

PA 07_0087 - Schedule 5, Condition 8 - Updated Bloomfield Response to Recommendations in Independent Environmental Audit Report 2021

Auditors Conclusions and Recommendations		Bloomfield Response	Timeline
Schedule 2 Condition 15	The revision of management plans going forward will need to consider the outcomes of the required consultation in further detail to ensure compliance with this condition. Further for future revisions of management plans it should be confirmed with Department of Planning, Industry and Environment upfront whether additional consultation is required with listed agencies (in addition to consultation that has occurred for the original versions of the management plans).	When future revisions of management plans are required Bloomfield will confirm with DPI&E upfront whether additional consultation is required with listed agencies.	As and when required.
Schedule 3 Condition 3 (a)	It is recommended a program to monitor the effectiveness of the modelling software (comparing to monitoring data) to be incorporated into the noise monitoring program to ensure the accuracy of the software is maintained.	Noise Monitoring Plan updated. DPE approved 29/6/22	Complete
Schedule 3 Condition 3 (c)	It is recommended the Annual Review detail other noise mitigation measures such as noise suppression equipment to provide a comprehensive overview of the measures implemented at Bloomfield Colliery.	To be included in future Annual Reviews.	Complete
Schedule 3 Condition 16	It recommended Air Quality Monitoring Program to be updated to: <ul style="list-style-type: none"> • Ensure that the protocol in the Air Quality Monitoring Program provides clarity on how the incremental impact is determined so that compliance with the air quality impact assessment criteria in PA 07_0087 can more easily be evaluated. • include the locations of the two DustTrak monitors and meteorological station. • a description on how extraordinary events are identified. 	Air Quality Monitoring Program updated. DPE approved 29/6/22.	Complete

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Schedule 3 Condition 21	It is recommended that sediment dams be dewatered to the site water management system as required by <i>Managing Urban Stormwater: Soils and Construction Volume 2E – Mines and Quarries (DECC 2008)</i> .and that this requirement be appropriately documented in the WMP and site EMS.	Noted. A documented process will be developed to record dewatering activities as required.	
Schedule 3 Condition 21	As per the recommendation in the approved Erosion and Sediment Control Plan within the Water Management Plan Bloomfield should build up the toe of the rehabilitated batter on the main ROM haul road to act as armouring against the erosive fast flowing runoff water during intense storm events.	Noted. The area is adjacent to a main haul road and is used for the catchment of dirty water from the road surface The area will be shaped and rehabilitated during mine closure.	
Schedule 3 Condition 23 (f)	It is recommended that the Groundwater Management Plan be revised to include procedures for the verification of the groundwater model as required.	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	November 2022
Schedule 3 Condition 23 (f)	It is recommended to ensure consistency that reference to Bore IDs in the Groundwater Management Plan and Annual Reviews be updated correctly for future reporting.	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	November 2022
Schedule 3 Condition 25	It is noted that the performance indicators / completion criteria are different in the Mine Operations Plan, Rehabilitation Management Plan and Closure Plan for the site. The performance indicators and completion criteria are to be included in revised versions of the documents which are to be developed in accordance regulators authorities as required by the respective Project Approval Conditions.	The Rehabilitation Management Plan and Mine Closure Plan as required under MP 07_0087 have been updated. DPE approved 29/6/22.	Complete
Schedule 3 Condition 25	As noted in Section 7.1 of the Mine Operations Plan, the development and finalisation of the capping design for the U Cut tailings dam is in progress and due for completion by end December 2021. The outcomes of the capping strategy are to be included in an updated Mine Operations Plan to be prepared for the site following the completion of the additional studies scheduled for completion during December 2021, as detailed in Section 8.2.2 of the Mine Operations Plan.	The Resource Regulator has introduced new standard rehabilitation and reporting conditions on all mining leases. These new conditions will replace existing rehabilitation conditions and replaces current Mining Operations Plans. Bloomfield has engaged consultants GHD to assist in preparation of the Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed

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Schedule 3 Condition 25A	It is recommended to develop a rehabilitation plan for the remediation of the gullying observed to the east of U Cut Tailings Dam.	Gully observed in existing rehabilitation scheduled to be repaired as part of 2022 rehabilitation program.	2022
Schedule 3 Condition 25A	Undertake and complete the Landform and Rehabilitation Assessment as committed in the Mine Operations Plan. This assessment includes an objective of confirming if the historical and current landform is consistent with the approved operations. The outcomes of this assessment are to be included in a revised Mine Operations Plan to assist in the determination of whether the constructed landform is consistent with approved operations.	Landform and Rehabilitation Assessment in progress. The Resource Regulator has introduced new standard rehabilitation and reporting conditions on all mining leases. These new conditions will replace existing rehabilitation conditions and replaces current Mining Operations Plans. Bloomfield has engaged consultants GHD to assist in preparation of the targeted Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed
Schedule 3 Condition 25A	In conjunction with the completion of the proposed mitigation measures as detailed Table 20 (Section 9.2) of the Mine Operations Plan, it is recommended Bloomfield align the material balances of production and rehabilitation scheduling in the Mine Operations Plan (which are no longer current due to changes in mine planning, rates of mining and earlier completion of mining) to the new planned production and rehabilitation schedules to achieve the final landform.	The Resource Regulator has introduced new standard rehabilitation and reporting conditions on all mining leases. These new conditions will replace existing rehabilitation conditions and replaces current Mining Operations Plans. Bloomfield has engaged consultants GHD to assist in preparation of the targeted Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed
Schedule 3 Condition 26	It is recommended the Landscape Management Plan to be revised in consultation with Office of Environment and Heritage, DoI and Council.	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	Completed
Schedule 3 Condition 27	It is recommended that site capping material balances are reviewed following the finalisation of the tailings dam capping strategy. The topsoil balance is also to be reviewed to confirm whether adequate topsoil material is available for the completion of rehabilitation works onsite. If adequate topsoil is not available to achieve the nominated 100 mm placement of topsoil across remaining rehabilitation areas, identify priority utilisation areas or strategies to achieve successful rehabilitation relinquishment utilising the reduced topsoil volumes.	Soil balances to be reviewed when annual aerial photo and Lidar data capture is completed.	Completed

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Schedule 3 Condition 27	Topsoil and capping materials are to be demarcated and signposted in the field, with the volumes and quality of the material to be recorded as part of the site data management system.	Soil balances to be reviewed when annual aerial photo and Lidar data capture is completed.	Completed
Schedule 3 Condition 27	It is noted that the performance indicators / completion criteria are different in the Mine Operations Plan, Rehabilitation Management Plan and Closure Plan for the site. The performance indicators and completion criteria are to be included in revised versions of the documents which are to be developed in accordance with regulatory authorities as required by the respective Project Approval Conditions.	The Rehabilitation Management Plan and Mine Closure Plan required under MP 07_0087 have been updated. DPE approved 29/6/22.	Completed
Schedule 3 Condition 27	It is recommended that Bloomfield undertake a review of the appropriateness of the existing analogue sites to support performance indicators and comparisons for rehabilitation criteria and recommend additional sites as necessary	Two additional analogue sites (one pasture, one forest) have been established as part of a review of the rehabilitation monitoring program.	Completed
Schedule 3 Condition 28	It is recommended the location of final void in the Mine Operations Plan and Final Void Management Plan is reviewed to confirm a consistent void location is identified in each plan.	Final Void Management Plan updated. DPE approved 29/6/22.	Completed
Schedule 3 Condition 29	The Mine Closure Plan is required to be developed in consultation with DRG and Council. The rehabilitation objectives, performance indicators and completion criteria included in the Mine Closure Plan are also required to be updated to ensure they are consistent with other documents including the Mine Operations Plan and Rehabilitation Management Plan.	Mine Closure Plan updated. DPE approved 29/6/22.	Completed
Schedule 3 Condition 29	The Mine Closure Plan is required to be updated to reflect the outcomes of the Closure Execution Plan as defined in Section 8.2.2 of the Mine Operations Plan, which is due to be completed December 2021 as defined in the Mine Operations Plan.	Mine Closure Plan updated in accordance with Schedule 3, Condition 29. DPE approved 29/6/22.	Completed

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Schedule 3 Condition 29A	It is recommended that Bloomfield finalise the process of securing management of the site under Part 4, Division 12 of the National Parks and Wildlife Act 1974 with Biodiversity Conservation Trust.	Consultation with the NSW Biodiversity Conservation Trust (BCT) is ongoing. Bloomfield will contact BCT to progress site meeting proposed in BCT's last correspondence.	In progress. Site meeting completed.
Schedule 3 Condition 29B	It is recommended that Bloomfield undertake a review and update to the Biodiversity Offset Management Plan to include an appropriate mechanism and process to monitor the performance of the offset and to assess progress towards the completion criteria	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	30 November 2022
Schedule 3 Condition 29C	It is recommended that Bloomfield finalise the Biodiversity Stewardship Agreement for the offset site with Biodiversity Conservation Trust.	Consultation with the NSW Biodiversity Conservation Trust (BCT) is ongoing. Bloomfield will contact BCT to progress site meeting proposed in BCT's last correspondence.	In progress. Site meeting completed.
Schedule 3 Condition 31	It is recommended Bloomfield Colliery review and update the Aboriginal Cultural Heritage Management Plan in consultation with the Mindaribba Land Council and Office of Environment and Heritage as required and submit the plan to the Secretary for approval. As part of this review it is recommended Bloomfield consult with Abel to discuss the status of the regional monitoring network for Aboriginal heritage across the Abel mining area (including Bloomfield) as described in the plan and ensure annual monitoring is being conducted as outlined in the Aboriginal and Cultural Management Plan or make revisions as appropriate to account for current operations.	Updated draft Aboriginal Cultural Heritage Management Plan forwarded to Mindaribba Land Council for consultation. As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	Ongoing
Schedule 3 Condition 31A	It is recommended that Bloomfield seek confirmation from the Secretary that the Condition Assessments completed as per the requirements of this condition have been completed to their satisfaction.	The condition surveys of the Buttai Reservoir and Buttai Cemetery were submitted to the Department on 18 October 2018. Bloomfield will contact the Department to enquire about progress on the review of the surveys.	Completed

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Schedule 3 Condition 33	It is recommended that the Energy Savings Action Plan should be reviewed and revised in accordance with the requirements of this condition and submitted to the Secretary for approval. The revised plan should consider energy use by mobile equipment and include a details of a program to monitor the effectiveness of energy saving measures to reduce energy use on site.	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	February 2023
Schedule 5 Condition 4	It is recommended Bloomfield develop and implement an appropriate review tracking system to monitor and track plans and document reviews to demonstrate compliance with the requirements of this condition.	In 2021 Bloomfield implemented a compliance database (INX) to ensure that all requirements are adequately addressed.	Completed
Schedule 5 Condition 6	It is recommended that Bloomfield notify the Department and Resource Regulator of the TSS exceedances that occurred on 21/22 March 2021 against the EPL for the Project.	The TSS exceedance was reported to the EPA on 23 March 2021 and EPA reference number C04379-2021 was issued. This was a non-compliant discharge under Bloomfield EPL 396 and not an exceedance of the Project Criteria and therefore not required to be reported. Bloomfield believes that the event did not constitute environmental harm and therefore not reportable to the Department or Resource Regulator.	Complete
Noise Monitoring Program	It is recommended that Bloomfield's Noise Monitoring Program be subject to review and revision to ensure that noise monitoring covers Bloomfield operations within the Bloomfield Infrastructure Site in order to demonstrate compliance with applicable criteria (including rail criteria).	Noise Monitoring Plan updated. DPE approved 29/6/22	Completed
Air Quality Monitoring Program	It is recommended that Bloomfield's Air Quality Monitoring Program be subject to review and revision to ensure that air quality monitoring covers Bloomfield operations within the Bloomfield Infrastructure Site in order to demonstrate compliance with applicable criteria.	Air Quality Monitoring Program updated. DPE approved 29/6/22.	Completed

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Water Management Plan	It is recommended that Bloomfield seek to engage with DPE and have the revised WMP reviewed and approved so that it can be implemented. The revisions in the revised plan were made to ensure that water management covers Bloomfield operations within the Bloomfield Infrastructure Site	Revised Water Management Plan submitted via Portal on 12 August 2021. Notification of commencement of detailed assessment of the Plan made by Department on 24 November 2021. DPE approved 23/8/22	Completed
Rehabilitation	The rehabilitation maintenance inspection and works program is to be detailed in the Mine Operations Plan, with clarification of how the outcomes of the site inspection undertaken by site personnel will be utilised in the development of rehabilitation maintenance programs. The Mine Operations Plan update is also to include how the outcomes of the biennial rehabilitation monitoring will be utilised to determine whether there are any rehabilitation maintenance works required to be completed at site.	The Resource Regulator has introduced new standard rehabilitation and reporting conditions on all mining leases. These new conditions will replace existing rehabilitation conditions and replaces current Mining Operations Plans. Bloomfield has engaged consultants GHD to assist in preparation of the targeted Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed
Water Management	It is recommended that the Overland Dam be resized appropriately to account for the large area of catchment that reports to it and ensure its design capacity prevents future uncontrolled discharges.	Works have commenced on increasing pump capacity, desilting and enlarging the Overland Dam.	In progress
Water Management	It is recommended Bloomfield incorporate requirement to monitoring in accordance with Approved methods for sampling and analysis of water pollutants in NSW (NSW EPA, 2021 version currently in draft format) into the Water Management Plan and confirm that their sampling procedures and the laboratory analysis undertaken is in accordance with the document.	As required under Schedule 5 Condition 4 all management plans will be reviewed and, if necessary, revised to the satisfaction of the Secretary.	November 2022