



Rix's Creek Mine- Rix's Creek North Response to Auditors Recommendations



Condition / Issue	Identified Non- Compliance	Non Compliance	Recommendation	Rix's Creek's Response	By Date
PA08_0102					
Schedule 3, Condition 2 Schedule 3, Condition 3 Schedule 3, Condition 4 Schedule 3, Condition 5	Noise monitoring does not assess the proportion of privately owned land for which exceedances may occur.	Administrative	Bloomfield either seek to modify the consent to remove the requirement to assess compliance of noise limits over vacant land or approval to complete noise modelling annually to validate noise monitoring results in this regard and report in the annual review or complete modelling as required in response to any complaints received in this regard.	Assessment of the condition will be undertaken annually and a report will be included in the Annual Review. Assessment will utilise the results of the monthly compliance attended noise monitoring and the predictive noise model for the same period to determine compliance. Bloomfield will seek removal of the condition at the next consent modification.	Annually by 31 March
Schedule 3, Condition 8			Bloomfield should seek to formalise the request of compliance reports from train operators to demonstrate that all locomotives are approved to operate on the NSW rail networks. Bloomfield should confirm with the Department appropriate conditions of RailCorp and ARTC EPL's that should be referenced here and that need to be complied with.	Bloomfield will request locomotive class information from Pacific National, Aurizon and Genesee & Wyoming rail providers to determine compliance with Condition E2 of EPL 3142 held by ARTC. This information will be provided in the Annual Review Report.	Annually by 31 March
Schedule 3, Condition 10 (e)	A cumulative protocol has not been developed in coordination with the nearby mines and included in the noise management plan as required.	Low	A formal protocol should be developed in consultation with the owners of the nearby mines as required and that it be included in the noise management plan for the Departments approval.	A draft protocol will be developed and sent to Integra Underground, Ashton and the Mount Owen Complex for consultation. Comments received from other mines during the consultation period will be used to prepare a protocol to minimise cumulative noise impacts from the mines. The requirements of the protocol will be included in the Rix's Creek Mine Noise Management Plan.	30 June 2018
Schedule 3, Condition 16 Schedule 3, Condition 27 Schedule 3, Condition 40			Bloomfield should follow up with the Department the status of the management plans that have been submitted for approval under these conditions.	All outstanding Management Plans have been approved as at end of December 2017.	Complete
Schedule 3, Condition 19 (f)	A cumulative protocol has not been developed in coordination with the nearby mines and included in the blast management plan as required.	Low	A formal protocol should be developed in consultation with the owners of the nearby mines as required and that it be included in the blast management plan for the Departments approval.	A draft protocol will be developed and sent to Ashton and the Mount Owen Complex for consultation. Comments received from other mines during the consultation period will be used to prepare a protocol to minimise and manage the cumulative blast impacts of the mines. The requirements of the protocol will be included in the Rix's Creek Mine Blast Management Plan.	30 June 2018
Schedule 3, Condition 22 Schedule 3, Condition 23	Air quality monitoring does not assess the proportion of privately owned land for which exceedances of the cumulative criteria may occur.	Administrative	Bloomfield either seek to modify the consent to remove the requirement to assess compliance of air quality criteria over vacant land or seek approval from the Department to complete air modelling annually to validate monitoring results in this regard and report in the annual review or complete modelling as required in response to any complaints received in this regard.	Assessment of the condition will be undertaken annually and a report will be included in the Annual Review. Assessment will model the results of the PM10 real time monitoring from the Rix's Creek Mine and the Upper Hunter Air Quality Monitoring Network to determine compliance. Bloomfield will seek removal of the condition at the next consent modification.	Annually by 31 March
Schedule 3, Condition 27 (c)	A cumulative protocol has not been developed in coordination with the nearby mines and included in the air quality and greenhouse gas management plan as required.	Low	A formal protocol should be developed in consultation with the owners of the nearby mines as required and that it be included in the AQGGMP management plan for the Departments approval.	A draft protocol will be developed and sent to Integra Underground, Ashton and the Mount Owen Complex for consultation. Comments received from other mines during the consultation period will be used to prepare a protocol to minimise and manage the cumulative air quality impacts of the mines. The requirements of the protocol will be included in the Rix's Creek Mine Air Quality and Greenhouse Gas Management Plan.	30 June 2018
Schedule 3, Condition 33	During the audit period three unplanned discharges occurred that were in exceedance of the EPL discharge limits.	Low	A review of the water management system, monitoring requirements and procedures should be completed with key findings used to update the water management plan for the Departments approval.	The Water Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
Schedule 3, Condition 36 (d)	Section 5.1.2.2 outlines Erosion and Sediment Control measures for Rix's Creek North, however does not cover all requirements listed under this condition.	Low	Detailed erosion and sediment control plans should be reviewed and updated to provide a consistent and coordinated approach and that these are included in the water management plan.	The Erosion and Sediment Control Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
Schedule 3, Condition 36 (e)	Surface water management plan does not include specific water quality trigger levels.	Low	The water management plan should be updated to include specific trigger levels for water quality as required by this condition.	The Water Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
Schedule 3, Condition 37			It is recommended that the Martins Creek Biodiversity Offset Area be confirmed by a surveyor and if it is below the minimum size advice should be sought from the Department as to whether the area needs to be increased or if any further offsetting arrangements are required to address this condition.	Area to be determined and advice to be sought from DPE.	31 December 2018
Schedule 3, Condition 40 (c)	No mention of measures to conserve and/or reuse topsoil in the biodiversity management plan. Further while measures are taken to ensure revegetation reflects that of a native ecosystem, there is no specific section that details how landscaping activities will be carried out to ensure visual impacts are minimised.	Low	Update the BDMP to include the following: - specific mention of introducing naturally scarce elements - specific reference in Section 2.6.8 as to how the measure included will manage salinity - measures to specifically address the reuse of topsoil - a section on pre-clearance surveys and the method - a section on how visual impacts will be minimised	The Biodiversity Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
Schedule 3, Condition 44			Incorrect reference to Project Approval Condition – Management Plan states this as Schedule 3, Condition 47 (actually 44) During the next revision of the HMP that this error should be corrected	The Heritage Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
Schedule 3, Condition 46 (c)	No evidence to support that lighting equipment considers AS 4282 (Int) 1995.	Administrative	Include a lighting component in an appropriate site management plan and ensure that procurement of all lighting for site complies with this standard.	The Heritage Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018

Schedule 3, Condition 52 (a), (c) & (e)	No evidence of the rehabilitation management plan being prepared in consultation with relevant agencies or the CCC prior to submission and approval. Section 5.2 of the rehabilitation management plan lists Rehabilitation Objectives, however not all of the objectives listed in Table 15 are addressed in the MOP including: - Final landforms designed to incorporate micro-relief and integrate with surrounding natural landforms - Ensure public safety - Minimise the risk of flood interaction for all flood events up to and including the Probable Maximum Flood.	Low	Include all Rehabilitation Objectives from Table 15 in the rehabilitation management plan as required by this condition.	The Rehabilitation Management Plan has been superseded by the Rix's Creek North Mining Operations Plan and was approved by the Division of Resources and Geosciences (DRG) on 28 November 2017. Rix's Creek Mine is required to submit a new MOP on the grant of ML1725, our portion of CL382. This is expected to occur during 2018. The new MOP including ML1725 will include the noted deficiencies.	31 December 2018
Schedule 5, Condition 5	Three incident reports were prepared and submitted to the Department during the audit period for uncontrolled water discharges from site. No evidence of a review or update of the WMP within 3 months of two of these incidents. Also no evidence of review and updates to management plans following the annual reviews during the audit period.	Low	A process of regular review and revision of management plans should be established to confirm compliance with this condition.	Compliance database utilising either M-Files or Pulse to be implemented.	30-Jun-18
Schedule 5, Condition 10 (c)	No formal or methodical review of compliance under this project approval presented for each reporting year in the annual reviews.	Low	A formal or methodical review of compliance under this project approval should be completed each year in the Annual Reviews.	Review of compliance under the project approval to be completed and reported in each Annual review	Annually by 31 March
Schedule 5, Condition 13	- Latest CCC minutes published on the Rix's Creek North website are dated February 2016, however the CCC has combined with Rix's Creek and the minutes from the latest meetings (including 20 September 2016 and 1 June 2017) which were for the combined sites are only published on the Rix's Creek website and are not on the Rix's Creek North website. - 2016 Annual Review has not been published on the Rix's Creek North website, however is located on the Rix's Creek website.	Administrative	Provide a link to CCC meeting minutes and Annual Reviews on the Rix's Creek North website and update website to explain that the two sites are operated together but under separate consents.	Website to be revised and updated to explain current operations	31 March 2018
Schedule 5, Condition 13	- 2014 Independent Audit of Rix's Creek North response to recommendations is not located on the website (sighted 24 October 2017). It was noted during the audit that this report was uploaded to the Vale website and had not yet been copied across following change of ownership.	Administrative	The 2014 Independent Audit of Rix's Creek North and response to recommendations should be uploaded to the Rix's Creek North website.	Completed	Completed
SoC B2, SoC B4	-No evidence provided to confirm that material will not be stripped in either extremely wet or dry conditions occurs and is not addressed in MOP. - No evidence provided to confirm that tracking over previously laid soil will be avoided to minimise compression effects occurs and is not addressed in MOP.	Administrative	Update the rehabilitation management plan in the MOP to include discussion on: <input type="checkbox"/> Material will not be stripped in either extremely wet or dry conditions <input type="checkbox"/> Tracking over previously laid soil will be avoided to minimise compression effects	The Rehabilitation Management Plan has been superseded by the Rix's Creek North Mining Operations Plan and was approved by the Division of Resources and Geosciences (DRG) on 28 November 2017. Rix's Creek Mine is required to submit a new MOP on the grant of ML1725, our portion of CL382. This is expected to occur during 2018. The new MOP including ML1725 will include the noted deficiencies.	31 December 2018
SoC B11	No inventory was able to be provided during the audit and not addressed in MOP.	Low	Update the rehabilitation management plan in the MOP to include discussion on: <input type="checkbox"/> An inventory of available soil will be maintained to ensure adequate topsoil materials are available for planned rehabilitation activities.	The Rehabilitation Management Plan has been superseded by the Rix's Creek North Mining Operations Plan and was approved by the Division of Resources and Geosciences (DRG) on 28 November 2017. Rix's Creek Mine is required to submit a new MOP on the grant of ML1725, our portion of CL382. This is expected to occur during 2018. The new MOP including ML1725 will include the noted deficiencies.	31 December 2018
SoC C5	There is no mention of Groundwater Dependent Ecosystems in the biodiversity offset strategy or rehabilitation management plan in the MOP.	Low	The rehabilitation management plan and or biodiversity management plan should be updated to detail how rehabilitation of groundwater dependent ecosystems will be undertaken. This update should include trigger thresholds for the groundwater management response	The Biodiversity Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
SoC C11			At next opportunity change commitment to 'Bloomfield' instead of 'ICO' in condition	Item to be addressed with DPE at the next Project Modificator	
SoC D5			At next opportunity liaise with the Department to remove portal sump from commitment as this is located at Integra Underground	Item to be addressed with DPE at the next Project Modificator	
SoC D7			Update the Erosion Sediment Control Plans to capture the commitment that If the weather outlook indicates future significant rainfall, water will be pumped out of any dirty water storage (with the potential to discharge offsite) that is within 100 mm of spilling, provided that a suitable alternative storage location is available elsewhere on the site	The Erosion and Sediment Control Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018
SoC H13 SoC H14			Include locations of new TEOMs (including the NW TEOM) in regards to the vicinity of residences listed under these SOC's in the AQGGMP	The Air Quality and Green House Gas Management Plan will be updated and submitted to the Department for review in accordance with Sch. 5 Cond. 5 of PA 08_0102. (by 19 April 2018).	19 April 2018