

WILPINJONG COAL PTY LTD

WILPINJONG COAL MINE

RESPONSE TO 2012 INDEPENDENT ENVIRONMENTAL AUDIT



Project No. WIL-12-11  
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**Table 1**  
**Response to Independent Environmental Audit**

Issue No.	Reference (AECOM, 2012)	Audit Recommendation Table 21 (AECOM, 2012)	Context of Recommendation (AECOM, 2012)	IEA Page No. (AECOM, 2012)	WCPL Response/Commitment
<b>Monitoring</b>					
1	NMP Section 5.1.1	Use results from the attended monitoring programme to verify data collected from the real-time noise monitors and maintain documentation.	<p><u>Requirement:</u></p> <p>Results from the attended monitoring programme will be used to verify data collected from the real-time noise monitors, where attended monitoring is conducted directly adjacent to real-time monitors. The attended monitoring data will also be used to determine whether there is a consistent relationship between real-time continuous noise levels and long-term attended monitoring data. This will be done annually to complement the regular maintenance and calibration of the real-time monitors.</p> <p><u>Evidence:</u></p> <p>Attended noise monitoring has historically been conducted on a quarterly basis. More recently (2010) a two-monthly frequency can be seen. Attended Noise Monitoring reports produced by Global Acoustics witnessed.</p>	Appendix I, Audit Protocol – Air Quality and Noise, page 14.	<p>The current practice for attended noise monitoring does not involve attended monitoring directly adjacent to the real-time monitors, as attended monitoring is focussed on key compliance points, whereas real-time monitoring is used as a management tool.</p> <p>It should be noted however, that the real-time monitors are calibrated monthly in accordance with applicable Australia Standards.</p> <p>In accordance with Condition 4 of Schedule 5, WCPL will review, and if required revise the Noise Management Plan.</p>
2	AQGGMP Section 6.4	Review the AQGGMP to reflect direct monitoring of TSP at Maher Residence.	<p><u>Requirement:</u></p> <p>In addition to the statutory air quality criteria, WCPL will also assess the Wilpinjong Coal Mine against internal performance indicators (Table 2).</p> <p><u>Evidence:</u></p> <p>Air quality monitoring techniques and locations were inspected by the audit team (PAEHolmes Photo log Pictures A4 - A5). The HVAS located at the Maher residence (HV3, co-located with PM10 TEOM 1) is fitted with a TSP sampling head.</p>	Appendix I, Audit Protocol – Air Quality and Noise, page 1.	<p>The former Maher residence is now owned by WCPL. Dust monitoring at the Maher Residence is also no longer an Environmental Protection Licence requirement.</p> <p>In accordance with Condition 4 of Schedule 5, WCPL will review and if required revise the Air Quality and Greenhouse Gas Management Plan taking into account the audit recommendation.</p>
<b>Management Plans</b>					

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3	All management plans	<p>Update the management plan review system for ease of reference to ensure that management plans are being reviewed and updated as necessary.</p> <p>Ensure relevant personnel are consulted in reviews and updates to management plans.</p>	<p>Recommendation relevant to the EMS (Sections 1.2, 12.3, 13.1), the ACHMP (Section 6) and the ESCP (Section 7).</p> <p><u>Requirement:</u></p> <p>As a minimum, revision of the Strategy shall be undertaken within 3 months of the completion of the Independent Environmental Audit (Condition 2, Schedule 5 of Application 05-0021). Revision of the Strategy shall be undertaken by the Environmental Coordinator and approved by the WCPL General Manager and the WCP Operations Manager.</p> <p><u>Evidence:</u></p> <p>Review of the EMS appears to have taken place during the 2009 reporting period in response to the 2008 IEA (Section 3.1 of the AEMR 2009). It is not clear whether this post audit review thus took place more than three months after the IEA occurred.</p> <p><u>Requirement:</u></p> <p>The EMS is to be reviewed for relevance and effectiveness annually and updated, as required. Changes resulting from revised risk identification or legislative change are to be made as soon as practical.</p> <p><u>Evidence:</u></p> <p>Review of the EMS appears to have taken subsequently following the most recent IEA, as was reported in Section 3.1 of the AEMR 2009. Section 3.1 of AEMR 2010 also makes reference to this plan being reviewed subsequent to the 2008 IEA having taken place. From this information, it is not able to be determined whether the EMS was in fact reviewed during each year of the current auditing period.</p>	<p>Main Report, Page 39; Appendix I, Audit Protocol – Management Plans, pages 1, 7, 8, 9, 22 and 26.</p> <p>Groundwater, page 3</p>	<p>In accordance with Condition 4 of Schedule 5, WCPL will review and if required revise the Environmental Management Strategy (EMS) taking into account the audit recommendation.</p>

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3 (Cont.)	All management plans (Cont.)		<p><u>Requirement:</u></p> <p>Periodic review and revision of the EMS is to be undertaken by senior management. The EMS review will include:</p> <ul style="list-style-type: none"> <li>– review of audit findings;</li> <li>– results of monitoring programs;</li> <li>– achievement of objectives and targets;</li> <li>– relevance of the Policy, objectives and targets to current and future conditions; and</li> <li>– information and concerns of stakeholders.</li> </ul> <p><u>Evidence:</u></p> <p>Review of the EMS appears to have taken subsequently following the most recent IEA, as was reported in Section 3.1 of the AEMR 2009. Section 3.1 of AEMR 2010 also makes reference to this plan being reviewed subsequent to the 2008 IEA having taken place. From this information, it is not able to be determined whether these factors were taken into account as part of the EMS reviews that took place during this auditing period.</p> <p><u>Requirement:</u></p> <p>Reviews will be undertaken annually and may be incorporated into the WCP Operations Management System Review Process. The General Manager and Operations Manager should both participate in this review.</p> <p><u>Evidence:</u></p> <p>Review of the EMS appears to have taken subsequently following the most recent IEA, as was reported in Section 3.1 of the AEMR 2009. Section 3.1 of AEMR 2010 also makes reference to this plan being reviewed subsequent to the 2008 IEA having taken place. From this information, it is not able to be determined whether these reviews were in fact undertaken annually during this auditing period.</p>		

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3 (Cont.)	All management plans (Cont.)		<p><u>Requirement:</u></p> <p>The ACHMP will be reviewed, and if necessary updated, by the Environmental Manager:</p> <ul style="list-style-type: none"> <li>– on an annual basis;</li> <li>– in consultation with the CHLSC;</li> <li>– where there is an incident on site relating to Aboriginal cultural heritage management;</li> <li>– as an outcome of any Independent Environmental Audit;</li> <li>– when there are changes to Project Approval or licence conditions relating to aspects of this ACHMP; or</li> <li>– in response to a relevant change in technology or legislation.</li> </ul> <p><u>Evidence:</u></p> <p>Review of the ACHMP appears to have taken place during the 2009 reporting period in response to the 2008 IEA (Section 3.1 of the AEMR 2009). It is not clear whether the ACHMP was reviewed annually during the current auditing period.</p> <p><u>Requirement:</u></p> <p>The ESCP will be reviewed, and if necessary, updated by the Environmental Manager:</p> <ul style="list-style-type: none"> <li>– on an annual basis;</li> <li>– where there is an incident on site relating to failure of erosion and sediment control;</li> <li>– in response to an Independent Environmental Audit;</li> <li>– when there are changes to Project Approval or licence conditions relating to aspects of this ESCP; or</li> <li>– in response to a relevant change in technology or legislation.</li> </ul>		

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3 (Cont.)	All management plans (Cont.)		<p><u>Evidence:</u></p> <p>Review of the ESCP appears to have taken place during the 2009 reporting period in response to the 2008 IEA (Section 3.1 of the AEMR 2009). It is not clear whether these reviews have occurred annually during the current auditing period.</p> <p><u>Requirement:</u></p> <p>In addition, this ESCP will be revised on a progressive basis, prior to land disturbance in areas that have not already been addressed in this ESCP.</p> <p><u>Evidence:</u></p> <p>Areas addressed by the ESCP are not clearly defined in the plan and Attachment 1 only provides specific control measures for "Initial Development Activities" suggesting that the ESCP needs to be reviewed to include current relevant activities.</p> <p><u>Requirement:</u></p> <p>Groundwater seepage and surface water runoff will collect in pit sumps. Water level, field pH and field EC of the collected water will be monitored on a monthly basis. The volumes of water transferred from the pit sumps will also be recorded.</p> <p><u>Evidence:</u></p> <p>pH and EC is monitored in pit sumps. Audit interview confirmed that this monitoring of pH and EC is not conducted for the sumps due to the fact that it is not practicable to undertake this monitoring safely.</p>		

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4	DA-05-0021-2006 Schedule 3 Condition 55	Consider reviewing the lighting procedure to address potential community impacts, and submit to the Director-General for endorsement.	<p><u>Requirement:</u></p> <p>The Proponent shall:</p> <p>(a) take all practicable measures to mitigate off-site lighting impacts from the project; and</p> <p>(b) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Director-General.</p> <p><u>Evidence:</u></p> <p>Lighting procedure has not been submitted to the Director General and is a safety based document, not focussed on community impacts. No lighting complaints in this audit period</p>	Appendix D, Audit Protocol – DA-05-0021-2006 (as modified), page 21.	<p>Since the approval of the Wilpinjong Coal Project, WCPL has purchased a large number of private properties that previously may have had proximal direct views of night lighting located on Mine fixed plant and mobile equipment.</p> <p>As noted by the IEA, in recent years night-lighting has not typically been a source of community complaints.</p> <p>WCPL will review and if required revise the lighting procedure taking into account the audit recommendation and Condition 55 of Schedule 3 of the Approval.</p>
5	EMS Section 11.2	Update the WCPL website to provide information about current activities, or proposed blast times.	<p><u>Requirement:</u></p> <p>The WCP website will be maintained as part of the site's Project Approval requirements. The website will provide the wider community with access to the sites monitoring results, details of current activities, proposed blast times, policies, environmental management plans and monitoring programs and any other information in relation to the site operation that may be considered of interest to the community. It is the responsibility of the Environmental Co-ordinator to maintain the Website.</p> <p><u>Evidence:</u></p> <p>The website contains most site information, monitoring results, AEMRs, management plans and EA documents, however it does not contain information about current activities, or proposed blast times.</p>	Appendix I, Audit Protocol – Management Plans, page 5.	Condition 11, Schedule 5 of Project Approval (05-0021) details the requirements for access to information applicable to the Mine, and outlines the documents required by the Project Approval to be made publicly available on the Peabody website ( <a href="http://www.peabodyenergy.com">www.peabodyenergy.com</a> ).

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6	ESCP Section 3.1	Review the site sediment basin strategy to reflect current operational activities.	<p><u>Requirement:</u></p> <p>Construction of sediment fences (downslope of disturbance and stockpile areas) where required.</p> <p><u>Evidence:</u></p> <p>No sediment fences observed during site inspection, however query this proposed measure as a long-term strategy for controlling sediment on site.</p> <p><u>Requirement:</u></p> <p>Runoff from construction/development areas and operation areas would be intercepted and channelled to sediment retention storages across the Project area and/or the CHPP and box cut water supply storages. Sediment retention storages would be sized to contain runoff from design rainfall events and trap silt and other suspended material. Sediment retention storages would be provided for the containment of spills and runoff from within construction/development areas. Water recovered from the open cut operations would be pumped to the CHPP water supply storage for use in the CHPP. During wet periods, when there may be an excess of water being generated on-site, water captured in active open cuts would be pumped to inactive open cut voids and/or tailings disposal areas for temporary storage.</p> <p><u>Evidence:</u></p> <p>Sediment dams observed in numerous locations on site, with all 'dirty water' discharge directed to on site in-pit (approx total storage volume of 4600ML).</p> <p><u>Requirement:</u></p> <p>Construction of sediment dams where required to provide for temporary retention of runoff from disturbance areas. Where practicable, existing farm dams will be preferentially utilised for this purpose.</p> <p><u>Evidence:</u></p> <p>Sediment dams observed in numerous locations on site, with all 'dirty water' discharge directed to on site in-pit (approx total storage volume of 4600ML).</p>	<p>Appendix I, Audit Protocol – Management Plans, page 24.</p> <p>Appendix E, Audit Protocol – EIS 2005, pages 16 and 23.</p>	<p>Sediment fences have now been installed downslope of disturbance areas that pose a reasonable risk of water flowing off-site.</p> <p>In accordance with Condition 4 of Schedule 5, WCPL will review and if required revise the ESCP taking into account the audit recommendation.</p>



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7	Surface Water Management Plan Section 8	Future Surface Water Impact Review reports to provide greater detail of the surface water monitoring and discussion of results and trends.	<p><u>Requirement:</u></p> <p>Surface water impact reviews, linked to site water balance reviews, will be conducted on an annual basis (or more frequently as required), using the results of the surface water monitoring programme to:</p> <ul style="list-style-type: none"> <li>– determine whether the Project is having an adverse impact on surface water;</li> <li>– investigate any landholder complaints which raise concerns that the Project is having an adverse effect on surface waters; and</li> <li>– facilitate the preparation of contingency/remediation plans for managing adverse impacts of the Project on surface water, where necessary.</li> </ul> <p><u>Evidence:</u></p> <p>Site water balance was reviewed in 2010, and ongoing reviews with the consultants, SKM, have been conducted since that time. A specific "Site Water Impact Review" has not been prepared, however it is noted that many of these commitments are addressed within the AEMR (2010).</p>	Appendix I, Audit Protocol – Surface Water, page 4.	<p>As stated in the IEA, the AEMR/Annual Review does include regular assessment of environmental performance with respect to surface water, including comparison to Surface Water Management and Monitoring Plan (SWMMP) baseline water quality ranges, consideration of any surface water related complaints and the results of stream health monitoring.</p> <p>WCPL is in the process of completing a site water balance review and review of the impact of the Mine on surface water resources and the results of this will be reported in the next Annual Review period.</p>

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8	Surface Water Management Plan Section 8	Site water balance to be included in future AEMRs.	<p><u>Requirement:</u></p> <p>In addition to these reviews, the site water balance will be reviewed annually to optimise performance and validate predictions. The site water balance review will incorporate the results of the surface, groundwater and aquatic biology impact reviews with the results of the borefield performance reviews to optimise performance and validate predictions.</p> <p><u>Evidence:</u></p> <p>Site water balance was reviewed in 2010, and ongoing reviews with the consultants, SKM, have been conducted since that time. No site water balance reviews were completed in 2008 or 2009. An operational water balance is undertaken each month, as confirmed during the audit interview.</p>	Appendix I, Audit Protocol – Surface Water, page 4.	It is noted that the AEMR/Annual Review includes regular reporting of the status of water storages on-site and any significant changes to site water management. WCPL is in the process of completing a site water balance review and the results of this review will be reported in the next Annual Review period.
9	Surface Water Management Plan Section 8	Verify water-related complaint prior to reviewing protocols.	<p><u>Requirement:</u></p> <p>In the event that a surface water-related complaint or a groundwater-related complaint is received from a local landholder in relation to a potential Project related effect on their water supply, the relevant data set will be reviewed by the Environmental Manager (or delegate), who will determine if the groundwater impact investigation protocol (Section 4) or surface water investigation protocol (Section 5) would be initiated.</p> <p><u>Evidence:</u></p> <p>No water related complaints were received during the auditing period.</p>	Appendix I, Audit Protocol – Management Plans, page 27.	<p>It is noted that where surface water or groundwater complaints may be received, these complaints would be verified, where possible, in accordance with the general Complaint Management Procedure as described in the EMS and the data set review process as detailed in the Surface Water and Groundwater Response Plan, before the relevant investigation protocol would be initiated.</p> <p>Recommendation noted - <u>no change proposed.</u></p>

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10	Groundwater Management Plan Section 1.9	<p>Future AEMRs to report on the following groundwater related issues:</p> <ul style="list-style-type: none"> <li>investigations arising from groundwater complaints or impacts;</li> <li>results of any contingency measures implemented; and</li> <li>results of any groundwater model refinements.</li> </ul>	<p><u>Requirement:</u></p> <p>In addition to the groundwater management issues required by the DA to be included in the AEMR, the AEMR will report on the following groundwater related issues:</p> <ul style="list-style-type: none"> <li>investigations arising from groundwater complaints or impacts (Section 7);</li> <li>results of any contingency measures implemented (Section 8); and</li> <li>results of any groundwater model refinements (Section 5).</li> </ul> <p><u>Evidence:</u></p> <p>No groundwater complaints have been received during the auditing period (as per AEMRs 2008, 2009 and 2010 Appendix E – Community Complaints Register Summary, and per the 2011 Community Complaints Register Summary on the WCPL website). No groundwater contingency measures have been required to be implemented during the auditing period. The groundwater modelling at WCM is currently being refined and updated, but progress on this has not been reported in the 2008, 2009 or 2010 AEMRs.</p>	Appendix I, Audit Protocol – Groundwater, page 9.	<p>It is noted that where groundwater investigations or contingency measures are required to be implemented, these will be reported in future Annual Reviews in accordance with the Groundwater Monitoring Plan (GMP).</p> <p>While some groundwater modelling was undertaken during the IEA period, this was for internal planning purposes only. WCPL is in the process of completing a review of site groundwater modelling and the results of this review will be reported in the next Annual Review period.</p>
<b>Other Actions</b>					
11	EIS Section 2.4.4	Undertake trials of various surface treatments (including subsoil and topsoil depths).	<p><u>Requirement:</u></p> <p>Subsoils across the Project disturbance areas would also be suitable for selective use as a subsoil medium for plant growth (Appendix M). Trials of various surface treatments (including subsoil and topsoil depths) would be undertaken during the Project life (Section 5.2.7).</p> <p><u>Evidence:</u></p> <p>Subsoils used - No trials conducted.</p>	Appendix E, Audit Protocol – EIS 2005, page 6.	<p>Subsoil substitution for topsoil has not been required as topsoil quantities have generally been sufficient, and hence trials have been focussed on other aspects of rehabilitation to date.</p> <p>Subsoil trials will be undertaken if required, in the event that a need arises in future.</p> <p>Rehabilitation trials are discussed further below in response to Issue No. 16 below.</p>

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12	EIS Section 2.11.1	Upgrade the oil/water separator system.	<p><u>Requirement:</u></p> <p>Waste hydrocarbons would be collected, stored and removed by licensed waste transporters on a periodic basis. Workshop hydrocarbon spills and leaks, and truck washdown areas would be contained by purpose built oil/water separator systems which would be inspected and maintained on a regular basis</p> <p><u>Evidence:</u></p> <p>The oil water separator was not in adequate working condition, no evidence of regular inspections</p>	Appendix E, Audit Protocol – EIS 2005, page 10.	<p>An oil/water separator is located downstream of the workshop area at the Mine and a manually operated oil/water separator is located at the vehicle washdown bay area.</p> <p><u>These facilities have been upgraded since the IEA was completed and regular inspections have now been implemented to maintain performance of the oil/water separator systems.</u></p>
13	EIS Section 4.2.4	Install light shields to limit the spill of lighting where practicable.	<p><u>Requirement:</u></p> <p>Night-lighting would be restricted to the minimum required for operational and safety requirements and would be directed away from roads and sensitive viewpoints. Lighting above topographic screens would be directed downwards and light shields would be used to limit the spill of lighting where practicable.</p> <p><u>Evidence:</u></p> <p>Light shields are not used.</p>	Appendix E, Audit Protocol – EIS 2005, page 15.	<p>Since the approval of the Wilpinjong Coal Project, WCPL has purchased a large number of former private properties that previously may have had proximal direct views of night lighting located on Mine fixed plant and mobile equipment.</p> <p>As noted by the IEA, in recent years night-lighting has not typically been a source of community complaints.</p> <p><u>WCPL will review and if required revise the lighting procedure taking into account the audit recommendation.</u></p>

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14	EIS Section 4.3.1	Reference is made to the catchment types and is reported in the Rehabilitation Management Plan	<p><u>Requirement:</u></p> <p>Areas disturbed by active mining would be minimised as far as practicable. In order to minimise and manage waters requiring on-site containment, the Project area would be segregated into several catchment types including:</p> <ul style="list-style-type: none"> <li>– undisturbed runoff areas;</li> <li>– construction/development runoff areas;</li> <li>– operation runoff areas; and</li> <li>– rehabilitation areas.</li> </ul> <p><u>Evidence:</u></p> <p>Rehabilitation Plans don't mention segregating the catchment areas. Rehabilitation was not progressed enough to verify this condition.</p>	Appendix E, Audit Protocol – EIS 2005, page 15.	<p>It is noted that the Section 5.7 of the ESCP (2010) discusses the management of runoff from rehabilitation areas and other catchment types.</p> <p>In accordance with Condition 4 of Schedule 5, <u>WCPL will review</u> and if required revise the Rehabilitation Management Plan taking into account the audit recommendation.</p>

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15	EIS Sections 5.1 and 5.1.2.10 Rehabilitation Management Plan Section 7.12	<p>Review the induction and environmental awareness programme to include:</p> <ul style="list-style-type: none"> <li>Cultural heritage; and</li> <li>Weed management.</li> </ul>	<p><u>Requirement:</u></p> <p>All Project employees and contractors would undertake an induction and environmental awareness programme prior to working independently on-site. As a component of this programme, employees would be given training in occupational health and safety requirements, an overview of the requirements of the EPP and an appreciation of the Aboriginal cultural heritage values of the Project area.</p> <p><u>Evidence:</u></p> <p>Induction sighted, Cultural Heritage not included.</p> <p><u>Requirement:</u></p> <p>Aboriginal cultural heritage training for Project employees (e.g. through site inductions).</p> <p><u>Evidence:</u></p> <p>Cultural Heritage not included in Site inductions.</p> <p><u>Requirement:</u></p> <p>In addition, WCPL personnel and contractors will be requested as part of the site induction process to report any observations of noxious and environmental weeds.</p> <p><u>Evidence:</u></p> <p>This is not included as part of the contractors site induction</p>	<p>Appendix E, Audit Protocol – EIS 2005, pages 35 and 42; Appendix I, Audit Protocol – Management Plans, page 56.</p>	<p>Site inductions now include discussions regarding noxious and environmental weeds, and staff and contractors are requested to report any observations of this nature. Mine personnel are aware of the need to control weed and animal pest species.</p> <p>Cultural heritage education and training is incorporated into the site induction programme.</p>

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16	EIS Section 5.2.7	Commence site specific trials and studies to examine options and to optimise revegetation techniques.	<p><u>Requirement:</u></p> <p>On-going site specific trials and studies would be conducted to examine options and to optimise revegetation techniques.</p> <p><u>Evidence:</u></p> <p>This has not commenced.</p>	Appendix E, Audit Protocol – EIS 2005, page 49.	<p>Rehabilitation trials are being established on the first 10 strips of mining in Pit 1. These trials will examine the success of planned landform designs and revegetation strategies and will be used to further refine rehabilitation concepts and methodologies. The trials will include establishment of woodland and grassland communities consistent with the post-mining land use. During 2012, direct drilling of seed into rehabilitation trial areas was undertaken to assess performance of increasing seed to soil contact and seed germination in comparison to areas which have been rehabilitated using the broadcast seeding method.</p> <p>Soil amelioration trials were also undertaken during 2012 to assess suitable gypsum application rates.</p>
17	MOP Section 4.8	Allow for variation/flexibility in future rehabilitation trials.	<p><u>Requirement:</u></p> <p>Rehabilitation trials will be carried out on the first 10 strips of mining in Pit 1. These trials will examine the success of planned landform designs and revegetation strategies and will be used to further refine rehabilitation methodologies. The trials will include establishment of woodland and grassland communities consistent with the post mining land use.</p> <p><u>Evidence:</u></p> <p>Native seed trial has been undertaken in this area. This is being monitored annually as per the Landline reports.</p>	Appendix I, Audit Protocol – Management Plans, page 97.	<p>Flexibility in rehabilitation trials is allowed for in the planning of trial activities. Rehabilitation trials will be ongoing and will include:</p> <ul style="list-style-type: none"> <li>• Trialling cattle grazing on established rehabilitated areas to evaluate the capacity of the rehabilitated land to sustain livestock grazing.</li> <li>• Trialling various topsoil depths to determine optimum growth medium conditions for seeding of pasture grasses and target tree species.</li> <li>• Trials to evaluate suitable seed mix volumes that reduce the competition of pasture grass species and promote target species growth.</li> </ul> <p>Results of these trials will be used as a guide for progressively rehabilitating disturbed areas across the mining operation and for closure planning.</p>

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18	Rehabilitation Management Plan Section 7.2	Hollow bearing trees to be assessed by consultant ecologists for the viability of using nest boxes.	<p><u>Requirement:</u></p> <p>Where practicable, habitat features (e.g. large hollows) would be salvaged during vegetation clearance activities and utilised in the rehabilitation areas, regeneration areas and ECAs (Section 7.11). In addition, artificial roosting/nesting boxes for fauna, particularly threatened fauna, may be used in the rehabilitation areas, regeneration areas and ECAs to provide short-term habitat resources.</p> <p><u>Evidence:</u></p> <p>No habitat hollows collected as yet. No nest boxes deployed.</p>	Appendix I, Audit Protocol – Management Plans, page 46	The area of land under rehabilitation at the Mine is increasing and WCPL commits to the commencement of relocation of habitat features (e.g. large hollows) and commencement of the deployment of roosting/nesting boxes (where these are identified as being beneficial by a consultant ecologist).
19	Rehabilitation Management Plan Section 7.6.2	Retain larger trees for relocation into the rehabilitation to provide fauna habitat.	<p><u>Requirement:</u></p> <p>Habitat features such as large hollows identified during the pre-clearance surveys will be salvaged and relocated to existing areas of remnant vegetation or rehabilitation areas where practical.</p> <p><u>Evidence:</u></p> <p>No tree salvaging has occurred to date.</p>	Appendix I, Audit Protocol – Management Plans, page 49	In accordance with Condition 4 of Schedule 5, <u>WCPL will review</u> and if required revise the Rehabilitation Management Plan taking into account the audit recommendation.
20	Rehabilitation Management Plan Section 8.1.1	Prepare and utilise a checklist to guide rehabilitation inspections to maintain compliance.	<p><u>Requirement:</u></p> <p>Visual monitoring of revegetation will be conducted as part of other routine environmental activities to ensure vegetation is establishing and to determine the need for any maintenance and/or contingency measures (such as the requirement for supplementary plantings, erosion control and weed and animal pest control). Visual assessments allow for the rapid application of remedial actions where necessary.</p> <p><u>Evidence:</u></p> <p>These procedures are undertaken on a regular basis as per audit interview.</p>	Appendix I, Audit Protocol – Management Plans, page 60.	In accordance with Condition 4 of Schedule 5, <u>WCPL will review</u> and if required revise the Rehabilitation Management Plan taking into account the audit recommendation.