

Maxwell Underground Coal Mine Project Independent Environmental Audit 2022

Response to Auditor Recommendations

Non-compliances

Ref Number	Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Action/Action Taken/Response	Proposed Action Due Date
SSD2	Development Consent SSD9526 Schedule 2 Condition 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, EAs and Modification Report (Mod 1); and d. generally in accordance with the Development Layout in Appendix 2	The development has generally been carried out in compliance with the conditions of this consent, with all written directions of the Planning Secretary, EIS (Mod 1), and the approved Development Layout. There has been one (1) non-compliance identified during the audit period: S2 B35 Off-site Water Discharges	No further action is required	No further action is required	NA
SSD69	Development Consent SSD9526 Schedule 2 Condition B35	Off-site Water Discharges and Transfers The Applicant must ensure that all water discharges from the site comply with: a. discharge limits (both volume and quality) set for the development in any EPL; and b. the relevant provisions of the POEO Act	At approximately 6.36am and 8.35am respectively on Tuesday 8 March 2022, Maxwell was notified that the DC2 Dam and the Rail Loop Dam started to overflow via their designated spillways, discharging water from the premises to Ramrod Creek following excessive rainfall on the day of and in the days preceding the incident. Both dams ceased discharging water at approximately 10.00 pm on Tuesday 8 March 2022.	Ensure that installation of additional pumping infrastructure on DC2 dam is completed. Verify that upgraded pumping infrastructure will have the capacity to minimise the risk of future discharges	Installation of additional pumping infrastructure on DC2 dam completed.	Completed

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PA2	Development Consent PA06_0202 Schedule 2 Condition 2	The Proponent shall carry out the project generally in accordance with the: a. EA; b. statement of commitments; c. EA (Mod 1); d. EA (Mod 2); and e. conditions of this approval. Note: The general layout of the project is shown in Appendix 2.	Maxwell was observed to be carrying out the development in general accordance with the EA, EIS, and conditions of consent. It is noted that the conditions of SSD9526 and directions of the Planning Secretary prevail over PA 06_0202. Non-compliance with Schedule 3, Condition 21. Multiple exceedances of the 24hr PM10 criteria in 2018 (November), 2019, and 2020 due to regional dust events. A number of bushfires were noted to have occurred throughout NSW during these exceedances.	PA 06_0202 will be relinquished on 5 July 2022. No further action is required.	No further action is required	NA																							
PA37	Development Consent PA06_0202 Schedule 3 Condition 21	Impact Assessment Criteria The Proponent shall ensure that the dust emissions generated by the project do not cause additional exceedances of the air quality impact assessment criteria listed in Tables 6, 7 and 8 at any residence, on privately-owned land, or on more than 25 percent of any privately-owned land. <small>Table 6: Long term impact assessment criteria for particulate matter</small> <table border="1"><thead><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr></thead><tbody><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>90 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>30 µg/m³</td></tr></tbody></table> <small>Table 7: Short term impact assessment criterion for particulate matter</small> <table border="1"><thead><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr></thead><tbody><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>24 hour</td><td>50 µg/m³</td></tr></tbody></table> <small>Table 8: Long term impact assessment criteria for deposited dust</small> <table border="1"><thead><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total deposited dust level</th></tr></thead><tbody><tr><td>Deposited dust</td><td>Annual</td><td>2 g/m²/month</td><td>4 g/m²/month</td></tr></tbody></table> Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	30 µg/m ³	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	2 g/m ² /month	4 g/m ² /month	Multiple exceedances of the 24hr PM10 criteria in 2018 (November), 2019, and 2020 due to regional dust events. A number of bushfires were noted to have occurred throughout NSW during these exceedances.	PA 06_0202 will be relinquished on 5 July 2022. No further action is required.	No further action is required	NA
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PA44	Development Consent PA06_0202 Schedule 3 Condition 27	Surface Water Discharges The Proponent shall only discharge water from the site in accordance with the provisions of an EPL or the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002.	Discharge and overflow of saline water from the DC2 Dam and Rail Loop Dam (respectively) at the Maxwell Underground Project to Ramrod Creek on 8 March 2022 not in accordance with EPL.	Ensure that installation of additional pumping infrastructure on DC2 dam is completed. Verify that upgraded pumping infrastructure will have the capacity to minimise the risk of future discharges.	Installation of additional pumping infrastructure on DC2 dam completed.	Completed									
EPL7	EPL1323 P1.3	<p>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.</p> <table border="1"> <thead> <tr> <th colspan="3"><i>Water and land</i></th> </tr> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>Discharge to utilisation area. Effluent volume monitoring.</td> <td>Discharge to utilisation area. Effluent volume monitoring.</td> </tr> </tbody> </table>	<i>Water and land</i>			EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	3	Discharge to utilisation area. Effluent volume monitoring.	Discharge to utilisation area. Effluent volume monitoring.	Discharge and overflow of saline water from the DC2 Dam and Rail Loop Dam (respectively) at the Maxwell Underground Project to Ramrod Creek on 8 March 2022 not in accordance with EPL.	Ensure that installation of additional pumping infrastructure on DC2 dam is completed. Verify that upgraded pumping infrastructure will have the capacity to minimise the risk of future discharges.	Installation of additional pumping infrastructure on DC2 dam completed.	Completed
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EPL10	EPL1323 L1.2	The proponent must install works and operate them to ensure that the Access Road and Rail Loop Dams do not overflow or discharge saline water from the Premises; or that they only discharge saline water from the Premises in accordance with the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation (2002). Note: Saline water is defined in the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation (2002).	Discharge and overflow of saline water from the DC2 Dam and Rail Loop Dam (respectively) at the Maxwell Underground Project to Ramrod Creek on 8 March 2022.	Ensure that installation of additional pumping infrastructure on DC2 dam is completed. Verify that upgraded pumping infrastructure will have the capacity to minimise the risk of future discharges.	Installation of additional pumping infrastructure on DC2 dam completed.	Completed
EPL38	EPL1323 O4.7	In relation to condition O4.5, the Proponent must record details of each inspection undertaken (date and time), the actions required or recommended following each inspection, the date those actions were completed or detail the reasons if they were not completed and the results of any test performed on the wastewater management system by the technician.	The Maxwell Infrastructure site. Sewage Treatment System. Maintenance and Compliance Reports do not contain a record of details of each inspection undertaken (date and time).	Ensure Maxwell Infrastructure site Sewage Treatment System Maintenance and Compliance Reports contain the date and time of each inspection undertaken.	Ensure Maxwell Infrastructure site Sewage Treatment System Maintenance and Compliance Reports contain the date and time of each inspection undertaken.	Implement immediately and ongoing.

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EPL46	EPL1323 O4.15	All above ground tanks and containers containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place. Bunds must: <ul style="list-style-type: none"> a. have wall and floors constructed of impervious materials; b. be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c. have floors graded to a collection sump; and d. not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome. 	A number of IBCs and fuel pods were not located within appropriately bunded areas or on a hardstand surface graded to a collection sump.	Ensure all containers containing material that is likely to cause environmental harm are contained in suitably bunded areas. Minimise the number of open containers located within bunds to reduce the generation of oily/contaminated water generated from rain events.	Ensure all containers containing material that is likely to cause environmental harm are contained in suitably bunded areas. Minimise the number of open containers located within bunds to reduce the generation of oily/contaminated water generated from rain events.	5/10/2022
EPL51	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:	Maxwell received an advisory letter from the EPA in July 2021 following submission of the 2020 Annual Return that showed EPA Identification Point No.11 (ES-04) had a data capture rate of 84 per cent. This occurred due to monitoring equipment failure from 30 June to 27 August 2020 which required the unit to be sent to the equipment manufacturer in the US for repairs. At the time, Maxwell was unable to source a replacement monitor. The monitor has since been repaired and is operational.	Undertake a review of the reliability of the current E-samplers and if appropriate, request an EPL variation to allow more flexibility in the type of monitoring equipment that can be used.	Undertake a review of the reliability of the current E-samplers	5/10/2022
CL2	CL229 C2	MINING, REHABILITATION, ENVIRONMENTAL MANAGEMENT PROCESS (MREMP) MINING OPERATIONS PLAN (MOP) (1) Mining operations, including mining purposes, must be conducted in accordance with a Mining Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent	Rehabilitation at the Maxwell UG Project is managed in accordance with the BMP and MOP. The BMP was approved by DPE on 20 September 2021 and supersedes the Rehabilitation and Offset Management Plan and Fauna Management Plan for the Maxwell Infrastructure site. The MOP was	Implement a consolidated compliance management systems to assign, track and complete compliance	Implement a consolidated compliance management systems to assign, track and complete compliance	5/10/2022

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		<p>and other approvals will form the basis for:-</p> <p>(a) ongoing mining operations and environmental management; and</p> <p>(b) ongoing monitoring of the project.</p> <p>(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgment.</p> <p>(3) A Plan must be lodged with the Director-General:-</p> <p>(a) prior to the commencement of operations;</p> <p>(b) subsequently as appropriate prior to the expiry of any current Plan; and</p> <p>(c) in accordance with any direction issued by the Director-General.</p> <p>(4) The Plan must present a schedule of proposed mine development for a period of up to seven (7) years and contain diagrams and documentation which identify:-</p> <p>(a) area(s) proposed to be disturbed under the Plan;</p> <p>(b) mining and rehabilitation method(s) to be used and their sequence;</p> <p>(c) areas to be used for disposal of tailings/waste;</p> <p>(d) existing and proposed surface infrastructure;</p> <p>(e) progressive rehabilitation schedules;</p> <p>(f) areas of particular environmental sensitivity;</p> <p>(g) water management systems (including erosion and sediment controls);</p> <p>(h) proposed resource recovery; and</p> <p>(i) where the mine will cease extraction during the term of the Plan, a closure plan including final rehabilitation objectives/methods and post mining land use/vegetation</p> <p>(5) The Plan when lodged will be reviewed by the Department of Mineral Resources.</p> <p>(6) The Director-General may within two (2) months of the lodgement of a Plan, require modification and</p>	<p>approved by the Resources on the 25 June 2021.</p> <p>A site inspection conducted by the Resources Regulator on 26 August 2019 and subsequent investigation found that Maxwell Ventures (Management) Pty Ltd had failed to comply with the progressive rehabilitation schedule for 2017 and 2018 as contained within the approved MOP (Official Caution NCG0002358), a breach of condition 2. It is noted that this breach occurred prior to the audit period.</p> <p>On 8 October 2020, Maxwell received an Official Caution under the Mining Act 1992 for failing to submit a RCE by the due date required by notice NTCE0005152 and for failing to comply with the progressive rehabilitation schedule for 2019 as contained within the approved MOP.</p> <p>The omission to lodge the RCE by the required deadline was due to a human error. When brought to the attention of Maxwell, the RCE was promptly produced and lodged with the Resources Regulator.</p>	<p>requirements by their due date.</p>	<p>requirements by their due date.</p>	

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		<p>relodgement.</p> <p>(7) If a requirement in accordance with clause (6) is not issued within two months of the lodgement of a Plan, lease holder may proceed with implementation of the Plan submitted subject to the lodgement of the required security deposit within the specified time.</p> <p>(8) During the life of the Mining Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in clauses (5) - (7) above.</p>				
CL36	CL395 C2	<p>Mining, Rehabilitation, Environmental Management Process (MREMP) Mining Operations Plan (MOP)</p> <p>(1) Mining operations, including mining purposes, must be conducted in accordance with a Mining Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent and other approvals will form the basis for:-</p> <ul style="list-style-type: none"> (a) ongoing mining operations and environmental management; and (b) ongoing monitoring of the project. <p>(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgement.</p> <p>(3) A Plan must be lodged with the Director-General:-</p> <ul style="list-style-type: none"> (a) prior to the commencement of mining operations (including mining purposes); (b) subsequently as appropriate prior to the expiry of any current Plan; and (c) in accordance with any direction issued by the Director-General. <p>(4) The Plan must present a schedule of proposed mine development for a period of up to seven (7) years and contain diagrams and documentation which identify:-</p> <ul style="list-style-type: none"> (a) area(s) proposed to be disturbed under the Plan; (b) mining and rehabilitation method(s) to be used and their sequence; 	<p>Rehabilitation at the Maxwell UG Project is managed in accordance with the BMP and MOP. The BMP was approved by DPE on 20 September 2021 and supersedes the Rehabilitation and Offset Management Plan and Fauna Management Plan for the Maxwell Infrastructure site. The MOP was approved by the Resources on the 25 June 2021.</p> <p>A site inspection conducted by the Resources Regulator on 26 August 2019 and subsequent investigation found that Maxwell Ventures (Management) Pty Ltd had failed to comply with the progressive rehabilitation schedule for 2017 and 2018 as contained within the approved MOP (Official Caution NCG0002358), a breach of condition 2. It is noted that this breach occurred prior to the audit period.</p> <p>On 8 October 2020, Maxwell received an Official Caution under the Mining Act 1992 for failing to submit a RCE by the due date required by notice NTCE0005152 and for failing to comply with the progressive rehabilitation schedule for 2019 as contained within the approved MOP.</p> <p>The omission to lodge the RCE by the required deadline was due to a human</p>	Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.	Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.	5/10/2022

Ref Number	Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Action/Action Taken/Response	Proposed Action Due Date
		<p>(c) areas to be used for disposal of tailings/waste;</p> <p>(d) existing and proposed surface infrastructure;</p> <p>(e) existing flora and fauna on the site;</p> <p>(f) progressive rehabilitation schedules;</p> <p>(g) areas of particular environmental, ecological and cultural sensitivity and measures to protect these areas;</p> <p>(h) water management systems (including erosion and sediment controls);</p> <p>(i) proposed resource recovery; and</p> <p>(j) where the mine will cease extraction during the term of the Plan, a closure plan including final rehabilitation objectives/methods and post mining landuse/vegetation.</p> <p>(5) The Plan when lodged will be reviewed by the Department.</p> <p>(6) The Director-General may within two (2) months of the lodgement of a Plan, require modification and re-lodgement.</p> <p>(7) If a requirement in accordance with clause (6) is not issued within two (2) months of the lodgement of a Plan, the lease holder may proceed with implementation of the Plan.</p> <p>(8) During the life of the Mining Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in clauses (5) – (7) above.</p>	<p>error. When brought to the attention of Maxwell, the RCE was promptly produced and lodged with the Resources Regulator.</p>			
ML2	ML1531 C2	<p>MINING, REHABILITATION, ENVIRONMENTAL MANAGEMENT PROCESS (MREMP)</p> <p>MINING OPERATIONS PLAN (MOP)</p> <p>(1) Mining operations, including mining purposes, must be conducted in accordance with a Mining Operations Plan (the Plan) satisfactory to the Director-General. The Plan together with environmental conditions of development consent and other approvals will form the basis for:-</p> <p>(a) ongoing mining operations and environmental management; and</p> <p>(b) ongoing monitoring of the project.</p>	<p>Rehabilitation at the Maxwell UG Project is managed in accordance with the BMP and MOP. The BMP was approved by DPE on 20 September 2021 and supersedes the Rehabilitation and Offset Management Plan and Fauna Management Plan for the Maxwell Infrastructure site. The MOP was approved by the Resources on the 25 June 2021.</p> <p>A site inspection conducted by the</p>	<p>Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.</p>	<p>Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.</p>	5/10/2022

Ref Number	Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Action/Action Taken/Response	Proposed Action Due Date
		<p>(2) The Plan must be prepared in accordance with the Director-General's guidelines current at the time of lodgment.</p> <p>(3) A Plan must be lodged with the Director-General:-</p> <ul style="list-style-type: none"> (a) prior to the commencement of operations; (b) subsequently as appropriate prior to the expiry of any current Plan; and (c) in accordance with any direction issued by the Director-General. <p>(4) The Plan must present a schedule of proposed mine development for a period of up to seven (7) years and contain diagrams and documentation which identify:-</p> <ul style="list-style-type: none"> (a) area(s) proposed to be disturbed under the Plan; (b) mining and rehabilitation method(s) to be used and their sequence; (c) areas to be used for disposal of tailings/waste; (d) existing and proposed surface infrastructure; (e) progressive rehabilitation schedules; (f) areas of particular environmental sensitivity; (g) water management systems (including erosion and sediment controls); (h) proposed resource recovery; and (i) where the mine will cease extraction during the term of the Plan, a closure plan including final rehabilitation objectives/methods and post mining land use/vegetation <p>(5) The Plan when lodged will be reviewed by the Department of Mineral Resources.</p> <p>(6) The Director-General may within two (2) months of the lodgement of a Plan, require modification and relodgement.</p> <p>(7) If a requirement in accordance with clause (6) is not issued within two months of the lodgement of a Plan, lease holder may proceed with</p>	<p>Resources Regulator on 26 August 2019 and subsequent investigation found that Maxwell Ventures (Management) Pty Ltd had failed to comply with the progressive rehabilitation schedule for 2017 and 2018 as contained within the approved MOP (Official Caution NCG0002358), a breach of condition 2. It is noted that this breach occurred prior to the audit period.</p> <p>On 8 October 2020, Maxwell received an Official Caution under the Mining Act 1992 for failing to submit a RCE by the due date required by notice NTCE0005152 and for failing to comply with the progressive rehabilitation schedule for 2019 as contained within the approved MOP.</p> <p>The omission to lodge the RCE by the required deadline was due to a human error. When brought to the attention of Maxwell, the RCE was promptly produced and lodged with the Resources Regulator.</p>			

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		<p>implementation of the Plan submitted subject to the lodgement of the required security deposit within the specified time.</p> <p>(8) During the life of the Mining Operations Plan, proposed modifications to the Plan must be lodged with the Director-General and will be subject to the review process outlined in clauses (5) - (7) above.</p>				

Opportunities for Improvement

Condition Number	Independent Audit Finding	Independent Audit Recommendation	Action/Action Taken/Response	Proposed Action Due Date
SSD9526 S2 A30	During the site inspection it was noted that the Barn owl had a damaged bird deterrent cage and one (1) depositional dust gauge (2175) required nearby potential tree pruning to maintain a minimum clear sky angle above the sample outlet of 120° in accordance with AS3580.1.1:2016. Maxwell was noted to have began resolving the damaged Barn owl had a damaged bird deterrent cage during the audit inspection. It was also noted that ES04 had failed during audit period, with ES04 also noted to have failed in the previous audit period.	Undertake a review of noise and air quality monitoring equipment to ensure maintenance and reliability and that air quality monitoring units are installed and sited in accordance with AS3580.1.1:2016.	Undertake a review of noise and air quality monitoring equipment to ensure maintenance and reliability and that air quality monitoring units are installed and sited in accordance with AS3580.1.1:2016.	5/10/2022
SSD9526 S2 A31	Maxwell has a General Induction training package for all employees and contractors that operate at the site.	Update general induction with specific reference to the project approval and applicable mining leases.	Update general induction with specific reference to the project approval and applicable mining leases.	5/10/2022
SSD9526 S2 B20	Implementation of the Spontaneous Combustion Management Plan	Ensure currently active spontaneous combustion sites such as the Southern Void site (286) are remediated/mitigated as soon as practicable and incorporated into mine site planning.	Ensure currently active spontaneous combustion sites such as the Southern Void site (286) are remediated/mitigated as soon as practicable and incorporated into mine site planning.	Immediately and ongoing
EPL O4.2	Evidence of offensive odour was noted from within the premises during the site inspection. However, the emission of offensive odour beyond the boundary of the Premises was not noted during the site inspection or as a result of a complaint during the audit period.	Ensure currently active spontaneous combustion sites such as the Southern Void site (286) are remediated/mitigated as soon as practicable and incorporated into mine site planning.	Ensure currently active spontaneous combustion sites such as the Southern Void site (286) are remediated/mitigated as soon as practicable and incorporated into mine site planning.	Immediately and ongoing
SSD9526 S2 B25	During the site inspection, wheel generated dust was noted as a result of grader movements along the existing haul road. At the time of the site inspection there were no water carts operating on the site to manage wheel generated dust in accordance with the Implementation of the Air Quality and Greenhouse Gas Management Plan. As construction increases, the implementation of water carts in accordance with the AQGGMP should be ensured to mitigate dust generation.	Ensure the use of water carts to mitigate wheel generated dust during construction activities and future operation.	Ensure the use of water carts to mitigate wheel generated dust during construction activities and future operation.	Immediately and ongoing
SSD9526 S2 B40	Water Management Performance Measures	Consider the potential to reduce sediment laden water entering the oily water sump. Ensure oily water separator is active.	Consider the potential to reduce sediment laden water entering the oily water sump. Ensure oily water separator is active.	5/10/2022
SSD9526 S2 B51	Implementation of the Biodiversity Management Plan	Further efforts should be employed to manage and	Review and update weed and pest management plans	5/10/2022

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PA 06_0202 S3 C35	Offset Strategy – weed management	control weeds and kangaroos on site. This will be particularly important as the access road is formed and management of the underground mine footprint is undertaken.	for next 12 months	
SSD9526 S2 B53	Invasive weeds remain moderate to high in the Southern Offset Area and the Northern rehabilitation areas, this was also noted during the site inspection. Significant weed control programs targeting Prickly Pear and Galenia were observed to be effective during the site inspection. The diversity of canopy and mid-storey species, particularly at the Southern Offset area and Northern rehabilitation area were noted in the 2021 AEMR to not be meeting the completion criteria targets mainly due to pest animals impacting on planting campaigns and weed infestations.			
SSD9526 S2 B71	Bushfire Management Plan (BFMP)	Suggested a figure be provided in the BFMP to clearly outline the location of managed and unmanaged vegetation within the site	Update BFMP to clearly outline the location of managed and unmanaged vegetation within the site	5/10/2022
SSD9526 S2 B76	Rehabilitation Objectives - It is noted remedial measures are yet to be finalised for the LEM Report required by Section 240 notification relating to long term erosional stability of the final landforms and surface water management structures located in the rehabilitation landform.	Include a soil balance in the next Annual Review. The current AR states available volumes however required volumes for rehab are not stated. The Land and Soil Capability (LSC) for the post mining rehabilitation criteria should be reviewed to ensure it's consistent with MOP Plans. Consideration should also be given to including assessment of grazing success to similar unmined analogue sites.	Complete a site soil balance. Review the Land and Soil Capability (LSC) for the post mining rehabilitation criteria to ensure it's consistent with MOP Plans. Consider including assessment of grazing success to similar unmined analogue sites in rehabilitation monitoring	5/10/2022
EPL L3.9	Noise measurements must not be undertaken during rain or where wind speed at microphone level will affect the acquisition of valid sound pressure level measurements.	Include equipment details, serial number, and wind speed levels on noise measurement reports.	Include equipment details, serial number, and wind speed levels on noise measurement reports.	Immediately and ongoing
EPL O2.1	Noted that fuel cart was leaking fuel within the workshop hardstand area during the site inspection.	Repair leak is repaired on fuel cart. Ensure fuel cart is regularly serviced and checked to ensure vales do	Repair leak is repaired on fuel cart. Ensure fuel cart is regularly serviced and checked to ensure vales do	Immediately and ongoing

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		not leak.	not leak.	
EPL O3.1	Review of the AQGGMP and Annual reviews indicates that the operation is carrying out activities in a manner that minimises the generation of dust. It is noted that there have been limited dust generating activities during the audit period.	Ensure water truck is available as construction activities increase in the next audit period	Ensure water truck is available as construction activities increase in the next audit period	Immediately and ongoing
EPL O3.3	No evidence of tracked sediment or oil was observed during the site inspection with light and heavy vehicle wash bays in place.	Update AQGGMP to directly reference management measures to ensure sediment or oil are not tracked from the premises. In particular mitigation measures for vehicles leaving from access points where wash bays are not available.	Update AQGGMP to directly reference management measures to ensure sediment or oil are not tracked from the premises. In particular mitigation measures for vehicles leaving from access points where wash bays are not available.	5/10/2022
EPL M1.3	Review of provided monitoring data and field sheets indicate that the required records are being collected for applicable monitoring.	Review consultant field sheets/ reports to ensure required information is being recorded.	Review consultant field sheets/ reports to ensure required information is being recorded.	5/10/2022
Stakeholder Consultation - BCD C09	Check the Drayton Wildlife Reserve to see if further targeted weed programs are required for Galenia, Prickly Pear, Creeping Pear and Golden Wreath Wattle, and for Galenia and Prickly Pear in the Southern Offset area – as described in the Maxwell Infrastructure 2020 Annual Environmental Monitoring Report.	Further targeted weed programs are required in the Drayton Wildlife Reserve with consideration of ideal weed growing conditions predicted in spring		
Stakeholder Consultation - MSC C14	Confirm an internal system for tracking commitments is in-place and up-to-date (for tracking approvals, licenses and management plan commitments). Systems are in place but are not currently consolidated with multiple registers in place.	Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.	Implement a consolidated compliance management systems to assign, track and complete compliance requirements by their due date.	5/10/2022