9. - Management of the discovery of new heritage sites/items, Section 8.3.2. - Monitoring program to record the effects of blasting on heritage items, Section 8.2. - Strategy for the care, control and storage of heritage relics salvaged from the site strategy provided if required, in Section 8.3.4. The HHMP was found to satisfy the relevant requirements of Condition B71.		
S2 B72	Identified heritage items are shown in the figures in Appendix 7. The Applicant must not commence mining operations north of Wybong Road until the Historic Heritage Management Plan is approved by the Planning Secretary.	- Historic Heritage Management Plan, Version 1, 30/09/2025 - Discussion with E&C Department	Approval was granted on 30 September 2022 (as referenced in Appendix A of the HHMP), and mining activities commenced on 1 December 2022.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B73	The Applicant must implement the Historic Heritage Management Plan as approved by the Planning Secretary.	- Historic Heritage Management Plan, Version 1, 30/09/2025 - Monthly Monitoring Reports – MCO Public Website. - Annual Reviews, 2022, 2023, 2024. - EMD blast database - Dynamaster database - Blast Management Plan, Version 21, 23/01/2025 - Email from MCO to landowner, Re: Historic Heritage Management Plan for review (comments due 31st August 2022 please), 17/09/2022. - Discussion with E&C Department.	Based on the site inspection and a review of relevant documentation and activities undertaken during the audit period, it was observed that MCO is effectively implementing the Historic Heritage Management Plan (HHMP). Interviews with the E&C Department confirmed the following practices at the site: - There are no listed historic heritage items located within the MCCO Project Area, however non-listed heritage items (previously recorded potential heritage items) located within the MCCO Project Area are recorded in Section 6.1 of the HHMP. - There are two listed heritage items in the vicinity of the Project Area, Brogheda and Wybong Cemetery. - All locations are listed in the internal GIS system, to be captured for any future GDP process. No historically significant items have been identified within the approved disturbance footprint. - Archival recordings of relevant heritage items were completed in 2021, prior to the current audit period. - No new heritage items were identified during the audit period, and no historical relics were salvaged. - Blasting impacts on heritage items are managed through the Blast Management Plan, which specifies vibration monitoring requirements for structures such as Anvil Hill Rock and The Book. The blast monitoring network is mapped in the Blast Management Plan, with data recorded in the EMD system and reported after each blast. Monthly blast	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference						
			summaries are also made available on the MCO public website. - Heritage items are included in site inductions and familiarisation processes. - Castle Hill, located on private property, is subject to ongoing consultation with the landholder. - Visual monitoring is limited to camera surveillance of identified rock shelters; no other routine visual inspections are conducted under the HHMP.								
Visual											
S2 B74	The Applicant must implement additional visual impact mitigation measures, as described in the report titled <i>Anvil Hill Coal Mine Visual Impact Mitigation Report</i> (Hansen Bailey 2008), if requested in writing by the residents listed in Table 8. These mitigation measures must: - be reasonable and feasible and aimed at reducing the visibility of the Mangoola Coal Project from residences; and - be implemented in consultation with the landowner, to the satisfaction of the Planning Secretary. <table><tr><td colspan="2">Table 8: Visual Mitigation</td></tr><tr><td>Mitigation</td><td>Receiver ID</td></tr><tr><td>Visual Mitigation</td><td>104, 110, 124, 125A, 125B, 125C, 134A, 134D, 134C, 182, 183A, 183B, 183C, 191, 193, 200, 227, 240, 241A, 241B and 241C.</td></tr></table>	Table 8: Visual Mitigation		Mitigation	Receiver ID	Visual Mitigation	104, 110, 124, 125A, 125B, 125C, 134A, 134D, 134C, 182, 183A, 183B, 183C, 191, 193, 200, 227, 240, 241A, 241B and 241C.	Discussion with E&C Department	During the audit period, no written requests were received from the residents listed in Table 8 for the implementation of additional visual impact mitigation measures in accordance with the <i>Anvil Hill Coal Mine Visual Impact Mitigation Report</i> (Hansen Bailey, 2008). This was confirmed through discussion with the Mangoola E&C Department. As such, the condition was not triggered.	Not Triggered	
Table 8: Visual Mitigation											
Mitigation	Receiver ID										
Visual Mitigation	104, 110, 124, 125A, 125B, 125C, 134A, 134D, 134C, 182, 183A, 183B, 183C, 191, 193, 200, 227, 240, 241A, 241B and 241C.										
S2 B75	The Applicant must: - take all reasonable steps to minimise the visual and off-site lighting impacts of the development; - take all reasonable steps to shield views of mining operations and associated equipment from users of public roads and privately-owned residences; - ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;	- Mangoola Coal Lighting Review for MCO, James Bailey and Associates, dated 9/12/2022 - Mangoola Coal Lighting Review for MCO, James	Mining operations commenced in the Wybong Pit on 1 December 2022, with the first blast fired on 19 January 2023 and first coal extracted on 28 August 2023. This represented the most significant change to visual and off-site lighting impacts under SSD-8642 during the audit period. To assess compliance with the relevant visual and lighting conditions, Mangoola Coal engaged James Bailey and Associates to conduct external	Compliant							

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- ensure no in-pit mobile lighting rigs shine directly above the pit wall and other mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes); - ensure that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 2019 – Control of Obtrusive Effects of Outdoor Lighting. - implement a landscaping strategy to shield public views of the development that includes a road-side tree planting and/or maintenance schedule for all vegetation screens and bunds shown in Appendix 8; and - ensure that the visual appearance of any new buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape.	Bailey and Associates, dated 11/09/2023 - Site Inspection - MCO Complaints Register	lighting compliance audits in both 2022 and 2023. The 2022 audit was completed prior to the completion of construction works north of Wybong Road and found no non-compliances, but recommended a follow-up review once mining operations commenced. The 2023 lighting audit captured the operational changes associated with the commencement of mining in the Wybong Pit. Again, no non-compliances were identified, but recommendations were made to: - Review and maintain roadside tree screening; - Use lower-intensity “yellow” lighting on elevated mobile plant where feasible. - Mangoola has implemented a lighting plant setup procedure aimed at reducing community impacts and manages lighting in accordance with AS4282:2019 – Control of Obtrusive Effects of Outdoor Lighting. Three complaints relating to lighting impacts were received during the audit period. In each case, Mangoola responded promptly by modifying operations to eliminate the off-site lighting impact. Based on documentation reviewed, site inspections, and the findings of independent audits, Mangoola Coal is considered compliant with the visual and lighting requirements of SSD-8642 during the audit period.		
S2 B76	Visual Impact Management Plan The Applicant must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	Letter from DPHI approving Version 1.0 of the VIMP, dated 04/07/2023	The Visual Impact Management Plan (VIMP) was a new requirement under SSD-8642 and was prepared in 2022 by suitably qualified professionals. An initial review was undertaken by DPHI on 30 August 2022, with comments	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- be prepared by a suitably qualified and experienced person/s; - describe the measures to be implemented to minimise and manage the visual and off-site lighting impacts of the development; - include a landscaping strategy to reasonably minimise or shield public views of the development (e.g. implementation of visual bunds to shield public views from the Wybong Post Office Rd realignment) from key vantage points in the public and/or private domain, that includes bunds, road-side tree planting and maintenance schedule; and - include a program to monitor, maintain and report on the implementation and effectiveness of the visual impact mitigation measures to the satisfaction of the Planning Secretary.	- Site Inspection - Daily inspection records - Lighting inspection forms - Annual tree screen bund inspection, dated 30/09/2024 - Mangoola lighting audit 2025, 28/05/25 - Visual Mitigation monitoring form	requesting additional detail regarding visual controls, monitoring, and proposed mitigation measures. MCO responded with a revised submission on 15 September 2022. Version 1.0 of the VIMP was subsequently approved by DPHI on 28 September 2022. Version 2.0 of the plan, dated 4 July 2023, was developed to address minor administrative amendments. As the updates did not materially alter the content or scope of the plan, formal re-approval by DPE was not required. Key visual impact mitigation measures implemented during the audit period include: - Establishment of a visual bund along Wybong Road, which is subject to annual inspections to assess condition and vegetation effectiveness. - Daily inspections of lighting setups by Mining Supervisors and periodic external lighting audits by a specialist consultant (James Bailey and Associates). - In August 2023, MCO planted 440 juvenile native trees along Ridglands Road, at the northeastern edge of the MCCO project area, to further mitigate visual impacts. This planting was observed during the site inspection. Based on a review of the approved VIMP, relevant correspondence with the Department, and site inspection findings during the audit inspection the VIMP is considered to have been adequately prepared to address the requirements of Condition B76.		
S2 B77	The Applicant must not commence mining operations north of Wybong Road until the Visual Impact		The VIMP was approved by the Planning Secretary on 28 September 2022. Mining	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Management Plan is approved by the Planning Secretary.		operations north of Wybong Road commenced on 1 December 2022, following this approval. Compliance with this condition was therefore achieved.		
S2 B78	The Applicant must implement the Visual Impact Management Plan as approved by the Planning Secretary.	Refer evidence Condition B76	The VIMP as approved on 28 September 2022. Mining operations north of Wybong Road commenced on 1 December 2022, at which point the implementation of the VIMP became mandatory. Evidence of implementation includes: - Daily lighting inspections by the Mining Supervisor. - Annual inspections of the visual bund and roadside vegetation along Wybong Road. - External lighting audits conducted by James Bailey and Associates in December 2022 and September 2023. - Tree planting in August 2023 along Ridgeland Road (440 juvenile native trees) as a visual impact mitigation measure. Response to complaints The complaints registers for the audit period identified 3 complaints related to visual amenity, primarily concerning lighting impacts from mining activities in the Wybong Pit area. These included reports of lights shining into residences or being visible from nearby properties. In each case, Mangoola Coal responded by investigating the concern and adjusting lighting configurations or operational setups to reduce off-site impacts. Based on the evidence reviewed, Mangoola has implemented the VIMP in accordance with the approved version.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
Waste					
S2 B79	The Applicant must: - take all reasonable steps to minimise the waste generated (including coal rejects and tailings) generated by the development; - classify all waste in accordance with the Waste Classification Guidelines (EPA, 2014); - dispose of all waste at appropriately licensed waste facilities; - manage on-site sewage treatment and disposal in accordance with the requirements of Council; and - monitor and report on the effectiveness of the waste minimisation and management measures in the Annual Review referred to in condition D11.	- Waste Tracking certificate, 10/08/2023 - JR Richards waste register and monthly summary spreadsheet - waste management plan, Version 8.0, dated 30/05/2024	Mangoola Coal Operations (MCO) has implemented systems for managing various waste streams generated on site, with practices guided by internal procedures and partially supported by external reporting mechanisms. MCO has developed an internal Waste Management Plan (Version 8.0, dated 30 May 2024). Although not a requirement of SSD 8642, the plan references relevant legislative obligations. MCO engages JR Richards as its licensed waste contractor. Waste collection data is tracked through: - Weekly EPA service dockets, reviewed by the Environment & Community (E&C) team; and - Monthly summary spreadsheets from JR Richards, which outline volumes of waste collected and include the licensed disposal locations (landfills), supporting traceability and compliance with EPA waste tracking requirements. MCO have in place a waste management plan, Version 8.0, dated 30/05/2024. This is an internal document which is not required by consent conditions however the plan does make reference to legislative requirements. Weekly EPA service dockets are reviewed by the E&C Team. The JR Richards monthly spreadsheet includes a summary of licenced landfill locations Council Approval for Sewage Treatment	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			MCO holds Council Approval 5/2010 for the operation of an on-site sewage treatment plant located at the Mine Infrastructure Area (MIA) and CHPP. Treated effluent is discharged to the MIA Dam. Monitoring of Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) is required by Council Approval 5/2010, and faecal coliforms and pH is required to be monitoring under EPL 12894. Refer to EPL checklist for details on the sewage treatment plant's compliance.		
S2 B80	Except as expressly permitted in an applicable EPL, specific resource recovery order or exemption under the Protection of the Environment Operations (Waste) Regulation 2014, the Applicant must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.		The EPL permits waste tyres only.	Noted	
Dangerous Goods					
S2 B81	The Applicant must ensure that the storage, handling, and transport of: - dangerous goods is carried out in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code; and - explosives are managed in accordance with the requirements of the Resources Regulator.	- Audit of the Hydrocarbon Management of Mangoola Coal Operations Pty Ltd, Gauge Industrial & Environmental, dated 08/04/2025 - Site Inspection	Mangoola Coal undertakes a voluntary, externally audit to assess compliance with <i>AS 1940:2017 and AS 1596:2014</i>, as part of its internal environmental and risk management framework. The most recent external hydrocarbon storage and handling audit was undertaken by GAUGE Industrial & Environmental in January 2025. While both standards were within the audit scope, no findings were recorded in relation to AS 1596. A number of minor housekeeping and maintenance issues were identified, primarily relating to diesel refuelling areas, bund integrity, sump maintenance, and housekeeping, with corrective actions recommended and tracked in CMO. During the IEA site inspection, several issues were identified relating to the storage and	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			handling of hydrocarbons and dangerous goods that may not align with best practice under AS 1940: Rail Loading Area Diesel Fill Point: Stained soil was observed adjacent to the diesel fill point, indicating previous fuel/hydrocarbon spills (refer photo below). Although the area is on a concrete hardstand, the slope and lack of bunding or drainage allow spills to migrate off the pad. It is recommended MCO remove the impacted soil and assess the need for containment improvements.  Bulk Fuel Storage Area – Sump Maintenance: The sump adjacent to the bulk fuel storage fill point was heavily silted with soil, sediment, and water, reducing effective bund capacity (refer below photo). It is noted 15mm of rain was recorded prior to the audit site inspection.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			 Bund Integrity – Fuel Farm: Soil and small vegetation growth was observed within the bunded areas at the bulk fuel storage area. It is recommended the soil be removed and soil build up reviewed in future inspections.  Orica Explosives Compound – Diesel Refill Point: Fuel-stained soil was visible outside the bunded zone, and an overflow pipe showed evidence of discharging hydrocarbon laden water onto ground. It is recommended MCO		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			remove any hydrocarbon stained soil, inspect the sump system and ensure containment in future.  The presence of a proactive auditing program, scheduled inspections, and the implementation of corrective actions demonstrates that reasonable and effective systems are in place to manage dangerous goods in accordance with applicable standards. Management of explosives on site is the responsibility of licensed contractor, Orica, and storage and handling activities are regulated and monitored by the NSW Resources Regulator. No issues were identified during the audit period relating to the management of explosives.		
Bushfire Management					
S2 B82	The Applicant must: - ensure that the development: - provides for asset protection in accordance with the relevant requirements in the Planning for Bush Fire Protection (RFS, 2019) guideline; and - ensure that there is suitable equipment to respond to any fires on the site; and	- Bushfire hazard inspection, dated 17/11/2022 and 20/01/2023 - GCAA Rural Properties Bushfire	Key controls observed during the audit include: Asset Protection Zones (APZs): APZs are maintained through regular mowing and slashing. While formal inspection records from the Commercial Department are not documented, required maintenance actions are raised in SAP to allow tracking and	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.	Inspection Checklists - Environmental Quarterly inspections - Discussion with MCO E&C Department - Bushfire Management Plan	completion via work orders or purchase orders. - Quarterly Offset Area Inspections: Conducted by the Environment & Community team to assess fuel loads and fire risk. Sighted completed GCAA Rural Properties Bushfire Inspection Checklists confirmed review of APZ condition, fuel loads, and overall fuel hazard ratings. - Bushfire Equipment and Signage: The Bushfire Management Plan (BMP) includes a figure summarising available firefighting equipment, and fire access tracks and gates are mapped and signposted to assist rapid response. - Bushfire Risk Assessment: External bushfire risk assessments have been undertaken and the BMP was developed in consultation with RFS and local brigades. - Fire Response Capacity: Site-based fire response capability includes water carts and other equipment suitable for initial containment. Based on available evidence and site observations, MCO has demonstrated a proactive approach to bushfire risk management and has appropriate systems in place to support RFS and emergency services if required.		
S2 B83	Prior to commencing mining operations under this consent, the Applicant must prepare a Bushfire Management Plan for the development in consultation with RFS. This plan must include a: - contact person and 24 hour contact phone number; - schedule and description of proposed bushfire mitigation works, including:	Eco Logical Australia 2023. Mangoola Coal Bushfire Management Plan. Prepared for Glencore-Mangoola Coal	A Bushfire Management Plan (Version 2.0, dated April 2025) has been prepared for Mangoola Coal Mine and its associated biodiversity offset areas. The Plan addresses all required elements of Condition B83, including: identification of contact personnel and emergency numbers;	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- location of vegetation and areas that include species and/or ecological communities that are listed under the Threatened Species Conservation Act 1995 and/or EPBC Act within the site; - location of water supply; and - internal access roads; • plan identifying the location and storage of bulk flammable liquids and materials; • 'hot works' management plan, including: - circumstances when 'hot works' are limited or prohibited; and - safety measures to be implemented when 'hot works' are being conducted; and • emergency/evacuation plan in accordance with the Guidelines for the Preparation of Emergency/Evacuation Plans (RFS) and Australian Standard AS3745 Planning for Emergencies in Facilities.	• Operation Pty Limited • Discussion with MCO E&C Department • Emails from MCO to NSW Rural Fire Service. RE: Mangoola - updated bushfire management plan, 16/11/2021 and 23/12/2021.	• mapping and description of bushfire mitigation works, including ecological communities and threatened species (Sections 4.1.7–4.1.9; Figure 9); • locations of water supply and internal access roads (Section 4.1.3; Figure 3); • locations of flammable liquid storage (Section 4.1.5); • ignition prevention strategies, including a 'hot works' management plan (Section 5.4); and • emergency and evacuation arrangements aligned with AS 3745 and RFS Guidelines (Section 6; Figure 8). The BMP was provided to the NSW Rural Fire Service (RFS), and Section 5.2.2 of the BMP outlines the importance of ongoing engagement with the RFS to support site familiarisation and preparedness. Evidence was sighted of ongoing consultation with the NSW RFS.		
S2 B84	The Applicant must implement the Bushfire Management Plan in consultation with RFS.	• Bushfire hazard inspection, dated 17/11/2022 and 20/01/2023 • GCAA Rural Properties Bushfire Inspection Checklists • Environmental Quarterly inspections • Discussion with MCO E&C Department	Bushfire events during the audit period Four bushfire events were recorded during the audit period. Two occurred in 2023 as a result of burnt-out vehicles along public roads, one near the closed end of Wybong PO Road (25 May), which was controlled using on-site equipment with the NSW RFS notified (but not required to attend), and another in the Northern Corridor offset (31 July), which self-extinguished. In early 2024, a lightning strike ignited a bushfire north of the Wybong Pit. MCO responded with a water cart and the NSW RFS attended and cleared the site. A separate small grassfire occurred in 2024 on a roadside area, self-	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- Bushfire Management Plan - Eco Logical Australia 2023. Mangoola Coal Bushfire Management Plan. Prepared for Glencore-Mangoola Coal Operation Pty Limited - Discussion with MCO E&C Department	extinguished, and did not require RFS involvement. No incidents originated from site operations, and no damage to infrastructure or environmental values was reported. Implementation Summary Evidence reviewed during the audit indicates that the Bushfire Management Plan (Version 2.0, April 2025) has been implemented across MCO and associated offset areas. Asset Protection Zones (APZs) have been established and maintained around key infrastructure in accordance with the BMP, with slashing and fuel reduction activities routinely undertaken. Fire preparedness measures, including the availability of firefighting equipment, water supply infrastructure, and internal access roads, were evident. Bushfire awareness and emergency response training has been delivered to site personnel as part of site familiarisation processes. The BMP has been provided to the NSW RFS however, there is limited documented evidence of active or ongoing consultation with the RFS. The site responded effectively to four minor bushfire events during the audit period, with appropriate internal responses and RFS notification or involvement where required.		
Rehabilitation					
S2 B85	Rehabilitation Objectives The Applicant must rehabilitate the site in accordance with the conditions imposed on the mining lease(s)	Rehabilitation Management Plan (v10, 2023)	The MCO Rehabilitation Strategy and Rehabilitation Management Plan (RMP) have	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
	associated with the development under the Mining Act 1992. This rehabilitation must be generally consistent with the proposed rehabilitation strategy described in the documents listed in condition A2(c) and shown in Appendix 9, and must comply with the objectives in Table 9. <i>Table 9: Rehabilitation and Mine Closure Objectives</i> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas of the site affected by the development</td><td> - Safe, stable and non-polluting - Fit for the intended post-mining land use/s - Establish the final landform and post-mining land use/s as soon as practicable after cessation of mining operations </td></tr><tr><td>Areas proposed for native ecosystem re-establishment</td><td> - Establish/restore native woodland ecosystems capable of being self-sustaining in perpetuity (as conditioned by conservation agreements and other covenants implemented under the Biodiversity Offset Strategy) - Establish local plant community types, with a particular focus on the plant communities and species shown in Appendix 9 - Establish: - riparian habitat within any diverted and/or re-established creek lines and retained water features; - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible </td></tr><tr><td>Areas proposed for agricultural land</td><td> - Establish/restore grassland areas to support sustainable agricultural activities - Use species found in the local area that are suitable for pasture production - Achieve land and soil capabilities that suitable for the intended post-mining land-use - Located adjacent to surrounding agricultural land, where practicable </td></tr><tr><td>Final Landform</td><td> - Stable and sustainable for the intended post-mining land use/s - Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable - Incorporate relief patterns and design principles consistent with natural drainage that mimic natural topography and mitigate erosion - Maximise surface water drainage to the natural environment (i.e. free draining landforms with the exception of final void catchments) - Minimise visual impacts, where practicable - Minimise post mining fugitive emissions from exposed coal seams - Minimise surface water flows and impacts on threatened orchid species </td></tr><tr><td>Final voids</td><td> - Designed as long term groundwater sink to limit the release of saline water into the surrounding environment, as described in the documents listed in condition A2(c), unless further mine planning and final landform design processes identify a more suitable outcome for the final voids (see condition B88) - Optimise the size and depth of final voids to ensure the final landform is stable and non-polluting - Minimise to the greatest extent practicable: - the size and depth; - the drainage catchment of final voids; - any high wall instability risk; and - the risk of flood interaction - Maximise potential for beneficial reuse, where practicable </td></tr><tr><td>Creek restoration works</td><td> - Engineered to be hydraulically and geomorphologically stable </td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><</tr></table>	Feature	Objective	All areas of the site affected by the development	- Safe, stable and non-polluting - Fit for the intended post-mining land use/s - Establish the final landform and post-mining land use/s as soon as practicable after cessation of mining operations	Areas proposed for native ecosystem re-establishment	- Establish/restore native woodland ecosystems capable of being self-sustaining in perpetuity (as conditioned by conservation agreements and other covenants implemented under the Biodiversity Offset Strategy) - Establish local plant community types, with a particular focus on the plant communities and species shown in Appendix 9 - Establish: - riparian habitat within any diverted and/or re-established creek lines and retained water features; - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible	Areas proposed for agricultural land	- Establish/restore grassland areas to support sustainable agricultural activities - Use species found in the local area that are suitable for pasture production - Achieve land and soil capabilities that suitable for the intended post-mining land-use - Located adjacent to surrounding agricultural land, where practicable	Final Landform	- Stable and sustainable for the intended post-mining land use/s - Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable - Incorporate relief patterns and design principles consistent with natural drainage that mimic natural topography and mitigate erosion - Maximise surface water drainage to the natural environment (i.e. free draining landforms with the exception of final void catchments) - Minimise visual impacts, where practicable - Minimise post mining fugitive emissions from exposed coal seams - Minimise surface water flows and impacts on threatened orchid species	Final voids	- Designed as long term groundwater sink to limit the release of saline water into the surrounding environment, as described in the documents listed in condition A2(c), unless further mine planning and final landform design processes identify a more suitable outcome for the final voids (see condition B88) - Optimise the size and depth of final voids to ensure the final landform is stable and non-polluting - Minimise to the greatest extent practicable: - the size and depth; - the drainage catchment of final voids; - any high wall instability risk; and - the risk of flood interaction - Maximise potential for beneficial reuse, where practicable	Creek restoration works	Engineered to be hydraulically and geomorphologically stable																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Feature	Objective																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
All areas of the site affected by the development	- Safe, stable and non-polluting - Fit for the intended post-mining land use/s - Establish the final landform and post-mining land use/s as soon as practicable after cessation of mining operations																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Areas proposed for native ecosystem re-establishment	- Establish/restore native woodland ecosystems capable of being self-sustaining in perpetuity (as conditioned by conservation agreements and other covenants implemented under the Biodiversity Offset Strategy) - Establish local plant community types, with a particular focus on the plant communities and species shown in Appendix 9 - Establish: - riparian habitat within any diverted and/or re-established creek lines and retained water features; - habitat, feed and foraging resources for threatened fauna species; and - vegetation connectivity and wildlife corridors, as far as is reasonable and feasible																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Areas proposed for agricultural land	- Establish/restore grassland areas to support sustainable agricultural activities - Use species found in the local area that are suitable for pasture production - Achieve land and soil capabilities that suitable for the intended post-mining land-use - Located adjacent to surrounding agricultural land, where practicable																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Final Landform	- Stable and sustainable for the intended post-mining land use/s - Integrated with surrounding natural landforms and other mine rehabilitated landforms, to the greatest extent practicable - Incorporate relief patterns and design principles consistent with natural drainage that mimic natural topography and mitigate erosion - Maximise surface water drainage to the natural environment (i.e. free draining landforms with the exception of final void catchments) - Minimise visual impacts, where practicable - Minimise post mining fugitive emissions from exposed coal seams - Minimise surface water flows and impacts on threatened orchid species																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Final voids	- Designed as long term groundwater sink to limit the release of saline water into the surrounding environment, as described in the documents listed in condition A2(c), unless further mine planning and final landform design processes identify a more suitable outcome for the final voids (see condition B88) - Optimise the size and depth of final voids to ensure the final landform is stable and non-polluting - Minimise to the greatest extent practicable: - the size and depth; - the drainage catchment of final voids; - any high wall instability risk; and - the risk of flood interaction - Maximise potential for beneficial reuse, where practicable																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Creek restoration works	Engineered to be hydraulically and geomorphologically stable																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Groundcover and Vegetation The 2024 Ausecology Monitoring Report concluded that: • Native species richness and floristic composition in rehabilitation areas is improving. • Multiple native vegetation communities were detected, consistent with target ecosystems. • Groundcover was generally dense and dominated by native grasses and forbs, meeting or exceeding coverage benchmarks. • Some sites showed the need for further interventions to support diversity and structure. Erosion and Landform Stability • Most rehabilitation areas were stable; however, localized erosion issues were identified in Block 487 of the South Pit Rehabilitation Area. This was confirmed during the site inspection and in Ausecology's 2024 rehabilitation monitoring report. The 2023 monitoring, undertaken by Umwelt, also noted general stability across rehabilitation areas. Remediation works were in progress at the time of the audit. • The issue was attributed to concentrated surface runoff. Remediation works were underway at the time of audit fieldwork . • Elsewhere, landform stability and erosion control measures were considered effective, with no major stability issues noted across the broader rehabilitation footprint. Weed Control		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			- Minor infestations of woody weeds (notably Galenia) were noted in both monitoring and site inspection. - Monitoring confirmed weed presence was low and that active weed management (including spot spraying) was being implemented where needed . Ecological Monitoring Results - Photo-point and quadrat surveys across rehabilitation and offset areas found: - Floristic structure and diversity remained consistent with reference benchmarks. - A number of sites exhibited sufficient structural and compositional similarity to remnant vegetation. - Overall, data supported the trajectory toward long-term rehabilitation objectives . Site Inspection Observations Audit inspection verified: - Groundcover establishment consistent with monitoring results. - Rehabilitation areas were clean and well-managed. - Visual alignment with approved final landform plans. - Localised erosion (Block 487) was clearly visible and under active remediation		
S2 B86	The Rehabilitation and Mine Closure Objectives in Table 9 apply to the entire site, including all landforms constructed under either this consent or previous consents. However, the Applicant is not required to undertake any additional earthmoving works on landforms that have been approved and constructed		This is noted.	Noted	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	under previous consents, except where those earthworks are required for the establishment of a stable, non-polluting and free-draining landform.				
S2 B87	Progressive Rehabilitation The Applicant must rehabilitate* the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable steps must be taken to minimise the total area exposed at any time. Interim stabilisation and temporary vegetation strategies must be employed when areas prone to dust generation, soil erosion and weed incursion cannot be permanently rehabilitated. <i>This condition does not prevent further disturbance at some later stage of the development of areas that have been rehabilitated.</i>	- Annual Reviews 2022, 2023, 2024 - Mangoola Rehabilitation Management Plan (v10, August 2023) - Site Inspection - Discussion with MCO E&C Department - Ausecology Rehabilitation Monitoring Report (June 2024) - CMO System Records	In accordance with the development consent, MCO is progressively rehabilitating disturbed areas as soon as reasonably practicable following disturbance. The audit reviewed rehabilitation performance, scheduling, and groundcover management through site inspection, review of Annual Reviews (2022–2024), the Mangoola Rehabilitation Management Plan (Version 10, August 2023), CMO system records, and the June 2024 Ausecology Rehabilitation Monitoring Report. Progressive Rehabilitation Rates are reported in the Annual Review. Data indicates consistent implementation of progressive rehabilitation. MCO demonstrated active efforts to limit disturbed land. Staged rehabilitation planning embedded within mine sequencing, the use of the GDP process and stormwater controls to manage surface stability, as well as scheduling of rehab works to align with completion of mining in designated areas. The site is undertaking progressive rehabilitation in accordance with consent requirements In areas not yet ready for final landform establishment, MCO has implemented appropriate interim stabilisation measures to manage dust, erosion, and weed risk. These measures are consistent with consent requirements and demonstrate a practical approach to meeting progressive rehabilitation obligations.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B88	Rehabilitation Strategy The Applicant must prepare a Rehabilitation Strategy for all land disturbed by the development to the satisfaction of the Planning Secretary. This strategy must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with the Resources Regulator and Council; - build upon the Rehabilitation and Mine Closure Objectives in Table 9, describe the overall rehabilitation outcomes for the site, and address all aspects of rehabilitation including mine closure, final landform (including final voids), post-mining land use/s, water management and management of any offset areas within the site; - align with strategic rehabilitation and mine closure objectives (Table 9); - address the principles of the Strategic Framework for Mine Closure (ANZMEC and MCA, 2000); - describe how the rehabilitation measures would be integrated with the measures in the Biodiversity Management Plan referred to in condition B57 and the Visual Impact Management Plan referred to in condition B76; - describe how rehabilitation will be integrated with the mine planning process, including a plan to address premature or temporary mine closure; - include indicative mine plans and scheduling for life-of-mine rehabilitation showing each rehabilitation domain; - include details of target vegetation communities and species to be established within the proposed revegetation areas; - investigate opportunities to refine and improve the final landform and final void outcomes over time;	- MCO Rehabilitation Strategy, 01/07/2022 - Letter from DPHI approving the Rehabilitation Strategy, dated 01/07/2022	The MCO Rehabilitation Strategy (the Strategy) was been prepared to meet the requirements of Schedule 2, Condition B88. The Strategy accompanies the sites Rehabilitation Management Plan (RMP). The rehabilitation strategy was approved by DPHI on 1 July 2022 and based on review of its contents is considered to adequately address the requirements of Condition B88.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- include a risks and opportunities assessment and risk register; - include a post-mining land use strategy to investigate and facilitate post-mining beneficial land uses for the site (including the final void), that: - align with regional and local strategic land use planning objectives and relevant land use zones; - support a sustainable future for the local community; - utilise existing mining infrastructure, where practicable; and - avoid disturbing self-sustaining native ecosystems, where practicable; - include a stakeholder engagement plan to guide rehabilitation and mine closure planning processes at the site. - investigate ways to minimise adverse socio-economic effects associated with rehabilitation and mine closure; and - include a program to periodically review and update this strategy at least every three years.				
S2 B89	The Applicant must not commence mining operations north of Wybong Road until the Rehabilitation Strategy is approved by the Planning Secretary.	Letter from DPHI approving the Rehabilitation Strategy, dated 01/07/2022	The Rehabilitation Strategy was approved before commencement of mining in Wybong pit.	Compliant	
S2 B90	The Applicant must implement the Rehabilitation Strategy approved by the Planning Secretary.		Refer findings against Condition B85. The Strategy was considered to have been adequately implemented during the audit period.	Compliant	
S2 B91	Rehabilitation Management Plan The Applicant must prepare a Rehabilitation Management Plan for the development, in accordance with the conditions imposed on the mining lease(s)	Rehabilitation Management Plan , Version 10, effective 1 August 2023	The Rehabilitation Management Plan (RMP), Version 10, effective 1 August 2023 was prepared in accordance with the NSW Resources Regulator's ESG3 Guideline, the Form and Way Rehabilitation Guidelines, and standard mining	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	associated with the development under the Mining Act 1992. This plan must: - be prepared in consultation with the Department and Council; - be prepared in accordance with any relevant Resources Regulator Guidelines; - include detailed performance indicators and completion criteria for each rehabilitation domain, and triggers for remedial actions; - include an overview of the identified risks to achieving successful rehabilitation; - describe the measures to be implemented on the site to achieve the Rehabilitation and Mine Closure Objectives in Table 9, the requirements of the Rehabilitation Strategy referred to in condition B88 and the criteria in paragraph (c); - include a program to monitor, independently audit and report on progress against the criteria in paragraph (c) and the effectiveness of the measures in paragraph (d); - describe any further studies, work, research or consultation that will be undertaken to expand the site-specific rehabilitation knowledge base, reduce uncertainty and improve rehabilitation outcomes; and - outline intervention and adaptive management techniques to ensure rehabilitation remains on a trajectory of achieving the Rehabilitation and Mine Closure Objectives, Rehabilitation Completion Criteria and the Final Landform in the Rehabilitation Management Plan as soon as reasonably practical.		lease conditions and Condition B86-B91 of SSD8642. The RMP was updated on 29 November 2024 (after initial preparation in 2021). The RMP includes: - Clear performance indicators and domain-based completion criteria (completion criteria still being finalised); - Monitoring and adaptive management programs to track progress and support continuous improvement; - An assessment of risks to successful rehabilitation, including drought, erosion, weed invasion, and access; - A description of progressive rehabilitation strategies to meet the objectives of Table 9 of SSD 8642; - Measures for adaptive management and triggers for remedial actions. No gaps identified against the requirements of Condition B91.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
Transport					
S2 B92	Monitoring of Coal Transport The Applicant must: - keep accurate records of: - amount of coal transported from the site (on a daily basis); and - date and time of each train movement generated by the development; and - publish these results in the Annual Review.	- Annual Reviews 2022, 2023, and 2024 - Train Haulage Summaries (including coal volumes and ship IDs) - CHPP records and E&C Department reporting - Site inspection observations - Mangoola Daily Production Report, MinVu, dated 6/7/2025 - MCO Production Productivity Summary, dated 06/07/2025	MCO has implemented systems to accurately track coal transport volumes and train movements as required by the condition. Coal processed through the CHPP is monitored via the MINVU system, with daily production and transport volumes recorded in internal systems. The total volume of coal transported and train movement data is appropriately summarised and published in the Annual Reviews for 2022, 2023, and 2024. Based on the evidence sighted, the condition is considered compliant for the audit period.	Compliant	
S2 B93	Train Movements and Refuelling The Applicant must: - restrict train movements to/from site to a maximum of 20 train movements a day (i.e. 10 trains in; 10 trains out); - use reasonable endeavours to ensure that its rail spur is only accessed by locomotives that are approved to operate on the NSW rail network in accordance with relevant noise limits imposed in any relevant rolling stock operator's EPL; and	- Aurizon EPL 21379 Condition R4.2 – Annual Rolling Stock Performance Report (2024) 5 February 2025 - One Rail Australia, Condition R4.2 – Annual Rolling Stock	Across the 2022–2024 reporting period, MCO has complied with the requirement to limit train movements to 20 per day. No exceedances were recorded, and this has been transparently reported in the Annual Reviews with supporting data in appendices. Locomotive access to the rail spur is managed through approved rail operators holding Environmental Protection Licences (EPLs) for rolling stock.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	only refuel trains on site that are directly associated with the coal transport operations of the development.	Performance Report, 05/04/2024	No evidence was observed which indicated MCO's refuelling facility was used other than exclusively for trains associated with MCO's coal transport operations.		
S2 B94	Road Maintenance The Applicant must: - prepare a pre-dilapidation survey of the road transport routes prior to the commencement of any construction or decommissioning works; - prepare a post-dilapidation survey of the road transport routes within 1 month of the completion of construction or decommissioning works, or other timeframe agreed by the applicable roads authority; and - rehabilitate and/or make good any construction and decommissioning related damage identified in the post-dilapidation survey prepared under condition B94(b) within 2 months of completing the post-dilapidation survey, or other timeframe agreed by the applicable roads authority, - to the satisfaction of the applicable roads authority.	Pavement Management Services, QUALTEST – Wybong Rd post construction dilapidation report, dated 19/07/2023	- The requirement under part (a) for a pre-dilapidation survey was completed outside the current IEA reporting period. - The 2022 Independent Environmental Audit (RPS, 2022) reported that a pre-dilapidation survey was completed on 7 January 2022, prior to the commencement of broader construction activities on 11 January 2022. This survey was conducted in consultation with Muswellbrook Shire Council and documented in the Wybong Road Dilapidation Survey Report (Qualtest, 25 March 2022). - Construction works related to access infrastructure were completed in early April 2023. A post-construction dilapidation survey of Wybong Road (from Yarraman Road to Bengalla Road) was undertaken by Pavement Management Services (QUALTEST) between 12–18 April 2023, with the report finalised on 19 July 2023. - The post-dilapidation report did not identify any repairs or damage attributable to construction works. No remediation was therefore required under condition (c).	Compliant	
S2 B95	If the construction and/or decommissioning of the development is to be staged, the obligations in this condition apply to each stage.	Discussion with MCO E&C Department	The requirement relating to staged construction or decommissioning has not been triggered during the audit period, as construction associated with the development has not been staged.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B96	If there is a dispute about the scope of any remedial works or the implementation of the works, then either party may refer the matter to the Planning Secretary for resolution.	Discussion with MCO E&C Department	No disputes regarding the scope or implementation of remedial works were identified during the audit period. As such, no matters have been referred to the Planning Secretary for resolution.	Not Triggered	
S2 B97	Thomas Mitchell Drive				
	After the commencement of construction (as notified under condition A13(b)), the Applicant must contribute to the upgrade and maintenance of Thomas Mitchell Drive, and the upgrade of the Thomas Mitchell Drive/Denman Road intersection, proportionate to its impact (based on usage) on that infrastructure, in accordance with the Thomas Mitchell Drive Contributions Study, unless otherwise agreed with the Planning Secretary. For Thomas Mitchell Drive, the contributions must: (a) be paid to Council by the end of the financial year in which construction commences for the upgrade works; and (b) be paid to Council in accordance with the maintenance schedule established in accordance with the Thomas Mitchell Drive Contributions Study during the life of the development (commencing from the year construction commences as notified under condition A13(b)), unless otherwise agreed with Council. For the Thomas Mitchell Drive/Denman Road intersection, the contributions must be paid to the relevant road authority undertaking the works (or if another mining company is undertaking the works, to that mining company) within three months of the completion of the intersection upgrade works to the satisfaction of TfNSW and Council, unless otherwise agreed with the Planning Secretary.	- BHP Invoice to MCO, KB00/20230015, dated 30/01/2023 - Remittance from MCO to BHP, doc no. 1500039796, dated 23/03/2023. - Discussion with MCO E&C Department	The Thomas Mitchell Drive Contributions Study identified Mount Pleasant, MCO, Bengalla, Mount Arthur, and Maxwell Underground as contributing stakeholders. Under Scenario 2, MCO was allocated 8% of the total contributions. The previous IEA (RPS, 2022) noted that the DPHI granted an extension for MCO's contribution payment until 31 December 2022. An invoice was sighted from BHP to MCO (Invoice KB00/20230015, dated 30 January 2023) for \$696,393.19, equating to 8% of the total contribution of \$8,704,914.84. A remittance record was sighted (Doc No. 1500039796, dated 23 March 2023) confirming that MCO made payment of its contribution to BHP. No direct payment was made to Council by MCO, as BHP coordinated the full contribution and was responsible for the aggregated payment to Council on behalf of all parties. There is no evidence of any disputes being referred to the Planning Secretary regarding the contribution amount or implementation of this condition. Conclusion MCO has complied with the requirements of Condition B97. MCO paid its allocated 8% share	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Notes: - If there is a dispute between the relevant parties about the implementation of this condition, then any party may refer the matter to the Planning Secretary for resolution. - In making a determination about the applicable contribution/s under condition B97, the Planning Secretary shall take into account the contributions already paid and currently required to be paid towards the upgrade and maintenance of the local road network and any associated Voluntary Planning Agreement with Council.		of the Thomas Mitchell Drive upgrade costs to BHP in early 2023, consistent with the Contributions Study and the extension granted by DPHI. BHP, as coordinating entity, was responsible for making the full payment to Council.		
S2 B98	The Applicant must ensure that: - all over-dimensional vehicle access to and from the site is via Wybong Road east of the mine access road; and - all heavy vehicle access to and from the site is via Wybong Road east of the mine access road, unless the applicable roads authority agrees otherwise. <i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimension vehicles on the road network.</i>	- Mangoola Coal Site Induction material, including a Restricted Access Training Slide identifying approved and restricted routes. - Project-Related Traffic Local Roads Policy, which outlines approved access requirements for all project-related heavy and over-dimensional vehicles. - Oversize and/or Overmass (OSOM) Permit No. 340859V18, dated 16 December 2024, issued under the	MCO's Site Induction includes a Restricted Access Training Slide, which clearly identifies approved and restricted access routes, including the requirement to use Wybong Road east for all over-dimensional and heavy vehicle access. The Project-Related Traffic Local Roads Policy reinforces these requirements for all contractors and site personnel. The MCO Maintenance Team is responsible for coordinating heavy vehicle permits for over-dimensional loads. The auditors sighted evidence of compliance with permit requirements, including: - OSOM Mass or Dimension Exemption Permit No. 340859V18, dated 16/12/2024 - OSOM Mass or Dimension Exemption Permit No. 873954V2, dated 28/09/2024 - These permits were issued under the National Heavy Vehicle Regulator (NHVR) in accordance with the Heavy Vehicle National Law (NSW). No evidence was identified to indicate use of unauthorised access routes or failure to obtain necessary permits.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		National Heavy Vehicle Regulator (NHVR). Oversize and/or Overmass (OSOM) Permit No. 873954V2, dated 28 September 2024, issued under NHVR.			
S2 B99	Project related traffic must not use Reedy Creek Road, Mangoola Road, Roxburgh Road or Castlerock Road to get to or from the site, except in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	Restricted access training slide from Mangoola induction	Mangoola's Site Induction includes a Restricted Access Training Slide which clearly identifies approved and restricted road routes, including a specific prohibition on the use of Reedy Creek, Mangoola, Roxburgh, and Castlerock Roads. A Project-Related Traffic Local Roads Policy is in place to support awareness and compliance. This requirement is also reinforced during site familiarisation (Site Famil) for workers, including heavy vehicle drivers and contractors. No evidence of unauthorised use of restricted roads by project-related traffic was identified during the audit. No emergencies were reported that required deviation from approved routes during the audit period.	Compliant	
S2 B100	Project-related heavy vehicle traffic must not use Wybong Road west of the mine access road (to the intersection with the Golden Highway) to access the site, except during construction and decommissioning,	Refer evidence against Condition B98	Compliance with this condition is reinforced through the Project-Related Traffic Local Roads Policy, which provides clear direction to	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	or in any emergency to avoid the loss of lives, property and/or prevent environmental harm.		employees, contractors, and delivery drivers regarding approved access routes. Refer evidence against Condition B98		
S2 B101	Condition B99 does not apply to any employees that reside on Reedy Creek Road, Mangoola Road, Roxburgh Road or Castlerock Road, or the infrequent use of the roads for consultation, environmental monitoring, and inspection and maintenance of nearby infrastructure.		This condition is noted	Noted	
S2 B102	Wybong Post Office Road Prior to undertaking mining operations within 200 m of Wybong Post Office Road, unless otherwise agreed to by the Planning Secretary, the Applicant must close the affected section of Wybong Post Office Road and either: - realign the affected section of Wybong Post Office Road as described in the EIS and shown conceptually in Appendix 2, to the satisfaction of the applicable roads authority; or - provide a financial contribution to Council at least equivalent to the cost of the works identified in subparagraph (a) that is to be directed towards the implementation of Council's preferred approach to addressing road network issues associated with the closure of the affected section of Wybong Post Office Road. <i>Note: Under the Roads Act 1993, the Applicant may require separate approvals from appropriate roads authorities prior to closure, construction or dedication of public roads.</i>	- Picture showing bridge on Yarraman Road - Road Closure and Works Deed, MSC and MCO, Not signed	Mining within 200 m of Wybong Post Office Road was planned as part of development under SSD-8642. Rather than realign the road, MCO elected to provide a financial contribution to Muswellbrook Shire Council under clause (b). A Road Closure and Works Deed between MCO and MSC was sighted (unsigned version), outlining financial contributions to be made by MCO toward the Yarraman Road bridge upgrade. Section 5.1 of the deed confirms that Council accepted the contribution in lieu of road realignment. A photograph of the Yarraman Road bridge was also provided as evidence of works supported by MCO's contribution. The requirement to undertake the realignment described in the EIS (clause a) was therefore not triggered. The requirement under Condition B100 has been appropriately addressed through financial contribution in accordance with clause (b).	Compliant	
S2 B103	If there is any dispute between the Applicant and Council in implementing the requirements of condition	Discussion with MCO E&C Department	No disputed occurred during the audit period which triggered this condition.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	B102, then either party may refer the matter to the Planning Secretary for resolution.				
S2 B104	Traffic Management Plan The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: - be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; - be prepared in consultation with TfNSW and Council; - include details of all transport routes and traffic types to be used for development-related traffic; - include details of flood warning signage, including flood depth indicators, in the vicinity of the haul road overpass; - include a protocol for undertaking pre and post-dilapidation surveys and repairing any roads identified in the dilapidation surveys to have been damaged during construction and/or decommissioning works; - include details of the measures to be implemented to minimise traffic safety issues and disruption to local road users during the construction, operation and decommissioning phases of the development, including: - temporary traffic controls, including detours and signage (where relevant); - notifying the local community about development-related traffic impacts; - minimising potential for conflict with school buses and stock movements; - access and car parking arrangements; - staggering shift changes with other mining operations in the locality, where practicable, to	- Letter from DPHI approving Version 2.0 of the TMP, dated 20/12/2024 - Traffic Management Plan – Version 2.0 (December 2024) - Discussion with MCO E&C Department	A review of the approved Mangoolia Coal Traffic Management Plan – Version 2.0 (December 2024) confirms that it satisfies all requirements of Condition B104 of SSD-8642. Version 2.0 of the plan was approved by the DPHI on 20 December 2024. - The TMP was originally prepared by Mark Lucas, Senior Transport Planner at GHD, whose appointment was endorsed by the Planning Secretary in accordance with clause (a). - Consultation with Transport for NSW (TfNSW) and Muswellbrook Shire Council (MSC), as the relevant road authorities, is documented in Section 1.4 of the TMP (v2.0), addressing requirement (b). - Section 5.1 and Table 5.1 detail the vehicle types and transport routes associated with the project, including personnel light vehicles, service vehicles, deliveries, and heavy vehicle equipment transport, satisfying clause (c). - Flood risk management at the haul road overpass is addressed in Section 5.5, which describes the installation of flood depth indicators and warning signage in accordance with requirement (d). - Protocols for pre- and post-construction dilapidation surveys and subsequent road repairs are outlined in Section 5.4 (Dilapidation Surveys and Rehabilitation), fulfilling requirement (e). The TMP also aligns with separate obligations under Condition B93.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	minimise impacts during AM and PM peak traffic periods; • responding to any emergency repair requirements or maintenance during construction and/or decommissioning; and • a traffic management system for managing over-dimensional vehicles; and • include a Drivers' Code of Conduct that includes procedures to ensure that drivers: - adhere to posted speed limits or other required travelling speeds; - (ii) adhere to the designated transport routes; and - (iii) implement safe driving practices.		• Clause (f) is addressed through Section 5.3, which outlines measures to minimise traffic safety risks and local road user disruption. • Appendix B of the TMP provides a Drivers' Code of Conduct that meets the requirements of clause (g). It outlines procedures for complying with posted speed limits, adhering to designated haul routes, and maintaining safe driving practices.		
S2 B105	If the construction and/or decommissioning of the development is to be staged, the obligations in condition B103 apply to each stage of construction and/or decommissioning.	• Discussion with MCO E&C Department	At the time of the audit, no staging of construction or decommissioning works had occurred or been proposed. As such, this condition has not been triggered.	Not Triggered	
S2 B106	The Applicant must not commence mining operations north of Wybong Road until the Traffic Management Plan is approved by the Planning Secretary.	• Discussion with MCO E&C Department	Version 1.0 of the TMP was approved by the DPHI on 20 May 2021, prior to the commencement of mining operations north of Wybong Road. Mining activities in the Wybong Pit (located north of Wybong Road) commenced on 1 December 2022, more than 18 months after TMP approval was granted.	Compliant	
S2 B107	The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.	• Traffic Management Plan – Version 1.0 (May 2021) and Version 2.0 (December 2024) • Driver Induction Training and	Key evidence of implementation includes: • Driver Induction Training and Restricted Access Training Slides reviewed during the audit clearly outline approved road use and restricted routes consistent with the TMP requirements. • Heavy Vehicle Oversize Permits sighted during the audit confirm compliance with the	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Restricted Access Training material • Oversize and Overmass Permits (NHVR) • Annual Reviews 2022, 2023, 2024 • Site inspection and interview with site personnel	traffic management system for over-dimensional vehicles • MCO's Maintenance Team manages the coordination of permits under the Heavy Vehicle National Law (NSW), in line with TMP Section 5.3.7. • Driver Code of Conduct is embedded in the TMP (Appendix B), and evidence confirms it is implemented through inductions and contractor briefings. • Annual Reviews (2022, 2023, 2024) confirm no significant incidents or community complaints associated with traffic management during the audit period. • No project-related heavy vehicle traffic was reported using Wybong Road west of the mine access road, consistent with TMP restrictions. The TMP has been actively implemented during the audit period. MCO has met the requirements of Condition B107.		
S2 B108	Social Impact Management Plan • The Applicant must prepare a Social Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s; • be prepared in consultation with Council, the CCC, local affected communities and other interested stakeholders; • identify both positive and negative social impacts resulting from the development and following mine closure, both locally and regionally; • specify adaptive management and mitigation measures to avoid, minimise, and/or mitigate	• Letter from DPHI approving the SIMP, dated 27/10/2022 • Letter from MCO to DPHI identifying a suitably qualified person to prepare the SIMP, dated 07/07/2021 • SIMP submission to	The adequacy of the Social Impact Management Plan (SIMP) was reviewed to verify compliance with this condition. The following is noted: • Prepared by a suitably qualified person: Dr Sheridan Coakes was nominated by MCO and accepted by DPHI as suitably qualified to prepare the SIMP. A letter from MCO to DPHI, dated 7 July 2021, confirms this nomination. • Approved by the Planning Secretary: SIMP Version 1.0 was submitted on 19 August 2022, revised following agency feedback, and approved by DPHI on 27 October 2022.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	negative social impacts from the development and following mine closure; - identify opportunities to secure and enhance positive social impacts from the development, including opportunities to assist in maintaining community services and facilities; - include a stakeholder engagement plan to guide the evaluation and implementation of social impact management and mitigation measures; and - include a program to monitor, review and report on the effectiveness of these measures, including updating the plan 3 years prior to mine closure.	- DPHI (dated 19/08/2022) - SIMP, Version 1.0	- Consultation conducted: Appendix D of the SIMP summarises engagement with Muswellbrook Shire Council (MSC), the Community Consultative Committee (CCC), and local landholders. A SIMP Working Group was convened during the plan's preparation. - Assessment of social impacts: Section 5 of the SIMP adequately identifies both positive and negative social impacts, including during mine closure, at both local and regional scales. - Adaptive management and mitigation measures: Section 6 outlines social risk management strategies, including actions to mitigate workforce, access, amenity and closure-related risks. - Positive impact enhancement: Section 6.5 identifies initiatives to enhance social benefits. A Community Enhancement Working Group has been established to guide these efforts. - Stakeholder engagement plan: A Social Engagement Plan is included as Appendix E, detailing roles, timeframes and communication strategies. - Monitoring and review program: Section 7 outlines a program for monitoring and review, with a commitment to update the SIMP at least three years prior to mine closure.		
S2 B109	The Applicant must not commence mining operations north of Wybong Road until the Social Impact Management Plan is approved by the Planning Secretary.	Letter from DPHI approving the SIMP – dated 27 October 2022	The SIMP was approved by DPHI on 27 October 2022. Mining commenced on 1 December 2022.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 B110	The Applicant must implement the Social Impact Management Plan as approved by the Planning Secretary.	- Letter from DPHI approving the SIMP – dated 27 October 2022 - Community Mitigation Poster – dated 17 January 2024 (air quality measures offered within 0–6 km zone) - MCO Community Newsletter examples – confirming ongoing communication to residents (available on MCO public website) - Minutes and presentations sighted for CEP Working Group meetings: 11 January 2023, 7 February 2024, 19 February 2024, 13 November 2024 - Community Projects 2023–2025 Spreadsheet –	To verify the SIMP was adequately implemented during the audit period the following was observed: - Air quality mitigation measures advertised and offered to eligible residents: - Evidence sighted in the “Community Mitigation” event material (17/01/2024) and newsletter - Rainwater tank cleaning and solar panel cleaning offered to landholders within 0–6 km of active mining - Community Enhancement Program (CEP): - Inaugural meeting held 11/01/2023 Further meetings held on 07/02/2024, 19/02/2024, and 13/11/2024 - Minutes and presentations reviewed confirm ongoing engagement and tracking of initiatives - Community Investment: - MCO’s community investment register (2023–2025) confirms the provision of funding across multiple years for projects that support the needs of the local community covered by the CEP including Wybong, Mangoola, Castle Rock and Manobalai. Examples include support for the Wybong Public Hall, Wybong Cemetery Projects and supporting workshops to skill locals in first aid and support coordinated land management/feral animal control. - Multiple projects are also funded through open grants and targeted support for Muswellbrook, Sandy Hollow, Wybong and Denman Areas (e.g. Upper Hunter	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		includes over 50 funded projects across Upper Hunter region	Show, fire brigade defibrillators, school resources, community events. Implementation of the SIMP appears active and aligned with the commitments outlined in the approved plan.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference						
PART C ADDITIONAL PROCEDURES											
Acquisition Upon Request											
S2 C1	Upon receiving a written request for acquisition from the owner of the privately-owned land^a listed in Table 10, the Applicant must acquire the land in accordance with the procedures in conditions C12 to C19, inclusive. <i>Table 10: Land subject to acquisition upon request</i> <table><tr><th>Acquisition Basis</th><th>Land</th></tr><tr><td>Noise</td><td>R25, R66, R110, R130, R139, R148, R205</td></tr><tr><td>Noise and Air Quality</td><td>R83</td></tr></table> <i>^aThe location of the land referred to in Table 10 is shown in Appendix 3.</i>	Acquisition Basis	Land	Noise	R25, R66, R110, R130, R139, R148, R205	Noise and Air Quality	R83	Refer evidence against C12	A request for acquisition for an applicant within the table was received on 16 May 2024. Refer findings detailed against condition C12.	Compliant	
Acquisition Basis	Land										
Noise	R25, R66, R110, R130, R139, R148, R205										
Noise and Air Quality	R83										
Additional Mitigation Upon Request											
S2 C2	Upon receiving a written request for mitigation from the owner of any residence on the privately-owned land listed in Table 10 or Table 11, the Applicant must implement additional mitigation measures at or in the vicinity of the residence in consultation with the landowner. These measures must be consistent with the measures outlined in the Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Development (NSW Government, 2018). They must also be reasonable and feasible, proportionate to the level of predicted impact and directed towards reducing the noise and/or air quality impacts of the development. The Applicant must also be responsible for the reasonable costs of ongoing maintenance of these additional mitigation measures until the cessation of mining operations.	- Discussion with MCO E&C Manager - Email from landholder accepting mitigation measures, dated 26/11/2024 - Signed acceptance letter, dated n.d. - Noise mitigation assessment report, 21/02/2023	A request for additional mitigation under Condition C2 was received prior to the audit period commencing. Works were conducted during the audit period and accepted by the landholder (R174A and B) in November 2024. The auditors were provided copies of correspondence between MCO and the landholder, showing acceptance and satisfaction with the approach and completed works. The noise mitigation report, prepared by RHM Consulting Engineers (February, 2023) was also provided for review.	Compliant							

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference				
	Table 11: Land subject to additional mitigation upon request <table><thead><tr><th>Mitigation Basis</th><th>Land</th></tr></thead><tbody><tr><td>Noise</td><td>R128, R144, R154, R171, R176, R193, R261, R263, R109A, R109B, R109C, R109D, R109E, R109F, R125A, R134A, R182B, R164, R177, R251, R174A, R174B</td></tr></tbody></table> <i>*The locations of the land referred to in Table 11 are shown in Appendix 3.</i>	Mitigation Basis	Land	Noise	R128, R144, R154, R171, R176, R193, R261, R263, R109A, R109B, R109C, R109D, R109E, R109F, R125A, R134A, R182B, R164, R177, R251, R174A, R174B				
Mitigation Basis	Land								
Noise	R128, R144, R154, R171, R176, R193, R261, R263, R109A, R109B, R109C, R109D, R109E, R109F, R125A, R134A, R182B, R164, R177, R251, R174A, R174B								
S2 C3	If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.	Discussion with MCO E&C Manager	This condition was not triggered during the audit period	Not Triggered					
S2 C4	For the life of the development, the Applicant must continue to contribute to reasonable maintenance and recurrent operating costs associated with the noise mitigation measures installed at privately-owned residences under the Mangoola Coal Project and as described in the documents listed in condition A2(c). The contribution to ongoing maintenance and recurrent operating costs must be consistent with any existing agreement between the Applicant and the relevant landowner.	Discussion with MCO E&C Manager	MCO continues to contribute to the reasonable maintenance and recurrent operating costs associated with the noise mitigation measures installed at privately-owned residences under the Mangoola Coal Project, consistent with the requirements of the approval and existing agreements with the relevant landowners.	Compliant					
Notification of Landowners/Tenants									
S2 C5	Within one month of the date of this consent, the Applicant must: - notify in writing the owner of: - the land listed in Table 10 that they have the right to require the Applicant to acquire their land at any stage during the development; - the residences on the land listed in Table 10 and Table 11 that they are entitled to ask the	2022 IEA, RPS	Notification was made outside of the audit period. Notification made on 17 May 2021 which is within one month as per requirement.	Not Triggered					

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Applicant to install additional mitigation measures at the residence; and - any privately-owned land within 3 kilometres of the approved open cut mining pit/s that they are entitled to ask the Applicant for an inspection to establish the baseline condition of any buildings or structures on their land, or to have a previous property inspection report updated; • notify the tenants of any mine-owned land of their rights under this consent; and • send a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017) to the owners and/or existing tenants of any land (including mine-owned land) where the predictions in the documents listed in condition A2(c) identify that dust emissions generated by the development are likely to be greater than the relevant air quality criteria identified in condition B27 at any time during the life of the development.				
S2 C6	Prior to entering into any tenancy agreement for any land owned by the Applicant that is predicted to experience exceedances of the recommended dust and/or noise criteria, the Applicant must: (a) advise the prospective tenants of the potential health and amenity impacts associated with living on the land, and give them a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017); and	• Discussion with MCO E&C Manager	This condition was not triggered during the audit period.	Not Triggered	
S2 C7	As soon as practicable and no longer than 7 days after obtaining monitoring results showing an exceedance of any noise, blasting or air quality criterion in PART B of this consent, the Applicant must provide the details of the exceedance to any affected landowners, tenants and the CCC.	• Email to CCC from CCC Chair – notification of an exceedance of blast criterion exceedance, dated 18/03/2024	In accordance with Condition C7 MCO provided notification to the CCC Chair of an exceedance of blast criteria on 18 March 2024. The exceedance occurred on 11 March 2024. Follow up monitoring result showing the amended compliant monitoring result were provided after confirmation from DPHI.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 C8	For any exceedance of any air quality criterion in PART B of this consent, the Applicant must also provide to any affected land owners and/or tenants a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017).	Discussion with MCO E&C Manager	This condition was not triggered during the audit period. No exceedances of air quality criterion occurred during the audit period which were a result of MCO operations.	Not Triggered	
Notification of Exceedances					
S2 C9	If a landowner considers the development to be exceeding any relevant noise, blasting or air quality criterion in PART B of this consent, they may ask the Planning Secretary in writing for an independent review of the impacts of the development on their residence or land.	Discussion with MCO E&C Manager	This condition was not triggered during the audit period.	Not Triggered	
S2 C10	If the Planning Secretary is not satisfied that an independent review is warranted, the Planning Secretary will notify the landowner in writing of that decision, and the reasons for that decision, within 21 days of the request for a review.	Discussion with MCO E&C Manager	This condition was not triggered during the audit period.	Not Triggered	
S2 C11	If the Planning Secretary is satisfied that an independent review is warranted, within 3 months of the Planning Secretary's decision, or other timeframe agreed by the Planning Secretary, the Applicant must: - commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Planning Secretary, to: - consult with the landowner to determine their concerns; - conduct monitoring to determine whether the development is complying with the relevant criteria in PART B of this consent; and - if the development is not complying with the relevant criterion, identify measures that could be implemented to ensure compliance with the relevant criterion; and - give the Planning Secretary and landowner a copy of the independent review; and	Discussion with MCO E&C Manager	This condition was not triggered during the audit period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	comply with any written requests made by the Planning Secretary to implement any findings of the review.				
Land Acquisition					
S2 C12	Within 3 months of receiving a written request for acquisition from a landowner with acquisition rights, the Applicant must make a binding written offer to the landowner based on: - the current market value of the landowner's interest in the land at the date of this written request, as if the land was unaffected by the development, having regard to the: - existing and permissible use of the land, in accordance with the applicable planning instruments at the date of the written request; and - presence of improvements on the land and/or any approved building or structure which has been physically commenced at the date of the landowner's written request, and is due to be completed subsequent to that date, but excluding any improvements that have resulted from the implementation of the additional noise and/or air quality mitigation measures in condition C2; - the reasonable costs associated with: - relocating within the Muswellbrook local government area, or to any other local government area agreed to by the Planning Secretary; and - obtaining independent legal advice and expert advice for determining the acquisition price of the land, and the terms upon which it is to be acquired; and 1. reasonable compensation for any disturbance caused by the land acquisition process.	- Letter of offer to landholder, dated 7 Nov 2024, signed by MCO and Landholder - Discussion with MCO E&C Manager	A written request for acquisition was received by MCO on 16 May 2024. A written offer was made by MCO to the landholder on 7 August 2024, within the required three-month period. Following negotiations a revised offer was subsequently issued and accepted on 7 November 2024, with a signed letter of offer sighted during the audit. The auditors reviewed the letter of offer and the supporting valuation information, and validated that the offer was based on an independently assessed market value, including consideration of water entitlements. The offer included compensation for reasonable relocation expenses, and MCO committed to covering professional fees associated with conveyancing.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
S2 C13	If, within two months of the binding written offer being made under condition C12, the Applicant and landowner cannot agree on the acquisition price of the land and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Planning Secretary for resolution.	Refer evidence against C12	MCO is compliant with Condition C4. A binding written offer was made in accordance with Condition C12, and agreement was reached with the landowner within the required timeframe. As such, referral to the Planning Secretary was not required.	Not Triggered	
S2 C14	Upon receiving a request, under condition C13, the Planning Secretary will request the President of the NSW Division of the Australian Property Institute to appoint a qualified independent valuer to: - consider submissions from both parties; - determine a fair and reasonable acquisition price for the land and/or the terms upon which the land is to be acquired, having regard to the matters referred to in condition C12; - prepare a detailed report setting out the reasons for any determination; and (d) provide a copy of the report to both parties.	Refer evidence against C12	This condition was not triggered	Not Triggered	
S2 C15	Within 14 days of receiving the independent valuer's report, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the independent valuer's determination.	Refer evidence against C12	This condition was not triggered	Not Triggered	
S2 C16	However, if either party disputes the independent valuer's determination, then within 14 days of receiving the independent valuer's report, either party may refer the matter to the Planning Secretary for review. Any request for a review must be accompanied by a detailed report setting out the reasons why the party disputes the independent valuer's determination. Following consultation with the independent valuer and both parties, the Planning Secretary will determine a fair and reasonable acquisition price for the land, having regard to the matters referred to in condition C12, the independent valuer's report, the detailed report of the party that disputes the independent	Refer evidence against C12	This condition was not triggered	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	valuer's determination and any other relevant submissions.				
S2 C17	Within 14 days of this determination, the Applicant must make a binding written offer to the landowner to purchase the land at a price not less than the Planning Secretary's determination.	Refer evidence against C12	This condition was not triggered	Not Triggered	
S2 C18	If the landowner refuses to accept the Applicant's binding written offer under this condition within 6 months of the offer being made, then the Applicant's obligations to acquire the land shall cease, unless the Planning Secretary determines otherwise.	Refer evidence against C12	This condition was not triggered	Not Triggered	
S2 C19	The Applicant must pay all reasonable costs associated with the land acquisition process described in conditions C12 to C18 inclusive, including the costs associated with obtaining Council approval for any plan of subdivision (where permissible), and registration of this plan at the Office of the Registrar-General.	Refer evidence against C12	As part of the land acquisition process initiated by a request received on 16 May 2024, the signed letter of offer included: - The purchase price based on market valuation, - Explicit commitment by MCO to pay professional fees for conveyancing, and - Additional compensation for reasonable relocation costs. There was no evidence of a subdivision process being required or undertaken in this case. MCO confirmed its commitment, within the agreement letter, to covering all reasonable land acquisition costs, consistent with the requirements of Conditions C12–C18.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
PART D ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
Environmental Management					
S2 D1	Environmental Management Strategy The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: - provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; - set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; - set out the procedures to be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive record, handle and respond to complaints; - resolve any disputes that may arise during the course of the development; - respond to any non-compliance and any incident; (v) respond to emergencies; and - include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.	- PIRMP testing evidence from CMO. - CMO change trigger Page - Monthly Environmental Inspections, 10/02/2025 - CMO – showing no overdue inspections - CMO – showing	MCO has implemented its Environmental Management Strategy (EMS) in accordance with the requirements of SSD-8642. Version 12 of the EMS was approved by DHPI on 30 June 2022. The EMS was in 2025 and submitted to the DPHI for review on 27 June 2025. At the time of the audit the EMS was still under review by DPHI. The revised EMS removes outdated references to the Mining Operations Plan (MOP) and incorporates updated information regarding Biodiversity Stewardship Agreements (BSAs) now in effect. Once approved, further alignment with the Biodiversity Offset Management Plan and Strategy (BOMPS) will be required to ensure consistency between the EMS and offset documentation.	Compliant	
S2 D2	The Applicant must not commence mining operations north of Wybong Road until the Environmental		MCO commenced mining operations north of Wybong Road following the approval of the	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Management Strategy is approved by the Planning Secretary.		Environmental Management Strategy (EMS) by the Planning Secretary. The EMS was approved on 10 August 2022, satisfying the requirement of Condition B2.		
S2 D3	The Applicant must implement the Environmental Management Strategy as approved by the Planning Secretary.	• PIRMP testing results • CMO • CMO Change Trigger Page • Monthly E&C Inspections (sample sighted)	A review of the EMS's implementation during the audit period was conducted. The following findings are made: PIRMP Pollution Incident Response Management Plan (PIRMP) testing has been conducted annually in accordance with EPL 12894 and the EMS. Records of PIRMP drills were verified during the audit, including: • 2 August 2023 – Simulation of a hydrocarbon spill into a creek line from a vehicle rollover; • 26 February 2024 – Field simulation of dam wall failure; • 24 February 2025 – Desktop exercise simulating a blast fume incident. These exercises demonstrate a proactive and risk-based approach to pollution response preparedness. PIRMP testing records were available within the CMO system. Change Management MCO has a structured and robust change management process. The procedure requires change assessments for any modifications that may impact environmental approvals or compliance systems. The CMO Change Trigger page was reviewed and demonstrated that the process includes an overview of the proposed change, identification of affected stakeholders, consultation records, system impacts, and	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			assigned actions. Examples sighted during the audit included change processes related to an EPL variation (April and October 2023) and relocation of a noise monitor (October 2023). Environmental Inspections Monthly environmental inspections are conducted by the Environment & Community (E&C) team. These inspections are scheduled in CMO and were found to be up to date during the audit period, with no overdue items. The inspections review environmental controls, assess performance against key risk areas, and verify closeout of previous inspection actions. Bio-cells have been added to the inspection scope during the audit period. However, the audit identified a recurring issue regarding the effectiveness of inspections: Signs of historical staining were observed by auditors at the train loading area during the site inspection; however, no corresponding records of the staining were found in routine inspection documentation. This issue had also been raised during the 2025 AS1940 audit, indicating an oversight in this area. This represents an opportunity to strengthen the inspection process to ensure that high-risk areas, such as fuel and hydrocarbon management points, are consistently and proactively assessed. Conclusion Overall, the EMS is being implemented in accordance with SSD-8642 Condition B1, but targeted improvements are recommended to ensure inspections fully address high-risk areas and to improve internal consistency across management plans and reporting protocols.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
S2 D4	Adaptive Management The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Any exceedance of these criteria or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: - take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; - consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and - implement reasonable remediation measures as directed by the Planning Secretary.	Refer evidence within this checklist	During the audit period, several environmental exceedances were recorded, including: - Groundwater exceedances associated with monitoring locations such as GW26, largely attributed to climatic variability and limitations in the earlier hydrogeological model. MCO undertook an updated groundwater model (AGE, 2024) and maintained exceedance reporting protocols in line with the Groundwater Management Plan and TARP framework. - MCO developed and implemented an Action Plan to prevent recurrence, including updates to the Blast Field Sheet and procedural changes to incorporate cross-checking of blast data within the EMD system. An independent review was also conducted by Terrock Consulting. In all cases where incidents or exceedances occurred, MCO prepared and submitted incident and investigation reports to the DPHI. These included clear descriptions of the exceedance, contributing factors, and a summary of actions to prevent recurrence, consistent with the adaptive management obligations under this condition.	Compliant	
S2 D5	Management Plan Requirements Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: - a summary of relevant background or baseline data; - details of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Refer evidence within this checklist	The audit included review of multiple management plans required under SSD-8642. Each of the plans reviewed generally: - Included baseline data, relevant statutory conditions, and performance measures and indicators; - Described mitigation measures and monitoring programs; - Contained incident reporting protocols, public access mechanisms, and review procedures;	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	- any relevant limits or performance measures and criteria; and - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; • any relevant commitments or recommendations identified in the document/s listed in condition A2(c); • a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; • a program to monitor and report on the: - impacts and environmental performance of the development; and - effectiveness of the management measures set out pursuant to condition D4(c); • a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; a program to investigate and implement ways to improve the environmental performance of the development over time; a protocol for managing and reporting any: - incident, non-compliance or exceedance of any impact assessment criterion or performance criterion; - complaint; or - failure to comply with other statutory requirements; • public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and • a protocol for periodic review of the plan.		• Provided for adaptive management and continuous improvement (e.g., investigation of non-compliances, use of updated modelling, independent reviews); • Where applicable, included contingency measures and corrective action frameworks, consistent with Condition D4. In some instances, formatting and structure varied between plans; however, all core content required by Condition D5 was found to be addressed either directly or through referenced appendices.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.				
S2 D6	The Applicant must ensure that management plans prepared for the development are consistent with the conditions of this consent and any EPL issued for the site.	Refer evidence against management plan conditions	Management plans prepared for the development are consistent with the conditions of this consent and with the requirements of the site's EPL	Compliant	
Revision of Strategies, Plans and Programs					
S2 D7	Within three months of: - the submission of an incident report under condition D9; - the submission of an Annual Review under condition D11; - the submission of an Independent Environmental Audit under condition D12; - the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or - notification of a change in development phase under condition A13; - the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	- Letter to DPHI regarding management plan review following the 2022 IEA and change in development phase, dated 21/12/2022 - Letter to DPHI regarding management plan review following submission of the 2023 Annual Review, dated 31/05/2024 - Letter to DPHI regarding management plan review following submission of the 2024 Annual	- During the audit period, several incidents/non-compliances were reported (e.g., water quality exceedances, blast monitoring issues). While these events were investigated and reported to the Department, none were identified as formal triggers under Condition D9 that would require a full review of strategies or plans. As such, this sub-condition was not formally triggered during the audit period. - Annual Review 2023 – Management plans and strategies were reviewed post submission of the annual review and the IEA report. No changes were required to management plans as a result of the 2022 Annual Review 2024 - Letter to Department send on 31 May 2024 outlining management plan review conducted post submission of the Annual Review. No changes required as a result of the 2023 Annual Review. 2025 – Letter to Department send on 13 May 2025 outlining the revision of strategies, plans and programs conducted as a result of the 2024	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		Review, dated 13/05/2025 Internal review records sighted by auditors confirming management plans were reviewed following Annual Reviews and the 2022 IEA	Annual Review. No changes were required as a result of the 2024 Annual Review. The letter stated that the BOMP was being reviewed however no changes required and the GWMP to address updates made to the GW Model. It had previously been submitted. - The 2022 IEA triggered a review of all management plans. Letter sent to the department on the 21 December 2022 states that management plans, reviewed following the 2022 IEA, were considered to all be compliant with the conditions of SSD8642 - No modifications to SSD-8642 were approved during the audit period. - Commencement of mining in Wybong pit occurred on 1 December 2022. This change was addressed in MCO's 21 December 2022 letter to the Department, which confirmed that the relevant management plans had been reviewed and were considered compliant with the consent. No changes were required to the plans as a result of the change in phase.		
S2 D8	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.		Updates to management plans have occurred however this condition is technically not triggered as updates have not been required as a result of a direction from the Department. Most changes were to address operational changes.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Reporting and Auditing					
S2 D9	The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing through the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.		No incidents have occurred which meet the definition of an incident under this consent.	Not Triggered	
S2 D10	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing through the Department's Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	- Email receipt from Major Projects Portal, dated 14/03/2024 - Letter to DPHI from MCO, dated 14/03/2024 - Letter to DPHI, 11/3/2024 - Letter from DPHI, Non-compliance notification BLast 11 march 2024, dated 03/10/2024 - Email from DPHI, Blast #1527 – 18 January 2023, dated 4/10/24 - Portal submission, 21/3/24, failure	Non-compliances that MCO became aware of and triggered reporting under condition D10 are summarised below. Condition B25 – Failure to Monitor Airblast Overpressure and Ground Vibration (18 January 2023) MCO failed to monitor airblast overpressure and ground vibration for a blast event in the Main Pit on 18 January 2023. A gap in the data was initially identified on 5 March 2024. Following further investigation and advice from ACOEM, MCO confirmed the non-compliance on 7 March 2024. MCO notified the Department on 14 March 2024 via the NSW Planning Major Projects Portal. The notification letter outlined the nature of the non-compliance and confirmed that an investigation was underway. The outcomes of the investigation were subsequently included in the 2024 Annual Review. On 4 October 2024, the Department acknowledged the investigation summary and noted the corrective actions undertaken, including an update to the internal blasting procedure to incorporate data validation	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		to complete water quality analysis	processes and monthly checks against drill and blast records. The Department classified the matter as an administrative breach. Condition B11 – Blast Overpressure Exceedance (11 March 2024) On 11 March 2024, an exceedance of the 120 dB overpressure limit was recorded at blast monitoring unit BM09 (121.3 dB). MCO notified the Department on the same day, in accordance with Condition D10. In response to a Departmental request, MCO submitted a detailed investigation report on 22 March 2024, which included findings and proposed actions to prevent recurrence. The investigation concluded that the exceedance was not representative of actual conditions at the nearest receptor. On 3 October 2024, the Department acknowledged the report and noted the updates to be made to the Blast Management Plan, including provisions for calibration of overpressure monitoring equipment. These updates were subsequently approved by the Department. Condition C52 – Failure to Complete Required Water Quality Analysis (MP9a) On 18 March 2024, MCO identified a non-compliance during its review of 2023 surface water monitoring data. It was found that 13 of 32 required parameters were not analysed for one monitoring event at site MP9a. MCO notified the Department on 21 March 2024 via the Major Projects Portal. The letter		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			outlined the cause of the non-compliance and the actions taken to prevent recurrence. On 14 November 2024, the Department responded in writing, confirming that the breach had been recorded and acknowledging the proposed corrective actions. MCO met the requirements of Condition D10 by notifying the Department within seven days of becoming aware of each non-compliance. Notifications were made via the correct portal and included appropriate detail, with investigation outcomes and corrective actions provided or referenced.		
S2 D11	Annual Review By the end of March each year after the commencement of development, or other timeframe agreed by the Planning Secretary, a report must be submitted to the Department reviewing the environmental performance of the development, to the satisfaction of the Planning Secretary. This review must: (a) describe the development (including any rehabilitation) that was carried out in the previous calendar, and the development that is proposed to be carried out over the current calendar year; (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, including a comparison of these results against the: (i) relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) monitoring results of previous years; and	- Letter from DPHI submission of 2022 Annual Review, dated 16/08/2023 - Email from planning portal showing submission of the 2022, 2023 and 2024 Annual Review, dated 31/03/2023, 28/03/2024 and 31/02/2025 respectively.	In accordance with Schedule 2, Condition D15 of SSD-8642, MCO has submitted Annual Reviews to the Department by the end of March each year, meeting the required timeframes: 2022 Annual Review – submitted 31 March 2023 2023 Annual Review – submitted 28 March 2024 2024 Annual Review – submitted 31 March 2025 All Annual Reviews contain the required information and have been published on the MCO website in accordance with reporting and transparency requirements.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(iv) relevant predictions in the document/s listed in condition A2(c); (c) identify any non-compliance or incident which occurred in the previous calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence; (d) evaluate and report on: (i) the effectiveness of the noise and air quality and greenhouse gas management systems; (ii) compliance with the performance measures, criteria and operating conditions of this consent; and (iii) the status of translocated plants and vegetation quadrat data from orchid monitoring sites; (e) identify any trends in the monitoring data over the life of the development; (f) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (g) describe what measures will be implemented over the next calendar year to improve the environmental performance of the development.				
S2 D12	Copies of the Annual Review must be submitted to Council and made available to the CCC and any interested person upon request.	Discussion with MCO E&C Manager	Copies of each Annual Review were submitted to Muswellbrook Shire Council, made available to the Community Consultative Committee (CCC) and any interested person upon request, and published on the MCO website in accordance with the requirements of the development consent.	Compliant	
S2 D13	Within one year of commencement of development under this consent, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: (a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;	21/12/22 - letter to Department, IEA Submission 2022 Independent Environmental Audit Report, prepared by	In accordance with the requirements of the development consent, MCO commissioned and funded an Independent Environmental Audit (IEA) within the required timeframe. The previous audit was conducted in 2022 by independent auditors from RPS AAP Consulting Pty Ltd, with the audit team endorsed by the Planning Secretary.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary; (c) be carried out in consultation with the relevant agencies and the CCC; (d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals); (e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent; (f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and (g) be conducted and reported to the satisfaction of the Planning Secretary.	RPS, dated 21/03/2023	The audit included recommendations for improving environmental performance where applicable. The final IEA report was dated 21 March 2023 and published on the MCO website, along with MCO's formal response to the audit findings. A submission letter dated 21 December 2022 was provided to the Department, fulfilling the submission requirements under the consent.		
S2 D14	Within three months of commencing an Independent Environmental Audit, or other timeframe agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.	21/12/22 - letter to Department, IEA and RAR Submission	In accordance with Schedule 2, Condition D14 of the development consent, MCO submitted the 2022 IEA report, prepared by RPS AAP Consulting Pty Ltd, to the DPHI on 21/12/2022	Compliant	
S2 D15	Monitoring and Environmental Audits Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether		This condition is noted. MCO has implemented a comprehensive suite of monitoring programs and environmental audits in accordance with these	Noted	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit. For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.		requirements, with outcomes documented in Annual Reviews and Independent Environmental Audit reports submitted to the Department and made publicly available.		
S2 D16	Noise, blast and/or air quality monitoring under this consent may be undertaken at suitable representative monitoring locations instead of at privately-owned residences or other locations listed in Part B, providing that these representative monitoring locations are set out in the respective management plan/s.		This is noted.	Noted	
Access to Information					
S3 D17	Before the commencement of construction until the completion of all rehabilitation required under this consent, the Applicant must: (a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website: (i) the documents referred to in condition A2(c) of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent;	• EMM, Attended construction Noise Monitoring Reports, monthly from December 2021 to April 2023. • MCO Public Website • AQGGMP • EMS	Section 4.1 of the Environmental Management Strategy (EMS), Version 12, dated 13 December 2022, outlines Mangoola Coal Operations' (MCO's) commitment to publishing environmental documents and performance data online to meet D17 requirements. The EMS includes a table specifying which documents are to be made publicly available and commits to updating the website regularly.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(iv) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (v) minutes of CCC meetings; (vi) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (vii) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (viii) a summary of the current phase and progress of the development; (ix) contact details to enquire about the development or to make a complaint; (x) a complaints register, updated monthly; (xi) the Annual Reviews of the development; (xii) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; (xiii) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.		The auditors reviewed the MCO public website and confirmed the availability of key documents including: • Approved management plans • Annual Reviews • Complaints register (updated monthly) • CCC minutes • EPL Monitoring Data (Available to June 2025) • SSD8642 Monthly Monitoring Reports (available to April 2025) • Noise monitoring reports (available to July 2025) • Audit reports and responses • Contact details for enquiries and complaints. MCO met the requirements of Condition D17.		

2025 Environmental Protection Licence (EPL) 12894 Checklist

Audit Checklist – EPL 12894

Contents

1 ADMINISTRATIVE CONDITIONS	3
A1 WHAT THE LICENCE AUTHORISES AND REGULATES	3
A2 PREMISES OR PLANT TO WHICH THIS LICENCE APPLIES	3
A3 OTHER ACTIVITIES	4
A4 INFORMATION SUPPLIED TO THE EPA	4
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND	6
P1 LOCATION OF MONITORING/DISCHARGE POINTS AND AREAS	6
3 LIMIT CONDITIONS	11
L1 POLLUTION OF WATERS	11
L2 CONCENTRATION LIMITS	11
L3 WASTE	13
L4 NOISE LIMITS	14
L5 BLASTING	18
4 OPERATING CONDITIONS	22
O1 ACTIVITIES MUST BE CARRIED OUT IN A COMPETENT MANNER	22
O2 MAINTENANCE OF PLANT AND EQUIPMENT	23
O3 DUST	26
O4 EFFLUENT APPLICATION TO LAND	28
O5 WASTE MANAGEMENT	29
O6 OTHER OPERATING CONDITIONS	30
5 MONITORING AND RECORDING CONDITIONS	31
M1 MONITORING RECORDS	31
M2 REQUIREMENT TO MONITOR CONCENTRATION OF POLLUTANTS DISCHARGED	32
M4 WEATHER MONITORING	40
M6 TELEPHONE COMPLAINTS LINE	43
M7 BLASTING	44
M8 OTHER MONITORING AND RECORDING CONDITIONS	45
M9 NOISE MONITORING	47
6 REPORTING CONDITIONS	50
R1 ANNUAL RETURN DOCUMENTS	50
R2 NOTIFICATION OF ENVIRONMENTAL HARM	52
R3 WRITTEN REPORT	52
R4 OTHER REPORTING OBLIGATIONS	54
R5 OTHER REPORTING OBLIGATIONS	54
7 GENERAL CONDITIONS	59

G1 COPY OF LICENCE KEPT AT THE PREMISES OR PLANT	59
G2 CONTACT NUMBER FOR INCIDENTS AND RESPONSIBLE EMPLOYEES	59
8 SPECIAL CONDITIONS	61
E1 HUNTER RIVER SALINITY TRADING SCHEME	61
E2 DISPOSAL OF EXPLORATION WASTE	63
E3 WASTE TYRE RECYCLING REVIEW	63

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference															
1 ADMINISTRATIVE CONDITIONS																				
A1 WHAT THE LICENCE AUTHORISES AND REGULATES																				
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Coal works</td><td>Coal works</td><td>> 5000000 T annual handling capacity</td></tr><tr><td>Crushing, grinding or separating</td><td>Crushing, grinding or separating</td><td>> 500000 - 2000000 T annual processing capacity</td></tr><tr><td>Mining for coal</td><td>Mining for coal</td><td>> 5000000 T annual production capacity</td></tr><tr><td>Railway activities - railway infrastructure operations</td><td>Railway infrastructure operations</td><td>Any annual capacity</td></tr></table> <i>Note: In relation to this licence, the licensee must comply with:</i> <i>a) the activity scale limits imposed by this licence;</i> <i>b) the activity scale limits which apply for the reporting period specified in this licence; and</i> <i>c) the activity scale limits imposed by other legal instruments, such as approvals currently in force under the Environmental Planning and Assessment Act 1979.</i>	Scheduled Activity	Fee Based Activity	Scale	Coal works	Coal works	> 5000000 T annual handling capacity	Crushing, grinding or separating	Crushing, grinding or separating	> 500000 - 2000000 T annual processing capacity	Mining for coal	Mining for coal	> 5000000 T annual production capacity	Railway activities - railway infrastructure operations	Railway infrastructure operations	Any annual capacity	- Mangoola Daily Complex Report, 31/12/2024 - Discussion with the E&C Department	Production quantities are monitored through the CHPP using the MINVU system, which tracks both ROM coal (extracted) and product coal (processed) on a daily basis. These figures are compiled annually and reported in the Annual Review. The following quantities were verified during the audit period: 2022 reporting period – 7,686,725 tonnes of ROM coal was extracted 2023 reporting period – 10,093,439 tonnes of ROM coal was extracted 2024 reporting period – 11,473,234 tonnes of ROM coal was extracted - The quantity of coal processed through the CHPP was well below the production capacity limits specified in Condition A1.1 of the EPL.	Compliant	
Scheduled Activity	Fee Based Activity	Scale																		
Coal works	Coal works	> 5000000 T annual handling capacity																		
Crushing, grinding or separating	Crushing, grinding or separating	> 500000 - 2000000 T annual processing capacity																		
Mining for coal	Mining for coal	> 5000000 T annual production capacity																		
Railway activities - railway infrastructure operations	Railway infrastructure operations	Any annual capacity																		
A2 PREMISES OR PLANT TO WHICH THIS LICENCE APPLIES																				
A2.1	The licence applies to the following premises:		This is noted.	Noted																

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Premises Details MANGOOKA COAL OPERATIONS WYBONG ROAD WYBONG NSW 2333 THE PREMISES IS DEFINED AS "PROPOSED EPL BOUNDARY" IN THE PLAN TITLED "MANGOOKA COAL EPL 12984 - PREMISES PLAN AND ENVIRONMENTAL MONITORING LOCATIONS (EXCLUDING NOISE)", DATED 18/11/2021 ("PREMISES PLAN") (EPA REF. DOC21/813044-4); AND SHAPEFILES PROVIDED BY THE LICENSEE TO THE EPA VIA EMAIL ON 18/11/2021 (EPA REF. DOC21/813044-6). PUBLIC ROADS ARE NOT PART OF THE PREMISES UNLESS TEMPORARILY OR PERMANENTLY CLOSED IN ACCORDANCE WITH THE ROADS ACT 1993 OR AN AGREEMENT IS IN PLACE WITH THE RELEVANT ROAD AUTHORITY.				
A3 OTHER ACTIVITIES					
A3.1	This licence applies to all other activities carried on at the premises, including: Ancillary Activity Sewage Treatment		MCO operate a sewage treatment system in accordance with EPL and Council approval requirements. An assessment of compliance of the sewage treatment system is included in this checklist below.	Noted	
A4 INFORMATION SUPPLIED TO THE EPA					
A4.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: - the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the	- Site Inspection - Discussion with the E&C Department	MCO confirmed that all works and activities conducted during the audit period aligned with those outlined in the EPL application, with no deviations observed. The original licence application was not reviewed, and no evidence was found indicating any activities outside the scope of EPL 12894 and its associated application during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	EPA in connection with the issuing of this licence.				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																								
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND																													
P1 LOCATION OF MONITORING/DISCHARGE POINTS AND AREAS																													
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. <table><tr><th colspan="4">Air</th></tr><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>5</td><td>Meteorological Monitoring</td><td></td><td>Weather Station North (WSN) marked and shown as "Monitoring Point 5" on the Premises Plan.</td></tr><tr><td>18</td><td>Meteorological Monitoring</td><td></td><td>Weather Station South (WSS) marked and shown as "Monitoring Point 18" on the Premises Plan.</td></tr><tr><td>19</td><td>Particulate Matter Monitoring</td><td></td><td>Particulate matter Esampler marked and shown as "Monitoring Point 19" on the Premises Plan.</td></tr><tr><td>20</td><td>Particulate Matter Monitoring</td><td></td><td>Particulate matter Esampler marked and shown as "Monitoring Point 20" on the Premises Plan.</td></tr></table>	Air				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	5	Meteorological Monitoring		Weather Station North (WSN) marked and shown as "Monitoring Point 5" on the Premises Plan.	18	Meteorological Monitoring		Weather Station South (WSS) marked and shown as "Monitoring Point 18" on the Premises Plan.	19	Particulate Matter Monitoring		Particulate matter Esampler marked and shown as "Monitoring Point 19" on the Premises Plan.	20	Particulate Matter Monitoring		Particulate matter Esampler marked and shown as "Monitoring Point 20" on the Premises Plan.	- Discussion with E&C Department - Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025	MCO manages air quality in accordance with the Air Quality and Greenhouse Gas Management Plan (AQGGMP). MCO air quality monitoring program includes a combination of high-volume air samplers (TSP and PM₁₀), real-time continuous dust monitoring devices (PM10 and PM2.5) and meteorological stations. To meet the requirements of Condition P1.1 of the EPL, the following samplers are in place: - Continuous PM10 e-samplers at EPL Monitoring Points 19 and 20, located immediately north and south of the mining operations, respectively. MCO identify EPL monitoring site 19 as monitoring site D9-DC. Monitoring point 20 is identified as D8-DC. - Meteorological stations at two locations: Weather Station North (WSN1) on Wybong Road (EPL Point 5) and Weather Station South (WSS) adjacent to the CHPP (EPL Point 18). Details of these monitoring devices are provided in Table 5.3 of the AQGGMP and align with those specified in Condition P1.1 of the EPL.	Compliant	
Air																													
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																										
5	Meteorological Monitoring		Weather Station North (WSN) marked and shown as "Monitoring Point 5" on the Premises Plan.																										
18	Meteorological Monitoring		Weather Station South (WSS) marked and shown as "Monitoring Point 18" on the Premises Plan.																										
19	Particulate Matter Monitoring		Particulate matter Esampler marked and shown as "Monitoring Point 19" on the Premises Plan.																										
20	Particulate Matter Monitoring		Particulate matter Esampler marked and shown as "Monitoring Point 20" on the Premises Plan.																										
P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of		No utilisation area is specified in EPL 12894.	Noted																									

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																																																																																		
	limits for any application of solids or liquids to the utilisation area.																																																																																						
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <table><tr><th colspan="4">Water and land</th></tr><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>7</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 7" on Figure 1.</td></tr><tr><td>8</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 8" on Figure 1.</td></tr><tr><td>9</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 9" on Figure 1.</td></tr><tr><td>10</td><td>Groundwater monitoring</td><td></td><td>Bore marked and shown as "Monitoring Point 10" on Figure 1.</td></tr><tr><td>11</td><td>Groundwater monitoring</td><td></td><td>Stand pipe marked and shown as "Monitoring Point 11" on Figure 1.</td></tr><tr><td>12</td><td>Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring</td><td>Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring</td><td>Outlet of HRSTS discharge pipe, marked and shown as "Monitoring Point 12" on Figure 1.</td></tr><tr><td>13</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 13" on Figure 1.</td></tr><tr><td>14</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 14" on Figure 1.</td></tr><tr><td>31</td><td>Ambient water monitoring</td><td></td><td>Monitoring location marked and shown as "Monitoring Point 31" on Figure 1.</td></tr><tr><td>33</td><td>Discharge to utilisation area Effluent quality monitoring</td><td>Discharge to utilisation area Effluent quality monitoring</td><td>STP discharge marked and shown as "Monitoring Point 33" on Figure 1.</td></tr><tr><td>41</td><td>Discharge to waters Discharge quality monitoring</td><td>Discharge to waters Discharge quality monitoring</td><td>Discharge from Pit Water Dam (via Point 12), marked and shown as "Monitoring Point 41" on Figure 1.</td></tr><tr><td>42</td><td>Discharge to waters Discharge quality monitoring</td><td>Discharge to waters Discharge quality monitoring</td><td>Discharge from Raw Water Dam (via Point 12), marked and shown as "Monitoring Point 42" on Figure 1.</td></tr></table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	7	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 7" on Figure 1.	8	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 8" on Figure 1.	9	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 9" on Figure 1.	10	Groundwater monitoring		Bore marked and shown as "Monitoring Point 10" on Figure 1.	11	Groundwater monitoring		Stand pipe marked and shown as "Monitoring Point 11" on Figure 1.	12	Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring	Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring	Outlet of HRSTS discharge pipe, marked and shown as "Monitoring Point 12" on Figure 1.	13	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 13" on Figure 1.	14	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 14" on Figure 1.	31	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 31" on Figure 1.	33	Discharge to utilisation area Effluent quality monitoring	Discharge to utilisation area Effluent quality monitoring	STP discharge marked and shown as "Monitoring Point 33" on Figure 1.	41	Discharge to waters Discharge quality monitoring	Discharge to waters Discharge quality monitoring	Discharge from Pit Water Dam (via Point 12), marked and shown as "Monitoring Point 41" on Figure 1.	42	Discharge to waters Discharge quality monitoring	Discharge to waters Discharge quality monitoring	Discharge from Raw Water Dam (via Point 12), marked and shown as "Monitoring Point 42" on Figure 1.	- Water Management Plan - Water monitoring reports published on the MCO website.	Table F of the Water Management Plan outlines the EPL licenced water monitoring points and includes a location description for each. Internal references to monitoring points are included throughout the WMP and associated sub plans. The table below shows the EPL identification no. cross referenced against MCO's internal reference names, as detailed within the WMP and monitoring reports. <table><tr><th>EPL Identification no.</th><th>MCO Monitoring Site</th></tr><tr><td>7</td><td>SW16</td></tr><tr><td>8</td><td>SW03</td></tr><tr><td>9</td><td>SW04</td></tr><tr><td>10</td><td>GW04</td></tr><tr><td>11</td><td>GW26</td></tr><tr><td>12</td><td>HRSTS discharge point</td></tr><tr><td>13</td><td>SW14</td></tr><tr><td>14</td><td>SW17</td></tr><tr><td>31</td><td>SW07</td></tr><tr><td>33</td><td>Sewage Treatment Plant</td></tr><tr><td>41</td><td>SW18</td></tr><tr><td>42</td><td>No reference found</td></tr></table> The following findings were made: Monitoring Point 42 is not referenced in the WMP or Surface Water	EPL Identification no.	MCO Monitoring Site	7	SW16	8	SW03	9	SW04	10	GW04	11	GW26	12	HRSTS discharge point	13	SW14	14	SW17	31	SW07	33	Sewage Treatment Plant	41	SW18	42	No reference found	Compliant	
Water and land																																																																																							
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																																																																																				
7	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 7" on Figure 1.																																																																																				
8	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 8" on Figure 1.																																																																																				
9	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 9" on Figure 1.																																																																																				
10	Groundwater monitoring		Bore marked and shown as "Monitoring Point 10" on Figure 1.																																																																																				
11	Groundwater monitoring		Stand pipe marked and shown as "Monitoring Point 11" on Figure 1.																																																																																				
12	Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring	Discharge of saline water under the Hunter River Salinity Trading Scheme (HRSTS) Volume monitoring	Outlet of HRSTS discharge pipe, marked and shown as "Monitoring Point 12" on Figure 1.																																																																																				
13	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 13" on Figure 1.																																																																																				
14	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 14" on Figure 1.																																																																																				
31	Ambient water monitoring		Monitoring location marked and shown as "Monitoring Point 31" on Figure 1.																																																																																				
33	Discharge to utilisation area Effluent quality monitoring	Discharge to utilisation area Effluent quality monitoring	STP discharge marked and shown as "Monitoring Point 33" on Figure 1.																																																																																				
41	Discharge to waters Discharge quality monitoring	Discharge to waters Discharge quality monitoring	Discharge from Pit Water Dam (via Point 12), marked and shown as "Monitoring Point 41" on Figure 1.																																																																																				
42	Discharge to waters Discharge quality monitoring	Discharge to waters Discharge quality monitoring	Discharge from Raw Water Dam (via Point 12), marked and shown as "Monitoring Point 42" on Figure 1.																																																																																				
EPL Identification no.	MCO Monitoring Site																																																																																						
7	SW16																																																																																						
8	SW03																																																																																						
9	SW04																																																																																						
10	GW04																																																																																						
11	GW26																																																																																						
12	HRSTS discharge point																																																																																						
13	SW14																																																																																						
14	SW17																																																																																						
31	SW07																																																																																						
33	Sewage Treatment Plant																																																																																						
41	SW18																																																																																						
42	No reference found																																																																																						

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																					
			Management Plan (SWMP). EPL 12894 requires daily grab sampling from the Raw Water Dam (Monitoring Point 42) during discharge events. However, no discharges from this location occurred during the audit period. - The correlation between EPL monitoring points and MCO's internal site references is not consistently clear in the WMP. It is recommended that Table F be updated to include both the EPL number and corresponding MCO site reference to improve transparency. - Additionally, it is recommended that monitoring reports published on the MCO website (for both EPL and SSD 8642 reporting) clearly note EPL identification numbers to the relevant MCO monitoring site names.																							
P1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises. <table><tr><th colspan="3">Noise/Weather</th></tr><tr><th>EPA identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td colspan="3"></td></tr></table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location description				- Noise Management Plan - Blast Management Plan, Version 21, 23/01/2025	A review of the blast and noise monitoring data for the audit period indicated that monitoring was being undertaken at the monitoring points specified in the EPL. The following is noted in the AQGGMP and Blast Management Plan: <table><tr><th colspan="3">Noise Monitoring</th></tr><tr><th>EPL Point</th><th>MCO Monitoring Site</th><th>Location</th></tr><tr><td>22</td><td>NM15</td><td>Castlerock Road north</td></tr><tr><td>23</td><td>NM4</td><td>Yarraman Road south</td></tr></table>	Noise Monitoring			EPL Point	MCO Monitoring Site	Location	22	NM15	Castlerock Road north	23	NM4	Yarraman Road south	Compliant	
Noise/Weather																										
EPA identification no.	Type of monitoring point	Location description																								
Noise Monitoring																										
EPL Point	MCO Monitoring Site	Location																								
22	NM15	Castlerock Road north																								
23	NM4	Yarraman Road south																								

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations			Compliance Status	Non-Compliance Reference																																																																																										
	<table><tr><td>16</td><td>Air blast overpressure & ground vibration peak particle velocity monitoring</td><td>Blast monitor location marked and shown as "Monitoring Point 16" on Figure 1.</td></tr><tr><td>21</td><td>Air blast overpressure & ground vibration peak particle velocity monitoring</td><td>Blast monitor location marked and shown as "Monitoring Point 21" on Figure 1.</td></tr><tr><td>22</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM15) marked and shown as "Monitoring Point 22" on Figure 2.</td></tr><tr><td>23</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM4), marked and shown as "Monitoring Point 23" on Figure 2.</td></tr><tr><td>26</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM8), marked and shown as "Monitoring Point 26" on Figure 2.</td></tr><tr><td>27</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM10) marked and shown as "Monitoring Point 27" on Figure 2.</td></tr><tr><td>29</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM13) marked and shown as "Monitoring Point 29" on Figure 2.</td></tr><tr><td>30</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM14) marked and shown as "Monitoring Point 30" on Figure 2.</td></tr><tr><td>32</td><td>Air blast overpressure & ground vibration peak particle velocity monitoring</td><td>Blast monitor location marked and shown as "Monitoring Point 32" on Figure 1.</td></tr><tr><td>34</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM16) marked and shown as "Monitoring Point 34" on Figure 2.</td></tr><tr><td>35</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM17) marked and shown as "Monitoring Point 35" on Figure 2.</td></tr><tr><td>36</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM18) marked and shown as "Monitoring Point 36" on Figure 2.</td></tr><tr><td>37</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM19) marked and shown as "Monitoring Point 37" on Figure 2.</td></tr><tr><td>38</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM20) marked and shown as "Monitoring Point 38" on Figure 2.</td></tr><tr><td>39</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM21) marked and shown as "Monitoring Point 39" on Figure 2.</td></tr><tr><td>40</td><td>Noise monitoring</td><td>Attended noise monitoring location (NM22) marked and shown as "Monitoring Point 40" on Figure 2.</td></tr></table>	16	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 16" on Figure 1.	21	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 21" on Figure 1.	22	Noise monitoring	Attended noise monitoring location (NM15) marked and shown as "Monitoring Point 22" on Figure 2.	23	Noise monitoring	Attended noise monitoring location (NM4), marked and shown as "Monitoring Point 23" on Figure 2.	26	Noise monitoring	Attended noise monitoring location (NM8), marked and shown as "Monitoring Point 26" on Figure 2.	27	Noise monitoring	Attended noise monitoring location (NM10) marked and shown as "Monitoring Point 27" on Figure 2.	29	Noise monitoring	Attended noise monitoring location (NM13) marked and shown as "Monitoring Point 29" on Figure 2.	30	Noise monitoring	Attended noise monitoring location (NM14) marked and shown as "Monitoring Point 30" on Figure 2.	32	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 32" on Figure 1.	34	Noise monitoring	Attended noise monitoring location (NM16) marked and shown as "Monitoring Point 34" on Figure 2.	35	Noise monitoring	Attended noise monitoring location (NM17) marked and shown as "Monitoring Point 35" on Figure 2.	36	Noise monitoring	Attended noise monitoring location (NM18) marked and shown as "Monitoring Point 36" on Figure 2.	37	Noise monitoring	Attended noise monitoring location (NM19) marked and shown as "Monitoring Point 37" on Figure 2.	38	Noise monitoring	Attended noise monitoring location (NM20) marked and shown as "Monitoring Point 38" on Figure 2.	39	Noise monitoring	Attended noise monitoring location (NM21) marked and shown as "Monitoring Point 39" on Figure 2.	40	Noise monitoring	Attended noise monitoring location (NM22) marked and shown as "Monitoring Point 40" on Figure 2.		<table><tr><td>26</td><td>NM8</td><td>Wybong Road south</td><td></td></tr><tr><td>27</td><td>NM10</td><td>Wybong Road north</td><td></td></tr><tr><td>29</td><td>NM13</td><td>Roxburgh Road</td><td></td></tr><tr><td>30</td><td>NM14</td><td>Mangoola Road south</td><td></td></tr><tr><td>34</td><td>NM16</td><td>Bells Lane west</td><td></td></tr><tr><td>35</td><td>NM17</td><td>Cnr Golden Hwy & Rosemount Rd</td><td></td></tr><tr><td>36</td><td>NM18</td><td>Yarraman Rd, north of Wybong PO Rd</td><td></td></tr><tr><td>37</td><td>NM19</td><td>Yarraman Rd, near 165</td><td></td></tr><tr><td>38</td><td>NM20</td><td>Cnr Yarraman Rd + Ridgelands Rd</td><td></td></tr><tr><td>39</td><td>NM21</td><td>End of Mangoola driveway, near 144</td><td></td></tr><tr><td>40</td><td>NM22</td><td>Ridgelands Rd, south of 157</td><td></td></tr></table>	26	NM8	Wybong Road south		27	NM10	Wybong Road north		29	NM13	Roxburgh Road		30	NM14	Mangoola Road south		34	NM16	Bells Lane west		35	NM17	Cnr Golden Hwy & Rosemount Rd		36	NM18	Yarraman Rd, north of Wybong PO Rd		37	NM19	Yarraman Rd, near 165		38	NM20	Cnr Yarraman Rd + Ridgelands Rd		39	NM21	End of Mangoola driveway, near 144		40	NM22	Ridgelands Rd, south of 157			
	16	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 16" on Figure 1.																																																																																														
	21	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 21" on Figure 1.																																																																																														
	22	Noise monitoring	Attended noise monitoring location (NM15) marked and shown as "Monitoring Point 22" on Figure 2.																																																																																														
	23	Noise monitoring	Attended noise monitoring location (NM4), marked and shown as "Monitoring Point 23" on Figure 2.																																																																																														
	26	Noise monitoring	Attended noise monitoring location (NM8), marked and shown as "Monitoring Point 26" on Figure 2.																																																																																														
	27	Noise monitoring	Attended noise monitoring location (NM10) marked and shown as "Monitoring Point 27" on Figure 2.																																																																																														
	29	Noise monitoring	Attended noise monitoring location (NM13) marked and shown as "Monitoring Point 29" on Figure 2.																																																																																														
	30	Noise monitoring	Attended noise monitoring location (NM14) marked and shown as "Monitoring Point 30" on Figure 2.																																																																																														
	32	Air blast overpressure & ground vibration peak particle velocity monitoring	Blast monitor location marked and shown as "Monitoring Point 32" on Figure 1.																																																																																														
	34	Noise monitoring	Attended noise monitoring location (NM16) marked and shown as "Monitoring Point 34" on Figure 2.																																																																																														
	35	Noise monitoring	Attended noise monitoring location (NM17) marked and shown as "Monitoring Point 35" on Figure 2.																																																																																														
	36	Noise monitoring	Attended noise monitoring location (NM18) marked and shown as "Monitoring Point 36" on Figure 2.																																																																																														
	37	Noise monitoring	Attended noise monitoring location (NM19) marked and shown as "Monitoring Point 37" on Figure 2.																																																																																														
	38	Noise monitoring	Attended noise monitoring location (NM20) marked and shown as "Monitoring Point 38" on Figure 2.																																																																																														
	39	Noise monitoring	Attended noise monitoring location (NM21) marked and shown as "Monitoring Point 39" on Figure 2.																																																																																														
	40	Noise monitoring	Attended noise monitoring location (NM22) marked and shown as "Monitoring Point 40" on Figure 2.																																																																																														
	26	NM8	Wybong Road south																																																																																														
	27	NM10	Wybong Road north																																																																																														
	29	NM13	Roxburgh Road																																																																																														
	30	NM14	Mangoola Road south																																																																																														
	34	NM16	Bells Lane west																																																																																														
	35	NM17	Cnr Golden Hwy & Rosemount Rd																																																																																														
36	NM18	Yarraman Rd, north of Wybong PO Rd																																																																																															
37	NM19	Yarraman Rd, near 165																																																																																															
38	NM20	Cnr Yarraman Rd + Ridgelands Rd																																																																																															
39	NM21	End of Mangoola driveway, near 144																																																																																															
40	NM22	Ridgelands Rd, south of 157																																																																																															
The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.																																																																																																	
P1.5	For the purpose of the tables above: "The Premises Plan" refers to the plan titled "Mangoola Coal EPL 12894 -		This is noted			Noted																																																																																											

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Premises Plan and Environmental Monitoring Locations (excluding noise)", dated 18/11/2021 (EPA ref. DOC21/813044-4); and The "Noise Monitoring Plan" refers to the plan titled "Mangoola Coal EPL 12894 - Premises Plan and Noise Monitoring Locations", dated 18/11/2021 (EPA ref. DOC21/813044-5).				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
3 LIMIT CONDITIONS					
L1 POLLUTION OF WATERS					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Refer evidence against SSD8642 audit checklist condition B46	During the audit period, there was no evidence of water pollution as defined under Section 120 of the Protection of the Environment Operations Act 1997. Monitoring records, incident reports, and consultation with site personnel confirmed that no unauthorised discharges to waters occurred from MCO.	Compliant	
L2 CONCENTRATION LIMITS					
L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	- EPL water quality reports - Annual Reviews - Annual Returns - EMD	Water quality data for Monitoring Point 41 (active discharge) consistently demonstrates that pH and Total Suspended Solids (TSS) remained within the licenced limits: - pH: within the 6.5–9.5 range - TSS: remained below the 120 mg/L limit, with the highest value recorded at 99 mg/L in October 2022 Monitoring conducted by cBased Environmental, samples analysed by ALS, and results stored in the EMD (Environmental Monitoring Database). Monitoring Point 42 had no discharges during the audit period.	Compliant	
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	- EPL water quality reports - Annual Reviews	All pH results for discharges at Monitoring Point 41 were within the specified range; no exceedances were reported in any Annual Return or monthly water report. Monitoring Point 42 had no discharges during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																		
		- Annual Returns - EMD																					
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\		Only authorised parameters were monitored and reported. No evidence of unauthorised discharges or pollutants was identified.																				
L2.4	Water and/or Land Concentration Limits POINT 41,42 <table border="1"> <thead> <tr> <th>Pollutant</th><th>Units of Measure</th><th>50 Percentile concentration limit</th><th>90 Percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr> </thead> <tbody> <tr> <td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5-9.5</td></tr> <tr> <td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>120</td></tr> </tbody> </table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	pH	pH				6.5-9.5	Total suspended solids	milligrams per litre				120	- Monthly EPL Monitoring Reports - EMD - Annual Reviews - EPL Annual Returns - cBased Environmental field-based sampling records and ALS certificates of analysis	Discharge water quality at Point 41 is monitored monthly in accordance with the EPL. Field sampling is undertaken by cBased Environmental, with laboratory analysis conducted by ALS. All monitoring results are recorded and stored in the Environmental Monitoring Database (EMD), which also houses equipment calibration records, inspection logs, and historical trend data. During the audit period (July 2022 – July 2025), no exceedances of the applicable limits for pH or TSS were recorded at Monitoring Point 41. This was verified through: - Monthly EPL reports and review of EMD data all of which showed pH and TSS levels remained well within the licenced criteria. - Annual Returns, which did not report any non-compliances or incidents associated with discharges from Point 41. - Annual Reviews, which confirmed that licenced water discharge monitoring had been implemented and that	Compliant	
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																		
pH	pH				6.5-9.5																		
Total suspended solids	milligrams per litre				120																		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			discharge water quality consistently met the EPL limits. The highest TSS value recorded at Point 41 during the audit period was 99 mg/L, remaining below the EPL limit of 120 mg/L. All pH results during discharge events were within the range of 7.1 to 8.6, consistent with compliance requirements.		
L3 WASTE					
L3.1	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.		Mangoola Coal Mine holds an EPL authorising the disposal of heavy vehicle waste tyres only. The EPL also licences coal works (>5,000,000 t annual handling capacity), crushing, grinding or separating (500,000–2,000,000 t annual processing capacity), mining for coal (>5,000,000 t annual production capacity), and railway infrastructure operations (any annual capacity). Condition L3.1 is therefore only triggered in relation to tyre disposal, with no evidence of unlicensed waste disposal identified.	Compliant	
L3.2	The licensee must not dispose of more than 160 end-of-life mining heavy plant tyres on the premises in each annual return year period.	2024/25 Annual Return. - NSW EPA (2025). EPL 12894 – Variation Notice 1631210, dated 6 October 2025.	Disposal of end-of-life heavy plant tyres commenced in 2024 following EPL 12894 variation 1631210 (6 October 2025). The variation permits tyre burial within overburden emplacement areas and imposes specific disposal, stockpiling, and reporting requirements. In 2024/25, MCO disposed of 160 tyres, consistent with the EPL disposal limit. Records of tyre placement and quantities were maintained by the Tech Services Department and reported through the Annual Return.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																														
		- Discussion with MCO Environment & Community Manager - Site inspection																																	
L4 NOISE LIMITS																																			
L4.1	Noise generated at the premises must not exceed the noise limits in dB(A) presented in the table below. <table><tr><th>Location</th><th>Day LAeq(15min)</th><th>Evening LAeq(15min)</th><th>Night LAeq(15min)</th><th>Night LA1(15min)</th></tr><tr><td>EPA Point 22 (NM15) in NMG A</td><td></td><td></td><td>34</td><td>48</td></tr><tr><td>EPA Point 23 (NM4) in NMG H</td><td></td><td></td><td>41</td><td>54</td></tr><tr><td>EPA Point 26 (NM8) in NMG G</td><td></td><td></td><td>40</td><td>52</td></tr><tr><td>EPA Point 27 (NM10) in NMG B</td><td></td><td></td><td>35</td><td>51</td></tr><tr><td>EPA Point 29 (NM13) in NMG C</td><td></td><td></td><td>38</td><td>50</td></tr></table>	Location	Day LAeq(15min)	Evening LAeq(15min)	Night LAeq(15min)	Night LA1(15min)	EPA Point 22 (NM15) in NMG A			34	48	EPA Point 23 (NM4) in NMG H			41	54	EPA Point 26 (NM8) in NMG G			40	52	EPA Point 27 (NM10) in NMG B			35	51	EPA Point 29 (NM13) in NMG C			38	50	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website. - Annual Returns, 07/07/2022-06/07/2023, 07/07/2023-06/07/2024. - EMD attended noise monitoring records. - MCO RFI Response, Low Frequency Response	A review of the monitoring data for the audit period indicated that monitoring was being undertaken at the monitoring points specified in the EPL. EMM consulting are engaged to perform attended noise monitoring. The results from attended monitoring are compliance based, and any identified exceedances of noise impact assessment criteria would be reported to the Regulator accordingly. Noise monitoring reports are published monthly on the MCO public website. A review of noise monitoring reports for the audit period indicated that no exceedances of noise impact assessment criteria were recorded.	Compliant	
Location	Day LAeq(15min)	Evening LAeq(15min)	Night LAeq(15min)	Night LA1(15min)																															
EPA Point 22 (NM15) in NMG A			34	48																															
EPA Point 23 (NM4) in NMG H			41	54																															
EPA Point 26 (NM8) in NMG G			40	52																															
EPA Point 27 (NM10) in NMG B			35	51																															
EPA Point 29 (NM13) in NMG C			38	50																															

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference																																																									
	<table><tr><td>EPA Point 30 (NM14) in NMG D</td><td>37</td><td>53</td></tr><tr><td>EPA Point 34 (NM16) in NMG E</td><td>37</td><td>52</td></tr><tr><td>EPA Point 35 (NM17) in NMG F</td><td>36</td><td>51</td></tr><tr><td>EPA Point 36 (NM18) in NMG I</td><td>39</td><td>52</td></tr><tr><td>EPA Point 37 (NM19) in NMG J</td><td>35</td><td>51</td></tr><tr><td>EPA Point 38 (NM20) in NMG K</td><td>38</td><td>51</td></tr><tr><td>EPA Point 39 (NM21) in NMG L</td><td>40</td><td>49</td></tr><tr><td>EPA Point 40 (NM22) in NMG M</td><td>46</td><td>58</td></tr><tr><td>Residence 171, 176, 144</td><td>40</td><td>40</td></tr><tr><td>Residence 25, 128, 154, 193, 125A, 182B</td><td>40</td><td>38</td></tr><tr><td>Residence 261</td><td>Years 1 & 2 - 42 Year 3 Onward - 40</td><td>38</td></tr><tr><td>Residence 54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190,157</td><td>40</td><td>37</td></tr><tr><td>Residence 165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B</td><td>40</td><td>36</td></tr><tr><td>Residence 134A</td><td>Years 1 and 2 - 44 Year 3 onward 40</td><td>39</td></tr><tr><td>Residence 109A - F</td><td>Years 1 and 2 - 43 Year 3 onward - 40</td><td>39</td></tr><tr><td>Residence 263</td><td>Years 1 and 2 - 42 Year 3 onward - 40</td><td>39</td></tr><tr><td>Residence 164</td><td>40</td><td>35</td></tr><tr><td>All other privately owned residences</td><td>40</td><td>35</td></tr><tr><td>Wybong Hall and Anglican Church</td><td>48</td><td>48</td></tr></table>	EPA Point 30 (NM14) in NMG D	37	53	EPA Point 34 (NM16) in NMG E	37	52	EPA Point 35 (NM17) in NMG F	36	51	EPA Point 36 (NM18) in NMG I	39	52	EPA Point 37 (NM19) in NMG J	35	51	EPA Point 38 (NM20) in NMG K	38	51	EPA Point 39 (NM21) in NMG L	40	49	EPA Point 40 (NM22) in NMG M	46	58	Residence 171, 176, 144	40	40	Residence 25, 128, 154, 193, 125A, 182B	40	38	Residence 261	Years 1 & 2 - 42 Year 3 Onward - 40	38	Residence 54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190,157	40	37	Residence 165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B	40	36	Residence 134A	Years 1 and 2 - 44 Year 3 onward 40	39	Residence 109A - F	Years 1 and 2 - 43 Year 3 onward - 40	39	Residence 263	Years 1 and 2 - 42 Year 3 onward - 40	39	Residence 164	40	35	All other privately owned residences	40	35	Wybong Hall and Anglican Church	48	48	Explanation, July 2025. • EMM noise prediction tool • CMO Portal			
EPA Point 30 (NM14) in NMG D	37	53																																																												
EPA Point 34 (NM16) in NMG E	37	52																																																												
EPA Point 35 (NM17) in NMG F	36	51																																																												
EPA Point 36 (NM18) in NMG I	39	52																																																												
EPA Point 37 (NM19) in NMG J	35	51																																																												
EPA Point 38 (NM20) in NMG K	38	51																																																												
EPA Point 39 (NM21) in NMG L	40	49																																																												
EPA Point 40 (NM22) in NMG M	46	58																																																												
Residence 171, 176, 144	40	40																																																												
Residence 25, 128, 154, 193, 125A, 182B	40	38																																																												
Residence 261	Years 1 & 2 - 42 Year 3 Onward - 40	38																																																												
Residence 54, 79, 114, 141, 151, 192, 206, 321, 125C, 182A, 241A, 241C, 190,157	40	37																																																												
Residence 165, 177, 106B, 104, 166, 178, 251, 253, 260, 112B, 183C, 184A, 147, 112A, 112C, 240, 241B	40	36																																																												
Residence 134A	Years 1 and 2 - 44 Year 3 onward 40	39																																																												
Residence 109A - F	Years 1 and 2 - 43 Year 3 onward - 40	39																																																												
Residence 263	Years 1 and 2 - 42 Year 3 onward - 40	39																																																												
Residence 164	40	35																																																												
All other privately owned residences	40	35																																																												
Wybong Hall and Anglican Church	48	48																																																												
L4.2	For the purposes of condition L3.1: a) Residences referenced in this table are from consent SSD-8642 Mangoola Coal Continued Operations Project dated 26 April 2021 EPA Reference DOC21/754113; and b) Noise Monitoring Groups (NMG) in this table are referenced in the document titled "Justification for limits at noise monitoring points" dated 12 November 2021 by EMM Consulting, EPA Reference DOC21/813044-7.		This is noted.	Noted																																																										

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
L4.3	For the purposes of Condition L3.1: - Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays, - Evening is defined as the period from 6pm to 10pm, and - Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website.	This is noted. Day, evening and night periods are defined in Appendix B of the NMP. MCO advised that the attended monitoring frequency changed from quarterly day and night to monthly attended monitoring at night only, following consultation with the Department (as per the approved NMP). Real-time noise monitoring is also used for proactive and reactive noise management of day-to-day operations at MCO, rather than a tool to monitor compliance.	Noted	
L4.4	The noise limits set out in this licence apply under all meteorological conditions except for the following: - Wind speeds greater than 3 metres/second at 10 metres above ground level; or - Stability category F temperature inversion conditions and wind speeds greater than 2 metres/ second at 10 metres above ground level; or - Stability category G temperature inversion conditions. For the purposes of this condition: - Data recorded by the meteorological stations within licence condition P1.1 must be used to determine meteorological conditions; and ii) Temperature inversion conditions (stability category) are to be determined by the methods referred to in Fact Sheet D	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, Attended construction Noise Monitoring Reports, monthly from December 2021 to April 2023. - EPL Noise Reports September 2022, September	All reviewed Noise reports acknowledge the exceptions to meteorological conditions as outlined under EPL Criteria L4.4.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	of the Noise Policy for Industry (EPA 2017).	2023, March 2024, October 2024, February 2025.			
L4.5	The noise limits in condition L3.1 do not apply if the licensee has a written agreement with the relevant landowner to exceed the noise limit and the licensee has advised the EPA in writing. The noise limits in condition L3.1 do not apply to mine owned residences.	- Email from DPHI to MCO, Mangoola Coal Continued Operations Project - Post Approval Document Received - Impact Mitigation and Compensation Agreement (S SD-8642-PA-81), 21/11/2024 - Letter from MCO to DPHI, re. state significant Development SSD8642 – Schedule 2 Condition B2 and B28 Impact Mitigation and Compensation Agreement, 21/11/2024	In accordance with Condition B2 of SSD 864 and EPL 12864 Condition L4.5, the noise criteria in Table 1 did not apply to one receptor during the audit period, as an agreement was in place with the landowner, with noise mitigation rights decreased for compensation, however, monitoring continued at this location. The noise agreement and notification to DPHI was sighted during the audit.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website.			
L5 BLASTING					
L5.1	The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 16, 21 or 32 in Condition P1.4.	- EMD blast database - Dynamaster database - Blast Management Plan, Version 21, 23/01/2025 - Annual Blast Report 22_23 - Annual Blast Report 23_24 - Annual Review 2022, 2023, 2024	The auditors reviewed EMD, dynamaster and Blast Monitoring Reports which included blast monitoring results for all blasts during the audit period. EPL Condition M7.1 requires MCO to measure ground vibration and airblast overpressure for all blasts. MCO failed to monitor over pressure and ground vibration for one blast event in Main Pit on 18 January 2023. The issue was identified during an internal review on 5 March 2024, and subsequently confirmed as a non-compliance following advice from ACOEM on 7 March 2024. The EPA was formally notified on 14 March 2024, and MCO submitted a detailed investigation report on 8 May 2024. EPA considered it a contravention of the EPL and an offence under section 64 of	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			the POEO Act. Despite that, because it was a single isolated data gap and corrective action was taken, no recommendation has been made. In response to the non-compliance, MCO has updated the Blast Monitoring Plan to include data validation processes within the EMD system, including a cross-check of blast data against the original blast designs. A validation tracking system has now been implemented in CMO monthly, with a validation step incorporated into the Blast Field Sheet.		
L5.2	The airblast overpressure level from blasting operations in or on the premises must not exceed: 120 dB (Lin Peak) at any time; at either monitoring point 16, 21 or 32 in Condition P1.4.	• EMD blast database • Dynamaster database • Blast Management Plan, Version 21, 23/01/2025 • Annual Blast Report 22_23 • Annual Blast Report 23_24 • Annual Review 2022, 2023, 2024	The auditors reviewed EMD, dynamaster and Blast Monitoring Reports which included blast monitoring results for all blasts during the audit period. No exceedances of the blast criteria of this condition were recorded during the audit period.	Compliant	
L5.3	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 5 mm/second for more than 5% of the total number of blasts during each reporting period;	• EMD blast database • Dynamaster database • Blast Management	The auditors reviewed the EMD, Dynamaster, and Blast Monitoring Reports, which contained blast monitoring results for all blasts during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	at either monitoring point 16, 21 or 32 in Condition P1.4	- Plan, Version 21, 23/01/2025 - Annual Blast Report 22_23 - Annual Blast Report 23_24 - Annual Review 2022, 2023, 2024	No exceedances of the ground vibration peak particle velocity criteria for blasting operations were recorded during this period.		
L5.4	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 10 mm/second at any time; at either monitoring point 16, 21 or 32 in Condition P1.4.	- EMD blast database - Dynamaster database - Blast Management Plan, Version 21, 23/01/2025 - Annual Blast Report 22_23 - Annual Blast Report 23_24 - Annual Review 2022, 2023, 2024	The auditors reviewed the EMD, Dynamaster, and Blast Monitoring Reports, which contained blast monitoring results for all blasts during the audit period. No exceedances of the ground vibration peak particle velocity criteria for blasting operations were recorded during this period.	Compliant	
L5.5	Blasting in or on the premises must only be carried out between 09:00 hours and 17:00 hours, Monday to Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.	- Blast Monitoring Field Sheet, RS Wybong North, 13 June 2025 - EMD database - Ecotech platform	MCO carry out blasting at the Site between 9am and 5pm. The Ecotech platform (which records blast times), Blast Monitoring Field Sheets and Monthly Monitoring Reports were reviewed confirming that blasting activities were conducted within approved hours and days, as tracked in the EMD spreadsheet and reported in the Annual Reviews.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		MCO Public Website, Monthly Monitoring Reports	The Blast Management Plan outlines the approved blasting framework, including permissible hours and days for blasting.		
L5.6	Offensive blast fume must not be emitted from the premises. <i>Definition:</i> <i>Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances:</i> <i>1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or</i> <i>2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.</i>	- Blast Monitoring Field Sheet, RS Wybong North, 13 June 2025 - EMD database - Ecotech platform - MCO Public Website, Monthly Monitoring Reports - Community Complaints Registers, 2022, 2023, 2024, 2025, MCO Public Website	No incidents involving offensive blast fume being emitted occurred during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
4 OPERATING CONDITIONS					
O1 ACTIVITIES MUST BE CARRIED OUT IN A COMPETENT MANNER					
O1.1	Licensed activities must be carried out in a competent manner. This includes: - the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Refer findings against SSD-8642 Audit Checklist	At the time of the audit MCO was actively mining from the Main Pit and Wybong Pit, with all product coal processed at the Coal Handling Preparation Plant (CHPP) and transported from site by rail to the Port of Newcastle for export. Train haulage operations are managed by the CHPP, with haulage data tracked daily through the MINVU system and reported to the E&C Department to support compliance monitoring and reporting obligations. Site inspection observations confirmed coal processing, handling, and transport were being conducted competently. Inspection of the CHPP, Mine Infrastructure Area (MIA), Water Treatment Plant, Oily Water Separator, Waste storage areas, and associated documentation confirmed that the storage, processing, and handling of coal, water, hydrocarbons, and other substances were satisfactory. MCO has implemented an internal Waste Management Plan (v8.0, 30 May 2024) to guide waste handling practices. JR Richards is engaged under contract as the licensed waste contractor to manage general site waste, with weekly EPA service dockets and monthly registers outlining volumes collected and licensed disposal locations. A Waste Tracking Certificate (10 August 2023) was sighted.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			Council Approval 5/2010 governs the on-site sewage treatment plant, with monitoring of effluent parameters undertaken in accordance with Council and EPL 12894 requirements. In addition, disposal of end-of-life heavy plant tyres was undertaken in line with EPL 12894, with the 2024/25 Annual Return confirming disposal of 160 tyres, consistent with the annual limit. Based on site inspection observations and supporting documentation, the processing and handling of materials and the treatment and disposal of waste were found to be carried out in a competent manner.		
O2 MAINTENANCE OF PLANT AND EQUIPMENT					
O2.1	MAINTENANCE OF PLANT AND EQUIPMENT All plant and equipment installed at the premises or used in connection with the licensed activity: • must be maintained in a proper and efficient condition; and • b) must be operated in a proper and efficient manner.	• Refer findings against SSD-8642 Condition A30	Refer findings against SSD-8642 Condition A30 confirmed that all plant and equipment are maintained and operated in a proper and efficient manner. Evidence sighted included the SAP maintenance system and work orders, C-Based HVAS calibration record (26/05/2025), sound testing of excavator (08/04/2025), and interviews with the Maintenance Planner. Only qualified personnel and contractors undertake operation and maintenance, with calibration and training sighted by the auditors verified as current. No evidence of improper or inefficient operation was observed.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
02.2	The licensee is responsible for the correct operation of the sewage treatment system on their premises.	- Water Management Plan, Version 1, 02/12/2022 - Monthly EPL STP Effluent Reports, MCO Public Website - Site Inspection	MCO operates a sewage treatment plant (STP) adjacent to the MIA/administration area, which treats wastewater from the MIA and CHPP. Treated effluent is discharged to the MIA Dam. The system is designed to process up to 40,000 L of sewage influent per day. MCO holds Muswellbrook Shire Council approval WTA No: 5/2010 for the operation of the on-site sewage management system, as referenced in the approved Water Management Plan (v1.0, 02/12/2022). Monthly EPL effluent monitoring reports (publicly available on the MCO website) confirm ongoing compliance with required monitoring and reporting obligations. The sewage treatment system was observed to be operating under the required approval and in accordance with EPL and Council requirements. Condition assessed as Compliant.	Compliant	
02.3	Correct operation of the sewage treatment system involves regular supervision and system maintenance. The licensee must be aware of the system management requirements and must ensure that the necessary service contracts are in place.	- Gauge Industrial and Environmental , Sewage Treatment Plant (STP) Report, Version 1, 24 July 2023 - All Septic Services,	MCO engage contractors to undertake servicing and maintenance of the STP. All Septic Services undertake monthly periodic septic services and issue Statement of Compliance Certificates. Carbon based (C-Based) undertake sampling and ALS analyse results. Review of monitoring reports for the audit period indicates that Mangoola is managing on-site sewage treatment and	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		OSSM AWTS Statement of Compliance Certificate, 15/07/2023	disposal in accordance with Council requirements.		
O2.4	The sewage treatment system must be serviced by a suitably qualified and experienced wastewater technician at least once in each quarterly period and a minimum of four times per year.	Gauge Industrial and Environmental , Sewage Treatment Plant (STP) Report, Version 1, 13 August 2024	All Septic Services undertake servicing and monthly maintenance of the STP. Review of monitoring reports for the audit period indicates that Mangoola is managing on-site sewage treatment and disposal in accordance with Council requirements.	Compliant	
O2.5	The licensee must record each inspection and any actions required or recommended by the technician including date, time, all results of tests performed on the sewage treatment system by the technician.	- All Septic Services, OSSM AWTS Statement of Compliance Certificate, 6/08/2024 - Monthly EPL STP Effluent Reports, MCO Public Website	STP reports for each Annual Return in the audit period were prepared by Gauge Industrial and Environmental consultants. Gauge Industrial and Environmental report on effluent water quality, maintenance performance, septic service checks and a Statement of Compliance Certificate. The auditors reviewed the Gauge Industrial and Environmental STP Reports and noted that STP performance had declined over the past two years. In 2023, effluent quality was reported as satisfactory, with occasional BOD and nitrogen exceedances and isolated disinfection failures. 2024 reported frequent nitrogen exceedances, disinfection issues, and elevated bacterial levels. While maintenance reports identified issues requiring attention, there is no evidence to suggest that the sewage treatment system was not being operated correctly. The system continues to function within its design capacity as certified in the	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			Compliance Certificates, and operational obligations appear to have been met.		
O3 DUST					
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	- Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025 - Site Inspection - Novecom Pty Ltd Work Order History 1/6/2025-30/6/2025 - assets - Sentinex Noise Modules and monitors, Dust Modules and Monitors - CBased Environmental Pty Ltd, HVAS Calibration Forms various units, 26/05/2025. - Novecom Pty Ltd. Sentinex Dust Unit	Auditors confirmed that MCO maintain the Site in a condition which minimises or prevents the emission of dust from the premises. The site inspection confirmed MCO implement the controls outlined in the Air Quality and Greenhouse Gas Management Plan (AQGGMP) including use of water carts, road maintenance, low-height loading, operational air quality monitoring infrastructure, air quality monitoring program, data management, and weather forecasting informing daily planning. Refer to more controls outlined in SSD8642 Section 2 Schedule B30.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		Maintenance and Calibration Reports: - WO 49806. 2 Monthly – 11/06/20 25 (86 D1 TEOM 1405) - WO 49070. 2 Monthly – 2/04/202 5 (86 D3 TEOM 1405) - WO 49070. 2 Monthly – 12/06/20 25 (86 D6 BAM 1020 PM10-2.5))			
03.2	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	• Site Inspection	A site inspection was undertaken, covering the CHPP area, main pit and haul roads. The following control measures are in place to minimise wind-blown, or traffic generated dust:	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			- Water carts to prevent dust generation. - Graders maintain the road roads/tracks. - Water sprays for coal stockpiles and on train loader facilities. - Vehicle required to operate at low speeds to avoid the generation of excess dust. - Vehicle wash bay used.		
O3.3	All trafficable areas, coal storage areas and vehicle manoeuvring areas in or on the premises must be maintained, at all times, in a condition that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	Refer to evidence against Conditions O3.1 and O3.2	Refer to findings against Conditions O3.1 and O3.2	Compliant	
O4 EFFLUENT APPLICATION TO LAND					
O4.1	Effluent application must not occur in a manner that causes surface runoff.	- Site Inspection - Discussion with E&C Manager	Activities are not undertaken onsite which trigger this condition.	Not Triggered.	
O4.2	Spray from effluent application must not drift beyond the boundary of the premises.		Activities are not undertaken onsite which trigger this condition.	Not Triggered.	
O4.3	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' include the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.		Activities are not undertaken onsite which trigger this condition.	Not Triggered.	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
O5 WASTE MANAGEMENT					
O5.1	The Licensee is authorised to dispose of heavy plant-tyre waste generated on the premises in accordance with condition L3.2, in the waste rock/overburden emplacements. The Licensee must: - ensure that heavy plant waste tyres are re-used on the premises as much as practical; - ensure that heavy plant waste tyres are laid flat with a maximum of 10 tyres per site and a minimum distance of 10 metres between sites; - ensure that any surplus heavy plant waste tyres can be emplaced by being spread out within the waste - rock/overburden emplacement and buried as deep as practical, but covered by at least 20m of inert material beneath any final rehabilitated surface; - place heavy plant waste tyres at least 10 metres away from coarse reject material or tailings emplacement areas; - not place any heavy plant waste tyres near heated material; and 6. not place any heavy plant waste tyres in an area likely to leach to any watercourse.	- Dig and Dump Design Standard - Heavy-Plant Waste tyre Disposal Report, 7 July 2023 – 6 July 2024	MCO has implemented a heavy plant tyre management system aimed at maximising the operational life of each tyre. This system includes measures such as speed monitoring and regular tyre rotations. Due to mine closure and rehabilitation requirements, opportunities for on-site reuse of tyres are limited, as any reused tyres would ultimately require disposal. Tyre disposal is carried out in accordance with MCO's Dig and Dump Design Standard, which outlines the approved methodology for heavy tyre emplacement. The Technical Services team is responsible for managing the location and positioning of heavy vehicle plant tyres throughout the site in line with relevant EPL conditions.	Compliant	
O5.2	Stockpiles of any heavy plant waste tyres stored at the premises awaiting disposal must; - be less than 3.7 metres height and; - not cover an area of more than 400 square metres; and 3. not be located within 10 metres of any other flammable or combustible materials.	Earth Moving Tyres and Rim Management Standard, Version 6.0 22/05/2025	The requirements of O5.2 are outlined in MCO's Earth Moving Tyres and Rim Management Standard. Stockpiles of heavy plant waste tyres were sighted and requirements confirmed during the site inspection.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
O6 OTHER OPERATING CONDITIONS					
O6.1	A saline water management system must be established for the containment of any water that has come into contact with coal or coal tailings, including saline groundwater seepage, coal stockpile runoff and runoff from coal haul roads.	Surface Water Management Plan - Schematic	MCO manages saline water on site through its WMP, specifically the SWMP, which addresses saline water, commonly referred to as mine water. Mine water is contained within the site's controlled water system and is reused operationally by the CHPP and for dust suppression activities. Importantly, this water is only released via the HRSTS discharge point under specific conditions within the EPL.	Compliant	
O6.2	Water from the saline water management system must not be discharged from the site unless authorised by this licence and must not be used in areas that drain to the site's non-saline water management systems.	EMD database	During the audit period, saline water discharged from the site occurred exclusively through the HRSTS discharge point.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
5 MONITORING AND RECORDING CONDITIONS					
M1 MONITORING RECORDS					
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.		MCO maintains all monitoring results within the Environmental Monitoring Database (EMD), supported by field records from cBased Environmental and laboratory certificates of analysis from ALS (NATA-accredited). Records reviewed during the audit period confirmed that monitoring data is consistently recorded, retained, and readily retrievable for regulatory reporting and compliance verification.	Noted	
M1.2	All records required to be kept by this licence must be: - in a legible form, or in a form that can readily be reduced to a legible form; - kept for at least 4 years after the monitoring or event to which they relate took place; and - produced in a legible form to any authorised officer of the EPA who asks to see them.	- EPA Formal Warning, dated 17/06/2024 - EMD blast database - Dynamaster database - Blast Management Plan, Version 21, 23/01/2025	A formal warning was issued to MCO by the EPA on 17 June 2024. The EPA determined that failure to retain monitoring data required by Condition M7.1 for at least four years was a contravention of licence condition M1.2 and also breached licence condition R5.1, both of which constitute an offence under section 64 of the Act. No further regulatory action was recommended as the non-compliance related to a single blast event, was identified by MCO through its own internal review, and was promptly reported to DPHI and the EPA, along with details of the cause and corrective actions taken. Internal procedures have since been updated to prevent recurrence, and no similar issues were identified for the remainder of the reporting period, with the	Non-compliant	NC005

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference								
			proactive site response considered adequate.										
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: - the date(s) on which the sample was taken; - the time(s) at which the sample was collected; - the point at which the sample was taken; and d) the name of the person who collected the sample.	CBased Environmental Field Sheet surface Water Monitoring, COC COA 18/12/2024, 27/02/2024 and 20/06/2025	Records related to sampling are maintained in accordance with licence requirements. Chain of Custody (COC) forms, a sample of surface water field sheets, and laboratory reports such as those were sighted to document the necessary details for each sample collected. These included the date and time of sampling, the specific location or sampling point, and the name of the individual who collected the sample.	Compliant									
M2 REQUIREMENT TO MONITOR CONCENTRATION OF POLLUTANTS DISCHARGED													
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Conditions M2.2 and M2.3	Refer to evidence against conditions M2.2 and M2.3	Compliant									
M2.2	Air Monitoring Requirements POINT 19,20 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Continuous</td><td>Special Method 1</td></tr></table> <i>Note: Special Method 1 requires the Licensee to undertake the monitoring of PM10 concentration in strict accordance with the manufacturer's operating manual supplied with the continuous monitoring equipment and titled</i>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	Special Method 1	- Air Quality and Greenhouse Gas Management Plan, Version 2.0, Dated 26/03/2025 - EMD	The site inspection confirmed implementation of the approved AQGGMP, with effective dust controls (water carts, road maintenance, low-height loading), operational air quality monitoring infrastructure and data management, and weather forecasting informing daily planning.	Non-compliant	NC008
Pollutant	Units of measure	Frequency	Sampling Method										
PM10	micrograms per cubic metre	Continuous	Special Method 1										

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	<i>"E-Sampler-9800 Particulate Monitor Operation Manual Revision K", or any updated version as published by the manufacturer.</i>	- Annual Returns, 07/07/2022-06/07/2023, 07/07/2023-06/07/2024. - Annual Reviews 2022, 2023, 2024	Energy efficiency and greenhouse gas reduction measures, including optimised haulage, efficient equipment use, and annual performance reviews, were also being implemented. Refer to controls outlined in Section 2 Schedule B30. Air Quality data is recorded and available in the Sentinex platform, and saved in EMD, which is maintained by Novecom (Sentinex) and Mangoola (EMD). Annual inspection and calibration reports were stored in EMD and were sighted by the auditors. Calibration, maintenance and inspection is conducted by Novecom quarterly. The auditor sighted records of inspection and calibrations. During the audit period, there were occurrences where air quality monitoring data was not adequately captured in accordance with EPL 12894 requirements and the NSW EPA's <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (2022)</i>. Intermittent data loss occurred between 2022–2024 due to scheduled maintenance, technical faults, low battery, and flow failures. Field servicing was undertaken in each case, with units replaced where issues persisted. All faults were rectified promptly once identified.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Detail of the reported non-compliances in the Annual Reviews are provided below: Annual Review 7-7-2022 To: 6-7-2023 M2.2 – Monitoring Point 20 Failure to continuously monitor PM10 concentration at Monitoring Point 20 due to breakdowns and maintenance. • Failure to continuously monitor PM10 occurred three times 7/7/22-8/7/22, 27/11/22-1/12/22, 15/1/23 • 07/07/2022 to 08/07/2022 – Monitoring unit low battery charge. • 27/11/2022 to 01/12/2022 – Re-start issue after factory calibrated monitor was reinstalled. • 15/01/2023 – Technical issue, likely caused by insect interference, led to invalid and elevated 24hr average. There were no recognisable or adverse effects of the non-compliance. Air quality monitoring was completed at alternative Monitoring Point 19 during the breakdown period. Annual Review 7/7/23-6/7/24 M2.2 – Monitoring Point 19 Failure to continuously monitor PM10 concentration at Monitoring Point 19 due to breakdowns and maintenance. Occurred 7 times: • 19/08/2023 – 21/08/2023: Unit removed for 24-month OEM maintenance.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			1/04/2024 – 4/04/2024: Technical issue with flow rate, removal of unit for maintenance. M2.2 – Monitoring Point 20 Failure to continuously monitor PM10 concentration at Monitoring Point 20 due to breakdowns and maintenance. Occurred 16 times: 22/07/2023: sporadic flow failures resulted in insufficient data capture 26/07/2023: sporadic flow failures resulted in insufficient data capture 30/07/2023: sporadic flow failures resulted in insufficient data capture 3/08/2023 – 4/08/2023: sporadic flow failures resulted in insufficient data capture 7/08/2023: sporadic flow failures resulted in insufficient data capture 8/08/2023 – 9/08/2023: unit replaced with hire unit; insufficient data captured to calculate average 1/10/2023: Insufficient. insufficient data captured to calculate average. Reporting Gaps Annual Returns were noted to be missing the following dates ranges which were outlined in the Annual Reviews: 14/12/2023 and 18/12/2023; and 26/04/2024 and 29/04/2024. Further Review of Reporting Gaps The 2023–24 Annual Return (EPL reporting period: 7 July 2023 – 6 July 2024) included reported non-compliances		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			against Conditions M2.2 and M4.1. However, for non-compliances against Condition M2.1 (relating to EPL Monitoring Points 19 and 20), the “Date(s) when the non-compliances occurred, if applicable” field was left incomplete. A review of Annual Reviews against Annual Returns and raw data highlighted inconsistencies with regulatory reporting for Non-compliances, against requirements of the AQGGMP: • A comparison between the 2023-24 Annual Return and the 2023 Annual Review identified several discrepancies in the dates and descriptions of non-compliances for Monitoring Point 20. Examples include: • 1/10/2023 is referenced in the 2023-24 Annual Return, however is not reflected in the Annual Review • 14/12/2023 - 18/12/2023, referenced in the 2023 Annual Review, is not referenced in the 2023-24 Annual Return. • 26/04/2024 and 29/04/2024 is referenced in the 2024 Annual Review however is not referenced in the 2023-24 Annual Return. • The 2023-24 Annual Return states the Monitoring Point 20 unit was replaced on 17/07/2024. The 2023 Annual Review states the unit was replaced however replacement occurred between 09/08/2023 and 14/12/2023.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																																								
			MCO advised that some inconsistencies were due to character limitations within the EPA’s eConnect portal, which truncated the full list of dates entered in the “Cause of non-compliance” field. These inconsistencies suggest a lack of alignment between the two statutory reports. It is recommended that future Annual Reviews and Annual Returns clearly identify overlapping or related events, with reference to both the relevant reporting period and EPL monitoring point, to ensure consistency in regulatory reporting.																																																										
M2.3	Water and/ or Land Monitoring Requirements POINT 7,8,9,31 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Conductivity</td><td>microsiemens per centimetre</td><td>Once a month (min. of 4 weeks)</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Once a month (min. of 4 weeks)</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Once a month (min. of 4 weeks)</td><td>Grab sample</td></tr></table> POINT 10,11 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Conductivity</td><td>microsiemens per centimetre</td><td>Quarterly</td><td>A probe designed to measure the range 0 to 10,000 uS/cm</td></tr><tr><td>pH</td><td>pH</td><td>Quarterly</td><td>Grab sample</td></tr></table> POINT 12 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Continuous during discharge</td><td>A probe designed to measure the range 0 to 10,000 uS/cm</td></tr><tr><td>Volumetric flowrate</td><td>megalitres per day</td><td>Continuous during discharge</td><td>Flow meter and continuous logger</td></tr></table> POINT 13,14 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Conductivity</td><td>microsiemens per metre</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr></table> POINT 33	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Once a month (min. of 4 weeks)	Grab sample	pH	pH	Once a month (min. of 4 weeks)	Grab sample	Total suspended solids	milligrams per litre	Once a month (min. of 4 weeks)	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per centimetre	Quarterly	A probe designed to measure the range 0 to 10,000 uS/cm	pH	pH	Quarterly	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Electrical conductivity	microsiemens per centimetre	Continuous during discharge	A probe designed to measure the range 0 to 10,000 uS/cm	Volumetric flowrate	megalitres per day	Continuous during discharge	Flow meter and continuous logger	Pollutant	Units of measure	Frequency	Sampling Method	Conductivity	microsiemens per metre	Daily during any discharge	Grab sample	pH	pH	Daily during any discharge	Grab sample	Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample	- Mangoola Water Management Plan (MANOC-1772150304-6221, Rev 1, effective 2 December 2022) - Water Balance Review 2023 and 2024, prepared by Engeny 2025 Water Balance Update, prepared by Engenv	Monitoring under EPL 12894 is undertaken at Points 7, 8, 9, 10, 11, 12, 13, 14, 31, 33, 41, and 42 for the parameters, frequency, and methods specified in the licence. Review of monitoring records, Annual Reviews (2022–2024), and Annual Returns confirmed that monitoring was conducted in accordance with EPL requirements. At Point 33 (STP), the licence requires quarterly monitoring; however, Mangoola undertakes monthly monitoring to align with Council Approval requirements for BOD and TSS. This represents monitoring in excess of EPL obligations.	Compliant	
Pollutant	Units of measure	Frequency	Sampling Method																																																										
Conductivity	microsiemens per centimetre	Once a month (min. of 4 weeks)	Grab sample																																																										
pH	pH	Once a month (min. of 4 weeks)	Grab sample																																																										
Total suspended solids	milligrams per litre	Once a month (min. of 4 weeks)	Grab sample																																																										
Pollutant	Units of measure	Frequency	Sampling Method																																																										
Conductivity	microsiemens per centimetre	Quarterly	A probe designed to measure the range 0 to 10,000 uS/cm																																																										
pH	pH	Quarterly	Grab sample																																																										
Pollutant	Units of measure	Frequency	Sampling Method																																																										
Electrical conductivity	microsiemens per centimetre	Continuous during discharge	A probe designed to measure the range 0 to 10,000 uS/cm																																																										
Volumetric flowrate	megalitres per day	Continuous during discharge	Flow meter and continuous logger																																																										
Pollutant	Units of measure	Frequency	Sampling Method																																																										
Conductivity	microsiemens per metre	Daily during any discharge	Grab sample																																																										
pH	pH	Daily during any discharge	Grab sample																																																										
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample																																																										

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																								
	<table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Faecal Coliforms</td><td>colony forming units per 100 millilitres</td><td>Quarterly</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Quarterly</td><td>Grab sample</td></tr></tbody></table> POINT 41,42 <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>pH</td><td>pH</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr></tbody></table>	Pollutant	Units of measure	Frequency	Sampling Method	Faecal Coliforms	colony forming units per 100 millilitres	Quarterly	Grab sample	pH	pH	Quarterly	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	pH	pH	Daily during any discharge	Grab sample	Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample	- Site Water Storage Report, dated 30 June 2025 - CITEC System Weekly Water Level Reports (as described in site interviews) - Refer evidence against SSD8642 Condition B52.			
Pollutant	Units of measure	Frequency	Sampling Method																										
Faecal Coliforms	colony forming units per 100 millilitres	Quarterly	Grab sample																										
pH	pH	Quarterly	Grab sample																										
Pollutant	Units of measure	Frequency	Sampling Method																										
pH	pH	Daily during any discharge	Grab sample																										
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample																										
M3 TESTING METHODS – CONCENTRATION LIMITS																													
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: - any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or - if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or - if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Refer to evidence against Condition L2.4	Refer to findings against Condition L2.4 Monitoring for air pollutants required under the EPL was undertaken in accordance with the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> as referenced by the POEO (Clean Air) Regulation 2022. Evidence sighted included contractor monitoring reports, laboratory certificates of analysis, and Annual Review and Annual Return statements confirming that EPA-endorsed methodologies were used. No deviations were identified. Condition M3.1 is considered compliant.	Noted																									

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	<i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2022 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>				
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	- Field sampling records from cBased Environmental . - ALS laboratory certificates of analysis confirming NATA accreditation. - EMD data extracts showing pH and TSS monitoring results. - Annual Reviews (2022–2024) confirming EPL discharge monitoring. - Annual Returns (2022/23 and 2023/24) including	Monitoring of water discharges under EPL 12894 was undertaken in accordance with the <i>Approved Methods for the Sampling and Analysis of Water Pollutants in NSW</i> as required by Condition M3.2. Field sampling at Monitoring Point 41 is undertaken by cBased Environmental, with laboratory analysis conducted by ALS, a NATA-accredited laboratory. All monitoring results are stored in the Environmental Monitoring Database (EMD), which also maintains calibration records and inspection logs. No alternative methods were used or required EPA approval.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference																																													
		Statement of Compliance for water monitoring																																																
M4 WEATHER MONITORING																																																		
M4.1	For each monitoring point specified in the table below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1. The licensee must use the sampling method, units of measure, averaging period and sample at the frequency, specified opposite in the other columns: Point 5; and Point 18 <table><tr><th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Averaging Period</th><th>Sampling Method</th></tr><tr><td>Rainfall</td><td>mm</td><td>Continuous</td><td>1 hour</td><td>AM-4</td></tr><tr><td>Wind speed @ 10 metres</td><td>m/s</td><td>Continuous</td><td>15 minutes</td><td>AM-2 & AM-4</td></tr><tr><td>Wind direction @ 10 metres</td><td>0</td><td>Continuous</td><td>15 minutes</td><td>AM-2 & AM-4</td></tr><tr><td>Temperature @ 2 metres</td><td>0C</td><td>Continuous</td><td>15 minutes</td><td>AM-4</td></tr><tr><td>Temperature @ 10 metres</td><td>0C</td><td>Continuous</td><td>15 minutes</td><td>AM-4</td></tr><tr><td>Sigma theta @ 10 metres</td><td>0</td><td>Continuous</td><td>15 minutes</td><td>AM-2 & AM-4</td></tr><tr><td>Solar radiation</td><td>W/m2</td><td>Continuous</td><td>15 minutes</td><td>AM-4</td></tr><tr><td>Additional requirements - siting - measurement</td><td></td><td></td><td></td><td>AM-2 & AM-4 AM-2 & AM-4</td></tr></table>	Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method	Rainfall	mm	Continuous	1 hour	AM-4	Wind speed @ 10 metres	m/s	Continuous	15 minutes	AM-2 & AM-4	Wind direction @ 10 metres	0	Continuous	15 minutes	AM-2 & AM-4	Temperature @ 2 metres	0C	Continuous	15 minutes	AM-4	Temperature @ 10 metres	0C	Continuous	15 minutes	AM-4	Sigma theta @ 10 metres	0	Continuous	15 minutes	AM-2 & AM-4	Solar radiation	W/m2	Continuous	15 minutes	AM-4	Additional requirements - siting - measurement				AM-2 & AM-4 AM-2 & AM-4	- Annual Return - Weather Monitoring Data - EMD Platform - Discussion with E&C Department	During the audit period, there were multiple occurrences where weather monitoring data was not adequately captured in accordance with EPL 12894 Condition M4.1 requirements: Point 5 and 18: 2023 Point 5 and Point 18 for various 15-minute increments: 30/01/2023-31/01/2023, 8/02/2023, 4/03/2023, 6/03/2023-7/03/2023, 8/03/2023, 17/03/2023, 21/03/2023, 29/03/2023-30/03/2023, 1/04/2023-3/04/2023, 6/04/2023-8/04/2023, 10/04/2023, 30/04/2023, 5/05/2023, 13/05/2023, 17/05/2023, 20/05/2023-21/05/2023, 25/05/2023-26/05/2023, 31/05/2023, 4/06/2023-7/06/2023, 14/06/2023, 18/06/2023-19/06/2023, 22/06/2023-23/06/2023, 25/06/2023-26/06/2023, 29/06/2023-30/06/2023, 1/7/2023, 10/07/2023, 14/07/2023-18/07/2023, 1/8/2023-2/8/2023, 18/08/2023, 31/08/2023, 16/09/2023, 27/09/2023-28/09/2023, 1/10/2023, 14/10/2023, 22/10/2023, 30/10/2023, 7/11/2023, 9/11/2023-12/11/2023, 15/11/2023, 17/11/2023, 22/11/2023, 26/11/2023, 28/11/2023-29/11/2023, 1/12/2023, 10/12/2023, 12/12/2023, 15/12/2023, 19/12/2023, 25/12/2023.	Non-compliant	NC009
Parameter	Units of Measure	Frequency	Averaging Period	Sampling Method																																														
Rainfall	mm	Continuous	1 hour	AM-4																																														
Wind speed @ 10 metres	m/s	Continuous	15 minutes	AM-2 & AM-4																																														
Wind direction @ 10 metres	0	Continuous	15 minutes	AM-2 & AM-4																																														
Temperature @ 2 metres	0C	Continuous	15 minutes	AM-4																																														
Temperature @ 10 metres	0C	Continuous	15 minutes	AM-4																																														
Sigma theta @ 10 metres	0	Continuous	15 minutes	AM-2 & AM-4																																														
Solar radiation	W/m2	Continuous	15 minutes	AM-4																																														
Additional requirements - siting - measurement				AM-2 & AM-4 AM-2 & AM-4																																														

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			Point 5 & 18: 2024: 17/02/2024, 18/02/2024, 19/02/2024, 17/05/2024, 18/05/2024, 19/05/2024, 20/05/2024, 1/06/2024, 29/06/2024, 7/07/2024, 22/07/2024, 6/10/2024, 15/11/2024, 31/12/2024, 1/01/2024, 3/01/2024, 6/01/2024, 15/01/2024, 22/01/2024, 23/01/2024, 30/01/2024, 31/01/2024, 2/02/2024, 7/02/2024, 8/02/2024, 23/02/2024, 27/02/2024, 28/02/2024, 10/03/2024, 15/03/2024, 16/03/2024, 17/03/2024, 18/03/2024, 20/03/2024, 21/03/2024, 27/03/2024, 4/04/2024, 20/04/2024, 8/05/2024, 9/05/2024, 1/06/2024, 3/06/2024, 8/06/2024, 11/06/2024, 19/06/2024, 3/07/2024, 6/07/2024, 7/07/2024, 15/07/2024, 16/07/2024, 17/07/2024, 17/07/2024, 18/07/2024, 20/07/2024, 21/07/2024, 22/07/2024, 31/07/2024, 21/08/2024, 22/08/2024, 23/08/2024, 6/10/2024, 6/10/2024, 15/10/2024, 16/10/2024. There were no recognisable adverse effects of the non-compliance and data capture for the reporting period at Point 5 and Point 18 remained above 95% in 2022 and 2024. Note: dates above do not necessarily indicate outages for the entire date specified, rather it indicates missing 15 minute average values occurring during the specified period.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
M5 RECORDING OF POLLUTION COMPLAINTS					
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	- Complaints Register (2022–2025) - Annual Reviews (2022–2024) - Annual Returns	MCO maintains a legible record of all complaints received in relation to pollution from activities under EPL 12894. Complaints are recorded in the MCO complaints management system, including details of the complainant, nature of the complaint, time and date received, investigation outcomes, and actions taken. Records were available for review during the audit period.	Compliant	
M5.2	The record must include details of the following: - the date and time of the complaint; - the method by which the complaint was made; - any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; - the nature of the complaint; - the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and - if no action was taken by the licensee, the reasons why no action was taken.	- Complaints Register (2022–2025) - Internal Compliant Register	MCO maintains a detailed internal complaints register that records all information required under Condition M5.2, including date and time, method of contact, complainant details (or note if not provided), nature of complaint, action taken, follow-up, and reasons where no action was taken. Review of sample records confirmed that the required information is consistently obtained and documented. For transparency, a complaints register is also published on the MCO public website; however, this version contains redacted information (e.g. personal details) for privacy reasons. The full internal register with all required details is retained by MCO and was reviewed as part of the audit.	Compliant	
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Complaints Register	MCO retains all complaints records for at least four years, consistent with the requirements of Condition M5.3.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Discussion with E&C Department	No such request was received during the audit period; therefore, the condition was not triggered. The internal complaints register is maintained in a form that would enable prompt production if required.	Compliant	
M6 TELEPHONE COMPLAINTS LINE					
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	- CMO Complaint Form - CMO Complaint tracking in CMO - Annual Reviews 2022, 2023, 2024 - Annual Community Plan	MCO operates a dedicated 24-hour hotline which was verified during the audit period. Complaints are managed through the CMO portal. MCO work under a Community Complaint Management document. MCO maintains a documented complaint tracking process, which was reviewed by auditors. Noise complaints were observed to be decreasing. Complaints are logged in the CMO system and reviewed through monthly status reports, the Annual Community Plan (which includes complaint trends), and the Annual Reviews, which document Environment and Community performance summaries and complaint trends. Data can be filtered and graphed for trend analysis. When a complaint is lodged, it is automatically sent via text message to the Environment & Community (E&C) team, CHPP personnel and mining team for immediate investigation.	Compliant	
M6.2	The licensee must notify the public of the complaints line telephone number and the fact	- MCO Public Website - Community complaints	MCO notify the public of the complaints line telephone number on the MCO public website.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference												
	that it is a complaints line so that the impacted community knows how to make a complaint.	and blasting information hotline - Community Newsletters: #35, May 2025 #34, September 2024 #33, June 2024 #32, December 2023.	The community complaints and enquiries blasting Information hotline is also included in the community newsletters available on the MCO public website.														
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.		This is Noted	Noted													
M7 BLASTING																	
M7.1	To determine compliance with conditions L4.1, L4.2, L4.3 and L4.4: - Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 16, 21 and 32 for the parameters specified in Column 1 of the table below; and - The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the other columns. <table><tr><th>Parameter</th><th>Units of Measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Airblast Overpressure</td><td>Decibels (Linear Peak)</td><td>All Blasts</td><td>Australian Standard A 2187.2-2006</td></tr><tr><td>Ground Vibration Peak Particle Velocity</td><td>millimetres/second</td><td>All Blasts</td><td>Australian Standard A 2187.2-2006</td></tr></table>	Parameter	Units of Measure	Frequency	Sampling Method	Airblast Overpressure	Decibels (Linear Peak)	All Blasts	Australian Standard A 2187.2-2006	Ground Vibration Peak Particle Velocity	millimetres/second	All Blasts	Australian Standard A 2187.2-2006	- Blast Management Plan, Version 21, 23/01/2025. - EMD - Annual Returns, 07/07/2022-06/07/2023, 07/07/2023-06/07/2024. 2042 Annual Review. - Email to DPHI 14/3/2025	On 18 January 2023, MCO failed to monitor airblast overpressure and ground vibration for a scheduled blast event in the Main Pit due to a data gap. This contravenes MCOs requirement for continuous blast monitoring during all blasts as required by Condition M7.1. MCO identified the non-compliance on 5 March 2024 and, following advice from ACOEM on 7 March 2024, confirmed the non-compliance. The EPA was notified on 14 March 2024, and on 8 May 2024 MCO submitted the results of its investigation. Refer findings against R5.1 with regards to non-compliance reporting to the EPA.	Non-Compliant	NC006
Parameter	Units of Measure	Frequency	Sampling Method														
Airblast Overpressure	Decibels (Linear Peak)	All Blasts	Australian Standard A 2187.2-2006														
Ground Vibration Peak Particle Velocity	millimetres/second	All Blasts	Australian Standard A 2187.2-2006														

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		email regarding Non-compliance that occurred on 18 January 2023 (sighted). - Blast Monitoring field sheet – validation sign off 19/5/2025 - CMO system validation tracking - Terrock Consulting Engineers, Glencore - Mangoola Open Cut Blast Monitor Location Review, January 2025			
M8 OTHER MONITORING AND RECORDING CONDITIONS					
M8.1	Hunter River Salinity Trading Scheme (HRSTS) Monitoring The licensee must continuously operate and maintain communication equipment which makes the conductivity and flow measurements, taken at Point 12 available to the "Services Coordinator" within one hour of those measurements being taken and makes them available in the format specified in the	- Telemetry data extracts from Point 12. - Equipment calibration and maintenance records.	MCO operates continuous conductivity and flow monitoring at Point 12, with telemetry equipment transmitting data to the Services Coordinator within one hour, in the format required under the <i>Hunter River Salinity Trading Scheme Discharge Point Telemetry Specification – Rev V1.0</i>	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	"Hunter River Salinity Trading Scheme Discharge Point Telemetry Specification - Rev V1.0" released 4 October 2018 and as published by Water NSW.	- References in Annual Reviews 2022–2024. - Annual Returns 2022/23 and 2023/24	(2018). The system was confirmed as operational throughout the audit period.		
M8.2	The licensee must ensure that the results of the measurements it takes for conductivity and flow at monitoring point 12 are available to the regional water quality monitoring network operated by the NSW Office of Water (or other service provider as advised by the EPA) within 1 hour of its recording.	- Site inspection - Telemetry data transmission records.	Monitoring results from Point 12 are made available to the NSW Office of Water regional water quality network within one hour of recording. No delays or failures in data transfer were reported during the audit period.	Compliant	
M8.3	The licensee must ensure that all monitoring data is within a margin of error of 5% for conductivity measurements and 10% for discharge flow measurement.	- Site inspection - Calibration certificates and maintenance logs for HRSTS monitoring equipment.	Calibration records and monitoring reports confirm that HRSTS monitoring equipment operates within the specified accuracy margins ($\pm 5\%$ for conductivity; $\pm 10\%$ for flow). No exceedances of these tolerances were reported during the audit period.		
M8.4	The licensee must mark monitoring point(s) 12, 13, 14 with a sign which clearly indicates the name of the licensee, whether the monitoring point is up or down stream of the discharge point(s) and that it is a monitoring point for the Hunter River Salinity Trading Scheme.	Site inspection	Site inspection confirmed that monitoring points 12, 13, and 14 are clearly signposted with the licensee's name, upstream/ downstream designation, and identification as HRSTS monitoring points.	Compliant	
M8.5	Requirement to Monitor Particulate Matter The Licensee must record the average PM10 concentration at Monitoring Points 19 and 20 at intervals of 10 minutes. This data must be made available upon request by any	Air Quality and Greenhouse Gas Management	PM10 data is collected via Sentinex units and managed in EMD. EMD was sighted by the auditors (include air quality specialist) and include a list of data collected every 5 minutes.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	Authorised Officer of the EPA who asks to see them.	- Plan, Version 2.0, Dated 26/03/2025 - EMD database			
M9 NOISE MONITORING					
M9.1	To assess compliance with condition L3.1, attended noise monitoring must be undertaken in accordance with Conditions L3.2 to L3.5: - at the EPA points 22, 23, 26, 27, 29, 30, 34, 35, 36, 37, 38, 39, and 40 identified in P1.4; and - occur every calendar month in a reporting period; and - occur during one night time period as defined in the Noise Policy for Industry (EPA 2017) for a minimum of 15 minutes at each location listed above, and when relevant during the night.	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website. - EPL Noise Reports September 2022, September 2023, March 2024, October 2024, February 2025. - Annual Reviews, 2022, 2023 2024. - EMD	MCO conducts an attended noise monitoring program. The program, described in Section 6.2.4 of the Noise Management Plan (NMP), outlines monthly reporting periods, night-time sampling requirements, and 15-minute measurement intervals, with monitoring locations provided in Table 6.2. The NMP outline that monthly attended monitoring is undertaken at night by EMM Consulting. The auditors reviewed noise monitoring data recorded during the audit period. The conditions are noted in the reviewed EMM Monthly Attended Noise Monitoring reports and EPL Noise Reports. The noise specialist was satisfied that attended noise monitoring was being undertaken in accordance with the requirements of Condition M9.1.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		Annual Returns, 07/07/2022-06/07/2023, 07/07/2023-06/07/2024.			
M9.2	For the purposes of compliance monitoring and determining the noise generated at the premises the modification factors in the EPA's Fact Sheet C of the Noise Policy for Industry (EPA 2017) must be applied, as appropriate, to the noise levels measured by noise monitoring equipment. <i>Definitions: Noise refers to 'sound pressure levels' for the purpose of conditions L3.1 to L.3.4 and condition M9.</i>	- Noise Management Plan, Version 24, dated 20/12/2024 - EMM, MCO Monthly Attended Noise Monitoring reports, MCO Public Website. - Annual Reviews, 2022, 2023 2024. - EMD attended noise monitoring records. - EMM noise prediction tool	It was confirmed by the Noise expert that the methodology employed by the company undertaking the monthly attended noise monitoring is in line with the NSW Noise Policy for Industry (NPfI), i.e. excluding extraneous noise sources from the analysis.	Compliant	
M9.3	Where required in writing by the EPA, the Licensee must carry out attended monitoring at sensitive receivers in addition to the monitoring required by Condition M9.1.	Discussion with E&C Department	No written requests were received from the EPA during the audit period requiring attended monitoring at sensitive receivers in addition to the monitoring specified under Condition M9.1. Accordingly, this	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			condition was not triggered and is considered compliant.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
6 REPORTING CONDITIONS					
R1 ANNUAL RETURN DOCUMENTS					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: • a Statement of Compliance, • a Monitoring and Complaints Summary, • a Statement of Compliance - Licence Conditions, • a Statement of Compliance - Load based Fee, • a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, • a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and • a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	• econnet Snip and emails of Record of Submissions • Annual Return 07/07/2023-06/07/2024 • Annual Return 07/07/2022-06/07/2023	MCO is required to submit an Annual Return to the EPA by 4 September each year, covering the reporting period ending 7 July, in accordance with EPL 12894 Condition R1.1. The auditors sighted Annual Returns for the periods 7 July 2022 – 6 July 2023 and 7 July 2023 – 6 July 2024, which included all required components (Statement of Compliance, Monitoring and Complaints Summary, Load-Based Fee Statement, PIRMP Statement, Pollution Monitoring Data Statement, and EMS Statement). Records of submission via eConnect and confirmation emails were also sighted. Annual Returns were submitted within the required timeframe, and the condition is considered compliant.	Compliant	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i>			Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: • the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and	• Discussion with E&C Department	No licence transfer occurred during the audit Period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	ending on the date the application for the transfer of the licence to the new licensee is granted; and - the new licensee must prepare an Annual Return for the period commencing on the date the application for - the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.				
R1.4	R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and pending on: - in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Discussion with E&C Department	No licence surrender occurred during the audit period.	Not Triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	- Annual Return Submission emails (eConnect EPA) - EPA POEO Public Register, Licence summary	Annual Returns were submitted via eConnect EPA on the following dates: 2022-2023 Annual Return submitted via eConnect EPA on 31 August 2023 2023-2024 Annual Return submitted via eConnect EPA on 30 August 2024	Compliant	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	- Discussion with E&C Department - CMO	Annual Returns submitted by MCO were available in CMO and on the server. The	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
			folder included Annual Returns going back at least 4 years.		
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: - the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.		Refer to evidence against Condition R1.1	Compliant	
R2 NOTIFICATION OF ENVIRONMENTAL HARM					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Discussion with MCO E&C Department	This had not occurred during the audit period.	Not Triggered	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident. <i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>	Discussion with MCO E&C Department	This had not occurred during the audit period.	Not Triggered	
R3 WRITTEN REPORT					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: - where this licence applies to premises, an event has occurred at the premises; or - where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the	- Discussion with MCO E&C Department - Review of EPA Website	A written report had not been requested by the EPA during the audit period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.				
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		This had not occurred during the audit period.	Not Triggered	
R3.3	The request may require a report which includes any or all of the following information: - the cause, time and duration of the event; - the type, volume and concentration of every pollutant discharged as a result of the event; - the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; - the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; - action taken by the licensee in relation to the event, including any follow-up contact with any complainants; - details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and - any other relevant matters.		This had not occurred during the audit period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Discussion with MCO E&C Department	This had not occurred during the audit period.	Not Triggered	
R4 OTHER REPORTING OBLIGATIONS					
R4.1	Noise Exceedance Notification and Reporting The Licensee must report any exceedance of Licence noise limits to EPA by email to info@epa.nsw.gov.au as soon as practicable after the exceedance becomes known to the Licensee or to one of the Licensee's employees or agents.	Discussion with MCO E&C Department	There were no exceedances of the licence noise limits during the audit period.	Not Triggered	
R4.2	Within seven days of notifying the EPA of an exceedance of Licence noise limits, the Licensee must provide the EPA a report in writing that explains the cause of the exceedance and the actions taken to prevent future exceedances of noise limits.		This had not occurred during the audit period.	Not Triggered	
R4.3	An authorised officer of the EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the Licensee at Condition R4.2. The Licensee must provide such further details to the EPA within the time specified in the request.		This had not occurred during the audit period.	Not Triggered	
R5 OTHER REPORTING OBLIGATIONS					
R5.1	Reporting of Blast Monitoring	Discussion with MCO	Mangoola Coal notified the EPA on 14 March 2024 of a failure to monitor airblast overpressure and ground vibration	Non-compliant	NC007

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: - the date and time of the blast; - the location of the blast on the premises; - the blast monitoring results at each blast monitoring station; and (d) an explanation for any missing blast monitoring results.	E&C Department Mangoola Open Cut Investigation Report, Condition M7.1 and R5, 8/5/2024	for a blast event in the Main Pit on 18 January 2023. MCO identified the data gap on 5 March 2024 and, following advice from ACOEM on 7 March 2024, confirmed the non-compliance. The EPA was notified on 14 March 2024, and on 8 May 2024 MCO submitted the results of its investigation. The EPA determined this to be a contravention of licence condition M1.2 (failure to retain monitoring data for at least four years) and licence condition R5.1, which is an offence under Section 64 of the Act. The EPA issued a formal warning on 15 July 2024 in relation to these contraventions of the EPL.		
R5.2	Reporting exceedance of blasting limits The licensee must report any exceedance of the licence blasting limits to the Environment Line on 131 555 as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	Discussion with MCO E&C Department	There were no exceedances of the licence blasting limits during the audit period.	Not Triggered	
R5.3	Noise Compliance Assessment Report A report containing the monitoring results of noise compliance monitoring specified in this Licence must be submitted annually with the Annual Return. The report must include, for each monitoring period and monitoring location:	EPL Noise Reports September 2022, September 2023, March 2024, October 2024, February 2025.	EPL Noise reports with the required information were attached to each Annual Return during the audit period.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	- the contribution noise level from the premises as measured or determined at the monitoring location(s); and - a description of the method used to determine or estimate the contribution noise level from the premises that is consistent with the Noise Policy for Industry (EPA 2017).				
R5.4	HRSTS Reporting The licensee must compile a written report of the activities under the Scheme for each scheme year. The scheme year shall run from 1 July to 30 June each year. The written report must be submitted to the EPA's regional office within 60 days after the end of each scheme year and be in a form and manner approved by the EPA. The information will be used by the EPA to compile an annual scheme report.	- HRSTS Annual Report, July 2022-23 - HRSTS Annual Report, July 2023-24	HRSTS annual reports are provided with the submission of the Annual Return. The auditors sighted the annual reports and confirmed they contained the required information.	Compliant	
R5.5	Sewage Treatment System A report on the sewage treatment system maintenance program must submitted annually to the EPA with the Annual Return and must include: - Certification from the system provider that the sewage treatment system is operating within its capacity; - Date, time and results of all routine maintenance procedures undertaken to the sewage treatment system; and c) Written records of each quarterly inspection.	- Gauge Industrial and Environmental , Sewage Treatment Plant (STP) Report, Version 1, 24 July 2023 - All Septic Services, OSSM AWTS Statement of Compliance Certificate, 15/07/2023	MCO engages qualified contractors to carry out the servicing, maintenance, and reporting requirements for the Sewage Treatment Plant (STP). As part of the Annual Return, an STP Maintenance Report was sighted. This report includes detailed records of periodic inspections, including the date and time of each maintenance activity, the results of routine servicing, and a statement of compliance prepared by All Septic Services certifying that the system is being maintained in accordance with relevant standards and licence conditions.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
		- Gauge Industrial and Environmental , Sewage Treatment Plant (STP) Report, Version 1, 13 August 2024 - All Septic Services, OSSM AWTS Statement of Compliance Certificate, 6/08/2024 - Annual Returns			
R5.6	The licensee must retain a copy of each report required by Condition O2.5 for 3 years from the date each record is made.	- Discussion with E&C Department - Annual Returns	Annual Returns submitted by MCO were available in CMO and on the server. The folder included Annual Returns which included STP Reports as an attachment and going back at least 4 years.	Compliant	
R5.7	Heavy-Plant Waste Tyre Disposal Report The Licensee must provide the EPA with an Annual Heavy-Plant Waste Tyre Disposal Report. The Report must be submitted with the licence Annual Return each year and must include a plan of the disposed heavy-plant waste tyres on the premises for the period that includes: Each tyre serial number;	Heavy-Plant Waste tyre Disposal Report, 7 July 2023 – 6 July 2024	MOC prepares and submits a Heavy-Plant Waste Tyre Disposal Report to the EPA annually, as part of the Annual Return. This report was sighted to include a detailed plan of all heavy-plant waste tyres disposed of on-site during the reporting period. The key information was sighted by the auditors including tyre serial numbers, supplier details, delivery and disposal	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non Compliance Reference
	• Supplier of each tyre; • Date tyre delivered to site; • Disposal date of each tyre; • Co-ordinates (easting and northings) of the location of each tyre emplacement burial extent; • The Real Level (RL) in metres AHD of each tyre emplacement location; • The number of tyres buried in/within each emplacement location; and • 8. The cumulative total number of tyres disposed of at the premises each year		dates, precise burial coordinates (easting and northing), RL in metres AHD, the number of tyres per emplacement, and the cumulative total disposed of each year.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
7 GENERAL CONDITIONS					
G1 COPY OF LICENCE KEPT AT THE PREMISES OR PLANT					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	- MCO Public Website - Discussion with E&C Department	EPL 12894 is available on the MCO intranet and publicly on the MCO website.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.		Noted, however this condition is not triggered	Not Triggered	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	- MCO Public Website - Discussion with E&C Department	EPL 12894 is available for employees on the MCO intranet, on the MCO website or through the E&C Department.	Compliant	
G2 CONTACT NUMBER FOR INCIDENTS AND RESPONSIBLE EMPLOYEES					
G2.1	The licensee must operate 24-hour telephone contact lines for the purpose of enabling the EPA to directly contact one or more representatives of the licensee who can: - respond at all times to incidents relating to the premises; and - contact the licensee's senior employees or agents authorised at all times to: – speak on behalf of the licensee; and – ii) provide any information or document required under this licence.	- MCO Public Website - Community complaints and blasting information hotline - Community Newsletters: – #35, May 2025 – #34, September 2024 – #33, June 2024	The community complaints and blasting information hotline telephone number is advertised on the MCO public website. The community complaints and enquiries blasting Information hotline is also included in the community newsletters available on the MCO public website.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		- #32, December 2023.			
G2.2	The licensee is to update the EPA through the eConnect EPA platform of the appointment of any subsequent contact persons, or changes to the person's contact details as soon as practicable and in any event within fourteen days of the appointment or change.	Discussion with E&C Department	Contact person for the role of E&C Manager was updated during the previous audit period. Prior to the audit site inspection there was a change in E&C Manager which resulted in the contact person being updated again. MCO verbally confirmed this had been conducted.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
8 SPECIAL CONDITIONS					
E1 HUNTER RIVER SALINITY TRADING SCHEME					
E1.1	This licence authorises the discharge of saline water into the Hunter River Catchment from an authorised discharge point (or points), in accordance with the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	Refer evidence Condition E1.1.	Discharge events occurred during the audit period. Refer non-compliance against Condition E1.3 with regards to exceedances of licenced hourly discharge flow rate.	Non-compliant	
E1.2	For the purposes of Clauses 23 and 29 of the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002 the licensee must apply the conversion factor of 0.6.	- Review of HRSTS discharge records (2022–2025). - Review of salinity credit usage and reporting. - Discussions with MCO E&C team. - Annual Return data confirming application of conversion factor of 0.6 in calculating discharge credits.	MCO has consistently applied the required HRSTS conversion factor of 0.6 in accordance with EPL 12894 and the HRSTS Regulation.	Compliant	
E1.3	The licensee must not exceed the hourly volume discharge limit calculated using the following formula, at all discharge point(s) on this licence titled "Discharge of saline water	- Show Cause, EPA 17/4/2024 - Letter from MCO to EPA,	A non-compliance against EPL Condition E1.3 has been recorded due to MCO exceeding the licensed hourly flow rate during two HRSTS discharge events in August and October 2022. The	Non-compliant	NC010

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	under the Hunter River Salinity Trading Scheme (HRSTS)": $H = V / RRT$ Where: H is the hourly volume discharge limit (in megalitres per hour); V is the licence holder's volume discharge limit for the block (in megalitres) calculated in accordance with clause 23 of the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation (2002); and RRT is the difference between the discharge stop and start times shown on the river register for that block (in hours) <i>Note 1: The intent of this condition is to prevent spikes of saline water in the Hunter River as a result of discharges of less than the duration permitted by the river register.</i> <i>Note 2: A river register is issued by the Service Co-ordinator and allows participants of the Hunter River Salinity Trading Scheme (HRSTS) to discharge saline to the Hunter River during a discharge period.</i>	dated 15/5/2024 - Formal Warning issued by EPA, dated 15/07/2024	exceedances specifically related to the volume of water discharged through Monitoring Point 12. On 13 March 2022, WaterNSW issued a River Register permitting discharge of up to 10.07 ML for the upcoming block, commencing 14 March 2022 at 8:00 AM (AEST). On the morning of 15 March 2022, prior to the block ending, it was identified that the maximum daily discharge volume had been exceeded. A total of 10.9 ML was discharged, 0.83 ML over the licenced limit. Upon identifying the exceedance pumping was immediately ceased in accordance with internal procedures. The exceedance was recorded and reported in MCOs Annual Return, in accordance with reporting obligations under EPL 12894. The EPA issued MCO a Show Cause on 17 April 2024. MCO were required to provide a response by 13 May 2024. MCO received an extension from the EPA on the submission date to 15 May 2024. Formal Warning Letter issued on 15 July 2024 in response to the information. Recommendation – MCO response considered adequate and no recommendation is required.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
E2 DISPOSAL OF EXPLORATION WASTE					
E2.1	Drilling and exploration waste generated onsite may be disposed of in the existing tailings dam (TD4) at the licensed premises.	- CMO - Discussion with E&C Department	Drilling and Exploration Waste has been disposed of in accordance with this condition.	Compliant	
E3 WASTE TYRE RECYCLING REVIEW					
E3.1	The licensee must undertake a review of available recycling options for end-of-life heavy-plant waste tyres at least every 2 years and provide a report to the EPA that contains, but is not limited to, the following: - Analysis of the current capacity of recycling facilities that can accept end-of-life heavy-plant waste tyres for processing in NSW and other neighbouring states; - Evidence of enquiries made by the licensee in the previous 24 months to actively seek recycling options for end-of-life heavy-plant waste tyres generated at the premises; - Analysis of any pre-treatment options that can be performed at the premises to reduce the costs associated with the transporting and recycling of end-of-life heavy-plant waste tyres; - Analysis of the specific costs to the licensee associated with the transport and elivery/acceptance of site generated end-of-life heavy-plant waste tyres at the nearest capable recycling facilities; - The current costs associated with the continued on-site burial of end-of-life heavy-plant waste tyres; and	DRM (Development Risk Management) Waste Tyre Recycling Report, 12 December 2024	This condition was added in the latest variation of the EPL. Only one report was required in the audit period. Sighted 2024 waste tyre recycling program report, prepared by Development Risk Management. The report was submitted to the EPA on 20 December 2024.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	f) A full cost benefit analysis of continued on-site burial of end-of-life heavy-plant waste tyres compared to their transport from the Premises and their recycling/processing.				
E3.2	The licensee is required to submit the Waste Tyre Recycling Review by 31 December 2024 to the EPA at info@epa.nsw.gov.au .	Email to EPA 2024 DRM Waste Tyre Recycling Report, 14 December 2024	Submission record to EPA was sighted by auditors. Submitted on 20 December 2024.	Compliant	

Mining Leases, Exploration Licence and Assessment Lease Checklists

Audit Checklist – Mining Leases

Contents

GENERAL CONDITIONS	2
NOTICE TO LANDHOLDERS	2
REHABILITATION	3
MINING OPERATIONS PLANS AND ANNUAL REHABILITATION REPORT	3
COMPLIANCE REPORT	7
SPECIAL CONDITIONS	11
STANDARD MINING LEASER CONDITIONS	13

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
GENERAL CONDITIONS					
NOTICE TO LANDHOLDERS					
Condition 1 ML1747	(a) Within a period of three months from the date of grant/renewal of this mining lease, the lease holder must serve on each landholder a notice in writing indicating that this mining lease has been granted/renewed and whether the lease includes the surface. A plan identifying each landholder and individual land parcel subject to the lease area, and a description of the lease area must accompany the notice. (b) If there are ten or more landholders, the lease holder may serve the notice by publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this mining lease has been granted/renewed; state whether the lease includes the surface and must contain a plan and description of the lease area. If a notice is made under condition 1(b), compliance with condition 1(a) is not required.	Notice of variation attached to Mining Leases	ML1747 was varied on 17 Oct 2022. MCO reported that there are no landholders other than MCO.	Not Triggered	
Condition 1 ML1626 ML1815 ML1817	(a) Within 90 days from the date of grant/renewal of this mining lease, the lease holder must serve on each landholder a notice in writing to notify that this mining lease has been granted/renewed and whether the lease includes the surface. A plan identifying each landholder and individual land parcel subject to the lease area, and a description of the lease area must accompany the notice. (b) If there are ten or more landholders, the lease holder may serve the notice by	- Discussion with E&C Department - CMO	This condition was not triggered during the audit period as no mining leases were granted or renewed. Lease ML1626 was subject to variations on 17 October 2022 and 25 June 2025, however these were administrative amendments and did not constitute a grant or renewal that would activate the landholder notification requirements of Condition 1. Discussions with the E&C Department confirmed that all required notifications for earlier grants/renewals occurred prior to the audit period and that a compliance action	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	publication in a newspaper circulating in the region where the lease area is situated. The notice must indicate that this mining lease has been granted/renewed; state whether the lease includes the surface and must contain a plan and description of the lease area. If a notice is made under condition 1(b), compliance with condition 1(a) is not required.		has been recorded in the lease management system for the next renewal of ML1626, due in 2029.		
REHABILITATION					
Condition 2 ML1747	Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.	Instrument of Variation, ML 1747, dated 14/08/2022	This condition has been omitted from ML1747 following the approved variation on 17 October 2022. Rehabilitation obligations are regulated under SSD-8642 and managed through the approved Rehabilitation Management Plan (RMP), as required by the <i>Mining Act 1992 (NSW)</i> and <i>Mining Regulation 2016 (as amended by the 2021 Regulation)</i> , administered by the NSW Resource Regulator under the NSW Rehabilitation Reforms.	Not Applicable	
MINING OPERATIONS PLANS AND ANNUAL REHABILITATION REPORT					
ML1747	(a) The lease holder must comply with an approved Mining Operations Plan (MOP) in carrying out any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The lease holder must apply to the Minister for approval of a MOP. An approved MOP must be in place prior to commencing any significant surface	Rehabilitation Management Plan (v10, 2023)	The condition requiring preparation and implementation of a Mining Operations Plan (MOP) is no longer applicable. The requirement for a MOP was replaced by the Rehabilitation Management Plan (RMP) for large mines and a Rehabilitation Program for existing small mines in NSW, following the 2015 amendments to the <i>Mining Act 1992 (NSW)</i> . These reforms were fully implemented through the Mining	Not Applicable	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	disturbing activities, including mining operations, mining purposes and prospecting. (b) The MOP must identify the post mining land use and set out a detailed rehabilitation strategy which: (i) identifies areas that will be disturbed; (ii) details the staging of specific mining operations, mining purposes and prospecting; (iii) identifies how the mine will be managed and rehabilitated to achieve the post mining land use; (iv) identifies how mining operations, mining purposes and prospecting will be carried out in order to prevent and or minimise harm to the environment; and (v) reflects the conditions of approval under: • the Environmental Planning and Assessment Act 1979; • the Protection of the Environment Operations Act 1997; and • any other approvals relevant to the development including the conditions of this mining lease. (c) The MOP must be prepared in accordance with the ESG3: Mining Operations Plan (MOP) Guidelines September 2013 published on the Department's website at www.resourcesandenergy.nsw.gov.au/miners-and-explorers/rules-and-forms/pgf/environmental-guidelines (d) The lease holder may apply to the Minister to amend an approved MOP at any time. (e) It is not a breach of this condition if:		Amendment (Standard Conditions of Mining Leases – Rehabilitation) Regulation 2021, which commenced on 2 July 2022. From that date, all mining lease holders are required to comply with the RMP framework and supporting Annual Rehabilitation Report and Forward Program (ARRFP), administered by the NSW Resource Regulator under the NSW Rehabilitation Reforms. MCO has complied with the requirements of the <i>Mining Regulation 2016 (NSW)</i>, as amended by the <i>Mining Amendment (Standard Conditions of Mining Leases – Rehabilitation) Regulation 2021</i>, to prepare a Rehabilitation Management Plan (RMP). The RMP was prepared in accordance with the NSW Resources Regulator's Rehabilitation Management Plan Guideline and submitted in the approved form. The RMP is supported by an Annual Rehabilitation Report and Forward Program (ARRFP), consistent with the requirements of the NSW Rehabilitation Reforms.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(i) the operations which, but for this condition 3(e) would be a breach of condition 3(a), were necessary to comply with a lawful order or direction given under the Environmental Planning and Assessment Act 1979, the Protection of the Environment Operations Act 1997, the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 or the Work Health and Safety Act 2011; and Work Health and Safety Regulation 2011 (ii) the Minister had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out. (f) The lease holder must prepare a Rehabilitation Report to the satisfaction of the Minister. The report must: (i) provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP; (ii) be submitted annually on the grant anniversary date (or at such other times as agreed by the Minister); and (iii) be prepared in accordance with any relevant annual reporting guidelines published on the Department's website at www.resourcesandenergy.nsw.gov.au/miners-and-				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	explorers/rules-and-forms/pgf/environmental-guidelines (d) The lease holder may apply to the Minister to amend an approved MOP at any time. (e) It is not a breach of this condition if: (i) the operations which, but for this condition 3(e) would be a breach of condition 3(a), were necessary to comply with a lawful order or direction given under the Environmental Planning and Assessment Act 1979, the Protection of the Environment Operations Act 1997, the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 or the Work Health and Safety Act 2011; and Work Health and Safety Regulation 2011 (ii) the Minister had been notified in writing of the terms of the order or direction prior to the operations constituting the breach being carried out. (f) The lease holder must prepare a Rehabilitation Report to the satisfaction of the Minister. The report must: (i) provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP; (ii) be submitted annually on the grant anniversary date (or at such other times as agreed by the Minister); and				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(iii) be prepared in accordance with any relevant annual reporting guidelines published on the Department's website at www.resourcesandenergy.nsw.gov.au/miners-and-explorers/rules-and-forms/pgf/environmental-guidelines				
COMPLIANCE REPORT					
ML1747	(a) The lease holder must submit a Compliance Report to the satisfaction of the Minister. The report must be prepared in accordance with any relevant guidelines or requirements published by the Minister for compliance reporting. (b) The Compliance Report must include: (i) the extent to which the conditions of this mining lease or any provisions of the Act or the regulations applicable to activities under this mining lease, have or have not been complied with; (ii) particulars of any non-compliance with any such conditions or provisions, (iii) the reasons for any such non-compliance; (iv) any action taken, or to be taken, to prevent any recurrence, or to mitigate the effects, of that non-compliance. (c) The Compliance Report must be lodged with the Department annually on the grant anniversary date for the life of this mining lease. (d) In addition to annual lodgement under condition 4(c) above, a Compliance Report:	- Instrument of Variation, ML 1747, dated 14/08/2022 - Discussion with MCO E&C Department	This condition has been omitted from ML1747 following the approved variation on 17 October 2022. Annual Rehabilitation reports are submitted to the Resource Regulator and were sighted by the auditors.	Not Applicable	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(i) must accompany any application to renew this mining lease under the Act; (ii) must accompany any application to transfer this mining lease under the Act; and (iii) must accompany any application to cancel, or to partially cancel, this mining lease under the Act. (e) Despite the submission of any Compliance Report under (c) or (d) above, the titleholder must lodge a Compliance Report with the Department at any date or dates otherwise required by the Minister. (f) A Compliance Report must be submitted one month prior to the expiry of this mining lease, where the licence holder is not seeking to renew or cancel this mining lease.				
ENVIRONMENTAL INCIDENT REPORT					
ML1747	(a) The lease holder must notify the Department of all: (i) breaches of the conditions of this mining lease or breaches of the Act causing or threatening material harm to the environment; and (ii) breaches of environmental protection legislation causing or threatening material harm to the environment (as defined in the Protection of the Environment Operations Act 1997), arising in connection with significant surface disturbing activities, including mining operations, mining purposes and prospecting operations, under this mining lease. The	- Review of MCO incident register and regulatory reporting (2022–2025). - Discussions with MCO E&C team.	This condition was not triggered during the audit period. No breaches of the mining lease or Mining Act 1992 (NSW), nor any breaches of environmental protection legislation causing or threatening material harm to the environment, were recorded in connection with surface disturbing activities under ML1747. No incidents were required to be notified to the Department under this condition.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	notification must be given immediately after the lease holder becomes aware of the breach. (b) The lease holder must submit an Environmental Incident Report to the Department within seven (7) days of all breaches referred to in condition 5(a)(i) and (ii). (c) In addition to the requirements set out in conditions 5(a) and (b), the lease holder must immediately advise the Department of any notification made under section 148 of the Protection of the Environment Operations Act 1997 arising in connection with significant surface disturbing activities including mining operations, mining purposes and prospecting operations, under this mining lease.				
GROUP SECURITY					
ML1747 ML1815 ML1817 ML1626	The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining leases covered by the group security deposit, including obligations under each mining lease that may arise in the future. The amount to be provided and maintained as a group security deposit is \$<amount redacted>. The leases covered by the group security include: • ML 1747 (1992) • ML 1815 (1992) • ML 1817 (1992) • ML 1626 (1992)	• Email verifying security payment, date not captured. • Discussions with MCO E&C team.	Group security has been held in accordance with this condition. Sighted evidence of security deposit funding being provided.	Compliant	
COOPERATION AGREEMENT					

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
ML1626 ML1747 ML1815 ML1817	The lease holder must make every reasonable attempt, and be able to demonstrate its attempts, to enter into a cooperation agreement with the holder(s) of any overlapping title(s). The cooperation agreement should address but not be limited to issues such as: • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts; and • rehabilitation issues.	• Review of tenure records for ML1626, ML1747, ML1815, and ML1817. • Consultation with MCO E&C team.	No overlapping tenures identified within ML1747. For ML1815, MCO and Crown Lands are the only adjacent landholders. No overlapping resource tenure exists and no cooperation agreement is required. No overlapping titles recorded for ML1626 and ML1817 during the audit period. This condition was not triggered during the audit period. No overlapping titles exist within the lease areas, therefore no cooperation agreements are required.	Not Triggered	
ASSESSABLE PROSPECTING OPERATIONS					
ML1626 ML1817	(a) The lease holder must not carry out any assessable prospecting operation on land over which this lease has been granted unless: (i) it is carried out in accordance with any necessary development consent; or (ii) if development consent is not required, the prior written approval of the Minister has been obtained. (b) The lease holder must comply with the approval granted to the holder. (c) The Minister may require the lease holder to provide such information as required to assist the Minister consider an application for approval. (d) An approval granted under this condition may be granted subject to terms.	• Consultation with MCO E&C team.	This condition was not triggered during the audit period. No assessable prospecting operations were carried out that required development consent or Ministerial approval.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
EXPLORATION REPORTING					
ML1747	<i>Note: Exploration Reports (Geological and Geophysical)</i> The lease holder must lodge reports to the satisfaction of the Minister in accordance with section 163C of the Mining Act 1992 and in accordance with clause 57 of the Mining Regulation 2010. Reports must be prepared in accordance with Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.	2021/22 Exploration Report – Submitted 16 December 2022. 2022/23 Exploration Report – Submitted 18 December 2023. 2023/24 Exploration Report – Submitted 13 December 2024. - Email evidence of submission sighted (18 December 2023).	A consolidated exploration report is submitted for the period 20 November – 19 November each year. The following was sighted: 2021/22 Exploration Report – Submitted on 16 December 2022 2022/23 Exploration Report - Submitted on 18 December 2023 2023/24 Exploration Report - Submitted on 13 Dec 2024 During the audit period annual Group Exploration Reports were lodged to the satisfaction of the Minister in accordance with <i>Mining Act 1992</i> requirements. Although no exploration activities were undertaken in ML1747 or ML1815, reporting obligations were maintained through submission of consolidated Group Annual Exploration Reports.	Compliant	
ML1626 ML1815 ML1817	<i>Note: Exploration Reports (Geological and Geophysical)</i> The lease holder must lodge reports to the satisfaction of the Secretary in accordance with section 163C of the Mining Act 1992 and in accordance with clauses 59, 60 and 61 of the Mining Regulation 2016. Reports must be prepared in accordance with Exploration Reporting: A guide for reporting on exploration and prospecting in New South Wales.				
SPECIAL CONDITIONS					
DAMS SAFETY – MINING LEASES					
ML1626	(a) The lease holder must not mine within any part of the lease area which is within the notification area of the Anvil Hill Main Water Dam, Anvil Hill South In-Pit Tailings Storage Facility, and Anvil Hill Start-Up Tailings Storage Facility without the prior written	- Discussion with MCO E&C Department - Site Inspection	This condition was not triggered during the current audit period. Mining has occurred only in the Wybong Pit; however, all activities have remained outside the notification areas of the Anvil Hill Main Water Dam, Anvil Hill South In-Pit Tailings Storage Facility, and Anvil Hill	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	approval of the Minister and subject to any conditions the Minister may stipulate. (b) Where the lease holder desires to mine within the notification area, the lease holder must: (i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A plan of the mining system to be implemented must accompany the notice; and (ii) provide such information as the Minister may direct. (c) The Minister must not, except in the circumstances set out in sub-paragraph (ii), grant approval unless sub-paragraph (i) of this paragraph has been complied with. (i) This sub-paragraph is complied with if: A) Dams Safety NSW as constituted by section 6 of the Dams Safety Act 2015 and the owner of the dam have been notified in writing of the desire to mine referred to in paragraph (b). B) the notifications referred to in clause (a) are accompanied by a description or plan of the area to be mined. C) the Secretary has complied with any reasonable request made by Dams Safety NSW or the owner of the dam for further information in connection with the mining proposal. D) Dams Safety NSW has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and		Start-Up Tailings Storage Facility. No Ministerial approval was required or sought.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	E) where Dams Safety NSW has made recommendations, the approval is in terms that are: - in accordance with those recommendations; or - where the Minister does not accept those recommendations or any of them - in accordance with a determination under sub-paragraph (ii) of this paragraph. (ii) Where the Minister does not accept the recommendations of Dams Safety NSW or where Dams Safety NSW has failed to make any recommendations and has not informed the Minister in writing that it does not proposed to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam: A) as determined by agreement between the Minister and the Minister administering the Dams Safety Act 2015; or B) in the event of failure to reach such agreement – as determined by the Premier. (d) The Minister, on notice from Dams Safety NSW, may at any time or times: (i) cancel any approval given where a notice pursuant to section 19 of the Dams Safety Act 2015 is given. (ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed.				
STANDARD MINING LEASER CONDITIONS					
Schedule 8A	MCO must comply with the standard mining lease conditions set out in Schedule 8A of the <i>Mining Regulation 2016</i> .	Rehabilitation Risk Assessment: original 2021; updated	MCO must comply with the standard mining lease conditions set out in Schedule 8A of the Mining Regulation 2016. These include requirements for rehabilitation objectives, risk assessment,	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
Mining Regulation 2016		workshop 20/11/2024 (attendance record sighted). - Rehabilitation Management Plan (RMP): initial 2021; updated 29/11/2024. - Rehabilitation Objectives (ROBJ): approved 12/12/2023. - Completion Criteria: in preparation, not yet due (submission required ≥3 years prior to completion). - Forward-Looking Rehabilitation Program (FLRP): FLRP0001236 – RR Portal records as approved; email confirmation	Rehabilitation Management Plan (RMP), Rehabilitation Objectives (ROBJ), completion criteria, and a Forward-Looking Rehabilitation Program (FLRP). Risk Assessment - A whole-of-mine rehabilitation risk assessment was originally prepared in 2021, consistent with the NSW Rehabilitation Reforms transitional arrangements. - A review and update was undertaken during the audit period, with a workshop held on 20 November 2024. Attendees included the pit superintendent, mining maintenance, acting mine manager, technical services, Environment & Community (E&C) team, and an external consultant from IEMA. - Evidence sighted: attendance record of workshop and updated risk register. RMP - The initial RMP was prepared in 2021 (superseding the Mining Operations Plan under the July 2022 reforms). - A full update was completed on 29 November 2024. - Evidence sighted of consultation with DPHI, including: - Letter dated 29 October 2024 granting approval for Council		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		of system notification error.	to be excluded from consultation on Version 2.0. - DPHI approval of the updated RMP issued on 14 January 2025 (noting that Condition B91 requires consultation but not formal approval). ROBJ - ROBJ were formally approved on 12 December 2023 by the NSW Resource Regulator. - These objectives provide the overarching outcomes for rehabilitation in line with Schedule 8A. Completion Criteria - Under Schedule 8A, completion criteria must be developed and submitted to the NSW Resource Regulator at least three years prior to the expected completion of mining. - At the time of the audit, completion criteria were in development and had not yet reached final submission. - Evidence sighted: draft completion criteria under preparation and internal project timeline. - Finding: In progress. No non-compliance as submission is not yet due. FLRP		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			- FLRP submission confirmed as FLRP0001236. - Email correspondence sighted from the NSW Resource Regulator noting that an approval notification had not been issued due to a system error. However, the RR Portal records the FLRP as approved. - Finding: Compliant. FLRP is approved and current. MCO has complied with the Schedule 8A requirements of the <i>Mining Regulation 2016</i>. A current RMP, ROBJ, and FLRP are in place; a risk assessment has been reviewed and updated; and completion criteria are progressing toward submission within the required timeframe. No non-compliances were identified.		

Audit Checklist – Assessment Lease No. 9

Contents

GENERAL CONDITIONS	2
WORK PROGRAM	2
COMMUNITY CONSULTATION	2
PROTECTION OF THE ENVIRONMENT	3
SECURITY	4
REHABILITATION	4
ENVIRONMENTAL INCIDENT REPORTING	5
ANNUAL ACTIVITY REPORTING	5
CHANGE IN CONTROL	6
SPECIAL CONDITIONS	6
LANDHOLDER LIAISON PROGRAM AND PROPERTY ACQUISITION STRATEGY	6

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
GENERAL CONDITIONS					
WORK PROGRAM					
1	The lease holder must carry out the operations, and any other activities, described in the Work Program and comply with any commitments in relation to the conduct of operations specified in the Work Program, as for the time being in force, in respect of this lease.	- WP-AL9-2025-2030, Prospecting Authority Work Program, Application for Renewal, dated September 2024 - Instrument of renewal, dated 25/3/2025 - CCC meeting presentation slide,	A Work Program for future prospecting operations (WP-AL9-2025-2030) was submitted in September 2024 as part of the renewal process for AL9. The renewal was granted on 25 March 2025. Audit review confirmed that commitments in the Work Program have been addressed during the audit period, including: - Community consultation: Exploration included as a standing agenda item for CCC meetings. - Rehabilitation commitments: Rehabilitation planned for two boreholes to be drilled under the new Work Program. - Management plans: Ongoing implementation of environmental management plans in line with Work Program commitments.	Compliant	
COMMUNITY CONSULTATION					
2	The lease holder must carry out community consultation in relation to the planning and conduct of activities under this lease in accordance with the Exploration Code of	Annual Community Consultation Reports, available on	MCO has developed a Community Consultation Strategy (CCS) for exploration activity within the boundaries of Assessment Lease 9 (AL9). MCO prepare and publish an Annual Community	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Practice: Community Consultation (March 2016).	the MCO Public website - Community Consultative Committee meeting minutes (2022–2025). - Community Consultation Strategy (publicly available on lease holder's website)	Consultation Report specific to the CCS and AL9. In addition, a Community Consultative Committee (CCC) has been established and meets regularly, providing a structured forum for engagement with residents, community groups, and regulators. In addition, MCO maintains a dedicated website containing consultation documents, strategies, and updates on planned exploration activities.		
PROTECTION OF THE ENVIRONMENT					
3	The lease holder must prevent, or if that is not reasonably practicable, minimise so far as is reasonably practicable, any harm to the environment arising from activities carried out under this lease.	Refer SSD and EPL checklists	MCO has implemented a range of environmental management plans and controls under SSD-8642 and EPL 12894 to prevent or minimise harm to the environment from activities within the lease area. These include approved Water, Noise, Air Quality and Biodiversity Management Plans, progressive rehabilitation, and monitoring programs. No evidence was identified during the audit period of harm to the environment arising from activities under AL9 that was not already addressed through management, investigation, or reporting	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
			processes. The condition is therefore considered compliant.		
SECURITY					
4	The lease holder must provide a security deposit to secure funding for the fulfilment of obligations under this lease (including obligations that may arise in the future) as follows: (a) Amount: \$151,000 (b) Lease Holder's entitlement to interest: none.	Bank Guarantees AL9, dated 03/07/2025	Sighted evidence of a bank guarantee to the Department for: \$50,000 to Dep Trade Investment, Regional Infrastructure \$101,000 to Department of Planning and Environment	Compliant	
REHABILITATION					
5	The lease holder must carry out rehabilitation of all disturbance caused by activities carried out under this lease in accordance with the requirements in Part B of the <i>Exploration Code of Practice – Rehabilitation</i> (July 2015) to the satisfaction of the Minister.	- Work Program WP-AL9-2025-2030 - Site inspection	The approved Work Program WP-AL9-2025-2030 includes drilling of two exploration boreholes, with rehabilitation of those sites required on completion of drilling. As at the audit period, drilling activities have not yet commenced under this work program. Accordingly, no rehabilitation works were triggered during the audit period. Rehabilitation obligations will apply once drilling occurs under the current work program. MCO should ensure that borehole rehabilitation (capping, topsoil replacement, revegetation) is undertaken promptly after completion of drilling and is consistent with the Code of Practice.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
ENVIRONMENTAL INCIDENT REPORTING					
6	The lease holder must provide environmental incident notifications and reports to the Secretary no later than 7 days after those notifications and reports are provided to relevant authorities under the <i>Protection of the Environment Operations Act 1997</i> .	- Incident register for the audit period (2022–2025). - Annual Reviews - Regulator Consultation	No environmental incidents requiring notification under the POEO Act were reported during the audit period. As a result, no notifications to the Secretary were triggered under this condition.	Not Triggered	
ANNUAL ACTIVITY REPORTING					
7	Unless otherwise approved by the Secretary, the lease holder must submit annual activity reports prepared in accordance with the <i>Exploration Guideline: Annual Activity Reporting for Prospecting Titles</i> (July 2015) at the following times: (a) Annually, within one calendar month following the grant anniversary date of this lease (b) On any other date or dates directed by the Secretary in writing; and (c) Within one calendar month following the cancellation or expiry of this lease.	- Copies of Annual Activity Reports submitted 2022–2025. - Submission confirmation correspondence from the Department - Internal reporting calendar and compliance register.	During the audit, MCO provided evidence to verify that annual activity reports were prepared and submitted in line with the requirements of the Exploration Guideline. Reports have been lodged with the Department within one calendar month of the lease anniversary date as required. No directions were issued by the Secretary during the audit period for alternate submission dates, and the lease has not been cancelled or expired.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
CHANGE IN CONTROL					
8	If the lease holder is a corporation the Secretary must be notified within 30 days of any: (a) Change in effective control of the lease holder; or (b) Foreign acquisition of substantial control in the lease holder. Notification is not required where a change in effective control of the lease holder, or a foreign acquisition of substantial control of the lease holder, occurs as a result of the acquisition of shares or other securities on a registered stock exchange.	Discussion with MCO E&S Manager	During the audit period, there were no changes in effective control of MCO and no foreign acquisitions of substantial control. As such, no notifications under this condition were triggered or required.	Not Triggered	
SPECIAL CONDITIONS					
LANDHOLDER LIAISON PROGRAM AND PROPERTY ACQUISITION STRATEGY					
-	Upon the grant of the lease, the lease holder must establish a landholder liaison program, which must include procedures for addressing all landholder inquiries (<i>Landholder Liaison Program</i>). Where it is proposed that the lease area will be used in future for the development of open cut mining operations, the lease holder must establish a strategy for the acquisition of property within the lease area from any landholders who: (a) request in writing that the lease holder acquire their land; and	Landholder Liaison Program and Property Acquisition Strategy, Version 3.0 dated 05/11/2021	MCO has prepared and implemented a Landholder Liaison Program and Property Acquisition Strategy (LLPPAS), Version 3.0 (dated 5 November 2021), consistent with Condition 54 of AL9. The LLPPAS was originally submitted to the Division of Resources and Geosciences on 10 November 2017 and provided to private landholders within the lease area at that time. The program is being updated following the renewal of AL9.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(b) can demonstrate hardship and, despite bona fide attempts to sell, have been unable to sell their land as a consequence of the proposed open cut mining, (<i>Property Acquisition Strategy</i>). Copies of both the Landholder Liaison Program and the Property Acquisition Strategy must be provided to all landowners within the lease area and to the Executive Director Assessments and Systems, NSW Resources. Where such hardship and bona fide efforts to sell are established under the terms of this condition or agreed between the parties, the lease holder must be prepared to purchase the landowners land in accordance with this condition. Where agreement cannot be reached as to the demonstration of hardship and bona fide efforts to sell, either the lease holder or the landowner may refer the matter to the Secretary for resolution. Upon receiving such a referral, the Secretary shall appoint an independent arbitrator from the Minister's panel of arbitrators appointed under the <i>Mining Act 1992</i> (NSW) to: - consider submissions from both parties, - determine whether hardship exists and bona fide attempts to sell have been made, and - prepare a summary report for the Secretary.		No property acquisitions were triggered under Condition 54 of AL9 during the audit period. The Landholder Liaison Program and Property Acquisition Strategy (LLPPAS) remains in place, with Version 3.0 dated 5 November 2021, and is being updated following the renewal of AL9. The condition is considered compliant.		

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	The arbitrator's costs are to be borne by the lease holder. Land acquisition Within three months of receiving a written request from a landowner within the lease area, or within three months of receiving a copy of an arbitrator's report confirming hardship and bona fide attempts to sell, the lease holder must make a binding written offer to the landowner based on: (a) the current market value of the landowner's interest in the land, which is within the lease area, at the date of the written request, as if the land was unaffected by the potential development of open cut mining operations within the lease area, having regard to the: - existing and permissible use and amenity of the land, - presence of improvements on the land and/or any approved building or structure which has been physically commenced at the date of the landowner's written request, and is due to be completed subsequent to that date, and (b) the reasonable costs associated with the landowner obtaining legal and expert advice for determining the acquisition price of the land and the terms upon which it is to be acquired. If, within 28 days of the lease holder making an offer to acquire a landowner's land in				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	accordance with this condition, the lease holder and landowner cannot agree on the acquisition price and/or the terms upon which the land is to be acquired, then either party may refer the matter to the Secretary for resolution. Upon receiving such a referral, the Secretary shall request the President of the NSW Division of the Australian Property Institute (API) to appoint a qualified independent valuer to: - consider submissions from both parties; - establish a fair market value for the land and determine reasonable costs and compensation for the acquisition, in accordance with paragraphs (a)-(b) above; and - recommend appropriate fair and reasonable terms of acquisition. The appointed valuer is to provide a report and explanation of their valuation, determinations and proposed terms of acquisition to the Secretary, the lease holder and the landowner. The Secretary shall consider the valuation, determinations and terms of acquisition proposed by the independent valuer and advise the parties that: (a) the independent valuer's report is fair and reasonable, in which case the lease holder must make a written offer to purchase the land in accordance with the terms set out in				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	the independent valuer's report and at a price no less than that set in the report within 14 days, or (b) that the independent valuer's report is not fair and/or reasonable, in which case a further independent valuation and determination will be undertaken in accordance with this condition and the Secretary will duly request a further appointment by the API. If the landowner has not accepted a written offer duly made by the lease holder under this condition within 6 months of receipt of the offer, the lease holder's obligation to acquire the land shall cease, unless otherwise agreed by the Secretary. The lease holder shall bear the full costs of any independent valuer's valuation, determination and report under this condition. If the lease holder and landowner agree that only part of the land shall be acquired, the lease holder shall pay all reasonable costs associated with obtaining approval from the relevant consent authority for any plan of subdivision (where permissible), and registration of the plan at the Office of the Registrar-General. Definitions: <i>Hardship: conditions that are difficult to endure. Hardship may be caused by illness, age, financial stress or adverse personal circumstances.</i>				

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	<i>Bona fide attempts to sell:</i> – listing of the property, which is within the lease area, with a local Real Estate or Stock and Station Agent, for a period of at least six months at a price which is in line with the current market for the property, as if it was unaffected by potential future open cut mining operations within the lease. The listing must have occurred during the term of the assessment lease or during a twelve month period immediately prior to the grant of the assessment lease. <u>Landowner:</u> has the meaning given to the term ‘owner’ in the Land Acquisition (Just Terms Compensation) Act 1991 (NSW). <u>Market value:</u> means ‘market value’ as defined in the Land Acquisition (Just Terms Compensation) Act 1991 (NSW). <u>Secretary:</u> means the Secretary administering the Mining Act 1992.				

Audit Checklist – Exploration Licence No. 5552

Contents

GENERAL CONDITIONS	2
WORK PROGRAM	2
NATIVE TITLE	2
COMMUNITY CONSULTATION	2
PROTECTION OF THE ENVIRONMENT	3
SECURITY	3
REHABILITATION	3
ENVIRONMENTAL INCIDENT REPORTING	4
ANNUAL ACTIVITY REPORTING	4
CHANGE IN CONTROL	5
ADDITIONAL CONDITIONS	5
ACTIVITY APPROVALS ISSUED PRIOR TO 1 MARCH 2016	5

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
GENERAL CONDITIONS					
WORK PROGRAM					
1	The licence holder must carry out the operations, and any other activities, described in the Work Program and comply with any commitments in relation to the conduct of operations specified in the Work Program, as for the time being in force, in respect of this licence.	• Exploration records confirming last drilling in 2014. • Discussion with E&C Manager	No exploration drilling has been conducted within EL 5552 since November 2014, except for water monitoring bore drilling undertaken in 2023. This activity was exempt from the requirement to prepare a Work Program as it was captured under an approved Environmental Impact Statement (EIS). No other exploration activities were undertaken during the audit period	Not Triggered	
NATIVE TITLE					
2	The licence holder must not prospect on any land or waters within the exploration area on which Native Title has not been extinguished under the Native Title Act 1993 (Cth) without the prior written consent of the Minister.	• Discussion with E&C Manager	No prospecting activities were conducted on land or waters subject to Native Title within EL 5552 during the audit period. Accordingly, this condition was not triggered, and no Ministerial consent was required.	Not Triggered	
COMMUNITY CONSULTATION					
3	The licence holder must carry out community consultation in relation to the planning and conduct of activities under this licence in accordance with the Exploration Code of Practice: Community Consultation (March 2016).	• CCC meeting minutes (2022–2025). • Community newsletters. • Aboriginal stakeholder consultation records. • Website information	Community consultation obligations under EL 5552 are addressed through the existing consultation framework for the broader HVO operations, including: • The Community Consultative Committee (CCC), where exploration activities are a standing agenda item. • Regular community newsletters distributed to local residents. • Aboriginal stakeholder meetings held to discuss exploration and ongoing environmental management.	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
		available to the public.	Information published on the lease holder's public website. These mechanisms meet the requirements of the Exploration Code of Practice.		
PROTECTION OF THE ENVIRONMENT					
4	The licence holder must prevent, or if that is not reasonably practicable, minimise so far as is reasonably practicable, any harm to the environment arising from activities carried out under this licence.	- Discussion with E&C Manager - Site Inspection	No prospecting activities (beyond installation of monitoring bores in 2023, exempt under the EIS) have been undertaken in EL 5552 during the audit period. No environmental incidents, impacts or complaints were recorded in relation to activities under this licence. The broader HVO Environmental Management System, including incident reporting, monitoring programs, and rehabilitation planning, provides a framework to prevent and minimise harm should activities recommence.	Compliant	
SECURITY					
5	The licence holder must provide a security deposit to secure funding for the fulfilment of obligations under this licence (including obligations that may arise in the future) as follows: (a) Amount: \$13,000 (b) Licence holder's entitlement to interest: none.	Security deed, dated 2015	A Security Deed was executed in 2015 confirming a security deposit of \$13,000 for EL 5552. This security remains in place and is held by the Department. The amount aligns with the requirements of this condition	Compliant	
REHABILITATION					
6	The licence holder must carry out rehabilitation of all disturbance caused by activities carried out under this licence in accordance with the requirements in Part B of the Exploration Code of	- Discussion with E&C Manager - Site Inspection	No exploration drilling or other disturbance activities have been undertaken in EL 5552 during the audit period. The drilling of GWMP2 in 2022 was not classified as prospecting under the <i>Mining Act 1992</i> and	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	Practice - Rehabilitation (July 2015) to the satisfaction of the Minister.	- Records of drilling of GWMP2 (2022). - Exploration activity register confirming no prospecting-related disturbance within EL 5552. - Annual Reviews (2022–2025) noting no rehabilitation requirements for EL 5552.	therefore did not trigger rehabilitation obligations under this licence condition. No rehabilitation obligations under EL 5552 were therefore triggered during the audit period.		
ENVIRONMENTAL INCIDENT REPORTING					
7	The licence holder must provide environmental incident notifications and reports to the Secretary no later than seven days after those notifications and reports are provided to relevant authorities under the Protection of the Environment Operations Act 1997.	Refer evidence against the SSD and EPL checklists	No environmental incidents requiring notification under the POEO Act occurred in relation to activities under EL 5552 during the audit period. As such, this condition was not triggered.	Compliant	
ANNUAL ACTIVITY REPORTING					
8	Unless otherwise approved by the Secretary, the licence holder must submit annual activity reports prepared in	Annual Activity Reports for	Auditors sighted the Annual Activity Reports (AARs) for the audit period (2022–2025), which had been prepared in accordance with	Compliant	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	accordance with the Exploration Guideline: Annual Activity Reporting for Prospecting Titles (July 2015) at the following times: (a) Annually, within one calendar month following the grant anniversary date of this licence; (b) On any other date or dates directed by the Secretary in writing; and (c) Within one calendar month following the cancellation or expiry of this licence.	EL 5552 (2022, 2023, 2024, 2025).	the Guideline and submitted within one calendar month of the licence anniversary date. No alternate submission dates were directed by the Secretary, and the licence has not been cancelled or expired.		
CHANGE IN CONTROL					
9	If the licence holder is a corporation or a trust, the Minister's prior written approval is required before any: (a) Change in effective control of the licence holder; or (b) Foreign acquisition of substantial control in the licence holder. The Minister's approval is not required where a change in effective control of the licence holder, or a foreign acquisition of substantial control of the licence holder, occurs as a result of the acquisition of shares or other securities on a registered stock exchange.	Discussion with E&C Department	No changes in effective control of the licence holder, nor any foreign acquisitions of substantial control, occurred during the audit period. Accordingly, Ministerial approval was not required and this condition was not triggered.	Noted	
ADDITIONAL CONDITIONS					
ACTIVITY APPROVALS ISSUED PRIOR TO 1 MARCH 2016					
10	Any prospecting operations the subject of an activity approval granted pursuant to this exploration licence before 1 March 2016 must, in addition to any requirements of that approval, be carried out in accordance with the following Codes of Practice:	Discussion with E&C Department	No prospecting operations under EL 5552 were the subject of an activity approval granted prior to 1 March 2016. Accordingly, this condition was not triggered during the audit period.	Not Triggered	

Condition of Consent	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Non-Compliance Reference
	(a) Part B of the Exploration Code of Practice: Environmental Management (b) Part B of the Exploration Code of Practice: Produced Water Management, Storage and Transfer and these codes prevail to the extent of any inconsistency with a requirement of such an activity approval.				

Appendix B

DPE Endorsement of the
Audit Team

Appendix B DPE Endorsement of the Audit Team

NSW Planning ref: SSD-8642-PA-92

Robyn Ellis
Environment and Community Coordinator
Mangoola Coal Operations Pty Limited
Wonnarua Country
PO Box 495
MUSWELLBROOK NSW 2333

23/05/2025

Sent via the Major Projects Portal only

Subject: Mangoola Continued Operations – Independent Audit Team

Dear Ms Ellis

I refer to your request for endorsement by the Planning Secretary of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit (IEA) of the Mangoola coal mine, submitted as required by Schedule 2, Condition D13 of development consent SSD-8642 (the consent) to NSW Department of Planning, Housing and Infrastructure on 28 April 2025.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Kate Mitchelmore, lead auditor
- Haley Bates, auditor
- Patrick Martinez, noise and vibration specialist
- David Rollings, air quality specialist
- Darran Jordan, heritage specialist

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Please note, the Lead Auditor must attend the site inspection/s.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 02 6575 3420 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Appendix C

Photographic Log

Appendix C Photographic Log

Photo #	Comment	Photo
P - 1	CHPP	 CHPP AECOM - Mangoola IEA 01 Jul 2025, 11:21:22
P - 2	CHPP Covered conveyors	 CHPP AECOM - Mangoola IEA 01 Jul 2025, 11:20:48
P - 3	CHPP Laydown Area	 Laydown Area AECOM - Mangoola IEA 01 Jul 2025, 11:22:38

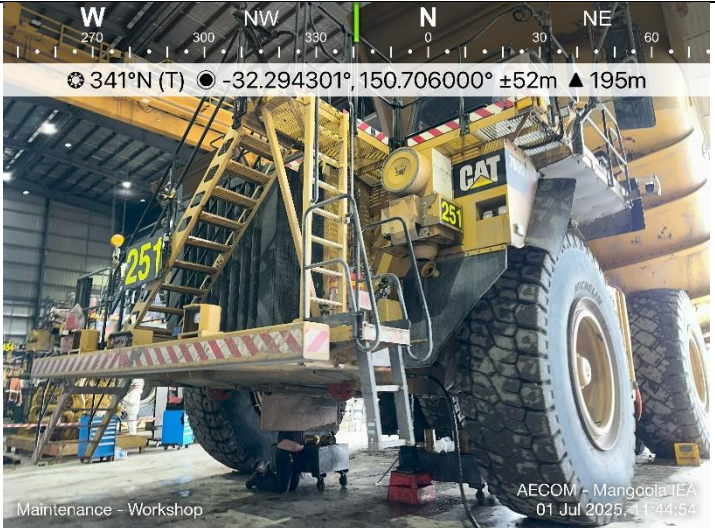
Photo #	Comment	Photo
P - 4	Maintenance Workshop – Waste Storage Area – Waste segregated, in correct bins and signposted.	 General Waste Bins AECOM - Mangoola IEA 03 Jul 2025, 11:14:43
P - 5	Maintenance Workshop – Maintenance Area – Truck 251	 Maintenance - Workshop AECOM - Mangoola IEA 01 Jul 2025, 11:44:54
P - 6	Workshop – Maintenance, external	 Maintenance AECOM - Mangoola IEA 01 Jul 2025, 11:50:40

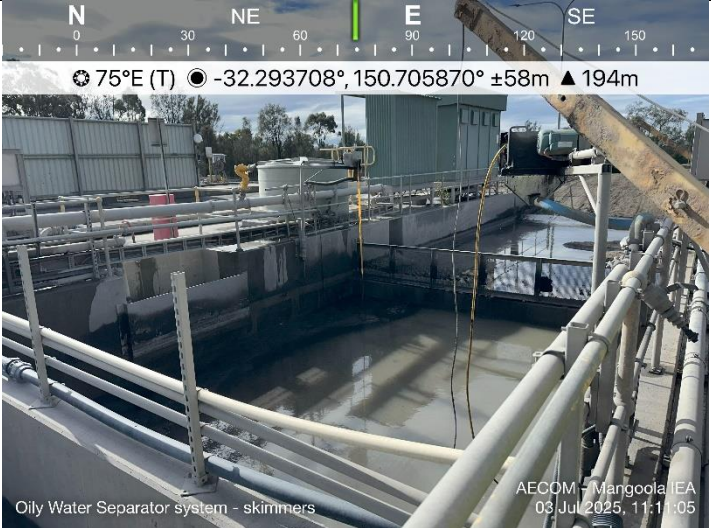
Photo #	Comment	Photo
P - 7	Wash Bay – Light Vehicles	 Wash Bay - Light Vehicles AECOM - Mangoola IEA 01 Jul 2025, 11:52:44
P - 8	Oily Water Separator – Skimmers	 Oily Water Separator system - skimmers AECOM - Mangoola IEA 03 Jul 2025, 11:11:05
P - 9	Oily Water Separator – Maintenance department logged non-operational skimmer at the time of the audit	 Oily Water Separator system - skimmers - broken skimmer AECOM - Mangoola IEA 03 Jul 2025, 11:11:41

Photo #	Comment	Photo
P - 10	Heavy vehicle waste tyre storage bay	 297°NW (T) ● -32.292376°, 150.705551° ±4m ▲ 199m Tyre storage AECOM - Mangoola IEA 03 Jul 2025, 09:44:49
P - 11	Fuel Farm – Bunding, fire protection and spill kits sighted.	 208°SW (T) ● -32.293960°, 150.707170° ±2m ▲ 197m Fuel Farm AECOM - Mangoola IEA 01 Jul 2025, 11:57:24
P - 12	Fuel Farm – Fill points.	 179°S (T) ● -32.294071°, 150.706870° ±3m ▲ 197m Fuel Farm AECOM - Mangoola IEA 01 Jul 2025, 11:58:02

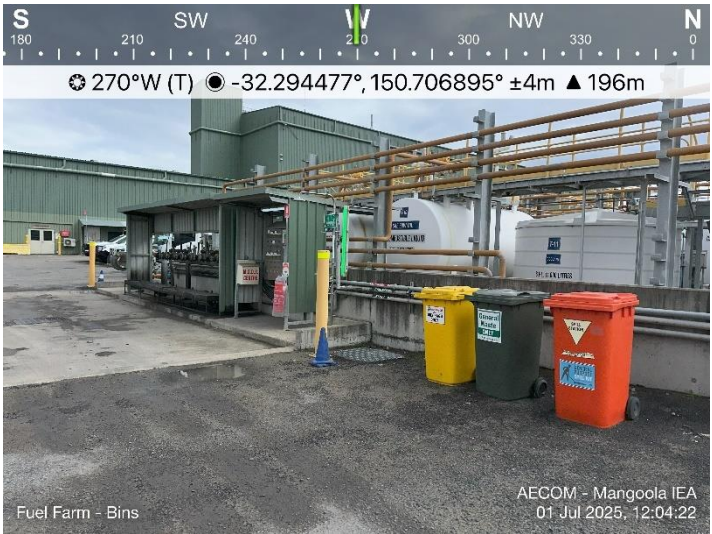
Photo #	Comment	Photo
P - 13	Fuel Farm Sump adjacent to the bulk fuel storage fill point. Sighted to be heavily silted with soil, sediment, and water. Note – 15mm of rainfall occurred prior to audit site inspection occurring.	
P - 14	Fuel Farm Bund Integrity: Soil and small vegetation growth was observed within the banded areas at the bulk fuel storage area.	
P - 15	Fuel Farm Bins and signage	 S 180 210 240 270 300 330 N 0 270°W (T) -32.294477°, 150.706895° ±4m ▲ 196m Fuel Farm - Bins AECOM - Mangoola IEA 01 Jul 2025, 12:04:22

Photo #	Comment	Photo
P - 16	Stores Building – Laydown Area	 143°SE (T) ● -32.294940°, 150.706487° ±6m ▲ 197m Stores Building - Laydown Area AECOM - Mangoola IEA 01 Jul 2025, 12:10:13
P - 17	Rail Loading Area	 261°W (T) ● -32.312590°, 150.720103° ±4m ▲ 131m Train refuelling facility AECOM - Mangoola IEA 01 Jul 2025, 10:52:36
P - 18	Rail Loading Area - Diesel Fill Point	 165°S (T) ● -32.311618°, 150.719311° ±2m ▲ 136m Train refuelling facility - diesel refill point AECOM - Mangoola IEA 01 Jul 2025, 10:54:06

Photo #	Comment	Photo
P - 19	Rail Loading Area - Diesel Fill Point	 Train refill facility AECOM - Mangoola IEA 01 Jul 2025, 10:55:10
P - 20	Rail Loading Area - Diesel Fill Point Stained soil observed adjacent to the diesel fill point, indicating previous fuel/hydrocarbon spills.	

Photo #	Comment	Photo
P - 21	MIA Dam	 MIA Dam AECOM - Mangoola IEA 01 Jul 2025, 10:45:36
P - 22	Raw Water Dam – MP42	 Raw Water Dam - MP42 AECOM - Mangoola IEA 02 Jul 2025, 12:04:28
P - 23	Orica Explosives Compound	 Orica Compound AECOM - Mangoola IEAv 01 Jul 2025, 13:21:51

Photo #	Comment	Photo
P - 24	Orica Explosives Compound - Diesel Refill Point	
P - 25	Orica Explosives Compound - Diesel Refill Point – Suspected fuel-stained soil was visible outside the bunded zone, and an overflow pipe showed evidence of discharging hydrocarbon laden water onto ground.	
P - 26	Orica Explosives Compound - Diesel Refill Point - Suspected fuel-stained soil was visible outside the bunded zone, and an overflow pipe showed evidence of discharging hydrocarbon laden water onto ground.	

Photo #	Comment	Photo
P - 27	Sewage Treatment Plant Monitoring Point 33	 STP, MP33 AECOM - Mangoola IEA 02 Jul 2025, 12:09:31
P - 28	Sewage Treatment Plant Monitoring Point 33 - Signage	 STP, MP33 signage AECOM - Mangoola IEA 02 Jul 2025, 12:10:27
P - 29	Sewage Treatment Plant - Potable Water Area	 STP, potable water are AECOM - Mangoola IEA 02 Jul 2025, 12:11:42

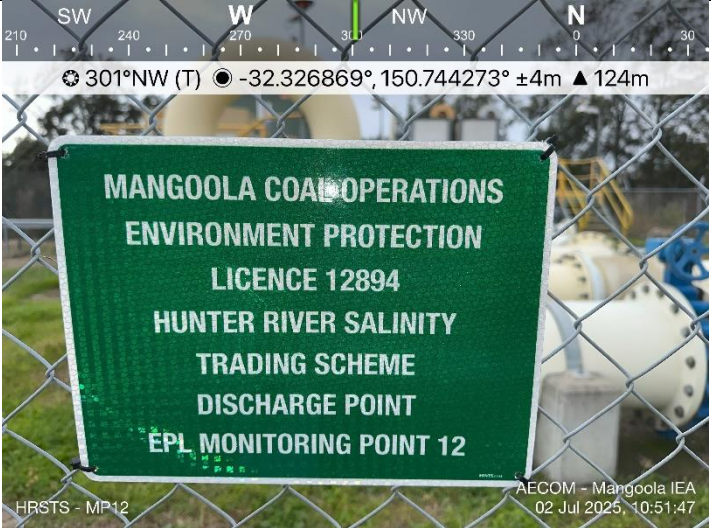
Photo #	Comment	Photo
P - 30	Hunter River Salinity Trading Scheme – Monitoring Point 12	 SW W NW N 210 240 270 300 330 0 ☉ 289°W (T) ● -32.326923°, 150.744234° ±1m ▲ 125m HRSTS - MP12 AECOM - Mangoola IEA 02 Jul 2025, 10:51:32
P - 31	Hunter River Salinity Trading Scheme – Monitoring Point 12, signage	 SW W NW N 210 240 270 300 330 0 ☉ 301°NW (T) ● -32.326869°, 150.744273° ±4m ▲ 124m MANGOOLA COAL OPERATIONS ENVIRONMENT PROTECTION LICENCE 12894 HUNTER RIVER SALINITY TRADING SCHEME DISCHARGE POINT EPL MONITORING POINT 12 HRSTS - MP12 AECOM - Mangoola IEA 02 Jul 2025, 10:51:47
P - 32	Hunter River Salinity Trading Scheme – Monitoring Point 12, continuous electrical conductivity probe	 SW W NW N 210 240 270 300 330 0 ☉ 283°W (T) ● -32.326859°, 150.744383° ±5m ▲ 126m HRSTS - MP12 - Continuous EC probe AECOM - Mangoola IEA 02 Jul 2025, 10:52:33

Photo #	Comment	Photo
P - 33	Church NE Blast Monitor (BM) 03 (EPL ID: 16)	MP 16 - The Church (BMO 3) AECOM - Mangoola IEA 02 Jul 2025, 11:07:07
P - 34	Church NE BM03 (EPL ID: 16)	MP 16 - The Church (BMO 3) AECOM - Mangoola IEA 02 Jul 2025, 11:08:41
P - 35	Mine blasting road closure signage	Mine Blasting Signage AECOM - Mangoola IEA 02 Jul 2025, 11:11:43

Photo #	Comment	Photo
P - 36	SX 81 Noise Monitor	 SX 81 - Noise Monitor AECOM - Mangoola IEA 02 Jul 2025, 11:15:20
P - 37	SX 81 Noise Monitor	 SX 81 - Noise Monitor AECOM - Mangoola IEA 02 Jul 2025, 11:15:39
P - 38	TEOM Monitoring Site D02-DC to D06-DC Continuous PM ₁₀	 TEOM D02DC and D02TSP AECOM - Mangoola IEA 02 Jul 2025, 11:18:05

Photo #	Comment	Photo
P - 39	PM10 HVAS D09-PM10, situated off Wybong Po Road. Monitor and surrounds were well maintained with no obstructions around the monitor.	
P - 40	Weather station WSN1, situated off Wybong Po Road. Weather station and surrounds were well maintained with no obstructions around the station.	
P - 41	Grader operational in South Pit. Minor dust generation observed during grading activities. Haul roads were well wetted and maintained.	

Photo #	Comment	Photo
P - 42	Main Pit Haul truck operational on a haul road. No dust observed from the operation of the haul trucks at the time of observation.	
P - 43	Main Pit Excavator loading a haul truck. Minor dust noted during loading. Dust was all contained within the loading area with no dust observed leaving the immediate area around the loading point.	
P - 44	Wybong Cemetery	NW 300 330 N 0 NE 30 60 90 E 18°N (T) -32.277258°, 150.637371° ±2m ▲ 157m  Wybong Cemetery AECOM - Mangoola IEA 02 Jul 2025, 11:45:54

Photo #	Comment	Photo
P - 45	Rehabilitation Anvil Hill	 228°SW (T) ● -32.290819°, 150.685595° ±4m ▲ 234m Anvil Hill AECOM - Mangoolia IEA 03 Jul 2025, 09:54:49
P - 46	Rehabilitation Anvil Hill	 299°NW (T) ● -32.290803°, 150.685603° ±6m ▲ 232m Anvil Hill AECOM - Mangoolia IEA 03 Jul 2025, 09:54:54
P - 47	Rehabilitation Anvil Hill Habitat Trees	 155°SE (T) ● -32.290827°, 150.685729° ±5m ▲ 233m Anvil Hill - Habitat trees AECOM - Mangoolia IEA 03 Jul 2025, 09:55:53

Photo #	Comment	Photo
P - 48	Rehabilitation Anvil Hill Minor infestations of woody weeds (notably Galenia)	
P - 49	Rehabilitation Anvil Hill Diversity of shrubs	
P - 50	Rehabilitation Anvil Creek Line	

Photo #	Comment	Photo
P - 51	Rehabilitation South Pit Rehabilitation	 NW 330 N 0 30 60 90 120 SE 43°NE (T) -32.299645°, 150.683731° ±6m ▲171m South Pit Rehab AECOM - Mangoola IEA 03 Jul 2025, 10:11:19
P - 52	Rehabilitation South Pit Rehabilitation	 NE 30 E 60 90 120 150 180 S 104°E (T) -32.299363°, 150.683362° ±6m ▲172m South Pit Rehab AECOM - Mangoola IEA 03 Jul 2025, 10:12:10
P - 53	Rehabilitation South Pit Rehabilitation	 W 270 NW 300 330 N 0 30 NE 60 337°NW (T) -32.298889°, 150.683100° ±14m ▲172m South Pit Rehab AECOM - Mangoola IEA 03 Jul 2025, 10:12:51

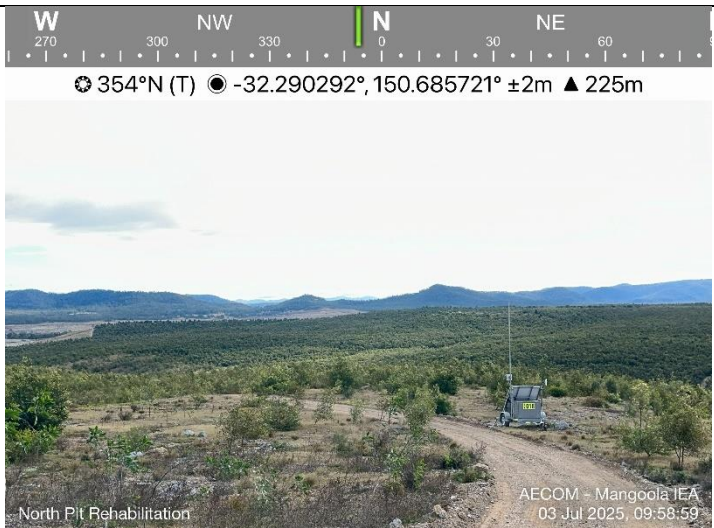
Photo #	Comment	Photo
P - 54	Rehabilitation South Pit Rehabilitation – Localised Block 487 Erosion	 South Pit Rehabilitation- Block 487 Erosion AECOM - Mangoola IEA 03 Jul 2025, 10:14:12
P - 55	Rehabilitation South Pit Rehabilitation – Localised Block 487 Erosion	 South Pit Rehabilitation- Block 487 Erosion AECOM - Mangoola IEA 03 Jul 2025, 10:15:05
P - 56	Rehabilitation North Pit Rehabilitation	 North Pit Rehabilitation AECOM - Mangoola IEA 03 Jul 2025, 09:58:59

Photo #	Comment	Photo
P - 57	Rehabilitation North Pit Rehabilitation – Nest boxes	North Pit Rehabilitation- Nest boxes AECOM - Mangoola IEA 03 Jul 2025, 10:30:59
P - 58	Rehabilitation North Pit Rehabilitation – Monitoring Point 4	North Pit Rehabilitation- Monitoring Point 4 AECOM - Mangoola IEA 03 Jul 2025, 10:34:26
P - 59	Rehabilitation North Pit Rehabilitation – Grass Tree Translocation	North Pit Rehabilitation- Grass Tree translocation AECOM - Mangoola IEA 03 Jul 2025, 10:35:35

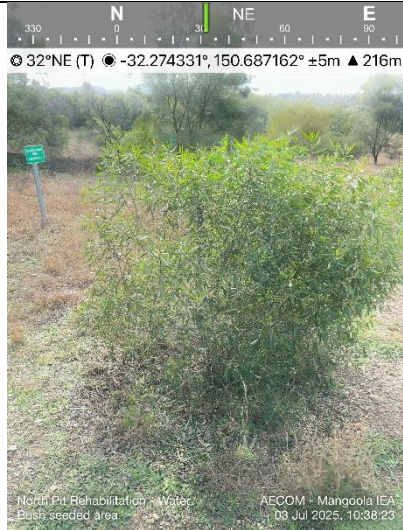
Photo #	Comment	Photo
P - 60	Rehabilitation North Pit Rehabilitation – 2013 seeded area.	
P - 61	Rehabilitation North Pit Rehabilitation – Water Bush seeded area.	
P - 62	Rehabilitation North Pit Rehabilitation – Lookout.	

Photo #	Comment	Photo
P - 63	Rehabilitation North Pit Rehabilitation – Slaty Box Track. Bat boxes.	North Pit Rehabilitation - Bat boxes AECOM - Mangoola IEA 03 Jul 2025, 10:46:24
P - 64	Rehabilitation North Pit Rehabilitation – Grasslands area with Acacia Falcata colonies.	North Pit Rehabilitation - Grasslands Area with Acacia falcata colonies AECOM - Mangoola IEA 03 Jul 2025, 10:49:05
P - 65	North Pit Rehabilitation and Big Flat Creek. Offset Area (nest boxes)	North Pit Rehabilitation and Big Flat Creek Offset Area (nest boxes) AECOM - Mangoola IEA 03 Jul 2025, 10:51:39

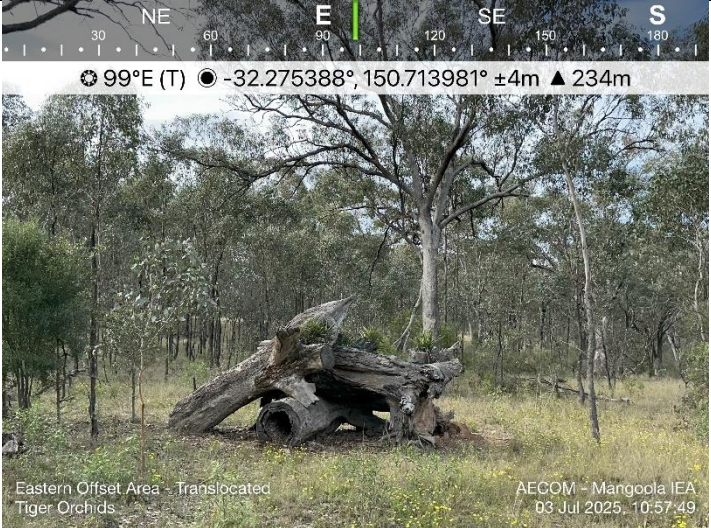
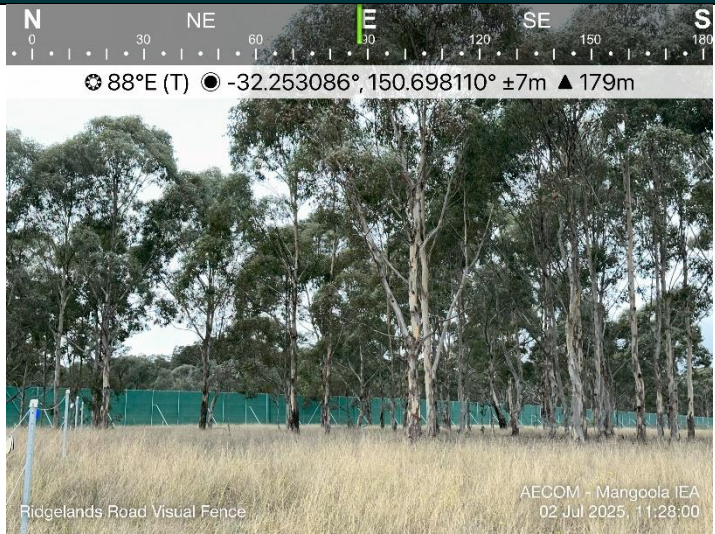
Photo #	Comment	Photo
P - 66	Ground Orchid Offset Area	 A photograph of a fenced-in area with a gate, surrounded by trees and grass. The photo includes a compass rose at the top showing North (N) and East (E), and a scale bar. The text overlay indicates a bearing of 40°NE (T), coordinates of -32.274246°, 150.712026° ±4m, and an elevation of 222m. The photo is labeled 'Ground Orchid Offset Area' and 'AECOM - Mangoola IEA 03 Jul 2025, 10:55:15'.
P - 67	Eastern Offset Area – Translocated Tiger Orchids	 A photograph of a large, fallen log in a grassy area with trees in the background. The photo includes a compass rose at the top showing North (N), East (E), and South (S), and a scale bar. The text overlay indicates a bearing of 99°E (T), coordinates of -32.275388°, 150.713981° ±4m, and an elevation of 234m. The photo is labeled 'Eastern Offset Area - Translocated Tiger Orchids' and 'AECOM - Mangoola IEA 03 Jul 2025, 10:57:49'.
P - 68	Eastern Offset Area	 A photograph of a grassy area with trees and a fallen log in the foreground. The photo includes a compass rose at the top showing North (N), East (E), and South (S), and a scale bar. The text overlay indicates a bearing of 133°SE (T), coordinates of -32.275385°, 150.714057° ±6m, and an elevation of 234m. The photo is labeled 'Eastern Offset Area' and 'AECOM - Mangoola IEA 03 Jul 2025, 10:58:15'.

Photo #	Comment	Photo
P - 69	Wybong Pit, taken from Eastern Offset Area	Wybong Pit, taken from Eastern Offset Area AECOM - Mangoola IEA 03 Jul 2025, 11:23:16
P - 70	Mangoola Biodiversity Stewardship Agreements (BSA) – Corridor arm to Ridgeland's Road.	Mangoola BSA - Corridor arm to Ridgelands Road AECOM - Mangoola IEA 03 Jul 2025, 11:47:12
P - 71	Mangoola BSA – Castle Rock Road	Mangoola BSA - Castle Rock Road AECOM - Mangoola IEA 03 Jul 2025, 11:57:37

Photo #	Comment	Photo
P - 72	Mangoola BSA – Castle Rock Road	SW W NW N 210 240 270 300 330 0 ☼ 295°NW (T) ● -32.258670°, 150.730303° ±4m ▲ 188m Mangoola BSA - Castle Rock Road AECOM - Mangoola IEA 03 Jul 2025, 11:57:42
P - 73	MCO001– Aboriginal Cultural Heritage Special Management Area	NE E SE S 30 60 90 120 150 180 ☼ 102°E (T) ● -32.252731°, 150.697965° ±8m ▲ 180m MCO001 - Heritage Special Management Location: 37-2-5816 AECOM - Mangoola IEA 02 Jul 2025, 11:26:40
P - 74	MCO001– Aboriginal Cultural Heritage Special Management Area	N NE E SE 0 30 60 90 120 150 ☼ 79°E (T) ● -32.253075°, 150.698096° ±7m ▲ 179m MCO001 - Heritage Special Management Location: 37-2-5816 AECOM - Mangoola IEA 02 Jul 2025, 11:27:50

Photo #	Comment	Photo
P - 75	Ridgeland's Road, visual fence	 88°E (T) ● -32.253086°, 150.698110° ±7m ▲ 179m Ridgelands Road Visual Fence AECOM - Mangoola IEA 02 Jul 2025, 11:28:00
P - 76	Ridgeland's Road, visual fence	 294°NW (T) ● -32.253318°, 150.698027° ±1320m ▲ 186m Ridgelands Road Visual Bund AECOM - Mangoola IEA 02 Jul 2025, 11:28:43

Appendix D

Agency and
Communication
Consultation

Appendix D Agency and Communication Consultation

Table 9 Agency Consultation Summary

Stakeholder	Feedback Summary	IEA Response
NSW DPHI	The Department has received complaints about: - Dust – complaints from a resident of Yarraman Road, Wybong about dust emissions from the extension activities at the north of the site. Mangoola Coal agreed to undertake additional monitoring to determine whether existing monitoring locations were representative of sensitive receivers to the north. Mangoola Coal agreed to carrying out this monitoring for a 12-month period. A report is due to the department by 31 July 2025. I would like the air quality specialist to look into the adequacy of the current air quality monitoring program as described in the Air Quality Management Plan for the development. - Blasting – A complaint about the blast conducted on 11 March 2023 from a resident at Yarraman Road, Wybong. The audit should assess Mangoola Coal's complaints management process.	All complaints were reviewed in detail as part of the IEA. A summary of complaints is provided against each topic in Section 7.0. The notable increase in complaints during 2024 correlates with the commencement of blasting in the Wybong Pit on 19 January 2023. This marked a shift in operational areas closer to sensitive receivers and likely contributed to heightened community sensitivity and perception of noise, blast and air quality impacts.
	Mangoola Coal reported to the department the following non-compliances - - failed to monitor a blast on 18 January 2023. - failed to monitor a full suite of groundwater parameters at location MP9a in 2024. - exceedance of the airblast overpressure at BM09 on 11 March 2024. Mangoola's internal investigation of the exceedance found through modelling that the airblast overpressure at the private residence did not exceed the criteria in the consent. This investigation indicated that the monitor BM09 was not representative of residential receivers due to topographic shielding. As such, the department required Mangoola Coal to review the location of blast monitors located on mine-owned land. In	As outlined in Section 5.1, these items were not considered non-compliances.

Stakeholder	Feedback Summary	IEA Response
	June 2025, Mangoola Coal submitted a revised Blast Management Plan with a new location for the above monitor.	
	Between 6 and 16 February 2023, Mangoola Coal undertook work in the Aboriginal Cultural Heritage Offset Area. On 22 March 2023, Mangoola Coal notified the Department of potential impact of an Aboriginal heritage item (listed in AHIMS) outside the approved disturbance area. Following investigations by Mangoola Coal and the Department, it was not possible to determine a breach of Schedule 2 Condition B65 of the consent, as Mangoola Coal had not been able to locate the item prior to carrying out the work. However, the Ground Disturbance Permit process was found to lack rigour. Maps included in the permit did not identify the presence of Aboriginal sites near the approved work area, as recommended in an Aboriginal Heritage Assessment; MCO did not review the GDP when the work was varied; MCO did not adequately supervise the work. The audit should include an assessment of whether, since this incident, Mangoola Coal has adequately implemented the environmental training programs identified in the Environmental Management Strategy.	In response to the potential non-compliance, MCO implemented the following measures to strengthen the GDP process: • Targeted GDP training for supervisors; • Increased supervision of all offsite work areas, and • the development of an internal management plan to guide GDP activities which requires E&C representatives to conduct field-based reviews using updated maps and procedures. GIS buffers have also been added around AHIMS registered centroid coordinates in the internal GIS system so that larger areas are considered in relation to proposed worksite pins. This is to trigger the assessment of AHIMS sites across increased areas in order to reduce the risk of future issues. A review of the GDPs implemented following the introduction of additional measures was conducted by the auditors. No issues were identified with the application or implementation of the GDP process on site.
NSW DCCEEW	NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:	Noted. See below for responses.
	The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: • Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.	The IEA included a detailed assessment of the adequacy and implementation of the MCO Water Management Plan, required by Condition B50 of SSD8642. In addition to the overarching WMP, MCO has prepared standalone management plans for surface water, groundwater, and erosion and sediment control, which together comprise the site's integrated water management system. Refer findings in Section 6.0 of the IEA report and detailed against Condition B50 of the SSD8642 audit checklist (Appendix B).

Stakeholder	Feedback Summary	IEA Response
	Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.	
	The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.	The application of site-specific Trigger Action Response Plans (TARP) was reviewed during the water management plan implementation review.
	Water supply availability is clearly defined for the project.	The approved Water Management Plan (WMP) outlines the site's integrated approach to water security, which includes surface water harvesting under harvestable rights, dewatering, reuse of mine water, and supplementary extraction from the Hunter River in accordance with relevant Water Access Licences (WMP Section 5.1-5.4). Site Water Balance Model MCO has adopted a neutral water balance strategy across the site, which has been independently validated through Water Balance Reviews conducted by Engeny in 2023 and 2024. A comprehensive update to the water balance model was finalised in 2025, also by Engeny, confirming that site water needs are reliably met through internal storages and licensable sources, without requiring water sharing arrangements. Water Needs Assessment Water availability is actively monitored on a weekly basis using real time monitoring systems, which provides dam level data to the Environment & Community (E&C) Department. Water levels in key storages (e.g. Raw Water Dam, Pit Water Dam) are assessed against Trigger Action Response Plans (TARPs) and the site water inventory, ensuring that any risk to supply is identified and managed early. Water Extraction from Hunter Review In response to reduced water levels within the CHPP, licensable water was extracted from the Hunter River in February 2024 under a valid Water Access Licence. This extraction was undertaken in accordance with regulatory requirements and subsequently reported in the 2024 Annual Water Usage Return. The Site Water Storage Report, dated 30 June 2025, confirmed that sufficient water volumes were maintained across site storages at the time of the audit.

Stakeholder	Feedback Summary	IEA Response
	Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.	As part of the IEA, MCO's compliance with relevant Water Access Licences (WALs) and water licence conditions was reviewed. The following observations were made: - Annual usage reports for 2022, 2023, and 2024 were reviewed for both groundwater and surface water take. MCO submits required Annual Records of Groundwater Take under EL5552, consistently reporting zero groundwater extraction during the audit period. All reports were submitted in accordance with the due dates (28 or 30 July, depending on licence type). - Water Take Summary: - Telemetry is installed at active extraction points, allowing remote and accurate tracking of water take. - Flow meters used are compliant with AS4747, and calibration records (e.g. ABB verification report dated 24/09/2024) were sighted. - Groundwater: No groundwater take occurred during the audit period. - Surface Water: Water was only extracted from the Hunter River under WAL 20WA211008. All other WALs (e.g. relating to Wybong Creek or Big Flat Creek) were not active, as site water surplus (2022–2023) eliminated the need for additional surface water take. - In February 2024, 400 ML of water was imported, recorded in the site's Water Order Register (FY25–26). - Flow monitoring data is captured through two systems. Flow meter data from the Hunter River to Mangoola is integrated via the internal CITEC system, which MCO uses for compliance and operational monitoring. Telemetry data for other water licences is captured through the iWAS system managed by WaterNSW. - Purpose of water use is logged in the Water Order Register, e.g. for CHPP supply. - A Water Accounting Non-Metered Usage Confirmation Report, dated 24/07/2024, confirms that actual use is tracked and reconciled with telemetry data annually. - A transfer of 1,000 ML of water licence units was made to Bulga Coal in the
	Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.	
	Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.	
	Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	

Stakeholder	Feedback Summary	IEA Response
		2025–26 water year in accordance with licence conditions.
Heritage NSW	Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.	The IEA included a detailed assessment of all conditions of SSD8642. This included assessment against conditions B65 – B73 which relate to heritage. The IEA also included a specialist in the area of heritage. The auditors and the heritage specialist did not identify any non-compliances with heritage-related conditions of consent or associated management plans during the audit period. Refer Appendix B – SSD8642 checklist for details.
CCC Chair	I advise that Glencore operates in accordance with its conditions of approval in relation to the establishment, convening and ongoing operation of the CCC. Annual site inspections are undertaken and generally members are happy with Glencore's management of environmental issues, complaint handling and ongoing rehabilitation performance. I can advise that there has not been any further comments/requests received from CCC members.	This feedback was noted

Appendix E

Audit Plan

Appendix E Audit Plan

Client Details	Sam Palmer Environment and Community Manager – Mangoola Operations Mobile: +61 408 905 812 Email: Sam.Palmer@glencore.com.au
AECOM Lead Auditor	Kate Michelmores Mobile: +61 402 156 250 Email: kate.michelmores@aecom.com
AECOM Project Manager	Haley Bates Mobile: +61 437 006 269 Email: haley.bates@aecom.com
Auditee	Mangoola Coal Operations Pty Limited (ABN 54 127 535 755)
Site Inspection Location	Wybong Road, Muswellbrook, NSW 2333
Audit Objective	Conduct an independent environmental audit (IEA) of Mangoola Operations (Mangoola) in accordance with Part D, Conditions 13 and 14 of the SSD 8642.
Audit Scope	The IEA will be conducted in accordance with Part D, Conditions 13 and 14 of the SSD 8642, Australia/New Zealand ISO 19011:2014 Guidelines for auditing management systems and the <u>Independent Audit Post Approval Requirements</u> (May 2020). The Audit Period - 22 July 2022 – 3 July 2025. The IEA will include a focus on assessing the environmental performance of the project, and its effects on the surrounding environment, the adequacy of plans (including management plans), and will recommend measures or actions to improve the environmental performance of the project or any plan. The IEA will include subject matter specialists in the following areas: - Noise and Vibration - Air Quality - Heritage
Key Dates	- Site Inspection: 1-3 July 2025 - Opening Meeting – 1 July 2025 (9am) - Closing Meeting – 10 July 2025 (Remote via TEAMS) - Draft Audit Report: 31 July 2025 (4 weeks after completion of the audit site inspection) - Final Audit Report: 14 August 2025 (assuming 1 week of review time by UCMPL)
Audit Team	Onsite - Kate Michelmores (Lead Auditor) Tuesday 1 July – Thursday 3 July - Haley Bates (Auditor) Tuesday 1 July – Thursday 3 July - David Rollings (Air Quality Specialist) Tuesday 1 July - Darran Jordan (Heritage Specialist) Wednesday 2 July Remote (via Teams) - Patrick Martinez (Noise and Vibration Specialist) Tuesday 1 July
Resources Required	- Meeting Room with power outlets - Basic workplace facilities (tea/coffee making facilities, water, bathrooms etc.) - Access to relevant staff for interviews/guidance during the site inspection.

	Vehicles and authorised driver for site inspections
Attachments	Attachment 1 – Audit Schedule

Attachment 1 – Audit Site Inspection Schedule

Time	1 July 2025	2 July 2025	3 July 2025
8:00 am – 12:00 pm	- Arrival at Site, Site / Safety inductions [KM, HB] (8:00 am) - Opening Meeting (9:00 am) - Information summary provided by Mangoola - Overview of operations, incidents and reported non-compliances during the audit period. - DR Arrival (9:00am) - Review Project Approval Part A Conditions Site Inspection – Workshop, CHPP, train loading facility, chemical storage, explosives storage wash down bays, wastewater treatment plant, Air Quality Sources and Monitors	- Arrival at Site [KM, HB, DJ] (8:00 am) / Safety induction - Review specific audit areas: Heritage Dangerous Goods, Visual, Waste, Bushfire Management, Transport Site Inspection – Heritage items, Rehabilitation & Biodiversity Areas	- Arrival at Site [KM, HB] (8:00 am) / Safety induction - Audit Review: - Finalise Project Approval Part D - CCC - Agency Consultation Requests - Previous IEA Recommendations - EPL Remaining Conditions Final inspection (if required)
12:00 – 12:45pm	Lunch	Lunch	Lunch
12:45 pm	- Review specific audit areas: - Water - PM – Remote Dial In (Teams): Noise, Vibration and Blasting - Air Quality, GHG, Met Monitoring	- Review specific audit areas: - Remaining Heritage - Mining Leases - Rehabilitation - Biodiversity	- Confirm evidence requests - Preliminary close out with E&C Team
3:45 pm	Auditor Review Time - Summarise audit evidence and confirm RFI list.	Auditor Review Time - Summarise audit evidence and confirm RFI list.	3:00 pm - Auditors Depart Site
4:15 pm	Daily Debriefing & RFI Summary	Daily Debriefing & RFI Summary	
4:30 pm	Depart Site [KM, HB, DR]	Depart Site [KM, HB, DJ]	

- Site:** **KM** – Kate Micheltmore, **HB** – Haley Bates, **DJ** – Darran Jordan. **PM** - Patrick Martinez, **DR** - David Rollings

Appendix F

Status of the previous
IEA Recommendations

Appendix F Status of the previous IEA Recommendations

Status of the previous IEA Recommendations

A summary of the 2022 IEA findings (RPS, 2022) and their status at the time of the 2025 IEA is provided in **Table** : Non-compliances against PA06_0014, **Table** Non-Compliances against SSD8642 and **Table**: Observations.

Table 10 Summary of previous IEA Findings – Non-Compliance against PA06_0014

Condition Reference	Finding	Action from 2022 IEA	Action Status
S3 C15	One overpressure exceedance (120.9 dB, 4 Mar 2020) and one vibration exceedance (no damage) were recorded; vibration limits were updated to 150 mm/s. A Category 4B fume event (10 Jan 2020) dissipated on site and was accepted by DPIE. Rock shelter monitoring and community notification systems are in place, with overall compliance achieved during the audit period.	Continue to implement the Blast Management Plan to minimise the dust and fume emissions of any blasting.	Continually Implemented - MCO has continued to implement the Blast Management Plan during the audit period. Refer Section 6.0 for details.
S3 C17	On 1 Oct 2021, blast monitor BM07 failed to record due to memory card corruption; the issue was investigated.	Continue to implement regular maintenance and equipment inspections by trained and competent technicians. Review equipment lifespan estimates as part of regular inspections.	Completed
S3 C27	Sandy Creek Farm Dams: Saline water discharges occurred on 17 Feb 2020, 26 Nov 2021, and 8 Dec 2021. The PIRMP was enacted, and DPIE and EPA were notified. Investigations found the source was rainfall runoff from a 25.7 ha clean water catchment. Regulators required no further action. The dams have manual diesel pumps with automated water level gauges but cannot be enlarged due to their biodiversity location.	Continue to implement the WMP, ensuring mitigation measures are implemented and maintained. Where possible review dewater procedure for areas considered to be high risk prior to predicted excessive rainfall events. Investigate the option of automating the pumps located on the Sandy Creek Farm Dams. Site location and feasibility constraints may prevent this, but the benefit would be to reduce the risk of having an uncontrolled discharge which could potentially cause pollution.	Completed

Table 11 Summary of previous IEA Findings – Non-Compliance against SSD8642

Condition Reference	Finding	Action from 2022 IEA	Status of Action
A2	The following non-compliances against the conditions of this consent were identified during the audit period: B46 Sandy Creek Farm Dams - Saline Water Discharges MCCO - Dirty Water Discharge.	No recommendation required.	Not applicable
B46	Sandy Creek Farm Dams (8 Dec 2021): Saline discharge from rainfall runoff; PIRMP enacted, DPIE/EPA notified, no further action required. MCCO Dirty Water (4 Jul 2022): Sediment-laden water left site after 79 mm rain in 48 hrs, exceeding design capacity; DPIE/EPA notified, sediment build-up in drains noted.	Continue to implement the WMP, ensuring mitigation measures are implemented and maintained. Where possible review dewater procedure for areas considered to be high risk prior to predicted excessive rainfall events. Undertake routine inspections of ESC structures by qualified and experienced personnel. Act promptly to any maintenance tasks required to ensure design capacities are maintained.	Continually Implemented

Table 12 Summary of previous IEA Findings – Non-Compliance against EPL 12894

Condition Reference	Finding	Action from 2022 IEA	Status of Action
L4.2	Blast #1200 (Main Pit West): Recorded 120.9 dB at BM07, exceeding the 120 dB limit. DPE and EPA were notified, investigation reports submitted, and DPE issued a formal warning (24 Mar 2020).	Review of actions following incident determined that mitigation measures developed are sufficient. No further recommendations required.	Not applicable
M2.2	Between 20-23 February 2021: Monitoring unit at Point 20 malfunctioned, causing a three-day data loss. Field repairs failed, requiring off-site servicing and unit replacement. Reported as non-compliance in the 2021 EPL 12894 Annual Return.	Continue to implement regular maintenance and equipment inspections by trained and competent technicians. Review equipment lifespan estimates as part of regular inspections.	Continually Implemented
M4.1	Weather Monitoring Non-Compliance: Data gaps occurred at Monitoring Point 5 (rainfall, temperature, solar radiation) and Monitoring Point 18 (rainfall, wind, temperature, sigma theta, solar radiation) across multiple 15-minute intervals. Monthly data validation checks and contractor changes were implemented. Reported in the EPL Annual Return (12 Aug 2021).	Continue to implement regular maintenance and equipment inspections by trained and competent technicians. Review equipment lifespan estimates as part of regular inspections.	
M7.1	1 Oct 2021: Blast monitor BM07 failed to record due to memory card corruption; issue investigated.	Continue to implement regular maintenance and equipment inspections by trained and competent technicians. Review equipment lifespan estimates as part of regular inspections.	

Table 13 Summary of previous IEA Findings – Non-Compliances against Mining and Exploration Leases

Condition Reference	Finding	Action from 2022 IEA	Status of Action
ML1626 Condition Reference 15	On 4 March 2020 there was an exceedance of overpressure criteria. The blast was located in Main Pit West and recorded an overpressure result at M07 (EPL monitoring point 21) of 120.9dB (exceedance of 120dB threshold). DPE and EPA were notified.	Continue to implement the Blast management Plan to minimise the dust and fume emissions of any blasting.	Continually Implemented
ML1626 Condition Reference 18	Sandy Creek Farm Dams (17 Feb 2020, 26 Nov 2021, 8 Dec 2021): Saline discharges from rainfall runoff triggered PIRMP activation; DPIE and EPA were notified. Investigations confirmed no environmental harm.	Continue to implement the WMP, ensuring mitigation measures are implemented and maintained. Where possible review dewater procedure for areas considered to be high risk prior to predicted excessive rainfall events.	Continually Implemented

Table 14 Summary of previous IEA Findings – General Recommendations

Condition Reference	Finding	Action from 2022 IEA	Status of Action
S3 C18/ L4.6	12 Jun 2020: A blast odour complaint was received via the hotline. Investigation (including weather review, dust data, and video footage) confirmed blasts dissipated within the pit and no fume left site. Complainant later described a diesel-like smell, and the review concluded the odour was not blast fume.	Consider including a link to the NSW Health - Mine blast fume and you factsheet https://www.health.nsw.gov.au/environment/factsheets/Pages/mine-blast-fumes.aspx in the Community Newsletter to better educate the community on what constitutes blast fume.	Not Applicable - the NSW Health factsheet referenced in the original report is no longer available online. As the report only recommended to "consider" this action, and the resource has been removed, the action is deemed no longer applicable.
S3 C27A	Mangoola manages surplus saline water through reuse in coal washing and dust suppression, avoiding discharges under normal conditions. HRSTS discharges were required only during prolonged wet weather (1–6 Apr 2022 and 4–23 Jul 2022). Saline water is stored in water storages and active pits as outlined in the 2021 Water Management Plan.	It would be good to present in the AEMR the dam levels over time, as a line trace, together with the Residual Mass (Rainfall) or Cumulative Departure from Mean Rainfall (CRD) curve. In order to minimise the amount of saline water make onsite during wet climatic periods, the water quality of surface runoff from well-established and stable areas of rehabilitation should be regularly monitored and incorporated as part of the mines surface water quality monitoring program.	Completed – MCO has actioned this by including the CRD in the Annual Review.
S3 C28	Evidence was provided that the WMP was prepared in consultation with EPA and DPI Water by a suitably qualified expert Stephen Downes whose appointment was approved by the Secretary on 2/09/2021.	As outlined under Condition B50 of the SSD8642 approval, the water management plan should be updated to include the management requirements now that MCO is allowed to release water to the Hunter River under EPL12894 and HRSTS.	In Progress – Dam Improvement works project
S3 C30	The Erosion and Sediment Control Plan (v8, effective 10 Mar 2021), approved by the Planning Secretary's nominee, follows the Blue Book guidelines. It sets the framework	Bunded fuel fill up point had a build-up of sediment and material present within the bund that may impact operation of the bund during a spill event (5/7/22). Potential to increase	Continually Implemented – note observations from 2025 IEA site inspection. It is noted the previous IEA site inspection

Condition Reference	Finding	Action from 2022 IEA	Status of Action
	for site-specific ESCPs under the Ground Disturbance Permit (GDP) system, identifying erosion-prone activities, control measures, and inspection requirements. Key erosion and sediment control dams are mapped in the PIRMP, with task-specific ESCPs prepared for changing site conditions; two examples were reviewed during the audit.	workshop inspection frequencies are increased during wet weather events.	experienced significant rainfall contributing to 2022 observations.
S3 C31	Surface Water Monitoring Plan Version: 9, Effective: 10 March 2021	Administration update required - In the next update of the SWMP, refer to the correct section of the WMP for Reporting and Monitoring. The SWMP Section 5 currently incorrectly refers to Section 9 of the WMP rather than the required Section 10. As outlined under Condition B50 of the SSD8642 approval, the water management plan should be updated to include the management requirements now that MCO is allowed to release water to the Hunter River under EPL12894 and HRSTS.	Completed
S3 C32	Groundwater Monitoring Program Version: 5, effective: 22/12/2014	Recommend that a comparison to predictions / intended drawdown is included in the Annual Reviews, without making the report 'voluminous'. Also, if possible, Interpreted contours.	Completed – Review conducted however not actioned. Groundwater monitoring report attached to the Annual Review includes a comparison of predicted vs actual drawdown levels.
S3 C33	Surface and Ground Water Response Plan Version: 8, effective: 29/01/2021 The Surface Water and Groundwater Response Plan (SWGRP) does not include measures to mitigate or compensate affected	Investigate a method to determine if the mining operations have potentially affected landowners for the loss of surface water in Sandy Creek, Big Flat Creek or Wybong Creek downstream of the project. Then outline measures to mitigate	Completed – no requirement for compensation identified.

Condition Reference	Finding	Action from 2022 IEA	Status of Action
	landowners for potential surface water loss in Sandy Creek, Big Flat Creek, or Wybong Creek. The 2021 Annual Review (Section 7.6.2.1) incorrectly stated that exceedances are reported to DPIE only after three consecutive elevated results. MCO staff confirmed this wording was incorrect and clarified that the site complies with the SWGRP.	and/or compensate those landowners affected and include in the Plan.	
S3 C34	Biodiversity Offset Management Plan and Strategy Version: 12, effective: 05/11/2018	Continued weed and pest control recommended. Recommendation to modify seeding/planting ratios as recommended by 2021 Ecological monitoring report (Umwelt 2022). Nest boxes may be more successful if located higher up in trees (3m is usually sufficient). This may be easier now that the trees have grown taller. Some translocated Cymbidium orchids were installed closer to the ground than originally due to logistics of salvage. Simple fencing may protect these from herbivore browsing. Fireweed (<i>Senecio madagascariensis</i>) is a Weed of National Significance that was observed in the offset areas. It is difficult to control, but targeted efforts during autumn and winter before the peak flowering and seeding occurs in spring could reduce numbers significantly.	Continually Implemented

Condition Reference	Finding	Action from 2022 IEA	Status of Action
S3 C54/ B75	Visual Amenity	The Mangoola “Equipment Procurement Process” forms should be amended to include the requirement that all new lighting is compliant with AS4282. Additionally following the installation of new lighting an offsite inspection should be completed and recorded. Undertake an updated external lighting audit to ensure compliance with AS4282 (INT) 2019 - Control of Obtrusive Effects of Outdoor Lighting.	Not applicable – Current operations deemed sufficient.
S3 C57	Waste	Water was noted within the minor volume contaminated soil waste bin – suggest an improved sealed storage bin system is implemented and lids are closed at all times.	Completed
S5 C3	Management Plan Requirements	Ensure all management plans are updated in accordance with the approved MCCO Project Management Plan Approach.	Continually Implemented
A31	All employees, contractors (and their sub-contractors) are required, at a minimum, to complete the Mangoola Site Familiarisation Induction that outlines the environmental requirements for undertaking work at Mangoola.	Update Mangoola Site Familiarisation Induction to include reference to SSD8642.	Completed
B47	Water Discharges	In order to minimise the amount of saline water make onsite during wet climatic periods, the water quality of surface runoff from well-established and stable areas of rehabilitation should be regularly monitored and incorporated as part of the mines surface water quality monitoring program. If trends in water quality	In Progress – Dam Improvement works project

Condition Reference	Finding	Action from 2022 IEA	Status of Action
		over time indicate that the runoff is of suitable quality for off-site discharge without polluting, MCO is encouraged to liaise with the relevant departments to allow this water to flow offsite. This will prevent the needing for this clean water to be pumped back into the saline water system and released through the HRSTS. This will not only be a major benefit to downstream watercourse ecosystem/s, but limit operational costs. As the rehabilitated catchments are becoming larger as the mine life evolves, both environmental and financial benefits will become increasing larger during wet climatic periods.	
B48	Water Management - General	Raw Water Dam: - Recommend a 'trace line' figure of water level in Raw Water Dam be included in AEMR. Chemical and Hydrocarbons: - Recommend photographic record of condition of bunds be included in the AEMR. Tailings Storages: - Recommend photographic record of periodic inspection of Tailings Dams be included in the AEMR. Overburden Emplacement:	In Progress – Dam Improvement works project in progress.

Condition Reference	Finding	Action from 2022 IEA	Status of Action
		- Suggests consideration of mechanism to demonstrate management of potentially acid forming materials during placement. This could take the form of periodic testing. Surface Water: - Prioritise revegetation of the disturbance areas adjacent Wybong Road associated with the MCCO Project (i.e. visual bund and recently constructed road diversion). Ongoing South Pit Rehabilitation water quality monitoring entering the dams is strongly encouraged. Early indications are that the water quality entering these dams from the Rehabilitation is of a quality that can be released from site. The condition of the dams is then leading to a degradation of the water quality with significant erosion of the dam batters. To minimise the need to capture and pump runoff from older and established rehabilitation areas back into the mine water system (which is adding strain to the system during wet periods like the present), upgrade the receiving sediment dams to be stable such that runoff entering the dams remains at a quality that can be released from site. This will involve ongoing monitoring of water quality from the established rehabilitation areas and liaison with the departments to confirm such a release is allowed.	
B50	Water Management Plan	Update the water management plan to include the management requirements now that MCO is allowed to release water to the Hunter River	Completed

Condition Reference	Finding	Action from 2022 IEA	Status of Action
	Now that the release of water into the Hunter River is permissible under EPL12894 and the HRSTS, the WMP is to be updated to reflect the management actions required. A further update to the WMP will be required prior to the commencement of extraction activities north of Wybong Road.	under EPL12894 and HRSTS. A further update to the WMP to meet the conditions of this consent will be required prior to the commencement of extraction activities to the north of Wybong Road.	
D6	Management Plan Requirements Review of the applicable management plans indicated that they are consistent with the conditions of this consent and EPL12894.	Ensure all management plans are updated in accordance with the approved MCO Project Management Plan Approach.	Continually Implemented
G2.2	Notification to the eConnect EPA platform of the change in E&C Manager to Sam Palmer was undertaken on 18 January 2022.	Record notification of changes in the future or request receipt from the EPA when using eConnect.	Noted.
Stakeholder SC20	Sustainable Agriculture Offset Area There is a portion of land identified in Figure 14 of the 2021 Annual Review labelled as "Sustainable Agriculture Offset Area".	Change land label from "Sustainable Agriculture Offset Area" to a more suitable description of the intended land use to reduce confusion in future Annual Reviews.	Completed – figures updated
ML1626 - Condition 9	Condition 9 of ML1626 was removed as approved by the regulator.	Provide updated record of change to Mining Lease on project website.	Completed