

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
SCHEDULE 2 - ADMINISTRATIVE CONDITONS				
S2.1	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction operation or rehabilitation of the projects.	The open cut areas were generally considered to be compliant. However, the underground area is non-compliant, principally due to poor hydrocarbon storage and management	IMC53/14 The hydrocarbon spillages and staining within and around the underground surface infrastructure areas should be remediated and appropriate measures put in place to minimise future spillages. This may include provision of additional storage / management facilities, review of equipment and plant maintenance requirements, and additional training in hydrocarbon storage, handling and spill response. The degree and number of hydrocarbon spillages / staining across a range of areas within the underground surface infrastructure areas indicate that hydrocarbon management is not being undertaken in a competent manner.	Work has commenced on improving site hydrocarbon storage at the Underground surface infrastructure areas. Implementation target date November 2015.
S2.2	The Proponent shall carry out the open cut project generally in accordance with the: a) previous open cut EAs; b) open cut project EA; c) OC statement of commitments; d) EA Mod 1; e) EA Mod 2; and f) conditions of this approval.	The Northern Open Cut out-of-pit waste rock emplacement was found to be non-compliant in August 2011. However, a modification approved 18 March 2012 has brought the site into compliance. The assessment of compliance with the Statement of Commitments and conditions of this approval are addressed against the relevant commitment / condition.	IMC61/14 It should be confirmed through survey whether the boundary of Tailings Dam 2 remains within the Project Approval boundary as shown in Project Approval 08_0101 and 08_0102. Should the tailings dam cross the boundary, consideration should be given to seeking a modification to provide for the existing extent as well as any activities required for the final rehabilitation of the tailings dam. The eastern extent of the existing Tailings Dam 2 appears to be outside of the Project Approval boundary. It is noted that figures within the Project Approval itself show the Project Approval boundary crossing through the tailings dam. Additionally, the tailings dam remains fully within the land parcels listed in the Project Approval and within the boundaries of the issued mining tenements. Whilst there may not be a legal issue, it is in the Company's interests to remove any doubt.	ICO will engage an independent consultant to determine if Tailings Dam 2 either is within or outside the project approval boundary. The TD2 assessment will be completed by July 2015.
S2.5	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: a) any reports, strategies, plans, programs, reviews, audits, or correspondence that are submitted in accordance with the conditions of this approval; and b) the implementation of any actions or measures contained in these documents.	Non compliant - A number of issues raised during the Department's review of the Annual Reviews were either not implemented within a reasonable timeframe or have not yet been implemented. Examples include uploading of information to the Company website, presentation of a compliance review table within the Annual Reviews, Annual Review figure quality has not yet been improved etc.	IMC59/14 Future Annual Reviews should address the improvements requested by DPE and other agencies from their review of previously submitted reports (see also Recommendations IMC49/14, IMC57/14). A number of improvements requested by DPE during their review of previously submitted Annual Reviews have not yet been implemented. IMC36/14 The version of the Stage 2 Non-Aboriginal Heritage Management Plan on the Company website should be replaced with a version containing the cross referenced figures and appendices. It is important that the Company provide all relevant information associated with management plans, strategies and programs.	Review of website information has been completed to ensure documentation and reports are up-to-date. The 2014 Annual Review has incorporated improvements requested by DPE and other agencies from previous years assessments.
S2.8	The Proponent shall not extract more than: a) 1.5 million tonnes of ROM coal from the open cut mining operations in the northern mining area in a calendar year; b) 4.5 million tonnes of ROM coal from the open cut mining operations in the western mining area in a calendar year; and c) 4.5 million tonnes of ROM coal from the underground mining operations on site in a calendar year.	Note: The Annual Reviews do not break down the volumes (e.g. total ROM coal was 5.083Mt for 2013).	IMC57/14 A breakdown of ROM coal should be provided in future Annual Reviews to enable confirmation of compliance against Schedule 2 Condition 8 of Project Approval 08_0101 and 08_0102. Annual reviews up to and including the 2013 period do not include a breakdown of ROM coal production which does not enable assessment of compliance. Inclusion of this detail also improves the value of the document for the Company's purposes.	Addressed in 2014 Annual Review.
S2.16	The Proponent shall ensure that all the plant and equipment used on site, or to transport coal from the site, is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	The open cut areas were generally considered to be compliant. However, the underground area is non-compliant, principally due to poor hydrocarbon storage and management.	See recommendation S2.1	Work has commenced on improving site hydrocarbon storage at the Underground surface infrastructure areas. Implementation target date November 2015.
SCHEDULE 3 - ENVIRONMENTAL PERFORMANCE CONDITIONS				
Noise				

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S3.2	Noise Criteria Except for the noise-affected land referred to in Table 1, the Proponent shall ensure that the noise generated by the projects does not exceed the criteria in Table 2 at any residence on privately-owned land or on more than 25 percent of any privately-owned land.	The noise monitoring does not assess the proportion of land for which exceedances may occur. This can only practically be achieved through noise modelling	A submission should be prepared seeking a modification to Project Approval 08_0101 and 08_0102 to remove the need to assess noise limits over 25% of privately owned land. Alternatively, approval may be sought for either annual review (as part of the validation of the noise model) or confirmation using the noise model upon receipt of a valid and non-vexatious claim. Noise monitoring in itself is unable to confirm compliance with noise limits over a proportion of a landholding. Modelling and production of noise contours is currently the only practical method to determine compliance. It is acknowledged that attempting to regularly complete this modelling would be a substantial expensive and, unless valid complaints are being received regarding excessive noise across a landholding, it provides little additional value to the monitoring undertaken at residences. The noise consultant should be requested review the quarterly noise reports to: – include a definitive review and statement of compliance, or otherwise, for all noise limits, including cumulative noise; and – state the stability class instead of / as well as the Sigma/Theta value. All monitoring reports should provide definitive assessments of compliance against relevant limits and include sufficient information for the reader to interpret the results without reference to additional documentation.	Noted. Consideration be given to implementation if ICO recommences operational activities or directed by relevant government agencies.
S3.4	Cumulative Noise Criteria Except for the noise-affected land referred to In Table 1, the Proponent shall implement all reasonable and feasible measures to ensure that the noise generated by the projects combined with the noise generated by other mines in the area does not exceed the criteria in Table 4 at any residence on privately-owned land or on more than 25 percent of any privately-owned land.	Whilst cumulative exceedances were recorded, the contribution from the Integra Mine Complex was within the Leq(15minute) criteria for the complex or during meteorological conditions for which the criteria do not apply.	See Recommendations S3.2	Assessment of cumulative noise to be addressed under attended monitoring if ICO recommences operational activities or directed by relevant government agencies.
S3.5	Cumulative Noise Acquisition Criteria If the noise generated by the projects combined with the noise generated by other mines in the area exceeds the criteria in Table 5 at any residence on privately-owned land or on more than 25 percent of privately-owned land, then upon receiving a written request for acquisition from the landowner, the Proponent shall acquire the land on as equitable basis as possible with the relevant mines in accordance with the procedures in Conditions 6-7 of Schedule 4.	The noise monitoring does not assess the proportion of land for which exceedances may occur. This can only practically be achieved through noise modelling. Whilst cumulative exceedances were recorded, the contribution from the Integra Mine Complex was within the Leq(15minute) criteria for the complex or during meteorological conditions for which the criteria do not apply.	See Recommendations S3.2	Assessment of cumulative noise to be addressed under attended monitoring if ICO recommences operational activities or directed by relevant government agencies.
S3.7	If the cumulative noise generated by the projects combined with the noise generated by other mines in the area exceeds the criteria at any residence on the land referred to in Table 8, then upon receiving a written request from the owner, the Proponent shall implement additional noise mitigation measures (such as double-glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. These measures must be reasonable and feasible. The Proponent shall share the costs associated with implementing these measures on as equitable basis as possible with the relevant mines. If within 3 months of receiving this request from the owner, the Proponent 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 Director-General for resolution.	Whilst cumulative exceedances were recorded, the contribution from the Integra Mine Complex was within the Leq(15minute) criteria for the complex or during meteorological conditions for which the criteria do not apply	See Recommendations S3.2	Assessment of cumulative noise to be addressed under attended monitoring if ICO recommences operational activities or directed by relevant government agencies.
S3.8	Rail Noise The Proponent shall seek to ensure that its rail spur is only accessed by locomotives that are approved to operate on the NSW rail network in accordance with noise limits L6.1 to L6A in RailCorp's EPL (No. 12208) and ARTC's EPL (No. 3142) or a Pollution Control Approval issued under the former Pollution Control Act 1970.	Basis - NSW EPA's POEO Public Register, 2014 Noise Management Plan The POEO Public register does not record any non-compliance with these conditions which are relevant to the site. Compliance assessed on this basis. It is noted that Section 5.1.2 of the 2014 Noise Management Plan requires annual requests of train operators to supply compliance reports, or similar, to confirm the locomotives are approved. Copies of these compliance reports were not supplied during the audit	IMC07/14 Measures should be put in place to request and follow up the supply of compliance reports from train operators confirming that the locomotives are approved to operate on the NSW rail network.	To be addressed if ICO recommences operational activities

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S3.9	<p>The Proponent shall:</p> <p>a) implement best practice noise management, including all reasonable and feasible noise mitigation measures to minimise the operational, low frequency, and rail noise generated by the projects;</p> <p>b) regularly assess the real-time noise monitoring and meteorological forecasting data and relocate, modify, and/or stop operations on site to ensure compliance with the relevant conditions of this approval;</p> <p>c) maintain or improve the effectiveness of noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired;</p> <p>d) ensure that noise attenuated plant is deployed preferentially in locations relevant to sensitive receivers;</p> <p>e) minimise the noise impacts of the Integra mine complex during meteorological conditions when the noise limits in this approval do not apply; and</p> <p>f) co-ordinate the noise management on site with the noise management at nearby mines (including the Ashton, Rix's Creek and Mt Owen mines) to minimise the cumulative noise impacts of these mines and the Integra mine complex to the satisfaction of the Director-General.</p>	<p>The preventative and corrective measures implemented were those outlined within Section 5 of the 2014 Noise Management Plan. Whilst no specific measures for management of low frequency noise are specified, Section 4.1.5 requires the assessment and reporting of low frequency noise.</p> <p>Entry 03/05/13 (NOC) includes comments for use of lower level placement areas, dozers to use first gear, etc. due to adverse meteorological conditions. Other records of modified activities include records of equipment shutdown time and email correspondence from mining personnel.</p> <p>All maintenance is completed in accordance with original equipment manufacturer (OEM) requirements.</p> <p>In 2013, evaporative fans were installed in an exposed location resulting in 82 complaints (70 from one receiver) between March & November 2013. The fans were subsequently relocated to a shielded location with no further issues arising.</p> <p>See response to Schedule 3 Condition 9b) above.</p> <p>Non Compliant - Whilst the Company maintains a policy of informing surrounding mines of any elevated noise levels recorded by Integra monitoring equipment, no formal co-ordinated noise management protocol or agreements are in place. Recommendation IMC02/14.</p>	<p>IMC02/14 Operators of surrounding mines, including Ashton, Rix's Creek and Mt Owen, should be formally approached again in relation to the sharing of noise data and a protocol to minimise the potential for cumulative noise impacts. An agreed protocol should preferably be in place prior to re-commencement of operational activities.</p>	<p>ICO will re-open dialogue with neighbouring mines with the aim of establishing a formal agreement if ICO recommences operational activities.</p>
S3.10a	<p>Noise Management Plan</p> <p>The Proponent shall prepare and implement a Noise Management Plan for the projects to the satisfaction of the Director-General.</p> <p>This plan must:</p> <p>a) be prepared in consultation with OEH, and submitted to the Director-General for approval by the end of May 2012;</p> <p>b) describe the measures that would be implemented to ensure:</p> <p>☐ best management practice is being employed;</p> <p>☐ the noise impacts of the Integra mine complex are minimised during meteorological conditions when the noise limits in this approval do not apply; and</p> <p>☐ compliance with the relevant conditions of this approval;</p> <p>c) describe the proposed management system in detail;</p> <p>d) include a monitoring program that:</p> <p>☐ uses a combination of real-time and supplementary attended monitoring measures to evaluate the performance of the Integra mine complex;</p> <p>☐ adequately supports the proactive and reactive noise management system on site;</p> <p>☐ includes a protocol for determining exceedances of the relevant conditions in this approval;</p> <p>☐ evaluates and reports on the effectiveness of the noise management system on site;</p> <p>☐ provides for the annual validation of the noise model for the Integra mine complex; and</p> <p>e) include a protocol that has been prepared in consultation with the owners of nearby mines (including the Ashton, Rix's Creek and Mt Owen Mines) to minimise the cumulative noise impacts of these mines and the Integra mine complex.</p>	<p>The current Noise Management Plan (NMP) was approved by DPE 15 September 2014.</p> <p>(a) The plan was submitted to (then) NSW P&I on 30 May 2012. The plan was approved by (then) NSW P&I on 09 October 2012.</p> <p>A revised plan, dated 01 September 2014 was approved by DPE 15 September 2014.</p> <p>(b) Preventative and corrective measures are addressed in the Plan.</p> <p>(c) The relevant requirements, relationship to other environmental documentation and objectives of the NMP.</p> <p>(d) The monitoring and reporting program generally addresses these items.</p> <p>It is noted that Section 7.1 of the 2014 NMP states that the Company is “investigating the feasibility of noise modelling tools”. No annual validations of the noise model for IMC have been completed to date. Recommendation IMC01/14.</p> <p>Non-compliant - (e)Whilst real-time data sharing is possible, commitments from other mines to facilitate this has not yet been achieved and no formal protocols are in place (Recommendation IMC02/14).</p> <p>In the interim, if higher mine noise is detected and considered to be a result of activities at another mine, dispatch is to contact that site and inform them.</p>	<p>IMC01/14 - The noise model for the complex should be validated on an annual basis in accordance with Project Approval 08_0101 and 08_0102 Schedule 3 Condition 10(d) and the Noise Management Plan updated to reflect the process and information requirements.</p> <p>In addition to meeting conditional requirements the use of validation modelling, even during care and maintenance operations, provides a useful tool in reviewing and assessing noise monitoring results and in planning ongoing operations.</p> <p>IMC02/14 - Operators of surrounding mines, including Ashton, Rix's Creek and Mt Owen, should be formally approached again in relation to the sharing of noise data and a protocol to minimise the potential for cumulative noise impacts. An agreed protocol should preferably be in place prior to re-commencement of operational activities.</p>	<p>Recommendation IMC01/14 noted.</p> <p>Recommendation IMC02/14 - ICO will re-open dialogue with neighbouring mines with the aim of establishing a formal agreement if ICO recommences operational activities.</p>
Blasting				
S3.19d	<p>Blast Management Plan</p> <p>The Proponent shall prepare and implement a Blast Management Plan for the open cut mining operations on site to the satisfaction of the Director-General.</p> <p>This plan must:</p> <p>a) be prepared in consultation with OEH, and submitted to the Director-General for approval by the end of March 2011;</p> <p>b) describe the blast mitigation measures that would be implemented to ensure compliance with the relevant condition of this approval;</p> <p>c) describe the measures that would be implemented to ensure that the public can get up-to-date information on the proposed blasting schedule on site;</p>	<p>The current Blast Management Plan 2012 – 2015 (BMP) was approved by (then) NSW Planning & Infrastructure on 16 October 2012.</p> <p>Original BMP was submitted on 08 April 2011.</p> <p>Section 5.1 of the BMP states that neighbours would be notified in accordance with the contact list and time requirement for notification. Table 3.1 also outlines personnel responsibilities for notification and update of blast signs. The Company website also includes blast notifications and information can be obtained by calling the Community Hotline (1800 505 361). The BMP does not include these two methods (Recommendation IMC05/14).</p>	<p>IMC05/14 The Blast Management Plan 2012-2015 should be updated to include the use of the website and Community Hotline as part of the blast notification process. Responsibility for update of the website and addressing enquiries through the hotline should also be included.</p> <p>The current Blast Management Plan does not include reference to the use and update of the website or use of the Community Hotline.</p>	<p>ICO not blasting under Care and Maintenance.</p> <p>The Blast Management Plan will be reviewed if ICO recommences operational activities.</p>
S3.19e	<p>e) include a protocol that has been prepared in consultation with the owners of the nearby mines for minimising and managing the cumulative blasting impacts of the mines.</p>	<p>The BMP outlines roles and responsibilities which includes coordinating blasting with the nearby mines to minimise cumulative impacts and ensure no blasts are initiated within 5 minutes of each other.</p> <p>Non-compliant - Whilst this protocol has not been formalised with surrounding mines, an informal protocol is in place with various examples of correspondence confirming notification between the surrounding mine sites. Recommendation IMC06/14.</p>	<p>IMC06/14 A formal protocol should be developed and agreed to with surrounding mine operators to ensure compliance with the Company's protocol of not initiating blasts within 5 minutes of surrounding mines.</p>	<p>ICO not blasting under Care and Maintenance - ICO will re-open dialogue with neighbouring mines with the aim of establishing a formal agreement if ICO recommences operational activities.</p>
Air Quality				

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S3.25f	Air Quality & Greenhouse Gas Management Plan f) co-ordinate the air quality management on site with the air quality management of nearby mines (including Ashton, Rix's Creek and Mt Owen mines) to minimise the cumulative air quality impacts of these mines and the Integra mine complex, to the satisfaction of the Director-General.	Non-compliant - Whilst the Company maintains a policy of informing surrounding mines of any elevated monitoring results (including visual observations), no formal co-ordinated air quality management protocol or agreements are in place. Recommendation IM15/14.	Whilst the Company maintains a policy of informing surrounding mines of any elevated monitoring results (including visual observations), no formal co-ordinated air quality management protocol or agreements are in place. Recommendation IMC15/14.	ICO will re-open dialogue with surrounding mines with the aim of developing a formal co-ordinated air quality management protocol if ICO recommences operational activities.
S3.26d	Air Quality & Greenhouse Gas Management Plan d) include a monitoring program that: ☑ uses a combination of real-time monitors and supplementary monitors to evaluate the performance of the Integra mine complex; ☑ adequately supports the proactive and reactive air quality management system; ☑ includes PM2.5 monitoring (although this obligation could be satisfied by the regional air quality monitoring network if sufficient justification is provided); ☑ evaluates and reports on the effectiveness of the air quality management system; ☑ includes a protocol for determining any exceedances of the relevant conditions of this approval; and	Compliant - Sections 4 & 9 of the 2014 AQGGMP outline the monitoring and reporting program which generally addresses these items. Section 4 also confirms that the regional network monitors at Camberwell & Singleton will be utilised for PM2.5 (Recommendation IM14/14). Section 5 also includes a trigger action response plan and corrective measures and Section 9 outlines reporting requirements for exceedances. Air Quality and Greenhouse Gas Management Plan (01 September 2014).	IMC14/14# The 2014 Air Quality and Greenhouse Gas Management Plan should be updated to include a justification as to the adequacy in using the regional network monitors at Camberwell and Singleton for PM2.5 monitoring. The justification should consider the proximity of the monitors, an analysis of PM2.5 trends across the Upper Hunter and relationship between concurrent PM10 and PM2.5 concentrations at the two monitoring stations. (Peer Review No. IMCA/1) Whilst the use of the regional monitors appears to be appropriate and Schedule 3 Condition 26(d) states that the obligation may be met by use of the regional monitors, specific justification is to be provided. IMC16/14 The 2014 Air Quality and Greenhouse Gas Management Plan should be reviewed prior to the recommencement of operational activities. Where applicable, modified or additional management measures determined through the ongoing pollution reduction studies undertaken under EPL 3390 should be reflected in the reviewed plan. Additionally, care and maintenance measures no longer applicable should be removed. (Peer Review No. IMCA/3) Commendably, the Company has prepared an extensive Air Quality and Greenhouse Gas Management Plan and continues to undertake studies into pollution reduction measures which will require ongoing updates to the management plan.	IMC14/14# - Recommendation IMC14/14 to be implemented upon next review of AQ&GHGMP. IMC16/14 - AQ&GHGMP will be reviewed prior to recommencing activities.
S3.26e	Air Quality & Greenhouse Gas Management Plan e) include a protocol that has been prepared in consultation with the owners of nearby mines (including the Ashton, Rix's Creek and Mt Owen mines) to minimise the cumulative air quality impacts of these mines and the Integra mine complex.	Non-compliant - Section 4 of the 2014 AQGGMP states that the Company has been negotiating with neighbouring mines for access to real-time monitoring data but negotiations remain ongoing (Recommendation IMC15/14).	IMC15/14 Operators of surrounding mines, including Ashton, Rix's Creek & Mt Owen, should be formally approached again in relation to the sharing of air quality data and a protocol to minimise the potential for cumulative air quality impacts. An agreed protocol should preferably be in place prior to re-commencement of operational activities. This protocol may 'piggy back' the regional forecasting model and regional dust management plan being coordinated by the NSW Minerals Council. (Peer Review No. IMCA/2) Schedule 3 Conditions 25(f) and 26(e) require co-ordinated management between the Company and surrounding mines to minimise the potential for cumulative air quality impacts. Whilst the Company maintains a policy of informing surrounding mines of elevated monitoring results, no formal protocol or management strategy has been prepared.	See recommendation implementation S3.25f.
Soil and Water				
S3.32	Water Supply The Proponent shall ensure that it has sufficient water for all stages of the projects, and if necessary, adjust the scale of mining operations to match its water supply.	Not Determined - The principal water source is 'dirty water' from dam D1 which received flows from the open cuts, portal sump and Possum Skin Dam. If required, water can also be sourced from the sediment dams, flows from the clean water diversion system and licenced extraction from Glennies Creek. The Company currently holds a total of 700ML of groundwater entitlements and 1,268.2ML of surface water entitlements. During the reporting period, no water was sourced from the clean water system or Glennies Creek. However, no data was available to validate the likely groundwater inflow volumes (Recommendation IMC22/14).	IMC22/14 The volume of groundwater inflows into the open cuts should be calculated / estimated in accordance with the 2014 Water Management Plan (and cross referenced procedure – see also Recommendation IMC29/14) and the details of the estimated volumes reported within the respective Annual Review. The volumes of groundwater inflows do not appear to have been calculated / estimated or reported during the audit period. It is a requirement of Schedule 3 Condition 40 to monitor groundwater inflows and Schedule 5 Condition 3 to report monitoring results within the Annual Review. The measurement of the groundwater inflows are also required in order to determine that the Company has appropriate water entitlements for the volume of water take.	ICO to estimate volume of groundwater inflows at North Pit and Western Extension and report in the 2015 Annual Review.

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S3.40c	Water Management Plan (c) an Erosion and Sediment Control Plan, which must: <ul style="list-style-type: none"> • identify activities that could cause soil erosion and generate sediment; • describe measures to minimise soil erosion and the potential transport of sediment to downstream waters; • describe the location, function and capacity of erosion and sediment control structures; and • describe what measures would be implemented to maintain these structures for the life of the projects 	Compliant - Section 5.1.3 of the 2014 WMP includes a summary of the erosion and sediment control plans (ESCPs) for: the North Open Cut; South Pit (Western Extension); and Other Disturbed Areas. A full copy of these plans is provided in Volume 2 of the WMP. Whilst the ESCPs generally cover the requirements a range of improvements are recommended (Recommendation IMC19/14)	IMC19/14 The Erosion and Sediment Control Plans (ESCPs) should be reviewed and updated to provide an up-to-date, consistent and coordinated plan. In the event that separate ESCPs are retained for each component of the complex, the coverage of each ESCP should be clearly defined on a figure. Currently the ESCP consists of four reports including three separate ESCPs and an overarching report prepared by different authors from 2009, 2010 and 2011. The plans also reference superseded approvals and contain a range of inconsistencies. It is also difficult to confirm that all areas of the complex have been appropriately addressed by the various ESCPs. IMC28/14# The site's regular checklist should be reviewed to ensure that regular checks and subsequent actions are taken to maintain the erosion and sediment control systems. This includes ensuring that outlets and dams are desilted as required and the silt / sediment is appropriately disposed of, the identification and rectification of erosion and scouring and the repair or removal of sediment fencing. The outcomes of these checks should be recorded and retained as a formal log. (Peer Review No. IMCff/14) Whilst the water management system appeared to be generally appropriately maintained, a number of instances of erosion, siltation and redundant silt fencing were observed. Successful operation of the erosion and sediment control system is dependent on the identified structures and facilities continuing to function as designed. It is important that this monitoring and maintenance is recorded to ensure monitoring and maintenance regimes continue to be implemented.	ICO is compliant with S3.40. Erosion and Sediment Control Plans to be reviewed in light of recommendation. Time frame by November 2015.
S.40c continued	Water Management Plan (c) an Erosion and Sediment Control Plan, which must: <ul style="list-style-type: none"> • identify activities that could cause soil erosion and generate sediment; • describe measures to minimise soil erosion and the potential transport of sediment to downstream waters; • describe the location, function and capacity of erosion and sediment control structures; and • describe what measures would be implemented to maintain these structures for the life of the projects 	Compliant - Section 5.1.3 of the 2014 WMP includes a summary of the erosion and sediment control plans (ESCPs) for: the North Open Cut; South Pit (Western Extension); and Other Disturbed Areas. A full copy of these plans is provided in Volume 2 of the WMP. Whilst the ESCPs generally cover the requirements a range of improvements are recommended (Recommendation IMC19/14)	IMC20/14* Add complete or compile relevant Mine survey and audit against the design specifications for sediment basins, clean water drains and dirty water drains, contained in the ESCPs. Records of date of construction, and any subsequent maintenance, should also be compiled. (Peer Review No. IMCW/03) Implementation of an ESCP is dependent on the identified structures and facilities being constructed as designed and in the order nominated. That is, individual features of the ESCP will not necessarily operate independently of other features. Failure to construct one element of the overall erosion and sediment control management system, either to design or as per the required timing, may jeopardise the overall function of the system.	ICO is compliant with S3.40. Erosion and Sediment Control Plans to be reviewed in light of recommendation. Time frame by November 2015.
S3.40d	Water Management Plan (d) a Surface Water Management Plan, which must include: <ul style="list-style-type: none"> • detailed baseline data on surface water flows and quality in creeks and other water bodies that could potentially be affected by the projects; • surface water impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts from the projects; • a program to monitor and assess surface water flows and quality, impacts on water users and stream health 	Compliant - Appendix C of the 2014 WMP provides a summary of the baseline surface water data for Glennies Creek and Station Creek including Electrical Conductivity and pH from September 2002 (Recommendation IM23/14). Surface water quality criteria and trigger levels are generally discussed in Section 5.2 of the 2014 WMP. It is noted that the site is operated as a zero discharge operation. Section 4 of the 2014 WMP addresses the required monitoring.	IMC23/14 The Surface Water Baseline Data (Appendix C) within the 2014 Water Management Plan should be expanded to include additional analytes and water level monitoring for all sites included within the surface water monitoring program. (Peer Review No. IMCr/14) Currently baseline data is only provided for pH and Electrical Conductivity within Glennies Creek and Station Creek. However, the surface water monitoring program also includes sampling within Bettys Creek, Main Creek, Martins Creek, Stony Creek, Blackwattle Creek and Tisdells Creek and includes a range of other analytes and water level monitoring. To enable ongoing comparison and evaluation of trends, baseline data for all monitoring sites should be compiled.	Water Management Plan is compliant with condition S3.40d. Recommendation noted.

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S3.40e	Water Management Plan (e) a Groundwater Management Plan, which must include: <ul style="list-style-type: none"> • detailed baseline data of groundwater levels, yield and quality in the region, and privately-owned groundwater bores, which could be affected by the projects; • groundwater impact assessment criteria including trigger levels for investigating any potentially adverse groundwater water impacts from the projects; and • a program to monitor and assess: <ul style="list-style-type: none"> - groundwater inflows to the open cut mining operations; and - impacts of the projects on the region's aquifers, any groundwater bores and surrounding watercourses, in particular Glennies Creek and Station Creek and adjacent alluvium 	Appendix D of the 2014 WMP provides a summary of the baseline groundwater data for project-related bores and states that there are no known privately owned groundwater bores that could be affected. Section 7.2 of the WMP provides impact assessment criteria for both groundwater levels and groundwater quality. Section 7.1.1 of the 2014 WMP states that groundwater inflows will be estimated using total volumes of water pumped and rainfall measurements. Cross reference is also made to Environmental Procedure Document 2124 – Groundwater Inflow Monitoring in North Open Cut (Integra, 2010). (Recommendation IMC22/14).	IMC29/14 The Procedure to monitor Groundwater Inflows into the North Open Cut should be reviewed and updated to include (or provide cross reference to) sufficient information to enable personnel to implement the procedure. The procedure should also be extended to include the South Pit and underground workings. (Peer Review No. IMCgg/14) Whilst the current procedure generally provides an adequate methodology for calculating inflows, it does not provide sufficient information to properly implement the procedure. The procedure also does not provide for the calculation of groundwater inflows for other areas of the Integra Mine Complex. IMC22/14 The volume of groundwater inflows into the open cuts should be calculated / estimated in accordance with the 2014 Water Management Plan (and cross referenced procedure – see also Recommendation IMC29/14) and the details of the estimated volumes reported within the respective Annual Review. (Peer Review No. IMCq/14) The volumes of groundwater inflows do not appear to have been calculated / estimated or reported during the audit period. It is a requirement of Schedule 3 Condition 40 to monitor groundwater inflows and Schedule 5 Condition 3 to report monitoring results within the Annual Review. The measurement of the groundwater inflows are also required in order to determine that the Company has appropriate	Refer to recommendation S3.32
Biodiversity				
S3.44c	Biodiversity Management Plan The Proponent shall prepare and implement a Biodiversity Management Plan for the projects to the satisfaction of the Director-General. This plan must: (c) include: <ul style="list-style-type: none"> • a description of the short, medium, and long term measures that would be implemented to: <ul style="list-style-type: none"> implement the offset strategy; and manage the remnant vegetation and habitat, both on site and in the offset areas; • detailed performance and completion criteria for the implementation of the offset strategy; • a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: <ul style="list-style-type: none"> - implementing revegetation and regeneration within the offset areas, including establishment of canopy, sub-canopy (if relevant), understorey and ground strata; - maximising salvage and beneficial use of resources in areas that are to be impacted, including vegetative, soil and cultural heritage resources; - protecting vegetation and soil outside the areas to be impacted; - rehabilitating Bettys Creek and Main Creek; - managing salinity; - conserving and reusing topsoil; - undertaking pre-clearance surveys; - managing impacts on fauna; - landscaping the site to minimise visual impacts; - collecting and propagating seed; - salvaging and reusing material from the site for habitat enhancement; - controlling weeds and feral pests, including terrestrial and aquatic species; - managing grazing and agriculture on site and in the biodiversity offset areas; 	Non compliant - Management strategies are provided for five vegetation communities within and surrounding the BOAs, waterways, topsoil, fauna, although it is noted that the performance criteria are only generalised and often not auditable. In some areas, the performance criteria provided are not criteria but more appropriately references to reporting or particular actions to be followed (Recommendation IMC32/14). Section 4 includes a range of management strategies and not necessarily specific measures that could be implemented following the review of the document (Recommendation IMC32/14). The management strategies in Section 4.1 are generalised and do not distinguish between vegetation levels.	IMC32/14# During the next revision of the Biodiversity Management Plan, more auditable performance criteria should be included in the document for all land management measures, e.g. seasonal/annual photo point monitoring of offset areas. The current version of the Biodiversity Management Plan incorporates a range of management strategies which are somewhat generic and, as a consequence, provide little direction for on-site personnel to follow in order to achieve the biodiversity objectives. The provision of more auditable performance criteria with the management strategies will assist site personnel to better assess the progress with the biodiversity-related issues on site. IMC33/14 During the next revision of the Biodiversity Management Plan, the items not fully covered in the Plan (listed in Condition 3(44)(c)) should be addressed in full. The current Biodiversity Management Plan will benefit from its revision including each of the nominated items in the condition. IMC34/14 Greater emphasis should be placed in future documents upon cross-referencing other internal documents (e.g. procedures) to the generalised management strategies in the Biodiversity Management Plan. The range of documents reviewed for the IMC, such as the Biodiversity Management Plan (and Rehabilitation Management Plan), contain generic text which needs to be supported by site-specific procedures. Cross referencing these procedures in the key plans would be sufficient and provide site-based personnel with clear directions of where the operational detail is documented.	Recommendation to be incorporated in the next revision of the Biodiversity Management Plan.

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
S3.44c	controlling access; - bushfire management; and - managing potential conflicts between the offset areas and Aboriginal cultural heritage values; • a description of the potential risks to the successful implementation of the biodiversity offset strategy, and a description of the contingency measures that would be implemented to mitigate these risks; • a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria; and • details of who would be responsible for monitoring, reviewing, and implementing the plan.		IMC35/14* During the next review of the Biodiversity Management Plan, the following matters should be addressed. • Highlight up front the biodiversity values for the site, as identified through the EA, and actions focused around the protection and offset of these species and ecological communities and habitat for such. (Peer Review No. IMCE/1) • Clearly outline the implementation of the revegetation/regeneration within the offset areas including itemisation of specific tasks, provision of checklists and timeframes, assigned responsibility and provide species lists and sourcing locations to align with vegetation communities and strata to be rehabilitated. (Peer Review No. IMCE/2) • Align flora monitoring methodology (BMP, Section 5.1.1) with the latest BioBanking methodology. (Peer Review No. IMCE/3) • Within the weed and pest management plan, clearly outline the method of approach for each weed and pest species, the seasonal target timeframe and yearly approach and performance criteria. (Peer Review No. IMCE/4) • Detail the biodiversity offset (Section 6) area progress in terms of actions undertaken in the year prior and relative performance measures. (Peer Review No. IMCE/15) During the biodiversity peer review, Biosis has identified a range of areas in which the Biodiversity Management Plan could be improved.	Recommendation to be incorporated in the next revision of the Biodiversity Management Plan.
Rehabilitation				
S3.56	Rehabilitation Objectives The Proponent shall rehabilitate the site to the satisfaction of the Director-General of DRE. This rehabilitation must be generally consistent with both the rehabilitation strategy described in the open cut and underground project EAs – and depicted conceptually in the figure in Appendix 9 – and the objectives in Table 19.	Compliant - A review of the rehabilitation progress in the 2011 AEMR and 2013 AEMR (dated 28/09/14) and the MOP (2014 to 2017) indicates that the relevant key objectives at this stage are generally being satisfied, although it is noted that not all proposed tree planting (Appendix 9 – Figure A) in the completed areas have yet been undertaken (see Recommendation IMC40/14). It would greatly assist in the evaluation of future rehabilitation and rehabilitation progress if a set of overlays are prepared identifying the year/season in which each area has undergone: • completion of landform reconstruction/soil placement and commencement of soil stabilisation, i.e. seeding/fertilising. • Commencement of tree planting, where relevant.	IMC40/14 The extent of tree planting on rehabilitated landforms should be reviewed and compared with the areas nominated in the Rehabilitation Management Plan. A program should then be prepared and implemented to plant the areas not yet planted. A comparison of the progress with woodland planting as displayed in the 2013 Rehabilitation Management Plan / Appendix 9 (Figure A) in Project Approval suggests that the Company’s program for tree planting on areas that have been re shaped and stabilised should be increased.	ICO is compliant with condition S3.56. Recommendation noted.
S3.58a	Rehabilitation Management Plan The Proponent shall prepare and implement a Rehabilitation Management Plan for the Integra mine complex to the satisfaction of the Director-General of DRE	2012 – 2015 Rehabilitation Management Plan approved by NSW P&I on 1 June 2012 although no correspondence was sighted from DRE (see Recommendation IMC52/14). Overall, the document is too generic to assist site personnel to plan and undertake the required rehabilitation activities in the manner required (see Recommendation IMC41/14).	IMC52/14 All documentation identified as “not available” should be located and incorporated in the electronic database / file. Not all relevant documentation, particularly correspondence, was located during and following the audit inspection. IMC41/14 The next version of the Rehabilitation Management Plan should more fully address the requirements of Condition 58a and 58b and either provide a greater level of detail on the various domains or cross-reference to other internal documents where the relevant detail is presented. The text within the Rehabilitation Management Plan (RMP) is somewhat generic and future on-site personnel would benefit from the inclusion of more detail or the cross referencing to procedures manuals, etc. that are maintained on site.	IMC52/14 ICO will undertake further efforts to locate documentation identified as "not available". IMC41/14 - Mining Operations Plan (MOP) covers specific rehabilitation commitments from December 2014 - September 2017. Recommendation to be raised with DRE to determine if approved MOP meets RMP requirements for S3.58.
SCHEDULE 5 - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Management				

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
S5.2a	Management Plan Requirements The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: a) detailed baseline data;	Compliant - Where relevant the management plans include baseline data (air and water) (Recommendation IMC23/14). All required management plans include a summary of the relevant statutory requirements, limits / criteria and performance indicators.	IMC23/14 The Surface Water Baseline Data (Appendix C) within the 2014 Water Management Plan should be expanded to include additional analytes and water level monitoring for all sites included within the surface water monitoring program. (Peer Review No. IMCr/14) Currently baseline data is only provided for pH and Electrical Conductivity within Glennies Creek and Station Creek. However, the surface water monitoring program also includes sampling within Bettys Creek, Main Creek, Martins Creek, Stony Creek, Blackwattle Creek and Tisdells Creek and includes a range of other analytes and water level monitoring. To enable ongoing comparison and evaluation of trends, baseline data for all monitoring sites should be compiled.	Water Management Plan is compliant with condition S3.40d. Recommendation noted.
S5.3a	Annual Review By the end of March 2012, and annually thereafter, the Proponent shall review the environmental performance of the projects to the satisfaction of the Director-General. This review must: c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;	Non-compliant - A specific compliance review is not undertaken as part of the Annual Reviews (Recommendation IM49/14).	IMC49/14 The Annual Reviews should include as an appendix a compliance review against the conditions of Project Approval 08_0101 and 08_0102. Schedule 5 Condition 3(c) requires the Annual Reviews to identify any non-compliance during the reporting period and actions being taken. Whilst a review of the recommendations from the previous Independent Environmental Audit is provided, no formal or methodical review of compliance is presented for the report year. Formal review of compliance should not be restricted to 3 yearly independent audits.	ICO will incorporate into next Annual Review.
Access to Information				
S5.10a	From the end of December 2010, the Proponent shall: (a) make copies of the following publicly available on its website: • the documents referred to in Conditions 2 and 3 of Schedule 2; • all current statutory approvals for the projects; • all approved strategies, plans and programs required under the conditions of this approval; • the monitoring results of the projects, reported in accordance with the specifications in any conditions of this approval, or any approved plans or programs; • a complaints register, updated on a monthly basis; • minutes of CCC meetings; • the annual reviews of the projects; • any independent environmental audit of the projects, and the Proponent's response to the recommendations in any audit; and • any other matter required by the Director-General;	Environmental Assessment Glennies Creek Open Cut Coal Mine dated October 2007 could not be located on the website (Recommendations IMC55/14 and IMC56/14). All current approvals were located. Currently approved strategies, plans and programs were located. At the time of the audit, monthly monitoring reports to September 2014 were available on the Company website. Improvements in the recording and reporting of noise monitoring results are suggested (Recommendation IMC04/14). At the time of the audit inspection, monthly complaints summaries were available to May 2014. Complaints received since that time have not been uploaded to the website (Recommendations IM55/14 and IMC56/14). At the time of the audit inspection, the last CCC meeting minutes available were for the May 2014 meeting. The minutes for the 04 August 2014 meeting were not available on the website (Recommendations IMC55/14 and IMC56/14). Annual Reviews were available. The 2011 Independent Environmental Audit was available. Responses to the recommendations are included in the each Annual Review. Train movement records are provided, however, at the time of the audit inspection, records were only available to July 2014 (Recommendations IMC55/14 and IMC56/14).	IMC55/14 The Company's website should be checked and updated on a regular basis, at least monthly, with all required monitoring data and reporting. A number of reports and monitoring results were not up to date on the website as required by Schedule 5 Condition 10 of Project Approval 08_0101 and 08_0102. IMC56/14 Consideration should be given to including a date of publication / upload for documentation uploaded to the Company website. Alternatively, another system may be implemented which records this information. Whilst date stamping is not a conditional requirement, its use assists confirmation of compliance with conditional timeframes for publication of data and reports. It is also a useful tool for the Company in maintaining relevant and up-to-date information on the website. IMC04/14 The noise consultant should be requested review the quarterly noise reports to: – include a definitive review and statement of compliance, or otherwise, for all noise limits, including cumulative noise; and – state the stability class instead of / as well as the Sigma/Theta value. All monitoring reports should provide definitive assessments of compliance against relevant limits and include sufficient information for the reader to interpret the results without reference to additional documentation.	IMC55/14 Review of website information has been completed to ensure documentation and reports are up-to-date. IMC56/14 - Recommendation noted. IMC04/14 - If ICO recommences operational activities or if relevant government agencies deem that attended noise monitoring is required while ICO is under care and maintenance, quarterly noise reports will be updated as per the recommendation.
S5.10b	From the end of December 2010, the Proponent shall: (b) keep this information up-to-date, to the satisfaction of the Director-General.	Non-compliant - A number of items were not up to date at the time of the audit inspection, (Recommendations IMC55/14 and IMC56/14).	IMC55/14 The Company's website should be checked and updated on a regular basis, at least monthly, with all required monitoring data and reporting. A number of reports and monitoring results were not up to date on the website as required by Schedule 5 Condition 10 of Project Approval 08_0101 and 08_0102. IMC56/14 Consideration should be given to including a date of publication / upload for documentation uploaded to the Company website. Alternatively, another system may be implemented which records this information. Whilst date stamping is not a conditional requirement, its use assists confirmation of compliance with conditional timeframes for publication of data and reports. It is also a useful tool for the Company in maintaining relevant and up-to-date information on the website.	Refer to implementation for S5.10(a)
APPENDIX 10 - STATEMENT OF COMMITMENTS - Underground Project Statement of Commitments				
Surface Water				

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
U48	<ul style="list-style-type: none"> ICO will maintain a photographic record of the creeks and dam walls to determine historical (baseline) rates of erosion. 	<p>Compliant - Advised that weekly photographs are taken of prescribed dam walls for Possum Skin Dam and Tailings Dam 2.</p> <p>Sighted photomonitoring records for Main Creek. No systematic photographing of other creeks were available.</p> <p>Recommendation IMC24/14.</p>	<p>IMC24/14 Systematic photographic monitoring should be undertaken of all monitored creeks. This could be undertaken concurrently with water quality monitoring. (Peer Review No. IMCy/14)</p> <p>Statement of Commitment No. U48 requires the maintenance of a photographic record of creeks and dam walls to determine baseline rates of erosion. Currently photographic records are only available for Main Creek.</p>	Incorporate photo records into the consultant scope of work for water quality monitoring. June 2015.
U57	<ul style="list-style-type: none"> Integra Coal will ensure it has sufficient water to meet mine operational demands in accordance with the statutory rules of the Hunter Regulated River Water Sharing Plan (HRRWSP) and/or Hunter Unregulated River and Alluvium Water Sharing Plan (HURAWSP), and any other statutory instruments in force under the Water Act 1912, and Water Management Act 2000. Should insufficient water be available to continue mining operations, mining operations will be scaled back to meet water supply requirements. 	<p>The principal water source is 'dirty water' from dam D1 which received flows from the open cuts, portal sump and Possum Skin Dam. If required, water can also be sourced from the sediment dams, flows from the clean water diversion system and licenced extraction from Glennies Creek.</p> <p>The Company currently holds a total of 700ML of groundwater entitlements and 1,268.2ML of surface water entitlements.</p> <p>During the reporting period, no water was sourced from the clean water system or Glennies Creek. However, no data was available to validate the likely groundwater inflow volumes (Recommendation IMC22/14).</p>	<p>IMC22/14 The volume of groundwater inflows into the open cuts should be calculated / estimated in accordance with the 2014 Water Management Plan (and cross referenced procedure – see also Recommendation IMC29/14) and the details of the estimated volumes reported within the respective Annual Review. (Peer Review No. IMCq/14)</p> <p>The volumes of groundwater inflows do not appear to have been calculated / estimated or reported during the audit period. It is a requirement of Schedule 3 Condition 40 to monitor groundwater inflows and Schedule 5 Condition 3 to report monitoring results within the Annual Review. The measurement of the groundwater inflows are also required in order to determine that the Company has appropriate water entitlements for the volume of water take.</p>	See Recommendation Implementation S3.32.
Rehabilitation				
U.78	<ul style="list-style-type: none"> Rehabilitation associated with proposed mining will be undertaken in accordance with the relevant MOP, REMP, Extraction Plans and SMPs. 	<p>Compliant - A review of the rehabilitation progress in the 2011 AEMR and 2013 AEMR (dated 28/09/14) and the MOP (2014 to 2017) indicates that the relevant key objectives at this stage are generally being satisfied, although it is noted that not all proposed tree planting (Appendix 9 – Figure A) in the completed areas have yet been undertaken (see Recommendation IMC40/14).</p>	<p>IMC40/14 The extent of tree planting on rehabilitated landforms should be reviewed and compared with the areas nominated in the Rehabilitation Management Plan. A program should then be prepared and implemented to plant the areas not yet planted.</p> <p>A comparison of the progress with woodland planting as displayed in the 2013 Rehabilitation Management Plan / Appendix 9 (Figure A) in Project Approval suggests that the Company's program for tree planting on areas that have been re shaped and stabilised should be increased.</p>	Condition is generally being satisfied. Consideration given to planting additional trees if deemed necessary.
Soils and Land Capability				
B1	Strip material to the depths stated in Table 6-3.	<p>(Table 6-3 from the Integra Open Cut Environmental Assessment, June 2009).</p> <p>Advised that the required stripping depths were undertaken.</p> <p>The current MOP does not specifically reference these depths (Recommendation IMC25/14).</p>	<p>IMC25/14 Ensure that future MOPs provide specific soil stripping, handling and stockpile procedures including stripping depths. (Peer Review No. IMCaa/14)</p> <p>Statement of Commitment No. B1 requires different soils to be stripped to specific depths, however, the current MOP does not specify these details.</p>	To be included in future MOPs.
B12	Topsoil will be spread to a nominal depth of 0.10m.	<p>Advised operator training is undertaken and spot testing completed for spread soil. No formal reporting / records are retained (Recommendation IMC22/14).</p>	<p>IMC44/14 Formal rehabilitation monitoring and reporting should be undertaken to record the progression of rehabilitation against the performance indicators within the Mining Operations Plan.</p> <p>Statement of Commitment No. B12 requires topsoil to be spread to a nominal depth of 0.1m. Whilst it is advised that the operator is trained to do this and spot testing is completed, no formal records are retained. Additional performance criteria are also specified within the Mining Operations Plan.</p>	Recommendation noted. ICO to consider implementation of a rehabilitation checklist to ensure records of topsoil depth and rehabilitation requirements are achieved.
Ground Water				
C6	The amount of water pumped into or out of the proposed Pit will be monitored to assess the actual volume of water stored within the pit as well as to assess the groundwater inflows and evaporation effects.	<p>Whilst the WMP provides for monitoring to calculate inflows, no data was available to validate the likely groundwater inflow volumes (Recommendation IM22/14).</p>	<p>IMC22/14 The volume of groundwater inflows into the open cuts should be calculated / estimated in accordance with the 2014 Water Management Plan (and cross referenced procedure – see also Recommendation IMC29/14) and the details of the estimated volumes reported within the respective Annual Review. (Peer Review No. IMCq/14)</p> <p>The volumes of groundwater inflows do not appear to have been calculated / estimated or reported during the audit period. It is a requirement of Schedule 3 Condition 40 to monitor groundwater inflows and Schedule 5 Condition 3 to report monitoring results within the Annual Review. The measurement of the groundwater inflows are also required in order to determine that the Company has appropriate water entitlements for the volume of water take.</p>	Refer to S3.32.
Surface Water				

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
D10	After construction of drainage works is complete, disturbed areas will be topsoiled and revegetated using a combination of pasture grasses and cover crops to stabilise the ground surface.	Drainage works were observed to be soiled and revegetated with groundcover species. Despite this, some areas of erosion / scouring within the dirty water management system were observed (Recommendation IMC26/14).	IMC26/14 The scouring and erosion within the dirty water management system for the South Pit should be repaired and stabilised. (Peer Review No. IMCdd/14) A number of scours and erosion areas were observed within the catch drains for the South Pit dirty water system. Whilst these are wholly contained within the dirty water catchment, ongoing erosion could limit the effectiveness of the system and/or potential contribute to an incident.	ICO will strive to repair scouring and erosion within the South Pit dirty water system. Implementation Date November 2015.
D11	As part of the rehabilitation activities, above ground landforms will feature drainage provisions designed to effectively capture and divert surface water run-off to stable disposal areas prior to being discharged into surrounding watercourses.	The clean water diversions appeared stable. However, some additional measures are recommended to ensure that dirty water cannot mix with clean water (Recommendation IMC27/14).	IMC27/14 The clean and dirty water drainage systems should be fully reviewed and opportunities identified to reduce the risk of water mixing between the systems. This should include, but not be limited to: – changing the camber of the road between the clean and dirty water drains adjacent Dam D1 to drain towards the dirty water drain rather than the clean water drain; and – measures to reduce the risk of dirty water from the dirty water drain at “the cattle yards” overflowing into the downslope clean water drain. (Peer Review No. IMCee/14) A number of potential risks were identified where dirty water and clean water could mix. Proactive management of such risks will help reduce the likelihood of an incident and maintain best practice management.	ICO has conducted a cleanout of both clean water and dirty water drains to reduce to likelihood of mixing between systems.
Biodiversity				
E8	Revegetation of suitable components of the Open Cut Area will be undertaken using species representative of the Ironbark Woodland.	This requirement needs to be addressed in updated rehabilitation plans (Recommendation IMC43/14	IMC43/14 The revegetation of suitable components of the Open Cut Area should be undertaken using species representative of the Ironbark Woodland. This is a requirement within the Statement of Commitments (No. E8).	ICO to include in next revision of Biodiversity Management Plan.
Noise and Blasting				
G5	Initiate regular discussions with potentially affected residents to proactively identify noise-related issues of concern.	Discussions are formally held through response to complaints and CCC meetings. Advised that informal contact is also made to advise residents of operations (Recommendation IMC48/14).	IMC48/14 Formal records should be retained of all discussions / contact with government agencies, surrounding operators and landholders. Appropriate records of relevant ‘informal’ contact should also be retained including date, time, person(s) and any commitments / statements. Whilst it is advised that various informal contact has been made with surrounding landholders regarding ‘issues of concern’, no records were available. A centralised system for recording these matters would both assist in providing continuity in community and government management (as Company personnel change) but also assist the Company in demonstrating that the ‘issues of concern’ have been appropriately addressed	Recommendation is in place and occurring.
Air Quality				
H1	Only the minimum area required for the operation of the Open Cut Project will be disturbed. Reshaping, topsoil emplacement and rehabilitation of overburden emplacement areas will occur as soon as practicable after the completion of overburden emplacement.	A review of the rehabilitation progress in the 2011 Annual Review and 2013 Annual Review (dated 28/09/14) and the MOP (2014 to 2017) indicates that the relevant key objectives at this stage are generally being satisfied, although it is noted that not all proposed tree planting (Appendix 9 – Figure A) in the completed areas have yet been undertaken (see Recommendation IMC40/14).	IMC40/14 The extent of tree planting on rehabilitated landforms should be reviewed and compared with the areas nominated in the Rehabilitation Management Plan. A program should then be prepared and implemented to plant the areas not yet planted. A comparison of the progress with woodland planting as displayed in the 2013 Rehabilitation Management Plan / Appendix 9 (Figure A) in Project Approval suggests that the Company’s program for tree planting on areas that have been re shaped and stabilised should be increased.	Condition is generally being satisfied. Consideration given to planting additional trees if deemed necessary.
Rehabilitation				
L4	The outside facing slopes of the post-mine landform will generally be a maximum of 10° where they are above the natural land surface. The internal facing slopes and those below natural surface reporting to the final void (including the low wall areas) will generally be a maximum of 18°.	It was not possible during the audit inspection to inspect all of the post-mine landforms. It is therefore not possible to assess compliance. It would be desirable for slope maps to be prepared on the rehabilitated areas based on aerial photographic contours – preferably on a regular (e.g. 2 yearly) basis (Recommendation IMC42/14).	IMC42/14 Slope maps should be prepared (based on final landform contours) to demonstrate that the post-mine landform at the IMC complies with the maximum slopes of 10° (external) and 18° (internal). Maps displaying final slopes would greatly assist to confirm (or otherwise) that the required final slopes are being achieved.	Recommendation noted. Consideration given to preparing contour map overlay.

Clause	Project Approval Requirement	Audit Finding	Recommendation	Recommendation Implementation Target Date
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