

2024 INDEPENDENT ENVIRONMENTAL AUDIT REPORT BLOOMFIELD COLLIERY

January 17, 2025





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Executive Summary

Atlantech Pty Ltd (Atlantech) was engaged by Bloomfield Collieries Pty Ltd (Bloomfield) to conduct an Independent Environmental Audit (IEA) of Bloomfield Colliery.

Bloomfield Colliery operates under Project Approval (PA) 07_0087 MOD4. As such, this audit addresses the requirements of PA 07_0087 Schedule 5 Condition 7.

The objective of the IEA was to determine the environmental performance and compliance status of Bloomfield Colliery against relevant regulatory approvals for the period 2 November 2021 to 1 November 2024. The audit scope was aligned with the following:

- Relevant conditions of the project approvals provided in Section 1.4.1;
- Section 3.3 of the *Independent Audit Post Approval Requirements* (2020) document; and
- Input obtained from relevant agencies (refer to Section 2.2).

The audit commenced on 19 November 2024 with the audit opening meeting. A site inspection was completed on the 19 and 20 November 2024.

The IEA identified a total of 12 non-compliances against conditions of PA 07_0087 and EPL 396 and no non-compliances against ML1738 and CCL761 during the audit period. Recommendations to address these non-compliances are provided in Section 4 of the report.

Overall, good environmental management practices were identified, with the following observations of keynote:

- There were no exceedances of the noise, air quality or blasting impact assessment criteria during the audit period.
- Weed control activities undertaken onsite and in the biodiversity offset area are recorded and tracked via an online mapping platform to determine effectiveness of control efforts and inform future activities.
- An internal Permit to Modify process has been established and is used to assess proposed site activities against current approvals in place for Bloomfield Colliery. The process ensures activities onsite are carried out in accordance with current state and federal approvals.
- Bloomfield have developed and implemented a rehabilitation quality control process during the audit period. This process includes a job breakdown structure for each element of rehabilitation and a hold/sign off point at the end of each stage. The process ensures implementation of rehabilitation is aligned to final landform design and the rehabilitation objectives.
- Pasture rehabilitation areas are being utilised for cattle grazing and results of the rehabilitation monitoring program show these areas are self-sustaining and producing quality forage to maintain cattle production





1. Introduction

Atlantech Pty Ltd (Atlantech) was engaged by Bloomfield Collieries Pty Ltd (Bloomfield) to conduct an Independent Environmental Audit (IEA) of Bloomfield Colliery as required by Schedule 5, Condition 7 of Project Approval (PA) 07_0087.

1.1 Background of the Project

Bloomfield Colliery is an open cut coal mine located in Ashtonfield, New South Wales (refer to Figure 1). The mine is owned and operated by Bloomfield Collieries Pty Limited (Bloomfield). Coal has been mined within the area for approximately 170 years through previous underground operations and current open-cut mining operations.

Project Approval (07_0087) was granted by the Minister for Planning under Part 3A of the Environment Planning & Assessment Act 1979 (EP&A Act) to allow for the completion of open cut mining operations and rehabilitation. The approval was issued 3 September 2009 and is subject to a number of conditions. Four variations to modify the Project Approval under s75W of the EP&A Act have been granted for the site.

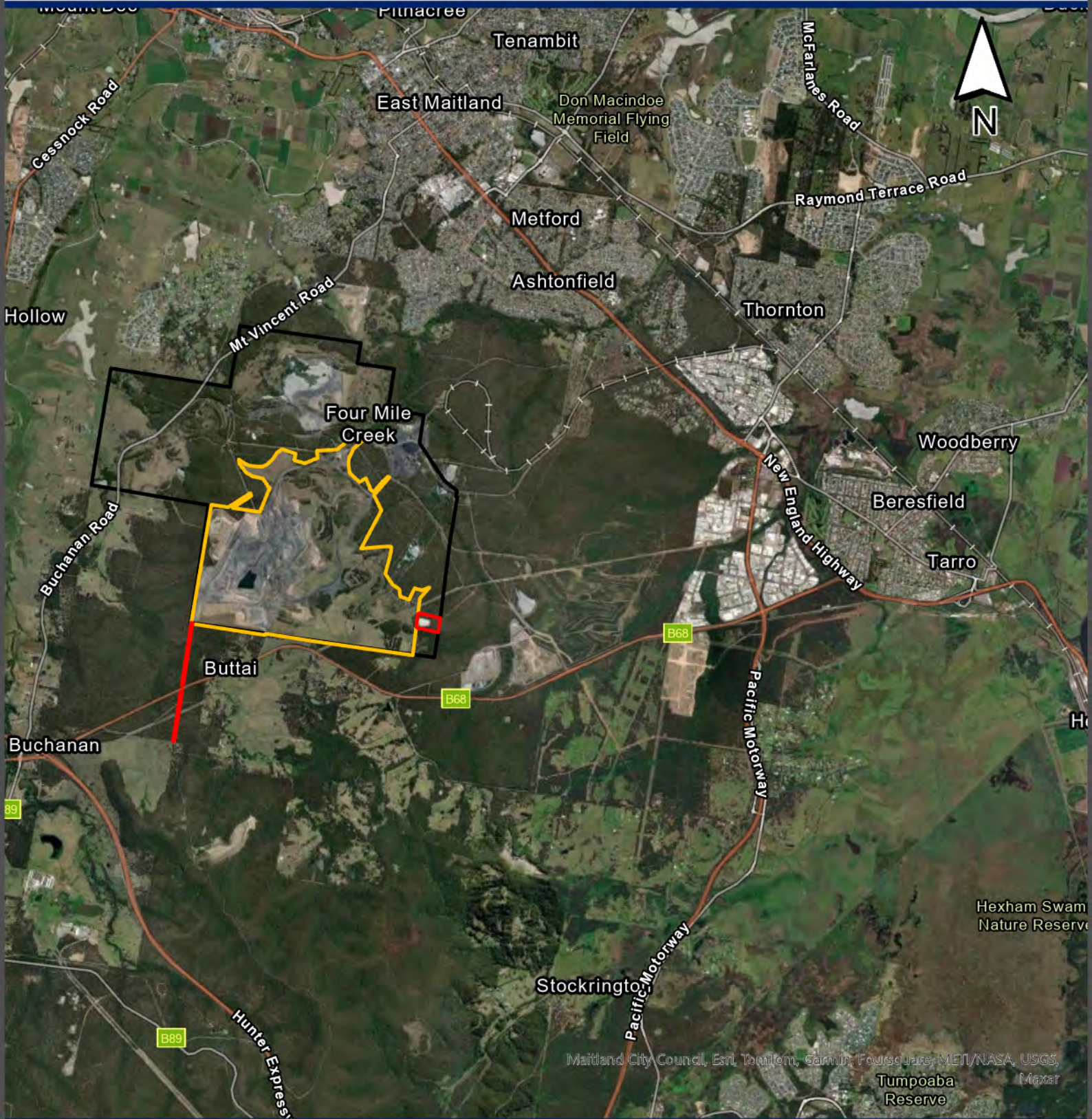
1.1.1 Relationship with Abel Underground Coal Mine

Abel Underground Mine is located immediately to the south-east of Bloomfield Colliery and is approved under PA 05_0136. The Abel Consent (PA 05_0136) provides approval for the Bloomfield Infrastructure Site which includes the Bloomfield CHPP and rail loading facility. Bloomfield Colliery is permitted to use the Bloomfield CHPP and rail loading facility under PA 05_0136 and are required to operate in accordance with the conditions of PA 05_0136 where they apply to the Bloomfield Infrastructure Site.

The activities and conditions under PA 05_0136 are outside the scope of this audit.



Site Locality



- PA07_0087
- ML1738
- CCL761

0 0.75 1.5 3
Kilometers

Date Created: 2/12/2024
Map Created By: J Pawson
Map Size: A4 Portrait
Coordinate System: GDA2020 MGA Zone 56
Map Reference: ATLGIS24-014_A4-1

Figure 1



1.2 The Audit Team

The IEA team members, including required technical specialists, are listed in Table 1.

Table 1: Bloomfield Colliery 2024 IEA team.

Name	Company	Audit Team Role
Samantha Hovar	Atlantech	Lead Auditor
Nina Rotton	Atlantech	Assistant Auditor
Dr Adam Wyatt	Engeny	Specialist Surface and Groundwater

1.3 Audit Objectives

The objective of the IEA was to determine the environmental performance and compliance status of Bloomfield Colliery against the regulatory approvals outlined in Section 3.1.

1.4 Audit Scope

The audit scope was aligned with the following:

- Relevant conditions of the project approvals provided in Section 1.4.1;
- Section 3.3 of the Department of Planning, Housing and Infrastructure (DPHI) *Independent Audit Post Approval Requirements* (2020) document; and
- Input obtained from relevant agencies (refer to Section 2.2).

1.4.1 Relevant Project Approval Conditions

The IEA requirements of PA 07_0087 are outlined in Table 2.

Table 2: Project Approval conditions.

Approval Condition	Requirement
PA 09_0087 Schedule 5, Condition 7	Every 3 years, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) Be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) Include consultation with the relevant agencies and the CCC (c) Assess the environmental performance of the project and whether it is complying with the relevant requirements of this approval and any relevant





Approval Condition	Requirement
	EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) Review the adequacy of any approved strategies, plans or programs required under these approvals, and (e) Recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, strategy, plan or program required under the abovementioned approvals. Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary
PA 09_0087 Schedule 5, Condition 8	Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary

1.5 Audit Period

The previous IEA undertaken in 2021 by Umwelt for Bloomfield Colliery covered operations occurring between 31 October 2018 and 1 November 2021.

The period to which this audit applies is inclusive of 2 November 2021 to 1 November 2024.

2. Audit Methodology

The audit was carried out in accordance with the requirements of ISO 19011:2018 *Guidelines for auditing management systems* and the DPHI *Independent Audit Post Approval Requirements* (2020).

2.1 Selection and Endorsement of Audit Team

The audit team was approved by DPHI on 27 September 2024 to undertake the IEA of Bloomfield Colliery. A copy of the endorsement letter from DPHI is provided in Appendix B.

2.2 Scope Development and Consultation

The audit scope was developed in accordance with the DPHI *Independent Audit Post Approval Requirements* (2020).





On 30 October 2024, Atlantech requested from DPHI input into the audit scope as well as confirmation of any other parties or agencies to be consulted during development of the audit scope. A response was received from DPHI on 5 November 2024 with a list of aspects to be considered during the audit. These aspects included:

- Review implementation of the Biodiversity Offset Management Plan.
- Surface and groundwater specialist review of the relevant management plans and the effective implementation of these plans, as well as a detailed assessment of the current water infrastructure to ensure they are functioning effectively and are compliant with all relevant standards.

Additionally, DPHI requested that Maitland City Council and any other relevant councils in relation to the biodiversity offset area be consulted during development of the audit scope. The relevant councils were contacted. However, Maitland City Council provided no response and Cessnock City Council had no additional input.

The Bloomfield Colliery CCC was also consulted on 1 November 2024 for input into the audit scope. A response was received on 8 November 2024 requesting the following aspects be considered in the audit scope:

- Review all complaints, exceedances and non-compliances, the corrective actions taken and whether these corrective actions were effective in preventing the non-compliance recurring; and
- Review the National Greenhouse Gas and Energy Reporting Scheme results, assess actions taken to reduce or offset Scope 1 and 2 emissions, and recommend further actions to improve this aspect of environmental performance.

All relevant correspondence with DPHI and the other agencies is provided in Appendix C.

2.3 Compliance Evaluation

The compliance evaluation process involved the following:

1. Review of all approvals applicable to Bloomfield Colliery.
2. Development of a compliance assessment spreadsheet with all relevant conditions to be assessed.
3. Initial request of information from site.
4. Preliminary desktop review of information.
5. Preparation of site inspection agenda and checklist.
6. Two-day site inspection.
7. Interviews and discussions with site personnel.
8. Additional requests of information from site.
9. Review of all information and evidence provided by site and gathered during the site inspection.





All documentation sighted during the audit is listed throughout Appendix D.

The technical specialist for water attended the site visit and completed the compliance assessment for all conditions related to surface water and groundwater. Their review and findings have been incorporated into this audit report and are detailed in Appendix F.

2.4 Site Interviews

Bloomfield personnel interviewed during the IEA are included in Table 3.

Table 3: Audit interviews conducted.

Name	Role
Chris Knight	Group Manager Environment – The Bloomfield Group
Greg Lamb	Environmental Advisor – Bloomfield Colliery
Nicholas Pearce	Maintenance Superintendent – Bloomfield Colliery

2.5 Site Inspection

The site inspection was undertaken over two days on 19 and 20 November 2024 at Bloomfield Colliery, and was attended by the lead auditor Samantha Hovar, assistant auditor Nina Rotton and water specialist Adam Wyatt.

The weather conditions were sunny on both days, with moderate winds. A total of 2 millimetres of rainfall was recorded in the 24 hours prior to the site inspection.

The purpose of the site visit was to complete physical validations and to collect photographic evidence. Observations recorded were used to supplement information gathered during the desktop review.

The locations shown in Figure 2 and described in Table 4 were inspected. The site visit locations provided a general representation of operational and environmental aspects of the sites. General observations were also completed whilst travelling between visit locations.

An opening meeting was held upon commencement of the audit at the site. The purpose of the opening meeting was to confirm the scope objectives, scope, methodology and resources required. A brief initial close-out meeting was held at the completion of the site visit to provide preliminary findings. A formal closing meeting was later held via Zoom on 19 December 2024 following detailed review of the audit findings. The opening meeting and formal closing meeting were attended by all members of the audit team, the Bloomfield Group Manager Environment, and the Bloomfield Environmental Advisor. The Bloomfield Mine Manager was also in attendance at the opening meeting.

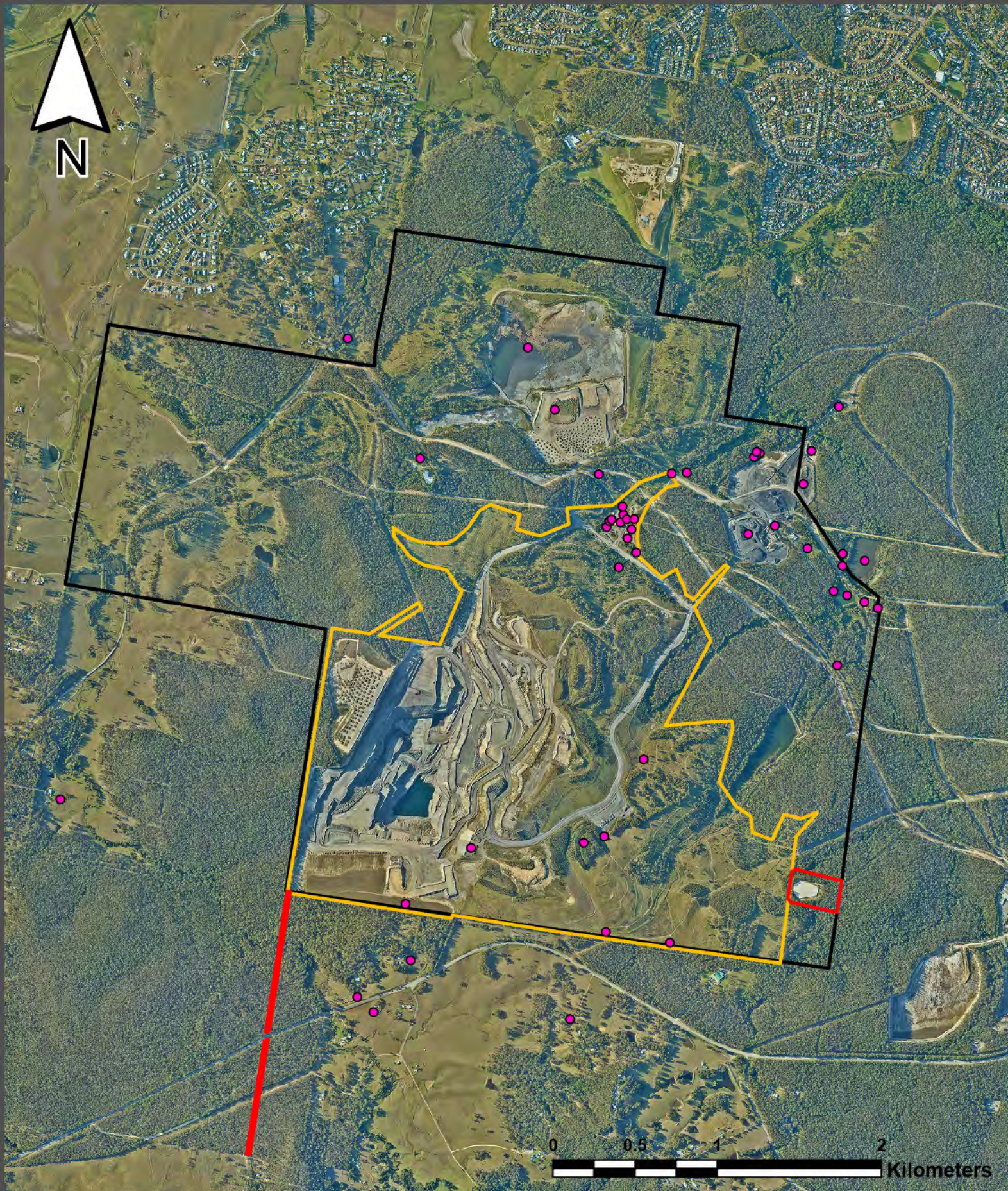




Table 4: Inspection Point Descriptions.

Point ID	Point Description	Point ID	Point Description
1	Main Administration Office	26	Workshop Sediment Sump
2	Clean water drainage	27	Groundwater monitoring point
3	ROM pad	28	Blast and Noise Monitoring Point
4	Rehabilitation	29	Blast Monitor
5	Pit lookout	30	Nearest sensitive receptor
6	Product coal pad	31	Dust Gauge
7	S Cut Rehabilitation	32	HVAS Air Quality Monitor
8	Established rehabilitation	33	Blast Monitor
9	Rehabilitation area	34	Aboriginal Heritage Site
10	Cattle yards	35	CHPP
11	Rehabilitation	36	Offsite Explosives Store
12	Southeast DustTrak	37	Possums Puddle
13	Loop Road Dam	38	Lake Foster
14	Established woodland rehabilitation	39	Pump Station
15	Topsoil stockpile	40	Licensed Discharge Point
16	HV park up	41	Discharge Channel
17	Oil Storage Area	42	Four Mile Creek Diversion
18	Laydown area	43	Overland Dam
19	Workshop	44	Runoff Drain from Pad
20	Workshop Sediment Trap	45	Overland Dam Pump
21	Fuel Tanks	46	Train Load Out
22	Waste Bins	47	Overland Dam Pump Fuel Tank
23	Ammonium nitrate storage	48	Tailings Dam
24	Tyre change out area	49	Tailings pipe
25	Waste IBCs and drums		







2.6 Compliance Status Descriptors

Compliance status has been determined using the descriptors described in Table 5, in accordance with DPHI *Independent Audit Post Approval Requirements* (2020).

Conditions not requiring action for compliance were described as noted.

Table 5: Compliance status descriptors.

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Risk ratings have been assigned to all non-compliances to indicate the severity of the non-compliance. Risk ratings were determined using the descriptors described in Table 6.

Table 6: Non-compliance Risk Ratings.

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: <ul style="list-style-type: none"> Potential for serious environmental consequences, but is unlikely to occur; or Potential for moderate environmental consequences, but is likely to occur.
Low	Non-compliance with: <ul style="list-style-type: none"> Potential for moderate environmental consequences, but is unlikely to occur; or Potential for low environmental consequences, but is likely to occur.
Administrative	Only to be applied where the non-compliance does not result in any risk of environmental harm.





3. Findings

3.1 Approval and Documents List

The approvals and documents audited as part of this audit include:

- Project Approval PA 07_0087 Modification 4
- Environment Protection Licence (EPL) 396;
- Mining/coal leases – ML1738 and CCL761;
- Environmental management plans and strategies; and
- Recommendations of the 2021 IEA.

All relevant environmental management plans and strategies reviewed are listed in Table 7.

Table 7: Environmental management plans and strategies.

Document Title	Relevant Approval	Document Date
Noise Monitoring Program	PA 07_0087 Schedule 3, Condition 4	04/06/2022
Blast Monitoring Program	PA 07_0087 Schedule 3, Condition 14	15/05/2020
Air Quality Monitoring Program	PA 07_0087 Schedule 3, Condition 16	06/06/2022
Water Management Plan	PA 07_0087 Schedule 3, Condition 19	05/08/2021
Landscape Management Plan	PA 07_0087 Schedule 3, Condition 26	19/05/2020
Rehabilitation Management Plan	PA 07_0087 Schedule 3, Condition 27	05/05/2022
Final Void Management Plan	PA 07_0087 Schedule 3, Condition 28	27/08/2022
Mine Closure Plan	PA 07_0087 Schedule 3, Condition 29	05/05/2022
Biodiversity Offset Management Plan	PA 07_0087 Schedule 3, Condition 29B	16/11/2017
Aboriginal Cultural Heritage Management Plan	PA 07_0087 Schedule 3, Condition 31	25/05/2010
Historic Heritage Conservation Management Plan	PA 07_0087 Schedule 3, Condition 31B	02/08/2021
Energy Savings Action Plan	PA 07_0087 Schedule 3, Condition 33	08/09/2011
Environmental Management Strategy	PA 07_0087 Schedule 5, Condition 1	15/05/2020

3.2 Compliance Performance

The total number of compliance requirements assessed as part of the audit and a summary of the compliance performance are provided in Table 8 and Figure 3





Table 8: Compliance Statistics.

Compliance Status	Number of compliance requirements			
	PA 07_0087	EPL 396	Mining Leases	All conditions
Compliant	54	44	2	100
Non-compliant	8	4	0	12
Not triggered	14	10	4	28
All conditions	76	58	6	140

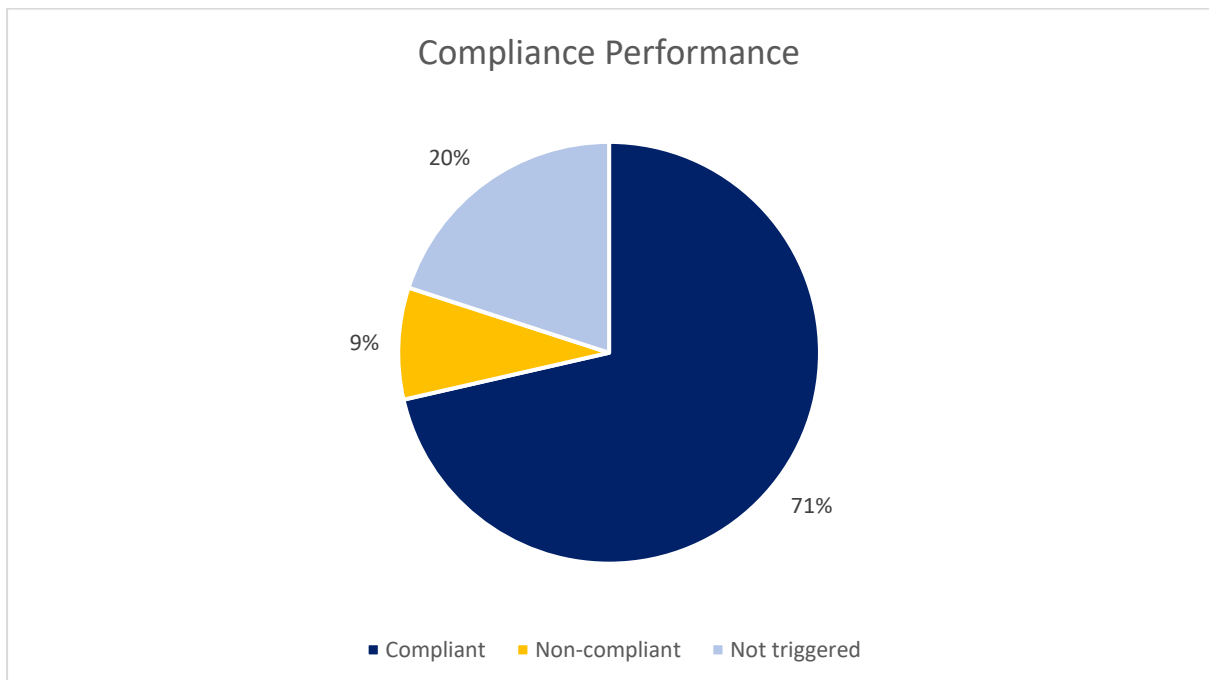


Figure 3: Compliance Performance Pie Graph.



3.3 Agency Notices, Orders, Penalties and Prosecutions

A formal warning was received from the Environmental Protection Agency (EPA) on 17 November 2022. The formal warning was in relation to breach of EPL 396 condition O1.1 following failure of flowmeter data logger during a licensed water discharge event on 5 January 2022. Refer to Table 15 for further detail regarding the non-compliance.

No other regulatory agency notices, orders or penalties were issued and no prosecutions against Bloomfield Colliery occurred during the audit period.

3.4 Non-compliances

Summaries of the non-compliances identified for each approval audited are provided in Tables 9 - 10. No non-compliances were identified against conditions of the relevant mining leases.



Table 9: PA 07_0087 Non-compliances.

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
NC1	Schedule 2, Condition 2A	The Proponent must carry out the project in accordance with the conditions of this approval.	Non-compliances against the conditions of this consent were identified during the audit.	Low	Nil – recommendations have been provided for each specific non-compliance.
NC2	Schedule 2, Condition 15	Where conditions of this approval require consultation with an identified party, the Proponent must: (a) consult with the relevant party prior to submitting the subject document to the Secretary for approval; and (b) provide details of the consultation undertaken including: • the outcome of that consultation, matters resolved and unresolved; and • details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.	Consultation has not been undertaken with all parties required for the Landscape Management Plan, including DoI and Council.	Administrative	Refer to recommendation provided under Schedule 3, Condition 26.
NC3	Schedule 3, Condition 19	The Proponent must prepare a Water Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with EPA and DoI and be submitted to the	Commitments in the plan were reviewed to determine whether the Proponent has implemented the WMP as approved by the Secretary.	Low	R1 – Bloomfield should ensure that ESCP inspections, maintenance and reporting is undertaken in accordance with Table 1 of the ESCP.

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
		<p>Secretary for approval within 6 months of the date of this approval; (b) be prepared by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and (c) include:</p> <ul style="list-style-type: none"> • a Site Water Balance; • an Erosion and Sediment Control Plan; • a Surface Water Monitoring Plan; • a Ground Water Monitoring Program; and • a Surface and Ground Water Response Plan. <p>The Proponent must implement the Water Management Plan as approved by the Secretary.</p>	The review is documented in Table 2 of Attachment F and indicates that not all of the commitments made in the plan have been fulfilled.		<p>R2 – Several surface water quality trigger exceedances that were not reported or investigated have been identified. Bloomfield should ensure that all exceedances of trigger levels in the SWMP are investigated and reported as per requirements outlined in the SWMP. Incidents are to be reported in accordance with Schedule 6 Condition 5 of the Project Approval.</p> <p>Bloomfield stated in response to a request for information relating to the above aforementioned exceedances that the SWMP water quality trigger values: <i>“were set after a small sample size in 2012. The WMP allows for a review of the triggers which may be appropriate with the pending WMP review after approval of DA Modification 5.”</i></p>

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
					R3 – Bloomfield should undertake a review of the SWMP water quality triggers and action any updates accordingly in the WMP.
NC4	Schedule 3, Condition 21	The Erosion and Sediment Control Plan must: (a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction (Volume 2E – Mines and Quarries) manual (DECC 2008), or its latest version; (b) identify activities that could cause soil erosion and generate sediment; (c) describe measures to minimise soil erosion and the potential for transport of sediment downstream; (d) describe the location, function and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to maintain the structures over time.	The Erosion and Sediment Control Plan (ESCP) does not address all requirements of this condition. While the document references that the erosion and sediment controls should be designed to the design standards outlined in the <i>Managing Urban Stormwater Soils and Construction Vol 2 Mines and Quarries</i> (the ‘Blue Book’), the capacity of the erosion and sediment control structures is not listed.	Administrative	R4 – The ESCP should be updated to include: • Details of the design evident that the sediment basins have been sized to accommodate. • The capacity of the sediment basins (including a breakdown of the sediment storage capacity and the settling zone capacity). • Details of the methodology used to calculate the sediment basin size. R5 – Bloomfield should review the sediment basin sizing requirements against surveyed capacities to ensure the storages are adequately sized.

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
NC5	Schedule 3, Condition 23	<p>The Groundwater Monitoring Program (GWMP) must include:</p> <ul style="list-style-type: none"> (a) further development of the regional and local groundwater model; (b) detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality (including at any privately owned bores in the vicinity of the site); (c) groundwater impact assessment criteria; (d) a program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation; (e) procedures for the verification of the groundwater model; and (f) reporting procedures for the results of the monitoring program and model verification. 	<p>The Groundwater Monitoring Program does not address all requirements of this condition.</p> <p>The procedure for the verification of the groundwater model detailed in Section 5.3 of the Water Management Plan is not considered adequate.</p> <p>Furthermore, there is no reporting procedure included for model verification included in the Groundwater Monitoring Program.</p>	Administrative	<p>R6 – Bloomfield should include a procedure for the verification of the groundwater model in the GWMP. It is recommended that the procedure include the requirement for periodic reviews by a suitably qualified hydrogeologist at a specified interval (e.g., every three years at least or more frequently if there is a significant change to the mine plan, acquisition of new hydrogeological information, or groundwater drawdown and inflows significantly exceed model predictions for that stage of mining). The review should include comparison of modelled and observed groundwater levels, and modelled and observed groundwater inflows to the mining pits.</p> <p>A reporting procedure for the model verification</p>

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
					should also be included in the GWMP.
NC6	Schedule 3, Condition 26	<p>The Proponent must prepare a detailed Landscape Management Plan for the project to the satisfaction of the Secretary and DRG. This plan must:</p> <p>(a) be prepared in consultation with OEH, DoI and Council by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and</p> <p>(b) include a:</p> <ul style="list-style-type: none"> • Rehabilitation Management Plan to be submitted to the Secretary for approval within 6 months of the date of this approval; • Final Void Management Plan to be submitted to the Secretary for approval by 30 June 2012; and • Mine Closure Plan to be submitted to the Secretary for approval by 30 June 2012. <p>The Proponent must implement the Landscape Management Plan as approved by the Secretary.</p>	A Landscape Management Plan has been prepared for the project and approved by the Secretary in accordance with the requirements of this condition. However, the plan has not been prepared in consultation with DoI and Council.	Administrative	R7 – The Landscape Management Plan should be provided to DoI and Council for consultation.

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
NC7	Schedule 3, Condition 33	<p>The Proponent must prepare an Energy Savings Action Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the Guidelines for Energy Savings Action Plans (DEUS, 2005), or its latest version, and be submitted to the Secretary for approval within 6 months of the date of this approval; (b) include consideration of energy use by mobile equipment; (c) include a program to monitor the effectiveness of measures to reduce energy use on site. <p>The Proponent must implement the Energy Savings Action Plan as approved by the Secretary.</p>	An Energy Savings Action Plan has been developed and approved. However, the plan does not address all requirements of this condition. Specifically, the action plan does not include consideration of energy use by mobile equipment and does not include a program to specifically monitor the effectiveness of measures to reduce energy use onsite.	Administrative	R8 – The Energy Savings Action Plan should be updated to include consideration of energy use by mobile equipment as well as a program to specifically monitor the effectiveness of measures to reduce energy use onsite.
NC8	Schedule 5, Condition 4	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) the submission of an annual review under Condition 3 above; (b) the submission of an incident report under Condition 6 below; (c) the submission of an audit report under Condition 7 below, or (d) any modification of the conditions of this approval (unless the conditions require otherwise), 	Management plan updates recommended in the previous 2021 IEA were not implemented. These recommendations which have not been addressed are detailed in Section 3.5 of this audit report and relate to:	Administrative	R9 – Implement outstanding recommendations in relation to management plan updates from the 2021 IEA for the following: <ul style="list-style-type: none"> - Groundwater Management Plan - Landscape Management Plan

PA 07_0087					
Non-compliance Reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
		<p>the Proponent must review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	<ul style="list-style-type: none"> - Groundwater Management Plan - Landscape Management Plan - Biodiversity Offset Management Plan - Aboriginal Cultural Heritage Management Plan - Energy Savings Action Plan - Water Management Plan 		<ul style="list-style-type: none"> - Biodiversity Offset Management Plan - Aboriginal Cultural Heritage Management Plan - Energy Savings Action Plan - Water Management Plan



Table 10: EPL 396 Non-compliances.

EPL 396					
Non-compliance reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
NC9	Condition L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Two discharges to water occurred that were not in compliance with the conditions of this license during the audit period. This non-compliance include: <ul style="list-style-type: none"> • An exceedance of the TSS limit at license discharge point 1 on 6 and 7 July 2022. • Passive spilling of a mine water dam on 5 July 2022. 	Low	No further actions recommended.
NC10	Condition L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	EPL discharge monitoring results for the audit period indicate the following exceedances of concentration limits: <ul style="list-style-type: none"> • The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 6 July 2022. The recorded TSS concentration on this date was 35 mg/L. • The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 7 July 2022. The recorded TSS 	Low	No further actions recommended.

EPL 396					
Non-compliance reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
			<p>concentration on this date was 42 mg/L.</p> <p>These are the only exceedances recorded during the monitoring period. TSS concentrations following the exceedances returned to levels that were more in line with the historic average. The event is document in the 2022 Annual Review.</p> <p>Environmental impacts as a result of the exceedances are likely to be negligible.</p>		
NC11	Condition O.1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<p>The EPA found a non-compliance against this condition in relation to the flowmeter data logger failure that occurred 5 January 2022 during the audit period. The EPA stated in a formal warning received 17 November 2022 that Bloomfield had failed to check that the data logger was operational immediately prior to the</p>	Low	<p>R10 – Move the waste IBCs and drums found behind the tyre change out pad to a bunded storage location or arrange for appropriate disposal.</p>

EPL 396					
Non-compliance reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
			<p>discharge occurring. The logger failure was due to low battery power, as solar powered. In response to this incident, the monitoring unit has been connected to mains power with battery backup to reduce risk of recurrence.</p> <p>In addition, a number of used intermediate bulk containers (IBCs) and drums with grease and chemical residue were observed near the tyre change out bay in an unbunded and uncovered area.</p>		
NC12	Condition M6.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air;	Monitoring results for EPL discharge point 1 and point 2 indicate that the volume of liquid discharged to water has been monitored at the frequency required under Condition M6.1 using the sampling method specific. Discharge volumes are reported as megalitres per	Administrative	R11 – Discharge volumes in the EPL monitoring reports and any other reporting of discharge volumes should be reported using the unit of measure specified under this condition (kilolitres per day). Calculated discharge volumes should be provided

EPL 396					
Non-compliance reference	Condition Reference	Condition Requirement	Non-compliance Details	Risk Rating	Actions and Recommendations
		<p>at the frequency and using the method and units of measure, specified below.</p> <p>POINT 1 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day By calculation (volume flow rate or pump capacity multiplied by operating time)</p> <p>POINT 2 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day In line instrumentation</p>	<p>day (ML/day) as opposed to kilolitres per day (kL/day). The discharge limit for point 1 is 40,000 kL/day. The maximum recorded discharge volume is 40 ML/day. All reported discharge volumes appear to be rounded to the nearest 5 ML. It is unclear whether volumes reported as 40 ML/day have been rounded up or down.</p> <p>There was a data logger failure on 5 January 2022 that resulted in the inability to calculate the discharge flow volume at discharge point 2. Actions have been taken (such as installation of backup power supply) to reduce the risk of this occurring in the future.</p>		to at least three significant figures.

3.5 Previous Audit Recommendations

Out of the 35 recommendations provided in the 2021 Bloomfield IEA report, a total of 23 actions have been confirmed as completed. The completion status of all 2021 IEA recommendations is detailed in Table 11.

Table 11: Status of 2021 IEA Recommendations.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
PA07_0087 Schedule 2 Condition 15	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.	Ongoing	The Mine Closure Plan, Final Void Management Plan and Rehabilitation Management Plan were updated during the audit period and approved by DPHI. These changes were administrative in nature and therefore additional consultation with listed agencies was not needed.
PA07_0087 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	Completed	The Noise Monitoring Program was updated during the audit period and approved by DPHI on 29/06/2022. Section 8.1 of the program states that quarterly reports will include a comparison of the actual noise monitoring results with the modelled noise levels to assess accuracy of modelling software.



Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
PA07_0087 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.	Completed	Operational noise management, performance and further improvements are detailed in Section 6.5 of the Annual Reviews.
PA07_0087 Schedule 3 Condition 16	It is 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	Completed	The Air Quality Monitoring Program was updated during the audit period and approved by DPHI on 29/09/2022. The following has been included in the monitoring program: <ul style="list-style-type: none"> - The 'Analysis of Results' section of the program describes how results are compared against the assessment criteria in PA 07_0087. - Figure 1 of the program includes the locations of the DustTrak monitors and the weather station. - The 'Control Measures' section of the program includes a description on how extraordinary events are identified through the use of predictive meteorological modelling software and real time weather station data.
PA07_0087 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</i> –	Noted. A documented process will be developed to record dewatering activities as required.	Not Completed	A dewatering procedure has not been documented in the WMP or EMS. This recommendation should be actioned.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	<i>Mines and Quarries (DECC 2008).and that this requirement be appropriately documented in the WMP and site EMS.</i>			
PA07_0087 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.	Not Completed	The area should be reviewed to determine whether there is an erosion risk. If an erosion risk is identified, the area should be shaped and rehabilitated prior to mine closure. The WMP should be updated to remove the recommendation upon completion, or, if the recommendation will not be actioned until mine closure.
PA07_0087 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.	The Groundwater Management Plan will be updated following current review of the groundwater model associated with the assessment of MOD 5 and subject to approval.	Not Completed	The GWMP has not been updated since the 2021 IEA. Non-compliance with this condition was identified during the current audit period.
PA07_0087 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.	The Groundwater Management Plan will be updated following current review of the groundwater model associated with the assessment of MOD 5 and subject to approval.	Not Completed	The GWMP has not been updated since the 2021 IEA.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
PA07_0087 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	The Rehabilitation Management Plan and Mine Closure Plan were updated during the audit period. The completion criteria and performance indicators in these plans now align.
PA07_0087 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 prepared the Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed	The capping strategy for the U-Cut tailings dam is included in the Bloomfield Rehabilitation Management Plan (Bloomfield, 2022).

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
PA07_0087 Schedule 3 Condition 25A	It is recommended to develop a rehabilitation plan for the remediation of the gulying observed to the east of U Cut Tailings Dam.	The observed gully in existing rehabilitation is included in the areas identified in mine closure planning as requiring significant re-disturbance for closure. A Biodiversity Due Diligence Report and Legacy Area Biodiversity Management Plan have been commissioned covering all areas identified for re-disturbance.	Completed	<p>In the 2021 Annual Review, Bloomfields stated in their response to this action:</p> <p><i>“Gully observed in existing rehabilitation scheduled to be repaired as part of 2022 rehabilitation program.”</i></p> <p>The Bloomfield Mine Annual Rehabilitation Report provided in Appendix E of the 2023 Annual Review states that:</p> <p><i>“4 ha on the southern section of the U Cut Tailings Facility has been prepared for rehabilitation and will be progressed to ecosystem and land use establishment during the 2025 reporting period.”</i></p>
PA07_0087 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.	<p>The Resource Regulator has introduced new standard rehabilitation and reporting conditions on all mining leases.</p> <p>These new conditions will replace existing rehabilitation conditions and replaces current Mining Operations Plans.</p> <p>Bloomfield has prepared the targeted Rehabilitation Management Plan as required under the reforms</p>	Completed	The Mine Operations Plan was superseded by the Rehabilitation Management Plan during the audit period, in line with new standard rehabilitation and reporting mining lease conditions. The Rehabilitation Management Plan include the final landform and rehabilitation plan which was updated in 2022.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
		implemented by the Resource Regulator.		
PA07_0087 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 prepared the targeted Rehabilitation Management Plan as required under the reforms implemented by the Resource Regulator.	Completed	The Mine Operations Plan was superseded by the Rehabilitation Management Plan during the audit period, in line with new standard rehabilitation and reporting mining lease conditions. The approved Rehabilitation Management Plan includes the current life of mine rehabilitation schedule in Section 6.1.
PA07_0087 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.	Not Completed	The Landscape Management Plan was not revised during the audit period and as such, consultation with OEH, DoI and Council did not occur.
PA07_0087 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	Soil balances to be reviewed when annual aerial photo and Lidar data capture is completed.	Completed	Bloomfield has advised that: <i>"Adequate topsoil volumes are available for rehabilitation. Topsoil volume stockpiled 867,000 m³. Total active disturbance 411 Ha. Based on 0.15 m</i>

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	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.			<i>depth of application there is enough volume for 573 Ha."</i> Sighted the stockpile balance spreadsheet, updated for 2021-2024.
PA07_0087 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	Up to date stockpile records and mapping were sighted showing volumes and quantity of material recorded as part of the site data management system.
PA07_0087 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	The Rehabilitation Management Plan and Mine Closure Plan were updated during the audit period. The completion criteria and performance indicators in these plans now align.



Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
PA07_0087 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	The Rehabilitation Management Plan was updated during the audit period to include two new analogue monitoring locations (four in total).
PA07_0087 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	The Final Void Management Plan was updated during the audit period and approved by DPHI on 29/06/2022. The final void location is described in the Final Void Management Plan and is consistent with the other subplans under the Landscape Management Plan.
PA07_0087 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	The Mine Closure Plan was updated during the audit period and approved by DPHI on 29/06/2022. The relevant agencies were consulted in the development of the original version of the plan. Evidence of consultation is provided in Appendix B of the Mine Closure Plan.
PA07_0087 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	Mine Closure Plan updated in accordance with Schedule 3, Condition 29. DPE approved 29/6/22.	Completed	The Mine Closure Plan was updated during the audit period and approved by DPHI on 29/06/2022. It is noted that the Mine Operations Plan was superseded by

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	Operations Plan, which is due to be completed December 2021 as defined in the Mine Operations Plan.			the Rehabilitation Management Plan in the audit period which no longer includes this requirement.
PA07_0087 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.	Ongoing	During the audit period, Bloomfield continued to work with NSW Biodiversity Conservation Trust to progress a Conservation Agreement (CA) for the Biodiversity Offset Area. An update on the progress of this work was provided to DPHI on 21 October 2024. The fee for the development of the Conservation Agreement was paid on the 29 August 2024. Currently Bloomfield are waiting on the drafting of the Conservation Agreement by BCT.
PA07_0087 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.	Not completed	The Biodiversity Offset Management Plan was not updated during the audit period.
PA07_0087 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.	Ongoing	During the audit period, Bloomfield continued to work with NSW Biodiversity Conservation Trust to progress a Conservation Agreement (CA) for the Biodiversity Offset Area. An update on the progress of this work was provided to DPHI on 21 October 2024. The fee for the

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
				development of the Conservation Agreement was paid on the 29 August 2024. Currently Bloomfield are waiting on the drafting of the Conservation Agreement by BCT.
PA07_0087 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.	Not Completed	The Aboriginal Cultural Heritage Management Plan was not updated during the audit period. The Mindaribba LALC were provided a draft updated version of the management plan in September 2017. Bloomfield are still awaiting feedback from the Mindaribba LALC on the draft update and as such, this revision has not yet been finalised.
PA07_0087 Schedule 3 Condition 31A	It is recommended that Bloomfield seek confirmation from the Secretary that the Condition Assessments completed as per the	The condition surveys of the Buttai Reservoir and Buttai Cemetery were submitted to the Department on 18 October	Completed	The condition surveys were completed and submitted to DPHI on 18/10/2018. As such, Bloomfield have fulfilled the

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	requirements of this condition have been completed to their satisfaction.	2018. Bloomfield will contact the Department to enquire about progress on the review of the surveys.		requirements of Schedule 3, Condition 31A.
PA07_0087 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.	The Energy Savings Action Plan will be updated to reflect commitments on proposed abatement measures contained within the Bloomfield Continuation Project Modification 5 when approved.	Not Completed	The Energy Savings Action Plan was not revised during the audit period.
PA07_0087 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	Bloomfield use the INX system for compliance tracking against the conditions of this approval, including review of required documents. Furthermore, the M files document control system is used to track and record document reviews and updates.
PA07_0087 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	Completed	Bloomfield's response is noted and nothing further is required.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
		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.		
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	The Noise Monitoring Program was updated during the audit period and approved by DPHI on 29/06/2022. The monitoring locations included in the monitoring program have been developed based on noise modelling and target locations that represent the potentially most affected areas from noise emissions from Bloomfield Colliery operations.
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	The Air Quality Monitoring Program was updated during the audit period and approved by DPHI on 29/09/2022. The monitoring network includes dust deposition gauges, high volume air samplers and DustTrak units located around the project area - both off and on lease.
Water Management Plan	It is recommended that Bloomfield seek to engage with	Revised Water Management Plan submitted via Portal on	Completed	Bloomfield's response is noted and nothing further is required.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	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	12 August 2021. Notification of commencement of detailed assessment of the Plan made by Department on 24 November 2021. DPE approved 23/8/22.		
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	The Mine Operations Plan was superseded by the Rehabilitation Management Plan during the audit period, in line with new standard rehabilitation and reporting mining lease conditions. The rehabilitation monitoring and maintenance process is described in the Rehabilitation Management Plan.
Water Management	It is recommended that the Overland Dam be resized appropriately to account for the large area of catchment	Works have commenced on increasing pump capacity, desilting and enlarging the Overland Dam.	Completed	During the site inspection carried out as part of this audit the resizing of the Overland Dam was verified.

Condition / Issue	Recommendation	Bloomfield Response	Status	Completion Details
	that reports to it and ensure its design capacity prevents future uncontrolled discharges.			
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.	The Water Management Plan will be updated following the assessment of MOD 5 and subject to approval.	Not Completed	The WMP has not been updated since the 2021 IEA.





3.6 EMP, Sub-plans and Compliance Documents

All environmental management strategies, plans, and sub-plans listed in Table 7 were reviewed during assessment of compliance with relevant approval conditions. Detailed review notes can be found in the audit table in Appendix D. Most documents were found to be adequate and were implemented during the audit period. However, a number of non-compliances summarised in Table 12 were identified.

Opportunities for improvement are provided in Section 3.14.

Table 12: Management Plan Non-Compliance Review Summary.

Management Plan	Finding	Non-Compliance Reference
Water Management Plan	Commitments in the plan were reviewed to determine whether the Proponent has implemented the WMP as approved by the Secretary. The review is documented in Table 2 of Attachment F and indicates that not all of the commitments made in the plan have been fulfilled.	NC3
Water Management Plan – Erosion and Sediment Control Plan	<p>The Erosion and Sediment Control Plan does not address all requirements of PA 07_0087 Schedule 3, Condition 21.</p> <p>While the document references that the erosion and sediment controls should be designed to the design standards outlined in the <i>Managing Urban Stormwater Soils and Construction Vol 2 Mines and Quarries</i> (the 'Blue Book'), the capacity of the erosion and sediment control structures is not listed.</p>	NC4
Water Management Plan – Groundwater Monitoring Program	<p>The Groundwater Monitoring Program does not address all requirements of PA 07_0087 Schedule 3, Condition 23.</p> <p>The procedure for the verification of the groundwater model detailed in Section 5.3 of the Water Management Plan is not considered adequate.</p> <p>Furthermore, there is no reporting procedure included for model verification included in the Groundwater Monitoring Program.</p>	NC5
Landscape Management Plan	The Landscape Management Plan has not been prepared in consultation with DoI and Council.	NC6



3.7 Environmental Performance

A summary of environmental performances over the audit period are provided in the below sections.

3.7.1 Noise

No noise exceedances were reported within the audit period at any residence on privately-owned land.

Nighttime attended noise monitoring is completed by a trained employee on nights when the mine is operational and where noise enhancement conditions are predicted to assist in real-time adaptive management of mining operations to manage compliance with noise limits. Quarterly attended noise monitoring is also undertaken by SLR. All noise monitoring is undertaken in accordance with PA 07_0087, the Noise Monitoring Program, the NSW Noise Policy for Industry and AS 1055:2018 *Acoustic – Description and Measurement of Environmental Noise*.

A total of three (3) complaints in relation to noise were received during the audit period. All complaints were addressed and resolved in a timely manner. Actions included targeted monitoring, predicted noise modelling, cessation of works or shut down of equipment.

Noise management measures implemented during the audit period included the following:

- Use of a predictive modelling system to assess meteorological forecasts and predict noise enhancement and risk. Data from this system is communicated daily to OCEs and supervisors to assist in work planning and operations are adjusted accordingly.
- Equipment fitted with noise attenuation controls.
- Sound power testing of equipment is undertaken.
- Location of operational mining activities have a buffer zone between operational zone and closest sensitive receptors.
- To improve environmental performance of the operation, four new haul trucks (Cat 793F) with a lower sound power level were purchased during the audit period.

3.7.2 Blast

No exceedances of airblast overpressure or vibration were recorded within the audit period at any residence on privately-owned land.

A total of two (2) complaints were received in relation to blasting.

A review of blast records found that all blasts occurred between 9am to 5pm Monday to Saturday and no more than two blast events were carried out per day and a maximum of one (1) blast event per week, averaged over each year in the audit period.

There were no public road closures as a result of blasting from the project during the audit period.

Management measures to minimise the impact of blasting to human safety, livestock, property and public infrastructure were implemented. These measures included:





- Blast design variables are managed to minimise potential impacts.
- A blast protocol and pre-blast checklist has been developed and is implemented.
- 500 m exclusion zone is applied around all blasts.
- Predictive meteorological modelling software, plume modelling and the real time onsite meteorological station are used to schedule blasts when conditions are optimal. Blasts are postponed during unfavourable weather conditions.
- Portable blast monitoring units are available in addition to the fixed real-time blast monitors. These portable units are used for blasting in sensitive areas.
- Notification of scheduled blasts is provided to relevant neighbours and the community through the website and local newspaper.

3.7.3 Air Quality

Results of the monitoring program show that Bloomfield has not caused exceedances of the air quality compliance criteria at any locations representative of residences on privately owned land. Furthermore, no significant visible emissions to air generated by Bloomfield were observed during the site inspection.

No complaints in relation to dust or odour were received.

Operations at Bloomfield were reviewed and the following observations were made in relation to air quality:

- There are sufficient water carts available onsite for road dust suppression and one water cart in operation was sighted.
- Evidence from the Annual Reviews and field inspection indicated that surface disturbance was generally minimised.
- The air quality management system in place at Bloomfield includes a combination of visual triggers, real-time DustTrak units located upwind and downwind of site and an appropriate response protocol.
- Predictive meteorological forecasting is used and discussed in the daily morning meeting with the operations team. These communications allow supervisors to plan work in accordance with the predicted conditions.
- Topsoil stockpiles observed during the site inspection had been shaped and vegetated to minimise wind erosion.

3.7.4 Water

A summary of performance in relation to water has been provided by the technical water specialist in Appendix F.

3.7.5 Biodiversity

During the audit period, Bloomfield continued to work with NSW Biodiversity Conservation Trust (BCT) to progress a Conservation Agreement for the Biodiversity Offset Area. The fee for the





development of the Conservation Agreement has been paid and Bloomfield are currently waiting on the drafting of the Conservation Agreement by BCT.

Measures to reduce impact to and improve biodiversity were implemented during the audit period. These measures included the following:

- Areas of undisturbed vegetation around mining areas have been strategically preserved for use as habitat corridors.
- Ongoing weed and pest management implemented onsite and, in the biodiversity, offset area.
- Fencing and signage around the offset area has been established to reduce unauthorised access.
- The offset area has good natural vegetation growth and minimal weed coverage.

No externally reportable incidents relating to flora and fauna management occurred during the audit period.

3.7.6 Rehabilitation

Rehabilitation activities are described and scheduled within the Rehabilitation Management Plan and Forward Work Program.

Completed works for the audit period, as reported in the Annual Rehabilitation Reports, were:

- 5.5 ha of vegetation cleared for mining operations.
- 21.8 ha of land prepared for rehabilitation, including an additional 6 ha that became available due to mine planning changes.
- 5.9 ha of rehabilitation progressed to ecosystem and land use establishment stage.

Ongoing progressive rehabilitation was sighted at the tailings storage facility and S Cut during the site inspection. Established rehabilitation in previous mining areas which is now being used for cattle grazing was also sighted.

Pasture rehabilitation monitoring results for the audit period found overall:

- Consistent and satisfactory performance at rehabilitation sites across Bloomfield Colliery.
- Results were stable or improving over previous years, with exceptions of results that can be attributed to temporary drought conditions.
- Results indicate rehabilitation sites are on a trajectory leading to the rehabilitation objective of a safe and stable landforms compatible with the surrounding landscape and with a land capability suitable for grazing.
- Rehabilitated pastures are well balanced, stable pastures that are producing quality forage suitable for cattle production. areas are well balanced self-sustaining and producing quality forage to maintain cattle production





A rehabilitation quality control process was developed and implemented during the audit period. The process includes a job breakdown structure for each element of rehabilitation and a hold/sign off point at the end of each stage. The process ensures implementation of rehabilitation is aligned to design and the rehabilitation objectives.

3.7.7 Visual Amenity

There was one (1) lighting complaint received during the audit period regarding lighting at the CHPP visible from neighbouring Ashtonfield. It is noted that the CHPP is outside of the project area. The complaint was actioned and controls implemented including lighting being tilted lower and shields installed.

Many elements of the site such as workshop and haul roads are not visible at offsite receiver locations and as such, the visual impact of the project is minimal

The buffer zone of native bushland between operations and closest sensitive receivers was maintained during the audit period. Buildings, structures, facilities and works sighted during the site inspection were found to blend with the surrounding landscape as far as possible.

3.7.8 Waste

There were no complaints or externally reportable incidents in relation to waste reported during the audit period.

Waste management is conducted by a qualified contractor. General waste collected for disposal decreased over the audit period from 94 tonnes in 2021, to 84 tonnes in YEM 2023 and 74 tonnes in YEM 2024.

During the audit period the following controls were implemented to minimise and manage waste:

- Waste streams segregated to maximise recycling and separate hazardous waste.
- Tracking of all waste streams to monitor performance and inform future management.
- Sufficient availability of waste receptacles around the operation, particularly at the workshop.
- Effective operation and maintenance of equipment to minimise disposal of heavy equipment tyres.
- Targeted scrap steel recycling programs undertaken.

3.7.9 Heritage

There were no complaints or externally reportable incidents in relation to heritage reported during the audit period.

Additionally, no heritage sites were discovered, damaged or disturbed during the audit period.





Annual condition assessments of the Buttai Cemetery found the site to be in an overall good condition and no observed damage or change to the gravesites was attributed to Bloomfield operations.

3.8 Consultation outcomes

As previously discussed in Section 2.2, consultation was undertaken with DPHI and other relevant agencies in development of the audit scope. Additional scope aspects were identified. The audit findings in relation to these addition scope aspects are detailed in Table 13.

Table 13: Consultation Outcomes.

Agency	Additional Scope Aspect	Audit Findings
DPHI	Review implementation of the Biodiversity Offset Management Plan.	<p>Management activities have been undertaken during the audit period in accordance with the Biodiversity Offset Management Plan. These activities include weed and feral animal monitoring, feral animal control, and signage and fence maintenance. This was evidenced during the site inspection and by management records.</p> <p>No evidence of unauthorised access to the offset area was sighted during the site inspection.</p> <p>Bloomfield continued to work with BCT to progress a Conservation Agreement for the Biodiversity Offset Area during the audit period.</p> <p>Further detail is provided in Section 3.7.5 and in Appendix D (PA07_0087 Schedule 3, Conditions 29A, 29B and 29C).</p>
	Surface and groundwater specialist review of the relevant management plans and the effective implementation of these plans, as well as a detailed assessment of the current water infrastructure to ensure they are functioning effectively and are compliant with all relevant standards.	<p>The surface and groundwater specialist attended the site inspection on 20 November 2024. Additionally, the technical specialist has completed a review of the relevant management plans and an assessment of current water infrastructure. This review is provided in Appendix F.</p>



Agency	Additional Scope Aspect	Audit Findings
CCC	Review all complaints, exceedances and non-compliances, the corrective actions taken and whether these corrective actions were effective in preventing the non-compliance recurring.	<p>A review of complaints and incidents, including effectiveness of corrective actions is provided in Sections 3.9 and 3.10 of this audit report. Non-compliances including exceedances are discussed in Section 3.4 of this report.</p> <p>Generally, Bloomfield has implemented corrective actions to address all complaints received and non-compliances that occurred during the audit period. The corrective actions implemented are considered effective.</p>
	Review the National Greenhouse Gas and Energy Reporting Scheme results, assess actions taken to reduce or offset Scope 1 and 2 emissions, and recommend further actions to improve this aspect of environmental performance.	<p>Scope 1 and 2 emissions reported during the audit period were below EIS predictions. Furthermore, scope 1 and 2 emissions decreased during the audit period, between the 2022/2023 reporting year and 2023/24 reporting year.</p> <p>To improve environmental performance, four new haul trucks (Cat 793F) with improved fuel efficiency were purchased during the audit period.</p> <p>Bloomfield are also considering the use of biodiesel from used cooking oils, sourced from a subsidiary company of the Bloomfield Group to fuel water management pumps onsite.</p> <p>Bloomfield has prepared an Energy Savings Action Plan in accordance with the conditions of the Project Approval and the requirements of the <i>Guidelines for Energy Savings Actions Plans</i> (Department of Energy, Utilities and Sustainability, 2005). The action plan aims to identify opportunities to reduce greenhouse gas emissions. A recommendation to improve this plan has been provided in Appendix D (PA07_0087 Schedule 3, Condition 33).</p>

3.9 Complaints

Complaints are managed in accordance with the Bloomfield Environmental Management Strategy. Under this strategy, Bloomfield operate a 24-hour telephone hotline for the members of the public to lodge complaints and concerns or to raise issues associated with the operations. The purpose of this service is to ensure community concerns and environmental matters are addressed in a prompt and efficient manner. Responses provided and actions completed for complaints received are recorded in a register which is made publicly available on the Bloomfield website.

A total of six (6) complaints were received during the audit period. A summary of complaints is provided in Table 14. A review of the complaints register found that complaints received during the audit period were generally resolved within a timely manner and were addressed in accordance with the process outlined in the Bloomfield Environmental Management Strategy.

Table 14: Complaints Summary.

Aspect	Number of Complaints*				
	2021 ¹	2022	2023	2024 ²	Total
Blast	0	1	0	1	2
Noise	0	1	1	1	3
Dust	0	0	0	0	0
Water	0	0	0	0	0
Lights	0	0	0	*1	*1
Odour	0	0	0	0	0
Other	0	0	0	0	0
Total	0	2	1	3	6

¹ Includes all complaints recorded from 2 November to 31 December 2021.

² Includes all complaints recorded from 1 January to 1 November 2024.

* It is noted that this complaint relates to lighting at the CHPP which is outside of the project area.

3.10 Incidents

Three (3) reportable incidents occurred at Bloomfield Colliery during the audit period. These incidents are detailed in Table 15.

No enforcement action was taken by any regulatory agencies in relation to these incidents, however one (1) written formal warning was received from the EPA as detailed in Table 15.

The passive spill event on 5 July 2022 was reported to DPHI and EPA in accordance with conditions of PA 07_0087 and EPL 396.

The other two incidents were reported to the EPA in accordance with EPL 396. While these two non-compliances do not specifically relate to conditions of the Project Approval, non-compliances of the EPL are considered incidents associated with the Project and it is recommended that any incidents reported under the EPL are also reported to the Department.



An opportunity for improvement in relation to this has been provided in Section 3.14 and Appendix D (PA07_0087 Schedule 5, Condition 6).

Table 15: Summary of Incidents at Bloomfield Colliery.

Date	Incident Details	Incident Response
05/01/22	EPL 396 condition M6.1 requires that the volume of water discharged is measured on a daily basis during discharge by inline instrumentation at EPA monitoring point 2. Due to a data logger failure associated with low battery power, the volume of water discharged at this location was unable to be calculated during a licensed discharge on 5 January 2022.	<p>The logger failure was discovered by Bloomfield on 7 February 2022 and was reported to the EPA on the same day.</p> <p>Following investigation, it was determined that the solar panel that powers the logger battery was obscured by vegetation. The battery was replaced following the battery failure on the 8 February 2024, as a short-term solution. Since this incident, the data logger has been connected to mains power and a backup battery has been installed to prevent recurrence.</p> <p>The failure in the data logger did not result in any adverse environmental impacts and the discharge was within licensed water quality requirements.</p> <p>Following the incident, a formal written warning was issued by the EPA on 17 November 2022 in relation to breach of licence condition O1.1 as the flowmeter data logger was not checked to be operational immediately prior to the discharge occurring. (Notice number 3502178). The EPA stated that Bloomfield must check and confirm monitoring equipment is operational immediately prior to any discharge occurring in future.</p> <p>No further logger failures occurred during the audit period.</p>
05/07/22	Following a large rainfall event between the 3 – 7 July 2022, the Overland Dam was observed to be passively spilling mine water into Four Mile Creek on the 5 July 2022. The dam was empty prior to the rain event and two diesel	<p>The passive spill was reported to the EPA and DPHI on 5 July 2022. The discharge event was also reported to the Resources Regulator and Maitland City Council.</p> <p>Water sampling at the Overland Dam and Four Mile Creek (upstream and downstream) commenced immediately following the</p>



Date	Incident Details	Incident Response
	pumps were operational prior to and during the spill. However, due to the rainfall intensity and runoff during the event the pumps were insufficient for the inflow to the dam.	<p>observation of the discharge event and continued until 8 July 2022. Sampling results indicate that there was no downstream deterioration in water quality.</p> <p>From the time of the spill observation, it was estimated that 33 ML of water flowed from the Overland Dam to the environment, which was an estimated 3% of the total flow in Four Mile Creek during the spill event.</p> <p>Following the incident, the Overland Dam was expanded in size to prevent recurrence. This improvement was sighted during the site inspection.</p>
06/07/22 to 07/07/22	On 6 July 2022 a water discharge was undertaken in accordance with EPL 396 conditions. During the discharge the Total Suspended Solids (TSS) exceeded the EPL limits.	<p>Notification of the incident was provided to the EPA on 8 July 2022.</p> <p>The decision to release water was made due to safety concerns of Lake Kennerson potentially overtopping the spillway in an uncontrolled manner due to recent heavy rainfall and forecast for further heavy rain in the Hunter Region.</p> <p>It was noted that the TSS value upstream was considerably higher than the discharge TSS values.</p> <p>Environmental impacts as a result of the exceedances are likely to be negligible.</p>

3.11 Predicted and Actual Environmental Impacts

Compliance was assessed between actual and predicted impacts documented in the Bloomfield Colliery environmental impact assessments, including the physical extent of the development in comparison with the approved boundary and potential off-site impacts of the development. Annual reviews, site aerial imagery and monitoring data was used to assess compliance.

The physical extent of the Bloomfield Colliery was confirmed to align with the approved project boundary.

The predicted and actual off-site impacts of the development are discussed below.



3.11.1 Noise

Modification 4 environmental impact assessment model predictions indicated that operational noise levels would remain below the relevant PA 07_0087 noise level limits at all receiver locations under calm and prevailing weather conditions provided noise management practices were implemented. The results of noise monitoring during the audit period show that noise levels remained below the relevant impact assessment criteria. There were no non-compliances or externally reportable incidents relating to noise in the audit period.

3.11.2 Blast

The environmental impact assessment for Modification 4 modelled the peak particle velocity level at 1.7mm/s and the peak airblast overpressure level at 115 dB(L). The results of blast monitoring indicate that particle velocities and airblast overpressure levels remained below the modelled peak values during the audit period.

3.11.3 Air Quality

Comparison between the Modification 4 Environmental Impact Assessment modelled results and the annual average air quality results for the audit period show that dust deposition, particulate matter < 2.5µm (PM2.5), particulate matter < 10µm (PM10) and total suspended particulates were below predicted levels.

3.11.4 Water

A summary of performance in relation to water has been provided by the technical water specialist in Appendix F.

3.12 Site Inspection

General observations collected during audit site inspection of Bloomfield Colliery are summarised in Table 16. Photographs were collected at all areas inspected; some photographs are provided in Appendix E.

Table 16: Bloomfield Colliery Site Inspection General Observations.

Area Inspected	General Observations
Mine Infrastructure Area	<ul style="list-style-type: none">• Oily water separator in use.• Segregation of waste including timber, oil, scrap metal, general waste, cardboard/paper and oil filters. Suitable number of bins available.• Suitable number of spill kits available.• Flammable liquids and gases stored separately at appropriate distances apart.





Area Inspected	General Observations
	<ul style="list-style-type: none"> • Appropriate dangerous goods signage in place. • Fuel tanks at the fuel farm were bunded. • Tyres stored appropriately at a central stockpile location. Waste tyres clearly demarcated for disposal. • Covered and bunded oil storage area in place and used. • A number of used intermediate bulk containers (IBCs) and drums with grease and chemical residue were observed near the tyre change out bay in an unbunded and uncovered area.
Active Mining Area	<ul style="list-style-type: none"> • Observed mining operations from the S Cut Pit lookout point. • One • No dust observed and water cart seen in operation. • No evidence of spontaneous combustion sighted.
Rehabilitation Sites	<ul style="list-style-type: none"> • Landform has been contoured for drainage and runoff is directed to farm dams and in pit. • Sighted agistment of cattle on established rehabilitation. • No visible erosion issues were identified in the areas inspected. • Minimal odour detected from the biosolids on rehabilitation. • Observed mixing of biosolids into topsoil in rehabilitation area. • Capping of tailings sighted. No visual issues identified. • Evidence of recent weed spraying observed on the topsoil stockpile at the tailings storage facility rehabilitation area.
Water Storages and Drainage	<ul style="list-style-type: none"> • Sighted the Overland Dam, S Cut in pit storage, Possums Puddle, Lake Foster and the Tailings Storage Facility. • Adequate capacity evident in all water storages inspected. • Upgrade works to Overland Dam sighted. • Inspected the clean water diversion. • Sighted stockpiles of material from recent desilting of dams.
Aboriginal and Historic Heritage Sites	<ul style="list-style-type: none"> • Fencing and signage in place. • No sign of unauthorised access or disturbance.
Environmental Monitoring Sites	<ul style="list-style-type: none"> • A sample of air quality and blast monitors were inspected. All equipment looked to be well maintained and operational. • The site meteorological station was in good condition and operational.
Biodiversity Offset Area	<ul style="list-style-type: none"> • The area is fenced with a locked gate and signage at entry points. No signs of unauthorised entry or cattle sighted in the area. • The area is heavily vegetated with native species and minimal weeds were observed. • Tracks were generally in good condition; a few fallen trees and washouts were noted.





3.13 Site Interviews

A summary of the topics covered in the interviews held with Bloomfield personnel during the site inspection is provided in Table 17.

Table 17: Summary of Audit Interviews Completed.

Name	Role	Interview Summary
Chris Knight	Group Manager Environment	<ul style="list-style-type: none"> • Systems used by the Environment Department. • Environmental monitoring programs. • Management practices in relation to bushfire, biodiversity, heritage, waste, dangerous goods, visual amenity, noise, dust, blast and water. • Weed and feral animal control programs. • Offset management. • Rehabilitation methodology. • Use of predictive meteorological, blast, noise and air quality modelling. • Reportable incidents during the audit period. • Management of community impacts and complaints. • Mining and coal processing activities onsite. • General activities undertaken during the audit period.
Greg Lamb	Environmental Advisor	
Nicholas Pearce	Maintenance Superintendent	<ul style="list-style-type: none"> • Equipment introduction to site procedure. • Equipment maintenance scheduling and tracking process. • Equipment pre-start operational check procedures. • Sound attenuation equipment and sound power testing.





3.14 Improvement Opportunities

Several environmental management improvement opportunities were identified during the audit and are detailed as follows:

- The Bloomfield Site Security Plan for the Storage and Handling of Explosives was due for review 24 October 2023. It is recommended that this plan is reviewed and updated if required.
- The Environmental Management Strategy should be reviewed and revised where necessary to replace references to the superseded Mining Operations Plan.
- The Biodiversity Offset Management Plan should be updated to include an appropriate mechanism and process to monitor the performance of the offset and to assess progress towards the completion criteria.
- It is recommended that Bloomfield notify DPHI and the Resources Regulator in future of any incidents that occur in relation to EPL 396. While incidents under the EPL may not relate directly to a condition of PA 07_0087, they are associated with the Project, as worded in Schedule 5, Condition 6 in relation to incident reporting.
- The latest versions of the Mining Leases dated 2022 should be uploaded to the Bloomfield website.
- The WMP provided on the Bloomfield website appears to be in draft format. The document has error references and highlighted text throughout. When the WMP is updated to capture actions from this audit, the formatting of the document should be reviewed.

3.15 Key Strengths

Key strengths of the development's environmental management and performance identified during the audit are listed below:

- There were no exceedances of the noise, air quality or blasting impact assessment criteria during the audit period.
- Weed control activities undertaken onsite and in the biodiversity offset area are recorded and tracked via an online mapping platform to determine effectiveness of control efforts and inform future activities.
- An internal Permit to Modify process has been established and is used to assess proposed site activities against current approvals in place for Bloomfield Colliery. The process ensures activities onsite are carried out in accordance with current state and federal approvals.
- Bloomfield have developed and implemented a rehabilitation quality control process during the audit period. This process includes a job breakdown structure for each element of rehabilitation and a hold/sign off point at the end of each stage. The process ensures implementation of rehabilitation is aligned to design and the rehabilitation objectives.





- Pasture rehabilitation areas are being utilised for cattle grazing and results of the monitoring program show that overall these areas have well balanced, stable pastures that are producing quality forage suitable for cattle production.



4. Recommendations

Details of all non-compliances identified during the audit are provided in Section 3.4. Recommendations have been made to address all non-compliances identified. These recommendations are provided in Table 18.

Table 18: Audit Recommendations.

Reference	Recommendation
R1	Bloomfield should ensure that ESCP inspections, maintenance and reporting is undertaken in accordance with Table 1 of the ESCP.
R2	Bloomfield should ensure that all exceedances of trigger levels in the SWMP are investigated and reported as per requirements outlined in the SWMP. Incidents are to be reported in accordance with Schedule 6 Condition 5 of the Project Approval.
R3	Bloomfield should undertake a review of the SWMP water quality triggers and action any updates accordingly in the WMP.
R4	The ESCP should be updated to include: <ul style="list-style-type: none"> • Details of the design evident that the sediment basins have been sized to accommodate. • The capacity of the sediment basins (including a breakdown of the sediment storage capacity and the settling zone capacity). • Details of the methodology used to calculate the sediment basin size.
R5	Bloomfield should review the sediment basin sizing requirements against surveyed capacities to ensure the storages are adequately sized.
R6	Bloomfield should include a procedure for the verification of the groundwater model in the GWMP. It is recommended that the procedure include the requirement for periodic reviews by a suitably qualified hydrogeologist at a specified interval (e.g., every three years at least or more frequently if there is a significant change to the mine plan, acquisition of new hydrogeological information, or groundwater drawdown and inflows significantly exceed model predictions for that stage of mining). The review should include comparison of modelled and observed groundwater levels, and modelled and observed groundwater inflows to the mining pits. A reporting procedure for the model verification should also be included in the GWMP.
R7	The Landscape Management Plan should be provided to Dol and Council for review and input.
R8	The Energy Savings Action Plan should be updated to include consideration of energy use by mobile equipment as well as a program to specifically monitor the effectiveness of measures to reduce energy use onsite.



Reference	Recommendation
R9	Implement outstanding recommendations in relation to management plan updates from the 2021 IEA for the following: <ul style="list-style-type: none"> - Groundwater Management Plan - Landscape Management Plan - Biodiversity Offset Management Plan - Aboriginal Cultural Heritage Management Plan - Energy Savings Action Plan - Water Management Plan
R10	Move the waste IBCs and drums found behind the tyre change out pad to a bunded storage location or arrange for appropriate disposal.
R11	Discharge volumes in the EPL monitoring reports and any other reporting of discharge volumes should be reported using the unit of measure specified under this condition (kilolitres per day). Calculated discharge volumes should be provided to at least three significant figures.





APPENDIX A – Independent Audit Declaration

Independent Audit Report Declaration Form

Project Name: Bloomfield Colliery

Consent Number: PA 07_0087

Description of Project: Operation of an open cut coal mine.

Project Address: Four Mine Road, Ashtonfield, NSW 2323

Proponent: Bloomfield Collieries Pty Ltd

Title of Audit: 2024 Independent Environmental Audit

Date: 20 December 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. The Audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. The findings of the Audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in concluding the Audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner, or operator of the project neither an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the Audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. Neither I nor my employer have provided consultancy services for the Audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for Auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an Audit Report produced to the Minister in connection with an Audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an Audit Report produced to the Minister in connection with an Audit if the person knows that the information is materially relevant to the monitoring or Audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor: Samantha Hovar

Signature:

Qualification(s): Bachelor of Environment and Sustainability
Exemplar Global Certified Lead Auditor – Integrated
Management Systems (Certification No. 6873556-5154070)

Company: Atlantech Pty Ltd

Company Address: 2 Portside Crescent, Maryville, NSW 2293





APPENDIX B – Audit Team Endorsement

Department of Planning, Housing and Infrastructure



NSW Planning ref: MP07_0087-PA-55

Chris Knight
Group Manager Environment
Bloomfield Collieries Pty Ltd
Wonnarua Country
Four Mile Creek Rd
Ashtonfield New South Wales 2323
27/09/2024

Sent via the Major Projects Portal only

Subject: Bloomfield Coal - IEA 2024 - Auditor Endorsement

Dear Mr Knight

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Bloomfield Coal Project, submitted as required by Schedule 5, Condition 7 of MP07_0087 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 3 September 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 5, Condition 7 of the approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Lead Auditor – Samantha Hover
- Assistant Auditor – Nina Foley
- Specialist Surface and Groundwater – Adam Wyatt

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Should you wish to discuss the matter further, please contact Joel Fleming, (Senior Compliance Officer) on 02 6575 3416 or email compliance@planning.nsw.gov.au

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Department of Planning, Housing and Infrastructure



Yours sincerely

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

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APPENDIX C – Audit Consultation

C1. Department of Planning, Housing and Infrastructure

From: Joel Fleming <joel.fleming@planning.nsw.gov.au>
Sent: Tuesday, 5 November 2024 9:51 AM
To: Samantha Hovar <samantha.hovar@atlantech.com.au>
Subject: Re: Request for Comment | Bloomfield Mine 2024 IEA Scope

Sorry Samantha, one last thing for the scope if not already in your plans. Could you please contact Maitland City Council, and any other relevant councils for BOA purposes, for consultation on the IEA scope and seek any input they may have?

Thanks.

Joel Fleming
T 02 6575 3416 | M 0467 715 429 | E joel.fleming@planning.nsw.gov.au

From: Joel Fleming <joel.fleming@planning.nsw.gov.au>
Sent: Tuesday, November 5, 2024 9:44 AM
To: Samantha Hovar <samantha.hovar@atlantech.com.au>
Subject: Re: Request for Comment | Bloomfield Mine 2024 IEA Scope

Hi Samantha,

Thank you for contacting the department for consultation on the upcoming independent audit of the Bloomfield Coal Project (MP07_0087). We appreciate your thorough approach to this process.

Please review the implementation of the Biodiversity Offset Management Plan. With heightened community interest in this matter, and the significance of this plan for long-term biodiversity conservation, it's crucial to make sure everything is being carried out effectively and meets all regulatory requirements.

Mr Adam Wyatt (Specialist Surface and Groundwater) should assist in reviewing the relevant management plans and the effective implementation of these plans, as well as conduct a detailed assessment of the current water infrastructure to ensure they are functioning effectively and are compliant with all relevant standards.. Your collaboration with the Mr Wyatt should be clearly presented in the audit report and relevant reporting by Mr Wyatt attached to the audit report.

If you have any questions, please feel free to contact me.

Thank you for your attention to these matters.

Joel Fleming
Senior Compliance Officer

Development Assessment and Sustainability | Department of Planning, Housing and Infrastructure
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The Store, 6 Stewart Avenue, Newcastle West NSW 2302
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The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.



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From: Samantha Hovar <samantha.hovar@atlantech.com.au>
Sent: Wednesday, October 30, 2024 2:44 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Request for Comment | Bloomfield Mine 2024 IEA Scope

Hi Heidi,

Atlantech has been appointed as the auditor to conduct the 2024 Independent Environmental Audit of the Bloomfield Mine.

I am writing to seek input from the Department of Planning, Housing and Infrastructure on the audit scope. Please refer to the attached letter for further details.

Do not hesitate to contact me if you have any questions regarding this request.

Kind regards,



Samantha Hovar
Senior Environmental Consultant, Atlantech



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C2. Community Consultative Committee

From: Lisa Andrews <lisaandrews.ic@gmail.com>
Sent: Friday, 8 November 2024 3:40 PM
To: Samantha Hovar <samantha.hovar@atlantech.com.au>
Subject: Re: Bloomfield Independent Environmental Audit

Hi Samantha, please see below, comments from one of the community representatives on the Bloomfield Collieries Community Consultative Committee for your consideration/inclusion.

REQUEST:

In line with (e) recommend appropriate measures or actions to improve the environmental performance of the mine complex etc, I would like to request that the auditors review all complaints, exceedances and non-compliances, the corrective actions taken and whether these corrective actions were effective in preventing the non-compliance recurring and hence improving the environmental performance of the mine.

I would also like the auditors to review the NGERS report, assess actions taken to reduce or offset Scope 1 and 2 emissions and also fugitive methane emissions and recommend further actions which could be taken to improve this aspect of environmental performance.

Thank you for the opportunity to comment.

In terms of my role as Independent Chairperson, I wish to advise that there are three Community Consultative Committee meetings held each year at the Bloomfield Collieries site, with the occasional extra-ordinary meeting due to the proposed modification. Attendance is generally good with occasional apologies due to competing priorities of volunteer members and Council representatives. The company provides a detailed presentation and addresses any issues raised. Accordingly, Bloomfield meets their conditions of consent in terms of its engagement with the community.

Best regards
Lisa

Lisa Andrews
Independent Chairperson &
Director
Articulate Solutions Pty Ltd
t: 0401 609 693
e: lisaandrews.ic@gmail.com

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On Fri, Nov 1, 2024 at 12:46 PM Samantha Hovar <samantha.hovar@atlantech.com.au> wrote:

Hi Lisa,

Atlantech has been engaged to conduct the 2024 Independent Environmental Audit of Bloomfield Mine.

I am writing to seek input from the Bloomfield Mine Community Consultative Committee on the audit scope. Please refer to the attached letter for further details.

Please do not hesitate to contact me if you have any questions regarding this request.

Kind regards,



Samantha Hovar
Senior Environmental Consultant, Atlantech



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66
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C3. Maitland City Council

From: Samantha Hovar
Sent: Thursday, 14 November 2024 1:05 PM
To: info@maitland.nsw.gov.au
Cc: Nina Rotton <nina.rotton@atlantech.com.au>
Subject: RE: Bloomfield Independent Environmental Audit

Good afternoon,

I am just following up on the email below.

Can you please advise if Maitland City Council would like to provide input on the scope of the Bloomfield Mine 2024 Independent Environmental Audit.

The site inspection is scheduled to take place Tuesday 19 – Wednesday 20 November. It would be great to have your response prior to this so we can address any input you may have.

Please do not hesitate to contact me if you have any questions regarding this request.

Kind regards,



Samantha Hovar
Senior Environmental Consultant, Atlantech



From: Samantha Hovar
Sent: Friday, 8 November 2024 7:37 AM
To: info@maitland.nsw.gov.au
Cc: Nina Rotton <nina.rotton@atlantech.com.au>
Subject: Bloomfield Independent Environmental Audit

Good morning,

Atlantech has been engaged to conduct the 2024 Independent Environmental Audit of Bloomfield Mine.

I am writing to seek input from the Maitland City Council on the audit scope. Please refer to the attached letter for further details.

Please do not hesitate to contact me if you have any questions regarding this request.

Kind regards,



Samantha Hovar
Senior Environmental Consultant, Atlantech



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samantha.hovar@atlantech.com.au

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C4. Cessnock City Council

From: David Paine <David.Paine@cessnock.nsw.gov.au>
Sent: Thursday, 14 November 2024 2:46 PM
To: Samantha Hovar <samantha.hovar@atlantech.com.au>
Subject: RE: Bloomfield Independent Environmental Audit

Dear Samantha,

Thank you for inviting Council to contribute to the Bloomfield Mine 2024 Independent Environmental Audit. While we appreciate the opportunity, we believe we have no additional insights to offer at this time.

Kind regards,
David
49934110

From: Samantha Hovar
Sent: Friday, 8 November 2024 7:38 AM
To: David.Paine@cessnock.nsw.gov.au
Cc: Nina Rotton <nina.rotton@atlantech.com.au>
Subject: Bloomfield Independent Environmental Audit

Hi David,

Atlantech has been engaged to conduct the 2024 Independent Environmental Audit of Bloomfield Mine.

I am writing to seek input from the Cessnock City Council on the audit scope. Please refer to the attached letter for further details.

Please do not hesitate to contact me if you have any questions regarding this request.

Kind regards,



Samantha Hovar
Senior Environmental Consultant, Atlantech



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APPENDIX D – Independent Audit Tables

The following tables detail the assessment of compliance against each condition of the project approvals.

Table 19: PA 07_0087 Audit Table

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 2, Condition 1	The Proponent must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews Audit interviews Site inspections Environmental Management Strategy Environmental Management Plans	The Environmental Management Strategy document provides the framework for environmental management at Bloomfield Colliery and generally addresses the requirements of this Project Approval. Findings and observations made during the audit and site inspection confirmed that Bloomfield are implementing appropriate measures to prevent and minimise material harm to the environment. No evidence of material environmental harm was found during the audit.	Reasonable and feasible measures to prevent and minimise material harm to the environment have been implemented over the audit period.	
Schedule 2, Condition 2	The Proponent must carry out the project generally in accordance with the: (a) EA, EA (MOD 1), EA (MOD 2), EA (MOD 3) and EA (MOD 4); (b) Biodiversity Offset Strategy; and (c) Statement of Commitments. Notes: The general layout of the project is shown in Appendix 2; and The Statement of Commitments is reproduced in Appendix 3.	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews Audit interviews Site inspections Biodiversity Offset Management Plan Site aerial imagery	Activities completed during the audit period, as reported in the Annual Reviews, generally aligned to that detailed in the environmental assessments listed under this condition. The project is being carried out in accordance with the Biodiversity Offset Management Plan including the completion of some short term and medium term management measures for the offset area such as the establishment of fencing, pest and weed monitoring and signage. Refer to Schedule 3, Conditions 29A, 29B, 29C and 29D for further detail. Operations at Bloomfield were undertaken generally in accordance with the statement of commitments provided in Appendix 3 of the Project Approval. No non-compliances against these commitments during the audit period were identified.	The development has been generally carried out in accordance with the Environmental Assessments listed under this condition, the Biodiversity Offset Strategy and the Statement of Commitments.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 2, Condition 2A	The Proponent must carry out the project in accordance with the conditions of this approval.	Non-compliant	Low	2021, YEM 2023 and YEM 2024 Annual Reviews Audit interviews Site inspections	The project is generally being carried out in accordance with the conditions of Project Approval 07_0087. However, non-compliances against the conditions of this approval have been identified during the audit period and are recorded in this table and in the main Audit Report.	The requirement of this condition was not satisfied during the audit period.	Refer to actions and recommendations provided for each non-compliance.
Schedule 2, Condition 3	If there is any inconsistency between the above documents, the more recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	Noted				Noted	
Schedule 2, Condition 4	The Proponent must comply with any reasonable requirements of the Secretary 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; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and (c) the implementation of any actions or measures contained in these documents.	Compliant		YEM 2024 Annual Review Letter from DPHI to Bloomfield dated 07/12/2023	<p>Following review of the YEM 2023 Annual Review submission, DPHI requested that the following information be included in future Annual Reviews:</p> <p>1. Section 6.4 – Blasting, please include information to demonstrate best practice is implemented to minimise dust and fume emissions from blasting events in accordance with Schedule 3, Condition 9 (b) of the consent.</p> <p>2. Section 10 – Independent Audit, please provide an update on what actions were completed during the reporting period to close out actions, and where applicable, justification for why timelines have been extended from previous reporting.</p> <p>DPHI also requested that Bloomfield provide an update on corrective actions completed in relation to the passive spill incident on 05/07/2022 in a submission to the Major Projects portal by 20 December 2023.</p> <p>The requested information was included in the YEM 2024 Annual Review in Section 6.4 (Blasting) and Section 10 (Independent Audit).</p>	Bloomfield complied with all reasonable requirements of the Secretary in relation to this condition during the audit period.	
Schedule 2, Condition 5	Mining operations may take place on the site until 31 December 2030. Note: Under this Approval, the Proponent is required to rehabilitate the site to the satisfaction of the Secretary and DRG. Consequently	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews Audit interviews Site inspections	The 2021, YEM 2023 and YEM 2024 Annual Reviews, as well as the site inspection, verified that mining operations were undertaken during the audit period.	The mining operations carried out during the audit period occurred within the approved timeframe specified	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	this approval will continue to apply in all other respects other than the right to conduct mining operations until the site has been rehabilitated to a satisfactory standard.					under the condition of this consent.	
Schedule 2, Condition 6	The Proponent must not extract more than 1.3 million tonnes of ROM coal a year from the site.	Compliant		Annual reviews 2021, YEM 2023 and YEM 2024 Bloomfield production data records from 2021, 2022, 2023 and 2024	Sighted annual production data records and figures reported in the Annual Reviews which indicated Run-of-Mine coal extracted during the audit period did not exceed 1.3 million tonnes. ROM coal reported figures: - 725,000 tonnes ROM coal between 1/01/2021 to 31/12/2021 - 918,000 tonnes ROM coal was reported for 1/01/2022 to 31/03/2023 - 660,000 tonnes ROM coal was reported for YEM 2024. - 301,723 tonnes ROM coal recorded for 1/4/24 to 31/10/24	ROM coal extraction did not exceed the limits specified under this condition during the audit period.	
Schedule 2, Condition 7	Project operations may take place 24 hours per day, 7 days per week.	Noted				Noted	
Schedule 2, Condition 8	With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	Not Triggered		All management plans and monitoring programs required under PA07_0087	No management plans or monitoring programs were submitted on a progressive basis during the audit period.	This condition was not triggered during the audit period.	
Schedule 2, Condition 9	The Proponent must prepare revisions of any strategy, plan or program required under this project approval if directed to do so by the Secretary. Such revisions must be prepared to the satisfaction of, and within a timeframe approved by, the Secretary.	Not Triggered		Audit interviews	No directions in relation to this condition were received from the Secretary during the audit period.	This condition was not triggered during the audit period.	
Schedule 2, Condition 10	With the approval of the Secretary, the Proponent may integrate any strategy, plan, program, review, audit or committee required by this approval with any similar requirement under the development consent for the Donaldson Coal Mine and the project approval for the Abel Coal Mine	Not Triggered		All plans, strategies and programs required under PA07_0087 CCC meeting minutes	No strategy, plan, program, review, audit or committee required by this approval was integrated with requirements under the development consent for the Donaldson Coal Mine or the project approval for the Abel Coal Mine during the audit period.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 2, Condition 11	<p>The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	Not Triggered		Audit interviews	No buildings or structures were altered or constructed during the audit period.	This condition was not triggered during the audit period.	
Schedule 2, Condition 12	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Not Triggered		Audit interviews	No demolition work was carried out during the audit period.	This condition was not triggered during the audit period.	
Schedule 2, Condition 13	The Proponent must ensure that all plant and equipment used on site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Compliant		<p>Audit interviews</p> <p>Pre-start records</p> <p>Pulse maintenance system</p> <p>Site inspection</p> <p>Induction Records</p> <p>Operator competency records</p>	<p>Equipment maintenance tracking and scheduling is managed in the site 'Pulse' system which was sighted during the site inspection on 19/11/2024. This system includes ancillary equipment such as lighting plants and pumps. Equipment pre-start records, maintenance schedule and equipment introduction to site records were also sighted.</p> <p>Completion of routine equipment servicing was observed at the site workshop during the inspection.</p> <p>Competency and induction records for operators was sighted and showed that plant and equipment are operated by competent personnel.</p>	Plant and equipment used onsite was generally observed to be maintained and operated in a proper and efficient manner.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 2, Condition 14	The Proponent must establish a Community Enhancement Fund of a minimum of \$500,000 and implement expenditure from that fund to the satisfaction of the Secretary. Proposals for expenditure from the fund must: (a) be prepared by the Proponent in consultation with Council and the CCC and be submitted to the Secretary for approval by 31 December 2009; (b) be expended over the ten calendar years 2010-2019; and (c) include: • a minimum of \$180,000 on local infrastructure projects within Cessnock LGA, to be commenced no later than 30 September 2011; and • a minimum of \$32,000 annually to locally-operating community charities.	Compliant		Bloomfield Independent Environmental Audit 2015 and 2021 reports	The 2015 and 2021 Independent Environmental Audits confirmed establishment of a Community Enhancement Fund and expenditure from the fund up to June 2019.	The requirements of this condition were fulfilled in the previous audit periods.	
Schedule 2, Condition 15	Where conditions of this approval require consultation with an identified party, the Proponent must: (a) consult with the relevant party prior to submitting the subject document to the Secretary for approval; and (b) provide details of the consultation undertaken including: • the outcome of that consultation, matters resolved and unresolved; and • details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.	Non-compliant	Administrative	Aboriginal Cultural Heritage Management Plan (V6) Air Quality Management Plan (V10) Blasting Monitoring Program (V8) Biodiversity Offset Management Plan (V4) Environmental Management Strategy (V7) Final Void Management Plan (V7) Historic Heritage Management Plan (V5) Landscape Management Plan (V7) Mine Closure Plan (V8) Noise Monitoring Plan (V4.6) Rehabilitation Management Plan (V11) Water Management Plan (V2)	All management plans, strategies and programs required under this consent provide evidence of consultation with identified parties during development of the plan, strategy or program where required. With the exception of the Landscape Management Plan, which has not been developed in consultation with DoI and Council. Refer to Schedule 3, Condition 26 for further detail.	Consultation was observed to have occurred where required by the conditions of this consent, apart from that required for the Landscape Management Plan.	Refer to recommendation provided under Schedule 3, Condition 26.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
				Energy Savings Action Plan (V2)			
Schedule 2, Condition 16	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Noted				Noted	
Schedule 2, Condition 17	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Not Triggered		Audit interviews	No directions were received in the audit period to comply with an updated, revised or replacement version of a guideline, protocol, Standard or policy.	This condition was not triggered during the audit period.	
Schedule 2, Condition 18	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the project.	Compliant		Employee Induction PowerPoint Presentation Employee Environmental Induction Employee Induction Acknowledgement form Site Orientation record for R.Hobden dated 16/08/2023 Worker induction package part 1 - 5	The Bloomfield induction outlines the planning approvals that are applicable to the Bloomfield Colliery site and specifies that "only activities allowed under these planning approvals can be carried out". The Environmental Induction also outlines general worker considerations to ensure compliance with the requirements of the Project Approval. Personnel are required to sign a form as acknowledgement that they have completed the induction.	All employees and contractors are made aware of and are instructed to comply with the conditions of this consent through the site induction process.	
Schedule 3, Condition 1	The Proponent must ensure that the noise generated by the project does not exceed at any residence on privately-owned land, or on more than 25% of any privately-owned land, the noise impact assessment criteria shown in Table 1 for the monitoring location nearest to that residence or land. Note: To interpret the locations in Table 1, see Appendix 2. However, if the Proponent has a written negotiated noise agreement with the landowner of any privately owned land, and a copy of this	Compliant		2021, 2023 and 2024 YEM Annual Reviews Audit interviews Quarterly Monitoring Reports (December 2021 to September 2024)	Quarterly noise monitoring results indicate compliance with noise limits at all monitoring locations during the audit period. No exceedances were recorded. Predicted noise emission modelling software was used to assist in operations planning to avoid exceedance of noise limits during noise enhanced conditions. There are currently no written noise agreements in place with any landowners.	No exceedances of the noise impact assessment criteria were recorded at any residence on privately-owned land during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	agreement has been forwarded to the Department and EPA, then the Proponent may exceed the noise limits in Table 1 on that land in accordance with the negotiated noise agreement.						
Schedule 3, Condition 2	<p>The Proponent must take all reasonable and feasible measures to ensure that the noise generated by the project combined with the noise generated by other mines does not exceed the following amenity criteria at any residence on, or on more than 25 percent of, any privately owned land:</p> <ul style="list-style-type: none"> • LAeq(11 hour) 50dB(A) – Morning shoulder and Day; • LAeq(4 hour) 45 dBA) – Evening; and • LAeq(9 hour) 40 dB(A) – Night. 	Compliant		<p>2021, YEM 2023 and YEM 2024 Annual Reviews</p> <p>Audit interviews</p> <p>Quarterly Monitoring Reports (December 2021 to September 2024)</p> <p>Complaints register 2021 - 2024</p>	<p>Quarterly noise monitoring results indicate compliance with noise limits at all monitoring locations during the audit period. No exceedances were recorded.</p> <p>Three noise complaints were received during the audit period. These complaints were investigated and actioned appropriately.</p>	No exceedances of the amenity criteria were recorded at any residence on privately-owned land during the audit period.	
Schedule 3, Condition 3	<p>The Proponent must:</p> <p>(a) implement all reasonable and feasible noise mitigation measures;</p> <p>(b) investigate ways to reduce the noise generated by the project; and</p> <p>(c) report on these investigations and the implementation and effectiveness of these measures in the Annual Review, to the satisfaction of the Secretary.</p>	Compliant		<p>2021, YEM 2023 and YEM 2024 Annual Reviews</p> <p>Audit interviews</p> <p>Site inspection</p> <p>Quarterly Monitoring Reports (December 2021 to September 2024)</p> <p>Noise Monitoring Program</p> <p>Bloomfield noise forecast report dated 19/09/2023</p> <p>Sound power survey dated August 2023</p> <p>EnvMet system - noise images for 24/06/2024</p>	<p>Mining operations are scheduled with regard to predicted weather conditions. Predictive meteorological modelling software is used which includes half-hourly noise predictions for the daily period and forecasted noise risk. Evidence of reduced operations and shutdown during noise enhancement conditions sighted.</p> <p>Sound power testing was completed for equipment in operation at Bloomfield during the audit period to review alignment with impact assessment predictions. As per the Noise Monitoring Program, further mitigation measures may be investigated if sound power levels are higher than predicted.</p> <p>Four new 793F haul trucks with sound attenuation were purchased during the audit period.</p> <p>Operational noise performance was been reported in the Bloomfield Annual Reviews in Section 6.5. This sections details noise management, noise monitoring results and further improvements to be implemented.</p> <p>Noise monitoring results during the audit period indicate compliance with relevant</p>	All requirements of this condition were met during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					noise criteria and therefore, effectiveness of the controls being implemented.		
Schedule 3, Condition 4	<p>The Proponent must prepare a Noise Monitoring Program for the project to the satisfaction of the Secretary. The Program must :</p> <p>(a) be prepared in consultation with EPA and be submitted to the Secretary for approval within 6 months of the date of this approval; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> • a combination of unattended and attended monitoring measures; and • a noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval. <p>The Proponent must implement the Noise Monitoring Program as approved by the Secretary.</p>	Compliant		<p>2021, YEM 2023 and YEM 2024 Annual Reviews</p> <p>Audit interviews</p> <p>Site inspection</p> <p>Quarterly Monitoring Reports (December 2021 to September 2024)</p> <p>Noise Monitoring Program</p> <p>Letter from DPHI to Bloomfield dated 29/06/2022 (ref MP 07_0087-PA-36)</p>	<p>The site Noise Monitoring Program was reviewed against the requirements of this condition:</p> <p>(a) Consultation with the required agency was completed in 2010 and evidence is provided in Appendix C of the monitoring program. No feedback on the program was provided. The Noise Monitoring Program has also been submitted to DPHI and the latest version was approved on 29/06/2022.</p> <p>(b) The monitoring program includes a description of monitoring measures (unattended and attended) in Section 4.2 and 4.3. Section 4.5 of the program outlines the integrated noise monitoring protocol for evaluating compliance with the noise impact assessment criteria.</p> <p>During the audit period, noise monitoring was undertaken in accordance with the Noise Monitoring Program and the results reported annually in the Annual Review.</p>	A Noise Monitoring Program has been prepared in accordance with the requirements of this condition and was implemented during the audit period.	
Schedule 3, Condition 5	The Proponent must ensure that the airblast overpressure level from blasting at the project does not exceed the criteria in Table 2 at any residence on privately-owned land.	Compliant		2021-2024 blasting results	Blast monitoring records for the audit period show no blasts exceeded the 115dB airblast overpressure level at the locations monitored. Monitoring was undertaken a four locations required under EPL 396.	No blasts exceeded an airblast overpressure limits during the audit period.	
Schedule 3, Condition 6	The Proponent must ensure that the ground vibration level from blasting at the project does not exceed the levels in Table 3 at any residence on privately-owned land.	Compliant		2021-2024 blasting results	Blast monitoring results indicate no blasts exceeded 5mm/sec peak particle velocity during the audit period. Monitoring was undertaken a four locations required under EPL 396.	No blasts exceeded the ground vibration limits during the audit period.	
Schedule 3, Condition 7	The Proponent must carry out blasting on site only between 9 am and 5 pm Monday to Saturday. No blasting is allowed on Sundays and Public Holidays.	Compliant		2021-2024 blasting results	Blast results indicate that blasting only occurred between the hours of 9am to 5pm Monday to Saturday. No blasting occurred on Sundays or Public holidays during the audit period.	All blasting was carried out within the hours and days specified by this condition.	
Schedule 3, Condition 8	The Proponent may carry out on the site a maximum of:	Compliant		2021-2024 blasting results	The maximum number of blasts in a day recorded during the audit period was two. The average number of blasts per week averaged over 12 months was less than one for 2021, 2022, 2023 and 2024.	The limit of 2 blasts per day and 5 blasts per week averaged over a 12 month period was not exceeded during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 9	During mining operations on site, the Proponent must implement best blasting practice to: (a) protect the safety of people, property, public infrastructure, and livestock; and (b) minimise the dust and fume emissions from blasting at the project, to the satisfaction of the Secretary.	Compliant		Air Quality Monitoring Program Blasting Monitoring Program Blast checklists dated 10/08/2022, 18/10/2023 and 12/03/2024 Explosives Principal Control Plan Blast Fume Management Strategy Site Security Plan for Storage and Handling of Explosives EnvMet Blast Prediction dated 25/06/2024 Audit interviews Blast results 2021 - 2024	<p>The Blast Monitoring Program describes the blast management measures implemented. This includes:</p> <ul style="list-style-type: none"> - a predictive meteorological modelling software which is used to schedule blasts when conditions are optimal. An example blast prediction from 25/06/2024 was sighted. - 500m exclusion zone around all blasts. - utilisation of independent technical advice for initiation techniques, timing and blast hole loading profiles to control airblast and ground vibration impacts. - use of onsite real time weather station data (e.g. wind speed and direction) to assist in planning of blasts. - public notification of scheduled blasts through SMS system, local newspapers and the Bloomfield website. - implementation of a blast protocol and pre-blast checklist. Completed checklists for the 10/08/2022, 18/10/2023 and 12/03/2024 were sighted. <p>These controls were verified during the site inspection and audit interviews. Furthermore, no blast exceedances or fume events were recorded during the audit period.</p> <p>Additional management strategies and measures undertaken at Bloomfield in relation to fume and dust are included in the Principal Explosives Control Plan, Air Quality Monitoring Program and the Blast Fume Management Strategy. The Blast Fume Management Strategy identifies likely causes of fume from blasting, controls to mitigate excessive blast fumes and the procedure for management of excessive blast fumes should they occur.</p>	The requirements of this condition were satisfied during the audit period.	Opportunity for improvement - It is noted that the Bloomfield Site Security Plan for the Storage and Handling of Explosives is due for review as of the 24/10/23
Schedule 3, Condition 10	The Proponent must not undertake blasting within 500 metres of any privately-owned land, unless suitable arrangements have been made with the landowner and any tenants to minimise the risk of flyrock-related	Compliant		Audit interviews Site inspection 2021, YEM 2023 and YEM 2024 Annual Reviews	Review of blast locations during the audit period show no blasting was undertaken within 500 metres of any privately-owned land.	All blasts within the audit period were found to be compliant with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	impact to the property to the satisfaction of the Secretary.						
Schedule 3, Condition 11	The Proponent must: (a) notify the landowner/occupier of any residence within 2 kilometres of the mining area who registers an interest in being notified about the blasting schedule at the mine, or any other landowner nominated by the Secretary; (b) operate a blasting hotline, or alternate system agreed to by the Secretary, to enable the public to get up-to-date information on the blasting schedule at the project; (c) advertise the blasting hotline number in a local newspaper at least 4 times each year; and (d) publish an up-to-date blasting schedule on its website, to the satisfaction of the Secretary.	Compliant		2015 Bloomfield Independent Environmental Audit ACM invoices dated 30/09/21, 31/12/21, 31/03/22, 30/06/22, 30/09/22, 31/12/22, 31/03/23, 30/06/23, 30/09/23, 31/12/23, 31/03/24, June 2024 and 30/09/24. Bloomfield Website Audit interviews	The 2015 Independent Environmental Audit confirmed that all relevant landowners were notified by letter on 10/11/2009 to register for blast notification. Bloomfield operate a 24 hour blasting hotline (02 4930 2680) which is advertised on the Bloomfield website and was published in the local newspaper four times per year during the audit period, as evidenced by invoices. The blasting schedule is published on the Bloomfield website (https://www.bloomcoll.com.au/sustainability/environmental-management/bloomfield-assessments/blasting-information). The website was reviewed by the audit team on 02/12/2024 and showed information for 28/11/2024.	The requirements of this condition in relation to blasting notification were satisfied during the audit period.	
Schedule 3, Condition 12	The Proponent must advise the owners of privately-owned land that they are entitled to a structural property inspection to establish the baseline condition of buildings and other structures on the property: (a) within 2 months of the date of this approval, for properties within 2 kilometres of blasting operations occurring at the date of this approval; and (b) at least 2 months prior to blasting within 2 kilometres of additional properties. If the Proponent receives a written request for a structural property inspection from any such landowner, the Proponent must: • within 2 months of receiving this request commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to inspect the condition of any building or structure on the land (prior to blasting taking place within 2 km of the property, if	Compliant		2015 Bloomfield Independent Environmental Audit Audit interviews	The 2015 Independent Environmental Audit confirmed that all relevant property owners were notified by letter on 30/10/2009 that they were entitled to a structural property inspection. No blasting within 2km of additional properties was undertaken during the audit period. No requests for structural property inspection were received during the audit period.	The requirements of this condition were satisfied during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	possible), and recommend measures to mitigate any potential blasting impacts; and • give the landowner a copy of the property inspection report.						
Schedule 3, Condition 13	If any landowner of privately-owned land within 2 kilometres of blasting operations, or any other landowner nominated by the Secretary, claims that buildings and/or other structures on his/her land have been damaged as a result of blasting at the project after the date of this approval, the Proponent must within 3 months of receiving this claim: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to investigate the claim; and (b) give the landowner a copy of the property investigation report. If this independent property investigation confirms the landowner's claim, and both parties agree with these findings, then the Proponent must repair the damages to the satisfaction of the Secretary. If the Proponent or landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution.	Not Triggered		Audit interviews	No claims were received during the audit period.	This condition was not triggered during the audit period.	
Schedule 3, Condition 14	The Proponent must prepare a Blast Monitoring Program for the project to the satisfaction of the Secretary. This program must: (a) be submitted to the Director General for approval within 6 months of the date of this approval; and (b) include a protocol for evaluating blasting impacts on, and demonstrating compliance with, the blasting criteria in this approval for all privately-owned residences and other structures. The Proponent must implement the	Compliant		Blast Monitoring Program 2021, YEM 2023 and YEM 2024 Annual Reviews Site inspection Audit interviews Blasting results 2021 - 2024	A Blast Monitoring Program has been prepared and addresses the following: (a) The 2015 Independent Environmental Audit confirmed that the monitoring program was submitted to the Department on 24/04/2010. (b) A protocol for evaluating blasting impacts is included on page 6 of the program. During the audit period, blasting was undertaken in accordance with the Blast Monitoring Program and monitoring results were reported annually in the Bloomfield Annual Review. A summary of the measure	A Blast Monitoring Program has been prepared for the project and implemented generally in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	Blast Monitoring Program as approved by the Secretary.				implemented during the audit period is provided under Schedule 3, Condition 9.		
Schedule 3, Condition 15	<p>The Proponent must ensure that dust emissions generated by the project do not cause additional exceedances of the criteria listed in Tables 4 to 6 at any residence on privately-owned land, or on more than 25 percent of any privately-owned land.</p> <p>Notes:</p> <p>a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources).</p> <p>b Incremental impact (i.e. incremental increase in concentrations due to the project on its own).</p> <p>c Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary.</p> <p>d Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.</p>	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews	<p>Monitoring results for the audit period were reviewed and did not indicate any exceedances of the dust emissions criteria offsite as a result of the project. The data showed:</p> <ul style="list-style-type: none"> • Annual average PM10 concentrations (total due to all sources) have not exceeded the 25 µg/m3 criterion • Maximum 24-hour average PM10 concentrations exceeded the 50 µg/m3 criterion in the 2024 Annual Review period, however the results were noted to be related to elevated regional dust levels. • Annual average PM2.5 concentrations (total due to all sources) have not exceeded the 8 µg/m3 criterion • Maximum 24-hour average PM2.5 concentrations exceeded the 25 µg/m3 criterion in the 2024 Annual Review period, however the results were noted to be related to elevated regional dust levels. • Annual average TSP concentrations (total due to all sources) have not exceeded the 90 µg/m3 criterion • Annual average deposited dust levels have not exceeded the 2 g/m2/month criterion 	There were no exceedances of the dust emissions criteria as a result of the project at residences on privately-owned land during the audit period.	
Schedule 3, Condition 16	<p>The Proponent must prepare an Air Quality Monitoring Program for the project to the satisfaction of the Secretary. This program must:</p> <p>(a) be prepared in consultation with EPA and be submitted to the Secretary for approval within 6 months of the date of this approval; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> • a combination of high-volume samplers and dust deposition gauges to monitor the dust emissions of the project and provision for additional real time monitoring if required in response to monitoring results and/or 	Compliant		Air Quality Monitoring Program (V10) Bloomfield 2015 Independent Environmental Audit Site inspection Audit interviews	<p>An Air Quality Monitoring Program has been prepared and addresses the following:</p> <p>(a) The 2015 Independent Environmental Audit confirmed that the monitoring program was prepared in consultation with the relevant agency and submitted to the Department for approval within 6 months of the date of this approval.</p> <p>(b) The location and type of monitoring equipment used is included on page 5 and 6 of the monitoring program. The program includes a combination of ten (10) dust deposition gauges around the project area, a high-volume sampler located at Buttai to the south of the project area, and two (2) Dust Track gauges located upwind (NE) and</p>	An Air Quality Monitoring Program has been prepared for the project in accordance with the requirements of this condition. The monitoring program was implemented during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	complaints; and <ul style="list-style-type: none"> an air quality monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this approval. <p>The Proponent must implement the Air Quality Monitoring Program as approved by the Secretary.</p>				<p>downwind (SW) of the site. A protocol for evaluating compliance is included on page 7 of the program.</p> <p>A sample of air quality monitoring locations were inspected during the site visit and data collected during the audit period has been reviewed. The monitoring is carried out in accordance with the relevant monitoring standards.</p>		
Schedule 3, Condition 17	During the project, the Proponent must ensure there is a suitable continuously operating meteorological station on or adjacent to the site that complies with the requirements in Approved Methods for Sampling of Air Pollutants in New South Wales (DEC, 2007), or its latest version, to the satisfaction of the Secretary.	Compliant		Calibration records dated Sep 2023, March 2024 and Sep 2024 Site inspection Audit interviews Vista data vision website 2024 daily and hourly data 2021, YEM 2023 and YEM 2024 Annual Review	A new meteorological station was installed onsite during the audit period which provides data for rainfall, temperature, relative humidity, wind speed, wind direction, and stability class. This station was sighted during the site inspection. Real-time data is available to view online - screenshots were sighted. Calibration reports for the station were also sighted and show that the station was fully operational and meets the requirements of the approved methods for sampling of air pollutants.	Bloomfield operates a meteorological station onsite in accordance with the requirements of this condition.	
Schedule 3, Condition 18	Except as may be expressly provided for by an EPL, or in accordance with section 120 of the Protection of the Environment Operations Act 1997, the Proponent must not discharge any mine water from the site. However, water may be transferred between the site and the adjoining Donaldson Coal Mine and/or Abel Coal Mine, in accordance with any approved Water Management Plan (see below).	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews	No discharges of mine affected water from dams operated under PA07_0087 occurred during the audit period.	The requirements of this condition were satisfied during the audit period.	
Schedule 3, Condition 19	<p>The Proponent must prepare a Water Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with EPA and DoI and be submitted to the Secretary for approval within 6 months of the date of this approval;</p> <p>(b) be prepared by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and</p> <p>(c) include:</p> <ul style="list-style-type: none"> a Site Water Balance; an Erosion and Sediment Control Plan; 	Non-Compliant	Low	Water Management Plan Monitoring data Annual reviews	<p>The current approved Water Management Plan (WMP) for the site is the <i>Bloomfield Mining Operations Water Management Plan, Revision D</i> (AECOM, 2021).</p> <p>The document was developed by published 10 August 2021. The NSW Department of Planning and Environment (DPE) approved the plan on 23 August 2022.</p> <p>Page 1 of the WMP (AECOM, 2021) states “<i>in accordance with Condition 19(a) the WMP has been prepared in consultation with the EPA and [DPE].</i>” Proof of the correspondence with these agencies is</p>	<p>Commitments in the Water Management Plan have not been fulfilled.</p> <p>Several surface water quality trigger exceedances that were not reported or investigated have been identified. Bloomfield should ensure that all</p>	<p>Bloomfield should ensure that ESCP inspections, maintenance and reporting is undertaken in accordance with Table 1 of the ESCP.</p>

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	<ul style="list-style-type: none"> • a Surface Water Monitoring Plan; • a Ground Water Monitoring Program; and • a Surface and Ground Water Response Plan. <p>The Proponent must implement the Water Management Plan as approved by the Secretary.</p>				<p>provided in Appendix F of the WMP (AECOM, 2021).</p> <p>Page 1 of the WMP (AECOM, 2021) states <i>“In accordance with Condition 19(b) the WMP has been prepared by a suitable qualified consultant as approved by the Department.”</i> Proof of the correspondence with the department verifying this is provided in Appendix F of the WMP (AECOM, 2021).</p> <p>The WMP (AECOM, 2021) includes the following components:</p> <ul style="list-style-type: none"> - a Site Water Balance in Appendix B; - an Erosion and Sediment Control Plan in Appendix C; - a Surface Water Monitoring Plan in Appendix D; and - a Ground Water Monitoring Program in Appendix E; - a Surface and Ground Water Response Plan captured in Appendix D and Appendix E. <p>Commitments in the plan were reviewed to determine whether the Proponents has implemented the WMP as approved by the Secretary. The review is documented in Table 2 of Attachment F and indicates that not all of the commitments made in the plan have been fulfilled.</p>		<p>exceedances of trigger levels in the SWMP are investigated and reported as per requirements outlined in the SWMP. Incidents are to be reported in accordance with Schedule 6 Condition 5 of the Project Approval.</p> <p>Bloomfield stated in response to a request for information relating to the above aforementioned exceedances that the SWMP water quality trigger values: <i>“were set after a small sample size in 2012. The WMP allows for a review of the triggers which may be appropriate with the pending WMP review after approval of DA Modification 5.”</i></p> <p>Bloomfield should undertake a review of the SWMP water quality triggers and action any updates accordingly in the WMP.</p>
Schedule 3, Condition 20	<p>The Site Water Balance must:</p> <p>(a) include details of:</p> <ul style="list-style-type: none"> • sources and security of water supply; • water use and management on site; • any off-site water transfers or discharges; and • reporting procedures; and <p>(b) describe measures to minimise water use by the project.</p>	Compliant		Water Management Plan	<p>Section 2 of the main body of the WMP (AECOM, 2021) addresses each of the requirements under part (a) of this condition. The Site Water Balance is provided in Appendix B of the WMP (AECOM, 2021) and captures each of the requirements.</p> <p>The Site Water Balance provided in Appendix B of the WMP (AECOM, 2021) indicates that Bloomfield is a water surplus site and that all demands can be met by water in the water management system without the need for the import of water from external sources. The report details how Bloomfield reuses</p>	The requirements of this condition were satisfied during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					water to minimise water use and how clean water is diverted around the mine water management system to reduce the amount captured.		
Schedule 3, Condition 21	<p>The Erosion and Sediment Control Plan must:</p> <p>(a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction (Volume 2E – Mines and Quarries) manual (DECC 2008), or its latest version;</p> <p>(b) identify activities that could cause soil erosion and generate sediment;</p> <p>(c) describe measures to minimise soil erosion and the potential for transport of sediment downstream;</p> <p>(d) describe the location, function and capacity of erosion and sediment control structures; and</p> <p>(e) describe what measures would be implemented to maintain the structures over time.</p>	Non-compliant	Administrative	Water Management Plan	<p>The Erosion and Sediment Control Plan (ESCP) is provided in Appendix C of the WMP (AECOM, 2021).</p> <p>Section 1.4 of the ESCP outlines activities that could cause soil erosion and generate sediment.</p> <p>Section 2 of the ESCP describes measures to minimise soil erosion and the potential for transport of sediment downstream.</p> <p>Figure 1 of the ESCP shows the location of the ESC structures. The function of each of the structures is outlined throughout Section 2 of the ESCP. While the document references that the ESCs should be designed to the design standards outlined in the Managing Urban Stormwater Soils and Construction Vol 2 Mines and Quarries (the 'Blue Book'), the capacity of the erosion and sediment control structures is not listed.</p> <p>Maintenance of the erosion and sediment control structures is outlined in Section 4.0 of the plan.</p>	The Erosion and Sediment Control Plan does not address all requirements of this condition.	<p>The ESCP should be updated to include:</p> <ul style="list-style-type: none"> • Details of the design evident that the sediment basins have been sized to accommodate, • The capacity of the sediment basins (including a breakdown of the sediment storage capacity and the settling zone capacity), and • Details of the methodology used to calculate the sediment basin size. <p>Bloomfield should review the sediment basin sizing requirements against surveyed capacities to ensure the storages are adequately sized.</p>
Schedule 3, Condition 22	<p>The Surface Water Monitoring Program must include:</p> <p>(a) detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project;</p> <p>(b) surface water and stream health impact assessment criteria;</p> <p>(c) a program to monitor the impact of the project on surface water flows, water quality and stream health; and</p> <p>(d) reporting procedures for the results of the monitoring program.</p>	Compliant		Water Management Plan	<p>The Surface Water Monitoring Program (SWMP) is provided in Appendix D of the WMP (AECOM, 2021).</p> <p>Detailed baseline data on surface water quality in creeks and other waterbodies that could potentially be affected by the project is provided in Section 1.4 of the SWMP. Bloomfield has advised that there is no baseline flow data available, as such, baseline flow data is unable to be included in the SWMP.</p> <p>Surface water and stream health impact assessment criteria is provided in Section 1.5 of the SWMP.</p>	The requirements of this condition were satisfied during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					<p>A program to monitor the impact of the project on surface water flows, water quality and stream health is provided in Section 2 of the SWMP.</p> <p>Reporting procedures for the results of the monitoring program are outlined in Section 2 of the SWMP.</p>		
Schedule 3, Condition 23	<p>The Groundwater Monitoring Program must include:</p> <p>(a) further development of the regional and local groundwater model;</p> <p>(b) detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality (including at any privately owned bores in the vicinity of the site);</p> <p>(c) groundwater impact assessment criteria;</p> <p>(d) a program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation;</p> <p>(e) procedures for the verification of the groundwater model; and</p> <p>(f) reporting procedures for the results of the monitoring program and model verification.</p>	Non-compliant	Administrative	Water Management Plan	<p>The Groundwater Monitoring Program (GWMP) is provided in Appendix E of the WMP (AECOM, 2021).</p> <p>Section 2.1 of the GWMP outlines further development of the regional and local groundwater model.</p> <p>Detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality is provided in Section 2.2 of the GWMP.</p> <p>A program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation is outlined in Section 2.4 and Section 3 of the GWMP.</p> <p>Section 5.3 of the WMP states that “<i>the following circumstances would trigger further development or refinement of the groundwater model:</i></p> <ul style="list-style-type: none"> • a significant change to the mine plan • acquisition of new hydrogeological information, such as groundwater levels and aquifer properties (i.e. hydraulic conductivity) which are different to calibrated values used in the model • groundwater drawdown and inflows which significantly exceed model predictions for that stage of mining.” <p>This is not considered a procedure for the verification of the groundwater model.</p> <p>Reporting procedures for the groundwater monitoring program are outlined in Section 2.5 of the GWMP. There is no reporting procedure included for model verification included in the GWMP.</p>	<p>The Groundwater Monitoring Program does not address all requirements of this condition.</p>	<p>Bloomfield should include a procedure for the verification of the groundwater model in the GWMP. It is recommended that the procedure include the requirement for periodic reviews by a suitably qualified hydrogeologist at a specified interval (e.g., every three years at least or more frequently if there is a significant change to the mine plan, acquisition of new hydrogeological information, or groundwater drawdown and inflows significantly exceed model predictions for that stage of mining). The review should include comparison of modelled and observed groundwater levels, and modelled and observed groundwater inflows to the mining pits.</p> <p>A reporting procedure for the model verification should also be included in the GWMP.</p>

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 24	The Surface and Groundwater Response Plan must describe the measures and/or procedures that would be implemented to: (a) investigate, notify and mitigate any exceedances of the surface water, stream health and ground water impact assessment criteria; (b) compensate landowners of privately-owned land whose water supply is adversely affected by the project; and (c) mitigate and/or offset any adverse impacts on groundwater dependent ecosystems or riparian vegetation.	Compliant		Water Management Plan	A Surface and Groundwater Response Plan is incorporated in Appendix D and Appendix E of the WMP (AECOM, 2021). Section 6 of the WMP (AECOM, 2021) also outlines how the items relevant to Schedule 3, Condition 24 are addressed. Section 6.2 outlines the procedure for investigating, notifying and mitigating any exceedances of the surface water, stream health and ground water impact assessment criteria. This section also outlines the commitment to compensate landowners of privately owned land in the event that their supply is adversely affected by the project and a procedure for mitigating/offsetting adverse impacts on groundwater dependent ecosystems or riparian vegetation.	The requirements of this condition were satisfied during the audit period.	
Schedule 3, Condition 25	The Proponent must rehabilitate the site to the satisfaction of DRG and the Secretary. This rehabilitation must be generally consistent with the proposed rehabilitation activities described in the documents listed in condition 2 of Schedule 2 and comply with the objectives in Table 5. Note: The rehabilitation objectives detailed in 5 apply to the entire site, including all landforms constructed under either this approval or previous consents. However, they do not require any additional earthmoving works to be undertaken for landforms that have been approved and constructed prior to Modification 4 or under previous consents.	Compliant		2021, YEM 2023 and YEM 2024 Annual Reviews 2022-23 Annual Rehabilitation Report 2023-24 Annual Rehabilitation Report 2022-25 Forward Program 2024-27 Forward Program Rehabilitation Management Plan Final Void Management Plan Mine Closure Plan Site inspection Audit interviews S-Cut 2021 and 2023 record sheets S-Cut 2024 maintenance sheet 2022 - 2024 herbicide records Stockpile volume register 2021 - 2023 rehabilitation monitoring reports	The rehabilitation objectives for site align with those specified in Table 5 of this condition and are defined in a range of documents including: <ul style="list-style-type: none">• Rehabilitation Management Plan• Final Void Management Plan• Mine Closure Plan• Forward Program The final landform for the site is detailed in the Final Void Management Plan and is consistent with Appendix 4 of this Project Approval. It was recommended in the previous audit that Bloomfield consider the need for additional analogue monitoring locations. Bloomfield updated the Rehabilitation Management Plan during the audit period to include two new analogue monitoring locations (four in total). Rehabilitation activities have been reported in the Annual Rehabilitation Reports during the audit period. Active and established rehabilitation areas were also sighted during the site inspection including at the tailings storage facility, S Cut and K Cut. Evidence of recent shaping, seeding, biosolids	Rehabilitation has been carried out in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					<p>application and weed control was seen.</p> <p>Rehabilitation monitoring results for the audit period found:</p> <ul style="list-style-type: none"> - Overall consistent and satisfactory performance at rehabilitation sites across Bloomfield Colliery. - Generally, results were stable or improving over previous years, with exceptions of results that can be attributed to temporary drought conditions. - Overall, the results indicate rehabilitation sites are on a trajectory leading to the rehabilitation objective of a safe and stable landforms compatible with the surrounding landscape and with a land capability suitable for grazing. - Overall, the rehabilitated pastures are well balanced, stable pastures that are producing quality forage suitable for cattle production. <p>Bloomfield developed and implemented a rehabilitation quality control process during the audit period. This process includes a job breakdown structure for each element of rehabilitation and a hold/sign off point at the end of each stage. The process ensures implementation of rehabilitation is aligned to design and the rehabilitation objectives.</p>		

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 25A	<p>The Proponent must rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable steps must be taken to minimise the total area exposed at any time. Interim stabilisation and temporary vegetation strategies must be employed when areas prone to dust generation, soil erosion and weed incursion cannot be permanently rehabilitated.</p> <p>Note: It is accepted that some parts of the site that are progressively rehabilitated may be subject to further disturbance at some later stage of the development.</p>	Compliant		<p>2021, YEM 2023 and YEM 2024 Annual Reviews</p> <p>2022-23 Annual Rehabilitation Report</p> <p>2023-24 Annual Rehabilitation Report</p> <p>2022-25 Forward Program</p> <p>2024-27 Forward Program</p> <p>Rehabilitation Management Plan</p> <p>Site inspection</p> <p>Audit interviews</p> <p>S-Cut 2021 and 2023 record sheets</p> <p>S-Cut 2024 maintenance sheet</p> <p>2022 - 2024 herbicide records</p> <p>Stockpile volume register</p> <p>2021 - 2023 rehabilitation monitoring reports</p>	<p>During the 2022 - 2023 period, the following activities were undertaken:</p> <ul style="list-style-type: none"> - 5.5 ha of vegetation was cleared for mining operations. - 11.9 ha was prepared for rehabilitation, including an additional 6 ha that became available due to mine planning changes. <p>During the 2023 - 2024 period, the following activities were undertaken:</p> <ul style="list-style-type: none"> - no additional land was disturbed for mining purposes - 9.9 ha was prepared for rehabilitation - 5.9 ha was progressed to ecosystem and land use establishment <p>Rehabilitation records and maintenance records were sighted and provide evidence that rehabilitation activities were undertaken during the audit period.</p> <p>Ongoing active rehabilitation at the tailings storage facility and S Cut was observed during the site inspection. Established rehabilitation in previous mining areas which is now being used for cattle grazing was also sighted. Exposed surfaces including topsoil stockpiles had good vegetated cover.</p> <p>Rehabilitation during the audit period has been completed in alignment with the Forward Program and Rehabilitation Management Plan.</p>	Rehabilitation has been carried out in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 26	<p>The Proponent must prepare a detailed Landscape Management Plan for the project to the satisfaction of the Secretary and DRG. This plan must:</p> <p>(a) be prepared in consultation with OEH, Dol and Council by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and</p> <p>(b) include a:</p> <ul style="list-style-type: none"> • Rehabilitation Management Plan to be submitted to the Secretary for approval within 6 months of the date of this approval; • Final Void Management Plan to be submitted to the Secretary for approval by 30 June 2012; and • Mine Closure Plan to be submitted to the Secretary for approval by 30 June 2012. <p>The Proponent must implement the Landscape Management Plan as approved by the Secretary.</p>	Non-compliant	Administrative	<p>Landscape Management Plan (V7)</p> <p>Rehabilitation Management Plan (V11)</p> <p>Final Void Management Plan (V7)</p> <p>Mine Closure Plan (V8)</p> <p>Letter from DPHI to Bloomfield dated 13/07/2020</p>	<p>A Landscape Management Plan has been prepared for the project and was assessed against the requirements of this condition.</p> <p>(a) Evidence of consultation is provided in Appendix 1 of the management plan. The plan was prepared in consultation with OEH, as required under the original approval condition. Suitable qualified experts were approved by DPHI on 16/12/2009. However, as identified in the 2021 IEA, consultation with Dol and Council is now required following approval of MOD 4. There is no evidence of consultation undertaken with Dol and Council.</p> <p>(b) The Rehabilitation Management Plan, Final Void Management Plan and Mine Closure Plan are reviewed in Schedule 3, Conditions 27, 28 and 29 respectively. These subplans have been submitted to and approved by the Secretary, as evidenced by correspondence provided in the appendices of these plans.</p> <p>The latest version of the Landscape Management Plan was submitted to DPHI and approved on 13 July 2020. The original version of the plan was also provided to DRE in 2010.</p>	<p>A Landscape Management Plan has been prepared for the project and approved by the Secretary in accordance with the requirements of this condition. However, the plan has not been prepared in consultation with Dol and Council.</p>	<p>The Landscape Management Plan should be provided to Dol and Council for review and input.</p>

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 27	<p>The Rehabilitation Management Plan must include:</p> <p>(a) the rehabilitation objectives for the site;</p> <p>(b) a description of the short, medium, and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> rehabilitate the site; and manage the remnant vegetation and habitat on the site; <p>(c) performance and completion criteria for the rehabilitation of the site;</p> <p>(d) a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for:</p> <ul style="list-style-type: none"> minimising and rehabilitating disturbed areas; protecting vegetation and soil outside the disturbance areas; undertaking pre-clearance surveys; managing impacts on fauna; landscaping the site to minimise visual impacts; conserving and reusing topsoil; collecting and propagating seed for rehabilitation works; salvaging and reusing material from the site for habitat enhancement; controlling weeds and feral pests; controlling access; and bushfire management; <p>(e) a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;</p> <p>(f) a description of the potential risks to successful rehabilitation and/or revegetation, and a description of the contingency measures that would be implemented to mitigate these risks; and</p> <p>(g) details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>	Compliant		Rehabilitation Management Plan (v11)	<p>The Rehabilitation Management Plan (RMP) was reviewed and addresses the following:</p> <p>(a) Rehabilitation objectives are included in Appendix A of the RMP.</p> <p>(b) Measures for rehabilitation and remnant vegetation/habitat are included under 'Management Measures' section of the plan.</p> <p>(c) Rehabilitation completion criteria and performance indicators are outlined in Appendix A of the RMP. The criteria included in this plan is consistent with that included in the Mine Closure Plan.</p> <p>(d) Measures to be implemented and associated procedures are specified throughout the RMP for each of the required environmental aspects.</p> <p>(e) A monitoring program is included under the 'Monitoring Protocol' section of the RMP as well as Appendix B.</p> <p>(f) Risks to rehabilitation and controls are discussed under the 'Risk to Rehabilitation' section of the plan.</p> <p>(g) Roles and responsibilities are outlined under the 'Roles and Responsibilities' section of the plan.</p>	The Rehabilitation Management Plan addresses all requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 28	The Final Void Management Plan must: (a) justify the final location and future use of the final void; (b) incorporate design criteria and specifications for the final void based on verified groundwater modelling predictions and a re-assessment of post-mining groundwater equilibration; and (c) describe what actions and measures would be implemented to: • minimise any potential adverse impacts associated with the final void; and • manage and monitor the potential impacts of the final void.	Compliant		Final Void Management Plan (V7)	The Final Void Management Plan was reviewed and addresses the following: (a) The Final Void Management Plan includes the final void location and future use on page 6 -7. The plan identifies two final void scenarios based on whether Abel Underground Mine resumes operation or not. (b) The final void design criteria is included on page 7 -8 of the plan and incorporates groundwater model predictions. (c) Page 8 - 10 of the plan outlines the potential impacts of the final void, proposed management measures and final void monitoring plan.	The Final Void Management Plan addresses all requirements of this condition.	
Schedule 3, Condition 28A	Prior to any decision to construct the embankment as described in EA (MOD 4), the Proponent must submit relevant details to the DSC.	Not Triggered		2021, YEM 2023 and YEM 2024 Annual Reviews Audit interviews	The embankment was not constructed during the audit period.	This condition was not triggered during the audit period.	
Schedule 3, Condition 29	The Mine Closure Plan must: (a) be prepared in consultation with DRG and Council; (b) define the objectives and criteria for mine closure; (c) investigate options for the future use of the site in a manner consistent with the Lower Hunter Regional Strategy (Department of Planning, 2006) and/or other extant regional planning strategies; (d) investigate ways to minimise the adverse socio-economic effects associated with mine closure, including reduction in local employment levels; (e) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the project; and (f) describe how the performance of these measures would be monitored over time.	Compliant		Mine Closure Plan (V8)	The Mine Closure Plan was reviewed and found to address the following: (a) The relevant agencies were consulted in the development of the plan in 2012. Evidence of consultation is provided in Appendix B of the plan. (b) The Mine Closure Plan defines the objectives and criteria for mine closure in Appendix A. (c) Future land use options are presented on page 8 - 10 of the Mine Closure Plan. It is noted in the plan that discussions regarding the final land use of the site are ongoing between Bloomfield, the landowners and relevant government agencies. Bloomfield state that rehabilitation of the area will enable future development of the site consistent with the Lower Hunter Regional Strategy. (d) Page 10 - 11 of the plan outlines the mechanisms to minimise the adverse socio-economic effects associated with mine closure, including employment reduction. (e) Page 11 - 12 of the plan outlines the ways Bloomfield will minimise and manage the ongoing environmental effects of the project in relation to air quality, surface water,	The Mine Closure Plan addresses all requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					groundwater and rehabilitation. (f) Page 12 of the plan outlines that the post closure monitoring program. The plan states that the monitoring program will be reviewed in consultation with DRG and Council to ensure it is appropriate for closure.		
Schedule 3, Condition 29A	By 31 December 2011, the Proponent must make suitable arrangements to provide appropriate long-term security for the Biodiversity Offset Area (see Appendix 6) to the satisfaction of the Secretary.	Compliant		Certificate of title dated 03/10/2012 Letter from Bloomfield to DPHI dated 21/10/2024 Email correspondence from BCT to Bloomfield dated 11/12/2020 2013 Bloomfield Independent Environmental Audit 2021 Bloomfield Independent Environmental Audit	<p>In March 2011 Bloomfield submitted a proposed offset strategy to NSW Department of Planning to provide long-term protection of a Biodiversity Offset Area by an enduring covenant or restriction on the use of the land under Part 4, Division 12 of the National Parks and Wildlife Act 1974. The 2013 Independent Environmental Audit confirmed that a Biodiversity Offset Area had been secured for the Bloomfield Colliery as per this strategy. This offset area was visited during the site inspection and the certificate of title for the lot was also sighted.</p> <p>Due to legislative change, the proposed strategy became unsuitable. In response, Bloomfield engaged discussion with the NSW Biodiversity Conservation Trust to determine a pathway forward to provide long term security for the offset area.</p> <p>During the audit period, Bloomfield continued to work with NSW Biodiversity Conservation Trust to progress a Conservation Agreement (CA) for the Biodiversity Offset Area. An update on the progress of this work was provided to DPHI on 21 October 2024.</p> <p>The fee for the development of the Conservation Agreement was paid on the 29 August 2024. Currently Bloomfield are waiting on the drafting of the Conservation Agreement by BCT.</p>	A Biodiversity Offset Area is held for the project and Bloomfield have continued to work with NSW Biodiversity Conservation Trust to progress a Conservation Agreement for the area.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 29B	<p>By 31 December 2011, the Proponent must prepare a Biodiversity Offset Management Plan to the satisfaction of the Secretary. This plan must:</p> <p>(a) be generally consistent with OEH's "Principles for the use of biodiversity offsets in NSW";</p> <p>(b) include:</p> <ul style="list-style-type: none"> • a description of the short, medium and long term measures that would be undertaken to implement the Biodiversity Offset Strategy; • detailed performance and completion criteria for the Biodiversity Offset Strategy; and • a detailed description of the measures that would be implemented within the Biodiversity Offset Area for: <ul style="list-style-type: none"> - revegetation and regeneration, including (where relevant) establishment of canopy, subcanopy, understorey and ground cover; - appropriate protection, conservation and management of native vegetation and faunal habitat; - controlling weeds and feral pests; - management of public access; and - bushfire management. <p>The Proponent must implement the Biodiversity Offset Management Plan as approved by the Secretary.</p>	Compliant		<p>Biodiversity Offset Management Plan (v4)</p> <p>Site inspection</p> <p>Audit interviews</p> <p>2021 - 2023 BOA weed and pest inspection reports</p> <p>2024 dog baiting work record</p> <p>2022 fence repairs work record</p>	<p>A Biodiversity Offset Management Plan has been prepared and was assessed against the requirements of this condition:</p> <p>(a) Appendix A of the management plan provides an assessment of the offset against the OEH 'Principles for the use of biodiversity offsets in NSW'.</p> <p>(b) The plan includes:</p> <ul style="list-style-type: none"> - Short, medium and long-term measures on page 6 - 7. - Performance and completion criteria on page 7. - Measures for the required environmental aspects on page 7 - 8. <p>The latest version of the management plan was approved by the Secretary on 19 December 2017.</p> <p>Management activities have been undertaken during the audit period in accordance with the plan. These activities include weed and feral animal monitoring, feral animal control, and signage and fence maintenance. This was evidenced during the site inspection and by management records.</p> <p>No evidence of unauthorised access was sighted during the site inspection.</p>	A Biodiversity Offset Management Plan has been prepared and approved by the Secretary in accordance with the requirements of this condition.	
Schedule 3, Condition 29C	<p>Within 6 months of the approval of the Biodiversity Offset Management Plan, the Applicant must lodge a conservation bond with the Department to ensure that the Biodiversity Offset Strategy is implemented in accordance with the performance and completion criteria of the Biodiversity Offset Management Plan. The sum of the bond must be determined by:</p> <p>(a) calculating the full remaining cost of implementing the offset strategy; and</p> <p>(b) employing a suitably qualified quantity surveyor to verify these</p>	Compliant		<p>2018 Bloomfield Independent Environmental Audit Bank Guarantee from Liberty International Underwriters dated 15 October 2018</p>	<p>The 2018 Independent Environmental Audit confirmed that Bloomfield lodged the conservation bond on 15 October 2018, following approval of the Biodiversity Offset Management Plan.</p>	The conservation bond has been lodged in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	<p>costs, to the satisfaction of the Secretary.</p> <p>If the Biodiversity Offset Strategy is completed to the satisfaction of the Secretary, the Secretary will release the conservation bond. If the Biodiversity Offset Strategy is not completed to the satisfaction of the Secretary, the Secretary will call in all or part of the conservation bond, and arrange for the satisfactory completion of the relevant works.</p>						
Schedule 3, Condition 29D	<p>Prior to works commencing for the widening of the haul road and upgrade of the watercourse as described in EA (MOD 4), the Proponent must retire 10 ecosystem credits as listed in the credit profile in Appendix D of EA (MOD 4) in consultation with OEH and in accordance with the Biodiversity Offsets Scheme of the BC Act, to the satisfaction of the BCT and OEH.</p> <p>Note: The listed credits were calculated in accordance with Framework for Biodiversity Assessment of the NSW Biodiversity Offset Policy for Major Projects (OEH, 2014) and may need to be converted to reasonably equivalent 'biodiversity credits', within the meaning of the BC Act, to facilitate retirement.</p>	Not Triggered		<p>Audit interviews</p> <p>Site inspection</p> <p>2021, YEM 2023 and YEM 2024 Annual Reviews</p>	<p>Works for the widening of the haul road and upgrade of the watercourse have not occurred.</p>	<p>This condition was not triggered during the audit period.</p>	
Schedule 3, Condition 30	<p>Within 6 months of the date of this approval, and again prior to 30 September 2011, the Proponent must provide contributions of \$20,000 to conservation projects within the Cessnock LGA, in consultation with 15 OEH and to the satisfaction of the Secretary.</p>	Compliant		<p>2015 Bloomfield Independent Environmental Audit</p>	<p>The 2015 Independent Environmental Audit confirmed that the required contributions have been made for conservation projects in the Cessnock local government area to the satisfaction of the Secretary.</p>	<p>The requirements of this condition have been satisfied.</p>	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 31	<p>The Proponent must prepare an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the OEH and the local Aboriginal community and be submitted to the Secretary for approval within 6 months of the date of this approval;</p> <p>(b) include a protocol for the ongoing consultation and involvement of Aboriginal communities in the conservation and management of Aboriginal heritage on site; and</p> <p>(c) describe the measures that would be implemented to protect Aboriginal sites on site, or if any new Aboriginal objects or skeletal remains are discovered during the project.</p> <p>The Proponent must implement the Aboriginal Cultural Heritage Management Plan as approved by the Secretary.</p>	Compliant		<p>Aboriginal Cultural Heritage Management Plan (V6)</p> <p>Site inspection</p> <p>Audit interviews</p> <p>Letter from DoP to Bloomfield dated 27/05/2010</p> <p>Email correspondence from Mindaribba Local Aboriginal Land Council to Bloomfield dated 12/09/2017</p> <p>Aboriginal Cultural Heritage Assessment Report dated June 2024</p> <p>South East Archaeology monitoring and salvage report dated October 2022</p> <p>Employee Environmental Induction Permit to Disturb form</p>	<p>An Aboriginal Cultural Heritage Management Plan has been prepared for the project and has been reviewed against the requirements of this condition:</p> <p>(a) The management plan was developed in consultation with Mindaribba LALC and approved by the Department of Planning. Mindaribba LALC were also consulted in regard to update of the management plan in 2017. This revision has not yet been finalised as Bloomfield are still awaiting feedback from the Mindaribba LALC.</p> <p>(b) A protocol for the ongoing consultation and involvement of Mindaribba LALC is included on page 7 under section 'Aboriginal Community'.</p> <p>(c) Measures to protect Aboriginal sites are described on page 8 - 10 under section 'Onsite Aboriginal Heritage'.</p> <p>The latest version of the management plan was approved by DoP on 27 May 2010.</p> <p>No Aboriginal cultural heritage sites were discovered, damaged or disturbed during the audit period.</p> <p>An Aboriginal cultural heritage site was sighted during the site inspection. The site was adequately demarcated to prevent unintentional access and there was no evidence of disturbance.</p> <p>The internal Permit to Disturb process assesses potential impact of proposed disturbance to archaeological sites, to ensure Aboriginal heritage sites are not impacted by activities onsite.</p> <p>The employee environmental induction covers Aboriginal Cultural Heritage including an overview, summary of LALC, Aboriginal objects and places, management requirements and worker requirements.</p> <p>An Aboriginal Cultural Heritage Assessment Report was completed by OzArk in 2024 for the proposed Modification 5. The field survey</p>	<p>An Aboriginal Cultural Heritage Management Plan has been prepared for the project in accordance with the requirements of this condition. The management plan was implemented during the audit period.</p>	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					was undertaken with the assistance of representatives from Awabakal Descendants Traditional Owners Aboriginal Corporation, Kauwal Pty Ltd, and Mindaribba Local Aboriginal Land Council. The Mindaribba Local Aboriginal Land Council was also involved in the monitoring and salvage field survey completed in October 2022 during the audit period.		
Schedule 3, Condition 31A	Within 2 months of approval of Modification 4, the Proponent must undertake condition surveys of the: (a) Buttai No 1 and No 2 reservoirs; and (b) Buttai Cemetery (Wilfred Elliot Private Cemetery), including any memorial headstones, graves, fences and trees, to the satisfaction of the Secretary.	Compliant		2021 Bloomfield Independent Environmental Audit	The 2021 Independent Environmental Audit confirmed that the required condition surveys were undertaken and submitted to the Department on 18/10/18.	The requirements of this conditions have been satisfied.	
Schedule 3, Condition 31B	The Proponent must prepare a Historic Heritage Conservation Management Plan for the Buttai No 1 and No 2 reservoirs and the Buttai Cemetery, to the satisfaction of the Secretary: This plan must: (a) be prepared by a suitably qualified and experienced person/s; (b) be prepared in consultation with OEH, Hunter Water, Council and relevant landowners; (c) be prepared in accordance with Heritage Council of NSW guidelines (where relevant); (d) outline the results of the condition surveys required under condition 31A of Schedule 3; (e) include a program for the regular monitoring of the condition of the No 1 and No 2 reservoirs throughout the life of the project; and (f) include a contingency plan in the case of any damage to the No 1 or No 2 reservoirs, or Buttai Cemetery caused by Modification 4. The Proponent must implement the Historic Heritage Conservation	Compliant		Historical Heritage Conservation Management Plan (v5) Letter from DPHI to Bloomfield dated 15/12/2021 Bloomfield Buttai Heritage Inspection Annual Condition Assessment dated 12 December 2022 Bloomfield Buttai Heritage Inspection Annual Condition Assessment dated 12 December 2023 Site inspection Audit interviews Employee Environmental Induction Permit to Disturb form	A Historic Heritage Conservation Management Plan has been prepared for the Buttai No 1 and No 2 reservoirs and the Buttai Cemetery. This management plan has been reviewed against the requirements of this condition: (a) The plan has been prepared by suitably qualified and experienced persons, as outlined in Section 1.4 of the management plan. (b) OEH, Hunter Water, Council and relevant landowners were consulted in the development of the plan, as described in Section 3 and Appendix B and C of the management plan. (c) The plan has been prepared in accordance with Heritage Council Guidelines as outlined in Section 2.3. (d) Condition survey results are provided in Section 4. (e) A monitoring program is included in Section 5.1. (f) A contingency plan is included in Section 5.2. The latest version of the management plan was submitted to the Secretary and approved on 15 December 2021.	A Historic Heritage Management Plan has been prepared for the project in accordance with the requirements of this condition. The management plan was implemented during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	Management Plan as approved by the Secretary.				<p>The Buttai reservoirs were sighted during the site inspection. The site was adequately secured to prevent unauthorised access and there was no evidence of disturbance.</p> <p>Annual condition assessments of the Buttai Cemetery were sighted. The cemetery was found to be in an overall good condition and no observed damage or change to the gravesites was attributed to Bloomfield operations. Recommendations provided in the 2022 assessment were confirmed to have been implemented during the 2023 assessment.</p> <p>No historic heritage sites were discovered, damaged or disturbed during the audit period.</p> <p>The internal Permit to Disturb process assesses potential impact of proposed disturbance to archaeological sites, to ensure historic heritage sites are not impacted by activities onsite.</p> <p>The employee environmental induction covers historic heritage including an overview of historic heritage onsite and worker requirements.</p>		
Schedule 3, Condition 32	<p>The Proponent must:</p> <p>(a) take all reasonable and feasible measures to mitigate visual and off-site lighting impacts of the project; and</p> <p>(b) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.</p>	Compliant		<p>Site inspection</p> <p>Audit interviews</p> <p>2021 - 2024 complaints registers</p> <p>Employee environmental induction</p> <p>Mod 4 Environmental Assessment (2018)</p>	<p>It is noted from the Mod 4 Environmental Assessment that many elements of the site such as workshop and haul roads are not visible at offsite receiver locations and that the visual impact of the project is minimal. None of the operation was visible from John Renshaw Drive during the site inspection.</p> <p>The employee environmental induction advises personnel working onsite to consider neighbouring sensitive receptors when locating mobile lighting towers and to direct lights away from residential areas and public roads.</p> <p>There was one (1) lighting complaint received during the audit period on 17/04/24 regarding lighting at the CHPP visible from Ashtonfield. It is noted that the CHPP is outside of the</p>	<p>The requirements of this condition were satisfied during the audit period and all reasonable steps to minimise the visual and off-site lighting impacts of the project have been implemented.</p>	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					project area. The complaint was actioned and lighting was tilted lower. Shields on these lights were also sighted during the site inspection.		
Schedule 3, Condition 33	<p>The Proponent must prepare an Energy Savings Action Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the Guidelines for Energy Savings Action Plans (DEUS, 2005), or its latest version, and be submitted to the Secretary for approval within 6 months of the date of this approval; (b) include consideration of energy use by mobile equipment; (c) include a program to monitor the effectiveness of measures to reduce energy use on site. <p>The Proponent must implement the Energy Savings Action Plan as approved by the Secretary.</p>	Non-compliant	Administrative	Energy Savings Action plan V2 08/09/2011	<p>An Energy Savings Action Plan has been developed in line with the <i>Guidelines for Energy Savings Action Plans</i> (2005) and was last approved by DPHI on 08/09/2011.</p> <p>The action plan does not include consideration of energy use by mobile equipment. The scope section of the plan states: "This assessment has generally been prepared in accordance with DEUS guidelines and as such does not assess mobile plant. However, it should be noted that if opportunities arise to change procedures or mobile equipment to reduce energy consumption they will be incorporated where possible". In order to satisfy the requirements of this condition, consideration of energy use by mobile equipment should be included in the action plan, as identified in the previous audit (Umwelt 2021).</p> <p>The action plan also does not include a program to specifically monitor the effectiveness of measures to reduce energy use onsite.</p>	An Energy Savings Action Plan has been developed and approved. However, the plan does not address all requirements of this condition.	The Energy Savings Action Plan should be updated to include consideration of energy use by mobile equipment as well as a program to specifically monitor the effectiveness of measures to reduce energy use onsite.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 3, Condition 34	The Proponent must: (a) monitor the amount of waste generated by the project; (b) investigate ways to minimise waste generated by the project; (c) implement all reasonable and feasible measures to minimise waste generated by the project; and (d) report on waste management and minimisation in the Annual Review, to the satisfaction of the Secretary.	Compliant		Remondis waste reports Audit interviews Site inspection Scrap steel report for Jul 2023 to August 2024 Annual reviews 2021, YEM 2023 and YEM 2024 Employee Environmental Induction	<p>Management of waste from the Bloomfield site is undertaken by Remondis for the collection and disposal of general waste, paper, scrap metal, cardboard and oil filter bins, and oils. Sighted Remondis waste records for the audit period between June 2022 - September 2024.</p> <p>Waste management was reported annually in the 2021, YEM 2023 and YEM 2024 Annual Reviews (Section 4.6). General waste collected for disposal decreased over the audit period from 94 tonnes in 2021, to 84 tonnes in YEM 2023 and 74 tonnes in YEM 2024.</p> <p>The following was sighted during the site inspection: - Correct segregation of waste using appropriate bins. - Sufficient number of bins around the operation, particularly at the workshop.</p> <p>The employee induction package provides waste management awareness training to all employees and contractors. The induction content covers waste minimisation, disposal requirements, waste streams, spill clean up process, and reporting of waste management issues.</p>	The requirements of this condition were generally satisfied during the audit period.	
Schedule 4, Condition 1	If the results of the monitoring required in schedule 3 identify that impacts generated by the project are greater than the relevant impact assessment criteria, except where a negotiated agreement has been entered into in relation to that impact, then the Proponent must, as soon as practicable and no longer than 7 days of obtaining the monitoring results, notify the Secretary, the affected landowners and tenants (including tenants of mine owned properties) accordingly, and provide quarterly monitoring results to each of these parties until the results show that the project is complying with the criteria	Not Triggered		2021, YEM 2023 and YEM 2024 Annual Reviews Environmental monitoring results Blast reports	Monitoring results (required under Schedule 3) for the audit period did not identify any impacts from the project greater than the relevant impact assessment criteria.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	in schedule 3 and publish the results on its website.						
Schedule 4, Condition 2	If the results of monitoring required in schedule 3 identify that impacts generated by the project are greater than the relevant air quality impact assessment criteria in schedule 3, then the Proponent must send the relevant landowners and tenants (including tenants of mine owned properties) a copy of the NSW Health fact sheet entitled “Mine Dust and You” (and associated updates) in conjunction with the notification required in condition 1.	Not Triggered		2021, YEM 2023 and YEM 2024 Annual Reviews Environmental monitoring results	Refer to evidence review provided for Schedule 4, condition 1.	This condition was not triggered during the audit period.	
Schedule 4, Condition 3	<p>If a landowner considers the project to be exceeding the impact assessment criteria in schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land.</p> <p>If the Secretary is satisfied that an independent review is warranted, the Proponent must within 2 months of the Secretary’s decision:</p> <ul style="list-style-type: none"> (a) consult with the landowner to determine his/her concerns; (b) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to conduct monitoring on the land, to: <ul style="list-style-type: none"> • determine whether the project is complying with the relevant impact assessment criteria in schedule 3; and • identify the source(s) and scale of any impact on the land, and the project’s contribution to this impact; (c) give the Secretary and landowner a copy of the independent review. <p>If the Secretary is not satisfied that an independent review is warranted, the Secretary will notify the landowner in writing of that decision, and the</p>	Not Triggered		Audit interviews	No requests for independent review were received during the audit period.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	reasons for that decision, within 21 days of the request for a review.						
Schedule 4, Condition 4	<p>If the independent review determines that the project is complying with the relevant impact assessment criteria in schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.</p> <p>If the independent review determines that the project is not complying with the relevant impact assessment criteria in schedule 3, and that the project is primarily responsible for this non-compliance, then the Proponent must:</p> <p>(a) take all reasonable and feasible measures, in consultation with the landowner, to ensure that the project complies with the relevant criteria and conduct further monitoring to determine whether these measures ensure compliance; or</p> <p>(b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.</p> <p>If further monitoring under paragraph (a) determines that the project is complying with the relevant criteria, then the Proponent may discontinue the independent review with the approval of the Secretary.</p>	Not Triggered		Audit interviews	No independent reviews were required during the audit period.	This condition was not triggered during the audit period.	
Schedule 4, Condition 5	<p>If the independent review determines that the relevant impact assessment criteria in schedule 3 are being exceeded, but that more than one mine is responsible for this non-compliance, then the Proponent must, together with the relevant mine/s:</p> <p>(a) implement all reasonable and feasible measures, in consultation with the landowner, to ensure that the relevant impact assessment criteria are complied with, and conduct further monitoring to determine</p>	Not Triggered		Audit interviews	No independent reviews were required during the audit period.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	<p>whether these measures ensure compliance; or</p> <p>(b) secure a written agreement with the landowner and other relevant mines to allow exceedances of the relevant impact assessment criteria in schedule 3, 18 to the satisfaction of the Secretary.</p> <p>If the further monitoring referred to under paragraph (a) above determines that the project is complying with the relevant impact assessment criteria in schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.</p>						
Schedule 5, Condition 1	<p>The Proponent must prepare an Environmental Management Strategy for the project, to the satisfaction of the Secretary. The strategy must:</p> <p>(a) be submitted to the Secretary for approval within 6 months of the date of this approval;</p> <p>(b) provide the strategic framework for environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; and • respond to emergencies; <p>(f) include:</p>	Compliant		<p>Environmental Management Strategy (V7)</p> <p>Correspondence from DPHI to Bloomfield dated 13/07/2020</p> <p>2021, 2022, 2023 and 2023 complaints registers</p> <p>Site inspection</p> <p>Audit interviews</p> <p>Bloomfield website - Bloomfield Colliery Continuation Project page</p> <p>2021, YEM 2023 and YEM 2024 Annual reviews</p>	<p>The Environmental Management Strategy was reviewed against the requirements of this condition:</p> <p>(a) The 2021 IEA confirmed that the strategy was submitted to DPHI on 07/11/2018, within three months of the approval of MOD 4 as required by Schedule 5, Condition 4. Approval from DPHI dated 13/07/2020 was sighted.</p> <p>(b) a strategic framework for environmental management of the project is provided on page 3 of the strategy.</p> <p>(c) statutory obligations of the project are outlined on page 5.</p> <p>(d) description of the roles and responsibilities of key staff members is provided on page 9.</p> <p>(e) relevant procedures are described on pages 10 - 11.</p> <p>(f) a list of the other documents required under this approval is provided on page 5 and a monitoring plan is provided on page 13.</p> <p>The Environmental Management Strategy was not revised during the audit period.</p> <p>Implementation of the plan is evidenced by the following:</p> <ul style="list-style-type: none"> - The complaints registers and audit interviews confirmed the complaints 	<p>An Environmental Management Strategy has been prepared, approved and implemented in line with the requirements of this condition.</p>	<p>Improvement opportunity - The Environmental Management Strategy should be reviewed and revised where necessary to replace references to the superseded Mining Operations Plan.</p>

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	<ul style="list-style-type: none"> references to the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and a clear plan depicting all the monitoring to be carried out in relation to the project. <p>The Proponent must implement the Environmental Management Strategy as approved by the Secretary.</p>				<p>procedure has been followed.</p> <ul style="list-style-type: none"> - Provision of required information to the public via the Bloomfield website and CCC meetings - Monitoring conducted in accordance with the monitoring plan - Reporting and investigation of incidents during the audit period <p>It is noted there is still reference to the now superseded Mining Operations Plan (MOP) within the Environmental Management Strategy.</p>		
Schedule 5, Condition 2	<p>The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures/criteria; the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> impacts and environmental performance of the project; effectiveness of any management measures (see (c) above); <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to continually improve the environmental performance of the project over time;</p>	Compliant		<p>Aboriginal Cultural Heritage Management Plan (V6)</p> <p>Air Quality Management Plan (V10)</p> <p>Biodiversity Offset Management Plan (V4)</p> <p>Final Void Management Plan (V7)</p> <p>Historic Heritage Management Plan (V5)</p> <p>Landscape Management Plan (V7)</p> <p>Mine Closure Plan (V8)</p> <p>Noise Monitoring Plan (V4.6)</p> <p>Rehabilitation Management Plan (V11)</p> <p>Water Management Plan (V2)</p>	<p>Review of the relevant management plans required under this consent indicate that they have been prepared in general accordance with the relevant guidelines and included the information outlined under this condition.</p> <p>It was noted in the previous 2021 IEA that the Biodiversity Offset Management Plan refers to and relies on the three yearly IEA process as an indicator to measure environmental performance and determine progress towards the completion criteria. This is not considered an appropriate mechanism to monitor the performance of the offset and to assess progress towards the completion criteria.</p>	The requirements of this condition have been satisfied.	Opportunity for improvement - Update 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.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.						
Schedule 5, Condition 3	<p>Each year, the Proponent must review the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the mine complex over the past year, which includes a comparison of these results against the</p> <ul style="list-style-type: none"> • the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions in the documents listed in condition 2 of Schedule 2; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measure will be implemented over the next year to</p> 	Compliant		<p>Annual Reviews 2021, YEM 2023 and YEM 2024</p> <p>Letter from DPHI to Bloomfield dated 07/12/2022</p> <p>Letter from DPHI to Bloomfield dated 07/12/2023</p> <p>Email from Bloomfield to DPHI dated 20/06/2022</p> <p>Planning Portal submission evidence</p>	<p>Annual reviews were prepared and submitted for the following periods:</p> <ul style="list-style-type: none"> - 1 January 2021 to 31 December 2021 - 1 January 2022 to 31 March 2023 - 1 April 2023 to 31 March 2024 <p>Approval from DPHI dated 07/12/2022 was sighted for the amendment of the annual review reporting period to align with The Bloomfield Group financial year period. To allow for this change, approval was also granted from DPHI for the 2022/23 report to cover an initial 15-month period.</p>	<p>Reports were submitted to the Planning Secretary for 2021, YEM 2023 and YEM 2024. These reports were prepared in accordance with the requirements of this condition.</p>	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	improve the environmental performance of the project.						
Schedule 5, Condition 4	<p>Within three months of:</p> <p>(a) the submission of an annual review under Condition 3 above;</p> <p>(b) the submission of an incident report under Condition 6 below;</p> <p>(c) the submission of an audit report under Condition 7 below, or</p> <p>(d) any modification of the conditions of this approval (unless the conditions require otherwise),</p> <p>the Proponent must review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	Non-compliant	Administrative	<p>Aboriginal Cultural Heritage Management Plan (V6)</p> <p>Air Quality Management Plan (V10)</p> <p>Blasting Monitoring Program (V8)</p> <p>Biodiversity Offset Management Plan (V4)</p> <p>Environmental Management Strategy (V7)</p> <p>Final Void Management Plan (V7)</p> <p>Historic Heritage Management Plan (V5)</p> <p>Landscape Management Plan (V7)</p> <p>Mine Closure Plan (V8)</p> <p>Noise Monitoring Plan (V4.6)</p> <p>Rehabilitation Management Plan (V11)</p> <p>Water Management Plan (V2)</p> <p>Energy Savings Action Plan (V2)</p> <p>M file system</p> <p>Audit interviews</p>	<p>The following plans and programs were revised during the audit period and approved by DPHI on 29/06/2022:</p> <ul style="list-style-type: none"> - Air Quality Management Plan - Final Void Management Plan - Mine Closure Plan - Noise Monitoring Program - Rehabilitation Management Plan <p>The M files system is used as the document control system to record documents reviews and revisions. Review records for all management plans for the audit period were sighted, which showed regular assignment to relevant individuals to carry out review of management plans followed by assignment to an appropriate approver.</p> <p>However, management plan updates recommended in the previous 2021 IEA were not implemented during the audit period. These recommendations which have not been addressed are detailed in Section 3.5 of this audit report and relate to:</p> <ul style="list-style-type: none"> - Groundwater Management Plan - Landscape Management Plan - Biodiversity Offset Management Plan - Aboriginal Cultural Heritage Management Plan - Energy Savings Action Plan - Water Management Plan 	Management plans have not been updated to address recommendations provided in the 2021 Independent Environmental Audit report.	<p>Implement outstanding recommendations in relation to management plan updates from the 2021 IEA for the following:</p> <ul style="list-style-type: none"> - Groundwater Management Plan - Landscape Management Plan - Biodiversity Offset Management Plan - Aboriginal Cultural Heritage Management Plan - Energy Savings Action Plan - Water Management Plan

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Schedule 5, Condition 5	<p>Within 3 months of the date of this approval, the Proponent must establish a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. The CCC must be operated in general accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016).</p> <p>Notes:</p> <ul style="list-style-type: none"> • The CCC is an advisory committee only. • In accordance with the guidelines, the committee should comprise an independent chair and appropriate representation from the Proponent, Council and the local community. • The CCC may also be combined with any similar CCC for the Donaldson Coal Mine or the Abel Coal Mine. 	Compliant		<p>CCC minutes from 2021, 2022, 2023 and 2024</p> <p>Email correspondence from the CCC Chairperson dated 08/11/2024 and 02/12/2024</p> <p>Bloomfield Mine CCC Annual Report March 2022 - March 2024</p>	<p>Review of CCC meeting minutes, Annual Reviews and the CCC Annual Reports found the following:</p> <ul style="list-style-type: none"> - CCC meetings were held three times a year over the audit period and meeting minutes have been made publicly available on the Bloomfield website. Extraordinary meetings were also held on 11/12/2023 and 27/05/2022 in relation to proposed project modifications. - Committee membership met guideline requirements in terms of representative numbers. - No issues with the effectiveness or operation of the committee were reported by the Chairperson in the annual report during the audit period. - A site inspection was held in March 2023. <p>The CCC Chairperson advised that Bloomfield provides a detailed presentation and addresses any issues raised.</p>	Operation of the Bloomfield CCC was continued over the audit period in general accordance with the Department's guidelines.	
Schedule 5, Condition 6	<p>The Proponent must notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.</p>	Compliant		<p>Email from Bloomfield to EPA dated 11/02/2022</p> <p>Email from Bloomfield to EPA dated 18/02/2022</p> <p>Email from Bloomfield to EPA dated 08/07/2022</p> <p>Letter from Bloomfield to EPA dated 12/07/2022</p> <p>Email from EPA to Bloomfield dated 13/07/2022</p> <p>Formal warning letter issued by EPA dated 17/11/2022 (Notice number 3502178)</p> <p>Letter from DPHI to Bloomfield dated 07/12/2022</p>	<p>The following incident was reported to the Department within the audit period:</p> <ul style="list-style-type: none"> - Passive spill from Overland Dam on 05/07/22. EPA and DPHI were notified of the incident on 05/07/22. The investigation report was provided to the EPA and DPHI on 12/07/22. <p>The following two non-compliances were reported to the EPA within the audit period under the EPL:</p> <ul style="list-style-type: none"> - Data logger failure to record flow during licensed discharge on 05/01/22. The failure to record flow was discovered on the 07/02/22 and was reported to the EPA on the 07/02/22. - Discharge exceeded TSS limit during licensed discharge on the 06/07/22 and 07/07/22. Notification of incident was made to the EPA on the 08/07/22. <p>These two non-compliances relate to EPL 396 and do not relate to conditions of this Project Approval. However, non-compliances of the EPL are considered</p>	All incidents were reported in accordance with the requirements of this condition.	Opportunity for improvement - It is recommended that Bloomfield notify the Department in accordance with this condition in future of any incidents that occur in relation to EPL 396.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					incidents associated with the Project and it is recommended that any incidents reported under the EPL are also reported to the Department.		
Schedule 5, Condition 7	<p>Every 3 years, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies and the CCC; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in relevant project approvals and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under these approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the mine complex, and/or any assessment, plan or program required under these approvals. <p>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</p>	Compliant		<p>Bloomfield Independent Environmental Audit report 2021</p> <p>Letter from DPHI to Bloomfield dated 27/09/2024 (ref MP07_0087-PA-55).</p>	<p>The previous Independent Environmental Audit (IEA) was conducted on 1 November 2021, within three years of the 2018 IEA. The 2021 audit report shows that the requirements of this condition were satisfied. Evidence of audit team approval, agency consultation and the independent audit declaration form are provided in the appendices of the report.</p> <p>The current IEA commenced on 19 November 2024, within three years following the 2021 IEA. This IEA satisfies the requirements of this condition:</p> <ul style="list-style-type: none"> a) The audit team was granted DPHI approval on 27/09/24. b) Consultation was undertaken with DPHI, Maitland City Council, Cessnock City Council, and the CCC as part of the audit. c) Environmental Performance of the project was assessed against conditions of the Project Approval, EPL396, and mining leases. d) Refer to assessment of PA07_0087 Schedule 3 Conditions 4, 14, 16, 19, 21, 22, 23, 24, 26, 27, 28, 29, 29B, 31, 31B, 33 and Schedule 5 Condition 1 and 2. e) Measures and actions to improve environmental performance have been recommended as part of this audit report. 	<p>The 2021 Independent Environmental Audit was completed within the required timeframe and undertaken in accordance with the requirements of this condition. The 2024 Independent Environmental Audit has also satisfied the requirements of this condition.</p>	
Schedule 5, Condition 8	<p>Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of</p>	Compliant		<p>2021 IEA submission confirmation email from DPHI dated 01/02/2022</p> <p>Letter from DPHI to Bloomfield dated 09/09/2022</p> <p>Email correspondence from Bloomfield to EPA and Resources Regulator dated</p>	<p>The previous Independent Environmental Audit (IEA) commenced on 1 November 2021 and was submitted to DPHI with Bloomfield's response to recommendations on 1 February 2022, within three months of commencement. Progress updates on the implementation of the audit actions have been provided in the 2021, YEM 2023 and YEM 2024 Annual Reviews.</p>	<p>The 2020 Independent Environmental Audit report was submitted to the Planning Secretary and recommendations have been</p>	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.			01/02/2022 2021, YEM 2023 and YEM 2024 Annual Reviews		implemented or are ongoing.	
Schedule 5, Condition 8A	Any condition of this approval that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit. Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the project to provide data on compliance with the approval or on the environmental impact of the project, and an “environmental audit” is a periodic or particular documented evaluation of the project to provide information on compliance with the approval or the environmental management or impact of the project.	Noted				Noted	
Schedule 5, Condition 9	From the end of 2009, the Proponent must make the following information publicly available on its website: (a) a copy of all current statutory approvals for the project; (b) a copy of the current environmental management strategy and associated plans and programs; (c) a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; (d) a complaints register, which is to be updated on a monthly basis; (e) a copy of the minutes of CCC meetings; (f) a copy of any Annual Reviews (over	Compliant		Bloomfield website	The following documents were sighted on the website on 28/11/2024: - Copies of the project approval, EPL and mining leases - Environmental Management strategy and associated plans and programs - Annual blast and waster discharge results - Annual reviews from 2008 to YEM 2024, which include a summary of monitoring results of the project - Complaints register with data from 2010 to November 2024 - CCC meeting minutes from 2010 to July 2024 - Independent Environmental Audit reports and Bloomfield response to recommendations from 2013, 2015, 2018 and 2021	Bloomfield provides the information required under this condition on its website.	Opportunity for improvement - Only the original version of the mining leases are provided on the Bloomfield website. Upload the latest versions dated 2022 to the website.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	the last 5 years); (g) a copy of any Independent Environmental Audit, and the Proponent’s response to the recommendations in any audit; and (h) any other matter required by the Secretary.						



Table 20: EPL 396 Audit Table

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Compliant		2021, 2023 and 2024 YEM Annual Reviews Bloomfield production data records from 2021, 2022, 2023 and 2024	The coal works and mining specified under this condition were carried out during the audit period at Bloomfield Colliery. ROM coal extraction at the Bloomfield Colliery was: - 725,000 tonnes ROM coal between 1/01/2021 to 31/12/2021 - 918,000 tonnes ROM coal was reported for 1/01/2022 to 31/03/2023 - 660,000 tonnes ROM coal was reported for YEM 2024. - 301,723 tonnes ROM coal recorded for 1/4/24 to 31/10/24	Scheduled activities have been carried out in accordance with the requirements of this condition during the audit period.	
Condition A2.1	The licence applies to the following premises: BLOOMFIELD COLLIERY FOUR MILE CREEK ROAD, ASHTONFIELD, NSW 2323 AS DESCRIBED BY COORDINATES AND MAP ON DOCUMENT DATED DEC-14 AND REGISTERED IN THE EPA RECORDS SYSTEM AS DOC17/425999	Compliant		Site inspection Audit interviews	Bloomfield Colliery was operated in accordance with this EPL during the audit period.	The requirements of this condition were satisfied during the audit period.	
Condition A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	Compliant		Site inspection Audit interviews 2021, 2023 and 2024 YEM Annual Reviews Bloomfield production data records from 2021, 2022, 2023 and 2024	The current EPL was granted 19/10/2021 and allows for >2,000,000 - 5,000,000 T annual handling of coal and discharge of up to 40 kL per discharge event. There were no exceedances of these limits during the audit period.	Works and activities have been carried out generally in accordance with the proposal contained in the licence application during the audit period.	
Condition P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Noted				Noted - there are no utilisation areas specified under condition P1.1.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Compliant		Water Management Plan 2021, 2023 and 2024 YEM Annual Reviews Monitoring results Site inspection Audit interviews Annual Returns 2021-2024	The Water Management Plan provides the location of discharge monitoring. EPA Point 1 was sighted during the site inspection. The annual reviews, annual returns and monitoring results for the audit period confirm monitoring was undertaken at the discharge monitoring points.	Discharge water quality monitoring was completed at the locations specified under this condition during the audit period.	
Condition P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for the emission of noise from the premises.	Compliant		Blast Monitoring Program 2021, 2023 and 2024 YEM Annual Reviews Monitoring results Site inspection Audit interviews Annual Returns 2021-2024	The Blast Monitoring Program provides the location of all blast monitoring sites used by the site. Two of the blast monitors were sighted during the site inspection. The annual reviews, annual returns and monitoring results for the audit period confirm monitoring was undertaken at these locations.	Blast monitoring was completed at the locations specified under this condition during the audit period.	
Condition L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Non-compliant	Low	Annual Returns and Annual reviews	Two discharges to water occurred that were not in compliance with the conditions of this license during the audit period. This non-compliance include: • An exceedance of the TSS limit at license discharge point 1 on 6 and 7 July 2022. • Passive spilling of a mine water dam on 5 July 2022. The required reporting process was followed.	The requirements of this condition were not met during the audit period.	No further actions recommended.

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Non-compliant	Low	Annual Returns and Annual reviews	<p>EPL discharge monitoring results for the audit period indicate the following exceedances of concentration limits:</p> <ul style="list-style-type: none"> • The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 6 July 2022. The recorded TSS concentration on this date was 35 mg/L. • The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 7 July 2022. The recorded TSS concentration on this date was 42 mg/L. <p>These are the only exceedances recorded during the monitoring period. TSS concentrations following the exceedances returned to levels that were more in line with the historic average. The event is document in the 2022 Annual Review. Environmental impacts as a result of the exceedances are likely to be negligible.</p>	The requirements of this condition were not met during the audit period.	No further actions recommended.
Condition L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Compliant		Annual Returns and Annual reviews	All samples for pH at Point 1 and Point 2 were within the specified range.	The requirements of this condition were met during the audit period.	
Condition L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.	Noted				Noted.	
Condition L2.4	Water and/or Land Concentration Limits for Point 1.	Noted				Noted.	
Condition L3.1	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area.	Compliant		EPL Monitoring Reports	EPL discharge monitoring results for the audit period indicate that there were no exceedances of volume limits specified under Condition L3.1 (40,000 kL/day for discharge point 1).	The requirements of this condition were satisfied during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition L3.2	Discharge from Point 1 as referred to in Condition L3.1 is only permitted under the following conditions: - in wet weather conditions following 10mm or greater 24 hours rainfall event in the catchment in the first 24 hour period following the rainfall event; and - in wet weather conditions following a 15mm or greater 24 hours rainfall event in the catchment in the second 24 hour period following the rainfall event; and - in wet weather conditions following a 20mm or greater 24 hours rainfall event in the catchment in the third 24 hour period following the rainfall event.	Compliant		EPL Monitoring Reports	EPL discharge monitoring results for the audit period indicate that discharges from EPL point 1 occurred only when the rainfall conditions under Conditions L3.1 were met.	The requirements of this condition were satisfied during the audit period.	
Condition L4.1	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence.	Compliant		Site inspection Audit interviews 2021 and YEM 2023 and 2024 Annual Reviews Biosolids pre-application reports dated March 2023 and July 2024 Biosolids application reports dated July 2021 and May 2023	Biosolids were received onsite during the audit period and application in the tailings emplacement rehabilitation area was observed during the site inspection. Biosolids used on the site during the audit period were managed in accordance with the Environmental Guidelines: Use and Disposal of Biosolids Products (EPA, 1997). Mulched vegetation and gypsum was also used in rehabilitation as required. No heavy plant waste tyres were disposed of onsite during the audit period. No evidence was found to suggest any other wastes were received at the site during the audit period.	Only the wastes specified within this condition were received onsite during the audit period. These wastes received were used for the activities defined under this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition L4.2	The Licensee must not dispose of any waste on the premises unless authorised to do so by a condition the Licence.	Compliant		Site inspection Audit interviews 2021, YEM 2023 and YEM 2024 Annual Reviews Waste tracking records	Bloomfield is authorised to dispose of heavy plant-tyre waste onsite in accordance with Condition O4.1. During the site visit it was confirmed that no heavy plant tyres were disposed of in the audit period. Refer to evidence provided for Condition O4.1. No evidence was found to suggest any other wastes were disposed on the site during the audit period. The majority of onsite waste is collected and disposed by Remondis. Waste collection and disposal records for the audit period were sighted.	The requirements of this condition were satisfied during the audit period.	
Condition L5.1	Blasting in or on the premises must only be carried out between 9:00 hours and 17:00 hours, Monday to Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.	Compliant		2021-2024 blasting results 2021, YEM 2023 and YEM 2024 Annual Reviews EPL Annual Returns	Blast results indicate that blasting only occurred between the hours of 9am to 5pm Monday to Saturday. No blasting occurred on Sundays or Public holidays during the audit period.	All blasting was carried out within the hours and days specified by this condition.	
Condition L5.2	The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 3, 4, 5 or 6 in Condition P1.3.	Compliant		2021-2024 blasting results 2021, YEM 2023 and YEM 2024 Annual Reviews EPL Annual Returns	Blast monitoring records for the audit period show no blasts exceeded 115dB airblast overpressure level at the locations monitored. Monitoring was undertaken at the four locations required under EPL 396.	No blasts exceeded an airblast overpressure limits during the audit period.	
Condition L5.3	The airblast overpressure level from blasting operations in or on the premises must not exceed: 120 dB (Lin Peak) at any time; at either monitoring point 3, 4, 5 or 6 in Condition P1.3.	Compliant		2021-2024 blasting results 2021, YEM 2023 and YEM 2024 Annual Reviews EPL Annual Returns	Blast monitoring records for the audit period show no blasts exceeded 115dB airblast overpressure level at the locations monitored. Monitoring was undertaken at the four locations required under EPL 396.	No blasts exceeded an airblast overpressure limits during the audit period.	
Condition L5.4	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 5 mm/second for more than 5% of the total number of	Compliant		2021-2024 blasting results 2021, YEM 2023 and YEM 2024 Annual	Blast monitoring results indicate no blasts exceeded 5mm/sec peak particle velocity during the audit period. Monitoring was	No blasts exceeded the ground vibration limits during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	blasts during each reporting period; at either monitoring point 3, 4, 5 or 6 in Condition P1.3.			Reviews EPL Annual Returns	undertaken at the four locations required under EPL 396.		
Condition L5.5	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 10 mm/second at any time; at either monitoring point 3, 4, 5 or 6 in Condition P1.3.	Compliant		2021-2024 blasting results 2021, YEM 2023 and YEM 2024 Annual Reviews EPL Annual Returns	Blast monitoring results indicate no blasts exceeded 5mm/sec peak particle velocity during the audit period. Monitoring was undertaken at the four locations required under EPL 396.	No blasts exceeded the ground vibration limits during the audit period.	
Condition L5.6	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances: 1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or 2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.	Compliant		2021-2024 Complaints registers Site inspection Audit interviews	There were no complaints made in relation to odour during the audit period. No offensive odours were detected during the site visit.	Odour from the operation was effectively managed during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition O1.1	<p>Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	Non-compliant	Low	<p>Site inspection</p> <p>Audit interviews</p> <p>Employee environmental induction</p> <p>Competency and induction records</p> <p>Email from Bloomfield to EPA dated 11/02/2022</p> <p>Email from Bloomfield to EPA dated 18/02/2022</p> <p>EPA formal warning letter dated 17/11/2022</p>	<p>The worker induction package is delivered to all employees and contractors, and provides a general overview on the management of materials, substances and waste on the site.</p> <p>Statements of competency are kept on record for all personnel.</p> <p>Activities observed during the site inspection were generally seen to be carried out in a competent manner. However, a number of used intermediate bulk containers (IBCs) and drums with grease and chemical residue were observed near the tyre change out bay in an unbunded and uncovered area.</p> <p>The EPA found a non-compliance against this condition in relation to the flowmeter data logger failure that occurred 5 January 2022 during the audit period. The EPA stated in a formal warning received 17 November 2022 that Bloomfield had failed to check that the data logger was operational immediately prior to the discharge occurring. The logger failure was due to low battery power, as solar powered. In response to this incident, the monitoring unit has been connected to mains power with battery backup to reduce risk of recurrence.</p>	<p>Incorrect storage of waste IBCs and drums was observed. The discharge data logger failure was also found to be a non-compliance against the requirements of this condition. However, sufficient preventative controls have been implemented to prevent recurrence of the logger failure.</p>	<p>Move the waste IBCs and drums found behind the tyre change out pad to a bunded storage location or arrange for appropriate disposal.</p>

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Compliant		Audit interviews Pre-start records Pulse maintenance system Site inspection Induction Records Operator competency records	Equipment maintenance tracking and scheduling is managed in the site 'Pulse' system which was sighted during the site inspection on 19/11/2024. This system includes ancillary equipment such as lighting plants and pumps. Equipment pre-start records, maintenance schedule and equipment introduction to site records were also sighted. Completion of routine equipment servicing was observed at the site workshop during the inspection. Competency and induction records for operators was sighted and showed that plant and equipment are operated by competent personnel.	Plant and equipment used onsite was generally observed to be maintained and operated in a proper and efficient manner.	
Condition O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant		Air Quality Monitoring Program Blasting Monitoring Program Blast checklists dated 10/08/2022, 18/10/2023 and 12/03/2024 EnvMet Blast Prediction dated 25/06/2024 Audit interviews 2021, YEM 2023 and YEM 2024 Annual Reviews Site inspection	Refer to evidence review provided under PA 07_0087 Schedule 3 Conditions 9, 15 and 16. Additionally, minimal dust from stockpiles and equipment was observed during the site inspection. One water cart in operation was sighted.	Emissions of dust from the premises were minimised during the reporting period.	
Condition O4.1	The licensee is authorised to dispose of heavy plant waste tyres generated on the premises, in the pit. The licensee must: a) ensure heavy plant waste tyres are reused on the premises as much as practical; b) ensure that any surplus waste tyres can be emplaced by being spread out on the pit floor and be buried as deep as is reasonably practical; c) ensure buried waste tyres are covered by at least 20 m of inert material beneath any final rehabilitated surfaces;	Not Triggered		Annual returns Audit interviews	No heavy plant tyres were disposed onsite during the audit period.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
	d) place the waste tyres at least 10 m away from coarse reject material or tailings emplacement areas; e) not place waste tyres near heated material; and f) not place any waste tyres in an area likely to leach to any waters.						
Condition M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Compliant		EPL Monitoring Reports	Monitoring results provided indicate compliance with this condition.	The requirements of this condition were satisfied during the audit period.	
Condition M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant		EPL Monitoring Reports	Monitoring results from 2012 onwards (i.e., greater than 4 years) are provided on the Bloomfield website. Monitoring results are provided in a legible tabulated format.	The requirements of this condition were satisfied during the audit period.	
Condition M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Compliant		EPL Monitoring Reports	Water discharge monitoring results from VGT Laboratories Pty Ltd indicate compliance with this condition. The monitoring results include the date and time that the sample was collected, the point at which the sample was taken and the name of the person who collected the sample.	The requirements of this condition were satisfied during the audit period.	
Condition M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Compliant		EPL Monitoring Reports	Monitoring results for EPL discharge point 1 and point 2 indicate that monitoring (including the pollutants measured, units of measure, monitoring frequency and sampling method) has been undertaken in accordance with the requirements of condition M2.2.	The requirements of this condition were satisfied during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition M2.2	<p>Water and/ or Land Monitoring Requirements</p> <p>POINT 1</p> <p>Pollutant Units of measure Frequency Sampling Method</p> <p>Conductivity micrograms per centimetre Daily during any discharge Grab sample</p> <p>Filterable iron milligrams per litre Daily during any discharge Grab sample</p> <p>pH pH Daily during any discharge Grab sample</p> <p>Total suspended solids milligrams per litre Daily during any discharge Grab sample</p> <p>POINT 2</p> <p>Pollutant Units of measure Frequency Sampling Method</p> <p>Conductivity micrograms per centimetre Daily during any discharge Grab sample</p> <p>pH pH Daily during any discharge Grab sample</p> <p>Total suspended solids milligrams per litre Daily during any discharge Grab sample</p>	Compliant		EPL Monitoring Reports	Refer to evidence review under EPL Condition M2.1.	The requirements of this condition were satisfied during the audit period.	
Condition M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Compliant		Water Management Plan, Monitoring Results, Annual Returns, NATA accredited	The Environmental Water Management Procedure (Bloomfield, 2023) outlines water sampling procedures. The specified sampling procedure is in accordance with the Approved Methods Publication.	Water quality monitoring is conducted in accordance with the requirements of this condition.	
Condition M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Compliant		Complaints register 2010 - 2024 INX system	<p>A register of complaints for each year is published on the Bloomfield Website. The complaints register is updated intermittently throughout the year. As at 29 November 2024, the 2024 complaints register was most recently updated on 15 November 2024.</p> <p>All complaints are also recorded in the site INX system. This was verified during the site inspection.</p>	A record of complaints has been maintained in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Compliant		Complaints register 2010 - 2024 INX system	The internal complaints register recorded in the INX system was sighted and demonstrated compliance with the information required. The external complaints register published on the Bloomfield website also includes all required information, apart from personal details of the complainant (as these details are sensitive).	The internal complaints register includes the information required under this condition.	
Condition M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliant		Complaints register 2010 - 2024 INX system	Complaint records from 2010 to 2024 were sighted on the Bloomfield website.	Records of a complaints have been kept for at least 4 years after the complaint was made.	
Condition M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not Triggered		Audit interviews	No requests in relation to this condition were received during the audit period.	This condition was not triggered during the audit period.	
Condition M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant		Audit interviews INX system Bloomfield website	Bloomfield operates a 24/7 hotline for complaints and blasting. The hotline was tested during the site visit on 20/11/2024 at 8.17am and was found to be operational. The hotline is also tested internally every month, record of this was sighted. Calls to the hotline are recorded and tracked in the INX system. This was verified during the site inspection. The hotline number is listed on the Bloomfield website.	A telephone complaints line was operated during the audit period for the purpose of receiving any complaints from members of the public.	
Condition M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Compliant		Local newspaper advertisement Bloomfield website Audit interviews	The complaints line is advertised on the Bloomfield website and in local newspapers.	Notification of the complaints line has been provided to the public.	
Condition M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Noted				Noted.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition M6.1	<p>For each discharge point or utilisation area specified below, the licensee must monitor:</p> <p>a) the volume of liquids discharged to water or applied to the area;</p> <p>b) the mass of solids applied to the area;</p> <p>c) the mass of pollutants emitted to the air;</p> <p>at the frequency and using the method and units of measure, specified below.</p> <p>POINT 1 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day By calculation (volume flow rate or pump capacity multiplied by operating time)</p> <p>POINT 2 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day In line instrumentation</p>	Non-compliant	Administrative	<p>EPL monitoring reports</p> <p>Email from Bloomfield to EPA dated 11/02/2022</p> <p>Email from Bloomfield to EPA dated 18/02/2022</p> <p>Formal warning letter issued by EPA dated 17/11/2022 (Notice number 3502178)</p>	<p>Monitoring results for EPL discharge point 1 and point 2 indicate that the volume of liquid discharged to water has been monitored at the frequency required under Condition M6.1 using the sampling method specific. Discharge volumes are reported as megalitres per day (ML/day) as opposed to kilolitres per day (kL/day). The discharge limit for point 1 is 40,000 kL/day. The maximum recorded discharge volume is 40 ML/day. All reported discharge volumes appear to be rounded to the nearest 5 ML. It is unclear whether volumes reported as 40 ML/day have been rounded up or down.</p> <p>There was a data logger failure on 5 January 2022 that resulted in the inability to calculate the discharge flow volume at discharge point 2. Actions have been taken (such as installation of backup power supply) to reduce the risk of this occurring in the future.</p>	The requirements of this condition were not met during the audit period.	Discharge volumes in the EPL monitoring reports and any other reporting of discharge volumes should be reported using the unit of measure specified under this condition (kilolitres per day). Calculated discharge volumes should be provided to at least three significant figures.
Condition M7.1	<p>To determine compliance with conditions L4.2 and L4.3:</p> <p>a) Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 3, 4, 5 and 6 for the parameters specified in Column 1 of the table below; and</p> <p>b) The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the other columns.</p> <p>Parameter Units of measure Frequency Sampling Method Airblast Overpressure Decibels (Linear Peak) All blasts Australian Standard AS 2187.2-2006 Ground Vibration Peak Particle Velocity millimetres per second All blasts Australian Standard AS 2187.2-2006</p>	Compliant		<p>2021-2024 blasting results</p> <p>2021, YEM 2023 and YEM 2024 Annual Reviews</p> <p>EPL Annual Returns</p>	<p>A review of the blast monitoring results for the audit period found that airblast overpressure and ground vibration levels were measured at the required monitoring locations, at the required frequency, using the specified sampling methodology. Electronic records of this data were sighted.</p>	Blast monitoring has been completed and recorded in accordance with the requirements of this condition.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Compliant		2021, 2022 and 2023 Annual Returns	Annual return submissions for 2021, 2022 and 2023 were sighted and verified to include all required statements of compliance as well as monitoring and compliance summaries.	Annual returns for the audit period have been completed and supplied to the EPA in the approved form.	
Condition R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Compliant		2020, 2021, 2022 and 2023 Annual Returns	Evidence of submission was sighted for the annual returns for the 2021, 2022 and 2023 reporting periods.	All Annual Returns in the audit period were prepared in respect of each reporting period.	
Condition R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Not Triggered		POEO public register entry for EPL 396	EPL licence 396 was not transferred during the audit period.	This condition was not triggered during the audit period.	
Condition R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not Triggered		POEO public register entry for EPL 396	EPL licence 396 was not surrendered or revoked during the audit period.	This condition was not triggered during the audit period.	
Condition R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant		Annual Return eConnect submission confirmation emails dated 28/02/2022, 17/02/2023, and 09/02/2024	The annual reporting period under the licence is 31 December to 30 December. Annual returns for the audit period were submitted in February, within 60 days of the reporting period end.	All Annual Returns for the audit period were supplied to the EPA within the required timeframe.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Compliant		2020, 2021, 2022 and 2023 Annual Returns Audit interviews	Annual returns are retained and saved on file by the Environment Department.	Copies of the Annual Returns supplied to the EPA have been retained.	
Condition R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant		2021, 2022 and 2023 Annual Returns	Certification and sign off in the 2021, 2022 and 2023 Annual Review submissions were sighted.	All Statements of Compliance supplied during the audit period have been certified and the Monitoring and Complaints Summary signed by the required persons.	
Condition R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Compliant		Audit interviews Email from EPA to Bloomfield dated 07/02/2022, 05/07/2022 and 13/07/2022	The following incidents occurred during the audit period: - Passive spill from Overland Dam on 05/07/22. - Data logger failure to record flow during licensed discharge on 05/01/22. - Discharge exceeded TSS limit during licensed discharge on the 06/07/22 and 07/07/22. Review of email correspondence with the EPA confirmed that notifications were made via the Environment Line service for all incidents listed above.	Notifications were made during the audit period by telephoning the Environment Line service on 131 555.	
Condition R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Compliant			The following incidents were reported to the EPA within the audit period: - Passive spill from Overland Dam on 05/07/22. EPA was notified of the incident on 05/07/22. The investigation report was provided to the EPA on 12/07/22. - Data logger failure to record flow during licensed discharge on 05/01/22. The failure to record flow was discovered on the 07/02/22 and was reported to the EPA on the 07/02/22. Written details were	Written details of all incidents were provided within seven days of becoming aware of the incident to the EPA.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
					provided to the EPA on 11/02/2022. - Discharge exceeded TSS limit during licensed discharge on the 06/07/22 and 07/07/22. Notification of incident was made to the EPA on the 08/07/22. Written details were also provided to the EPA on 08/07/22.		
Condition R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not Triggered		Audit interviews	Site personnel confirmed that no requests were received from the EPA during the audit period under this condition.	This condition was not triggered during the audit period.	
Condition R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not Triggered		Audit interviews	Refer to evidence review under EPL Condition R3.1.	This condition was not triggered during the audit period.	
Condition R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Not Triggered		Audit interviews	Refer to evidence review under EPL Condition R3.1.	This condition was not triggered during the audit period.	

Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
Condition R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not Triggered		Audit interviews	Refer to evidence review under EPL Condition R3.1.	This condition was not triggered during the audit period.	
Condition R4.1	The licensee must report any exceedance of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	Not Triggered		Blasting results 2021, YEM 2023 and YEM 2024 Annual reviews	No exceedances of the blasting criteria were recorded during the audit period.	This condition was not triggered during the audit period.	
Condition R4.2	For each Annual Return reporting period the licensee must submit a Heavy Plant Tyre Disposal Report to the EPA for that period. The report must include the following information for each waste tyre: a) the size and type; b) disposal date; c) cumulative tonnage of waste tyres disposed in each disposal area; d) GPS coordinates (easting and northing) of the disposal location; e) the Reduced Level (RL) referencing the Australian Height Datum in metres of the burial depth; and f) where reasonably available the purchase date, supplier and serial number.	Compliant		Tyre disposal reports Audit interviews	It was confirmed with site personnel that no heavy plant tyres were disposal onsite during the audit period. This was confirmed against the reports submitted with the annual returns for the audit period which state no heavy plant tyres were disposed.	The requirements of this condition were satisfied during the audit period.	
Condition G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant		Audit interviews	A copy of the licence is kept available at the mine.	The requirements of this condition have been satisfied.	
Condition G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not Triggered		Audit interviews	No request was made during the audit period.	This condition was not triggered during the audit period.	
Condition G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant		Audit interviews	A copy of the licence is kept available at the mine and is available on the site intranet to all employees.	The requirements of this condition have been satisfied.	

Table 21: Mining Leases Audit Table

Relevant ML	Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
CCL761 ML1738	Condition 1	(a) Within 90 days from the date of grant or renewal of this mining lease, the lease holder must give each landholder notice in writing: (i) that this mining lease has been granted or renewed; and (ii) whether the lease includes the surface. The notice must include a plan identifying the lease area and each landholder and individual land parcel within the lease area. (b) If there are ten or more landholders to which notice must be given, the lease holder will be taken to have complied with condition 1(a) if a notice complying with condition 1(a) is published in a newspaper circulating in the region where the lease area is situated.	Not Triggered		Audit interviews NSW Gov DiGS database	No mining leases were granted or renewed during the audit period.	This condition was not triggered during the audit period.	
CCL761 ML1738	Condition 2	The security deposit to be provided and maintained for this mining lease is part of a group security deposit. The lease holder is required to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining leases covered by the group security deposit, including obligations under each mining lease that may arise in the future. The amount of the security deposit to be provided as a group security deposit has been assessed at \$25,367,000. The leases covered by the group security include this CCL 761 (1973) and ML 1738 (1992).	Compliant		Bond premium invoice dated 16/07/2024 Correspondence from Resources Regulator to Bloomfield dated 24/01/2024	Correspondence from the Resources Regulator and documentation from Liberty Specialty Markets confirms that a security bond is held by the Department of Regional NSW to the amount required under this condition.	A security deposit has been maintained to secure funding for the fulfilment of obligations under the mining leases covered by the group security deposit.	
CCL761 ML1738	Condition 3	The lease holder must make every reasonable attempt, and be able to demonstrate its attempts to the satisfaction of the Secretary, to enter into a cooperation agreement with the holder(s) of any overlapping authorisations issued under the Mining Act 1992 and petroleum titles issued under the Petroleum (Onshore) Act 1991. The cooperation agreement should address but not be limited to: • access arrangements • operational interaction procedures • dispute resolution • information exchange • well location • timing of drilling • potential resource extraction conflicts and • rehabilitation issues.	Not Triggered		Audit interviews MinView database	There are no known overlapping authorisations with those held by Bloomfield issued under the Mining Act 1992 and petroleum titles issued under the Petroleum (Onshore) Act 1992.	This condition was not triggered during the audit period.	

Relevant ML	Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
CCL761 ML1738	Condition 4	(a) The lease holder must not carry out any assessable prospecting operation on land over which this lease has been granted unless: (i) it is carried out in accordance with any necessary development consent; or (ii) if development consent is not required, the prior written approval of the Minister has been obtained. (b) The Minister may require the lease holder to provide such information as required to assist the Minister to consider an application for approval. (c) An approval granted by the Minister under this condition may be granted subject to terms. (d) The lease holder must comply with the approval granted to the holder under this condition.	Not Triggered		Audit interviews 2021, YEM 2023 and YEM 2024 Annual Reviews	No exploration activities occurred during the audit period.	This condition was not triggered during the audit period.	
ML1738	Condition 5	(a) The lease holder must not mine within any part of the lease area which is within the notification area of the Bloomfield U Cut Tailings Dam without the prior written approval of the Minister and subject to any conditions the Minister may stipulate. (b) Where the lease holder desires to mine within the notification area, the lease holder must: (i) at least twelve (12) months before mining is to commence or such lesser time as the Minister may permit, notify the Minister of the desire to do so. A plan of the mining system to be implemented must accompany the notice; and (ii) provide such information as the Minister may direct. (c) The Minister must not, except in the circumstances set out in sub-paragraph (ii), grant approval unless sub-paragraph (i) of this paragraph has been complied with. (i) This sub-paragraph is complied with if: (a) Dams Safety NSW as constituted by section 6 of the Dams Safety Act 2015 and the owner of the dam have been notified in writing of the desire to mine referred to in paragraph (b). (b) the notifications referred to in clause (a) are accompanied by a description or plan of the area to be mined. (c) the Secretary has complied with any reasonable request made by Dams Safety NSW or the owner of the dam for further information in connection with the mining proposal. (d) Dams Safety NSW has made its recommendations concerning the mining proposal or has informed the Minister in writing that it does not propose to make any such recommendations; and (e) where Dams Safety NSW has made recommendations the approval is in terms that are:	Not Triggered		Audit interviews Site inspection Site aerial imagery	No mining was undertaken within the notification area of the Bloomfield U Cut Tailings Dam during the audit period.	This condition was not triggered during the audit period.	

Relevant ML	Condition Reference	Condition Requirement	Compliance Status	Non-Compliance Risk Rating	Evidence Source	Evidence Review	Findings	Actions
		<p>- in accordance with those recommendations; or</p> <p>- where the Minister does not accept those recommendations or any of them - in accordance with a determination under sub-paragraph (ii) of this paragraph.</p> <p>(ii) Where the Minister does not accept the recommendations of Dams Safety NSW or where Dams Safety NSW has failed to make any recommendations and has not informed the Minister in writing that it does not propose to make any recommendations, the approval shall be in terms that are, in relation to matters dealing with the safety of the dam:</p> <p>- as determined by agreement between the Minister and the Minister administering the Dams Safety Act 2015; or</p> <p>- in the event of failure to reach such agreement - as determined by the Premier.</p> <p>(d) The Minister, on notice from Dams Safety NSW, may at any time or times:</p> <p>(i) cancel any approval given where a notice pursuant to section 19 of the Dams Safety Act 2015 is given.</p> <p>(ii) suspend for a period of time, alter, omit from or add to any approval given or conditions imposed.</p>						
ML1738	Condition 6	<p>The following conditions apply to the carrying out of the ancillary mining activity(s) specified in Schedule 2:</p> <p>(a) Rehabilitation</p> <p>i. The lease holder must rehabilitate the land and water described in Schedule 3 that is disturbed by the ancillary mining activity(s) as soon as reasonably practicable after the disturbance occurs.</p> <p>(b) Standard Conditions</p> <p>i. The lease holder must comply with the standard conditions of mining leases (standard conditions) prescribed in Schedule 8A of the Mining Regulation 2016 as if the references to the mining area in those standard conditions was a reference to the land described in Schedule 3.</p>	Compliant		<p>Rehabilitation Management Plan</p> <p>Site aerial imagery</p> <p>Site inspection</p> <p>Audit interviews</p>	<p>The land described in Schedule 3 is still used for the purpose of the ancillary mining activity and therefore is not yet available for rehabilitation.</p>	<p>The ancillary mining activity was carried out in the audit period in accordance with the requirements of this condition.</p>	



APPENDIX E – Site Inspection Photos



Plate 1: Pit lookout.



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Plate 2: Pasture rehabilitation area.



Plate 3: S Cut 2023 Rehabilitation.



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Plate 4: S Cut Rehabilitation.



Plate 5: Biosolids application in rehabilitation.



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Plate 6: Aboriginal cultural heritage site signage.



Plate 7: HiVol Air Quality Monitor.



Plate 8: Depositional dust gauge.



Plate 9: Groundwater monitoring bores.



Plate 10: Blast monitor.



Plate 11: DustTrak internal air quality monitor.



Plate 12: Waste segregation at workshop.



Plate 13: Used IBCs near tyre change out pad.



Plate 14: Oily water separator at workshop.



Plate 15: Flammable liquid storage.



Plate 16: Flammable gas storage.



Plate 17: Fuel farm.



Plate 18: Oil storage area.



Plate 19: Bunded IBC storage.



Plate 20: Ammonium nitrate storage.



Plate 21: Loop road track dam.



Plate 22: Overland Dam facing northwest.



Plate 23: Overland Dam facing northeast.



Plate 24: Tailings storage facility.



Plate 25: Four Mile Creek diversion.



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Plate 26: Lake Foster.



Plate 27: Discharge point.





Plate 28: Discharge channel.



Plate 29: Biodiversity offset area.



APPENDIX F – Technical Specialist Report



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19 December 2024

Atlantech
Delivered via Email

Attention: Samantha Hovar

Dear Samantha

RE: BLOOMFIELD COLLIERY 2024 INDEPENDENT ENVIRONMENTAL AUDIT – WATER

INTRODUCTION

Engeny Australia Pty Ltd (Engeny) was engaged by Atlantech to undertake a compliance assessment for the Bloomfield Colliery (Bloomfield) which is owned and operated by the Bloomfield Group. Compliance was assessed against the conditions of Project Approval (PA) PA07_0087, Environment Protection Licence (EPL) 396 and mining leases for the site for the audit period 2 November 2021 to 1 November 2024.

METHODOLOGY

Available documentation relating to the management of surface water and groundwater across the site was reviewed. This documentation included:

- Project Approval PA07_0087.
- EPL 396.
- Impact assessment documentation.
- Environmental management plans/programs and monitoring reports.

Following review of the documentation, compliance was assessed based on the criteria defined in the NSW Government Independent Audit Guidelines (October 2015).

ASSESSMENT OUTCOMES

Summary of Non-Compliances and Review of 2021 IEA Actions

Table 1 summarises non-compliances identified during the audit process. A detailed list of findings applicable to all conditions assessed is provided in Attachment A. Actions and recommendations from the 2021 audit were reviewed to determine the status of the action/recommendation. The actions are tabulated in Table 3 with commentary on the status of the action provided.

TABLE 1 SUMMARY OF WATER RELATED NON-COMPLIANCES

Reference	Relevant Condition	Condition Requirement	Compliance Status	Findings	Recommendation(s)
PA07_0087	Schedule 3, Condition 19	<p>The Proponent must prepare a Water Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with EPA and DoI and be submitted to the Secretary for approval within 6 months of the date of this approval;</p> <p>(b) be prepared by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and</p> <p>(c) include:</p> <ul style="list-style-type: none"> • a Site Water Balance; • an Erosion and Sediment Control Plan; • a Surface Water Monitoring Plan; • a Ground Water Monitoring Program; and • a Surface and Ground Water Response Plan. <p>The Proponent must implement the Water Management Plan as approved by the Secretary.</p>	Non-Compliant	<p>The current approved Water Management Plan (WMP) for the site is the <i>Bloomfield Mining Operations Water Management Plan, Revision D</i> (AECOM, 2021).</p> <p>The document was developed by published 10 August 2021. The NSW Department of Planning and Environment (DPE) approved the plan on 23 August 2022.</p> <p>Page 1 of the WMP (AECOM, 2021) states “in accordance with Condition 19(a) the WMP has been prepared in consultation with the EPA and [DPE].” Proof of the correspondence with these agencies is provided in Appendix F of the WMP (AECOM, 2021).</p> <p>Page 1 of the WMP (AECOM, 2021) states “In accordance with Condition 19(b) the WMP has been prepared by a suitable qualified consultant as approved by the Department.” Proof of the correspondence with the department verifying this is provided in Appendix F of the WMP (AECOM, 2021)</p> <p>The WMP (AECOM, 2021) includes the following components:</p> <ul style="list-style-type: none"> • a Site Water Balance in Appendix B; • an Erosion and Sediment Control Plan in Appendix C; • a Surface Water Monitoring Plan in Appendix D; and • a Ground Water Monitoring Program in Appendix E; • a Surface and Ground Water Response Plan captured in Appendix D and Appendix E. <p>Commitments in the plan were reviewed to determine whether the Proponents has implemented the WMP as approved by the Secretary. The review is documented in</p>	<p>Bloomfield should ensure that ESCP inspections, maintenance and reporting is undertaken in accordance with Table 1 of the ESCP.</p> <p>Several surface water quality trigger exceedances that were not reported or investigated have been identified. Bloomfield should ensure that all exceedances of trigger levels in the SWMP are investigated and reported as per requirements outlined in the SWMP. Incidents are to be reported in accordance with Schedule 6 Condition 5 of the Project Approval.</p> <p>Bloomfield stated in response to a request for information relating to the above aforementioned exceedances that the SWMP water quality trigger values: “were set after a small sample size in 2012. The WMP allows for a review of the triggers which may be appropriate with the pending WMP review after approval of DA Modification 5.”</p>

Reference	Relevant Condition	Condition Requirement	Compliance Status	Findings	Recommendation(s)
				Table 2 and indicates that not all of the commitments made in the plan have been fulfilled	Bloomfield should undertake a review of the SWMP water quality triggers and action any updates accordingly in the WMP.
PA07_0087	Schedule 3, Condition 21	The Erosion and Sediment Control Plan must: <ul style="list-style-type: none"> (a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction (Volume 2E – Mines and Quarries) manual (DECC 2008), or its latest version; (b) identify activities that could cause soil erosion and generate sediment; (c) describe measures to minimise soil erosion and the potential for transport of sediment downstream; (d) describe the location, function and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to maintain the structures over time. 	Administrative Non-Compliance	<p>The Erosion and Sediment Control Plan (ESCP) is provided in Appendix C of the WMP (AECOM, 2021).</p> <p>Section 1.4 of the ESCP outlines activities that could cause soil erosion and generate sediment.</p> <p>Section 2 of the ESCP describes measures to minimise soil erosion and the potential for transport of sediment downstream.</p> <p>Figure 1 of the ESCP shows the location of the ESC structures. The function of each of the structures is outlined throughout Section 2 of the ESCP. While the document references that the ESCs should be designed to the design standards outlined in the Managing Urban Stormwater Soils and Construction Vol 2 Mines and Quarries (the 'Blue Book'), the capacity of the erosion and sediment control structures is not listed.</p> <p>Maintenance of the erosion and sediment control structures is outlined in Section 4.0 of the plan.</p>	<p>The ESCP should be updated to include:</p> <ul style="list-style-type: none"> Details of the design evident that the sediment basins have been sized to accommodate, The capacity of the sediment basins (including a breakdown of the sediment storage capacity and the settling zone capacity), and Details of the methodology used to calculate the sediment basin size. <p>Bloomfield should review the sediment basin sizing requirements against surveyed capacities to ensure the storages are adequately sized.</p>
PA07_0087	Schedule 3, Condition 23	The Groundwater Monitoring Program must include: <ul style="list-style-type: none"> (a) further development of the regional and local groundwater model; (b) detailed baseline data to benchmark the natural variation in groundwater levels, yield 	Administrative Non-Compliance	<p>The Groundwater Monitoring Program (GWMP) is provided in Appendix E of the WMP (AECOM, 2021).</p> <p>Section 2.1 of the GWMP outlines further development of the regional and local groundwater model.</p>	Bloomfield should include a procedure for the verification of the groundwater model in the GWMP. It is recommended that the procedure include the requirement for periodic reviews by a suitably qualified

Reference	Relevant Condition	Condition Requirement	Compliance Status	Findings	Recommendation(s)
		<p>and quality (including at any privately owned bores in the vicinity of the site);</p> <p>(c) groundwater impact assessment criteria;</p> <p>(d) a program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation;</p> <p>(e) procedures for the verification of the groundwater model; and</p> <p>(f) reporting procedures for the results of the monitoring program and model verification.</p>		<p>Detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality is provided in Section 2.2 of the GWMP.</p> <p>A program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation is outlined in Section 2.4 and Section 3 of the GWMP.</p> <p>Section 5.3 of the WMP states that <i>“the following circumstances would trigger further development or refinement of the groundwater model:</i></p> <ul style="list-style-type: none"> <i>a significant change to the mine plan</i> <i>acquisition of new hydrogeological information, such as groundwater levels and aquifer properties (i.e. hydraulic conductivity) which are different to calibrated values used in the model</i> <i>groundwater drawdown and inflows which significantly exceed model predictions for that stage of mining.”</i> <p>This is not considered a procedure for the verification of the groundwater model.</p> <p>Reporting procedures for the groundwater monitoring program are outlined in Section 2.5 of the GWMP. There is no reporting procedure included for model verification included in the GWMP.</p>	<p>hydrogeologist at a specified interval (e.g., every three years at least or more frequently if there is a significant change to the mine plan, acquisition of new hydrogeological information, or groundwater drawdown and inflows significantly exceed model predictions for that stage of mining). The review should include comparison of modelled and observed groundwater levels, and modelled and observed groundwater inflows to the mining pits.</p> <p>A reporting procedure for the model verification should be included in the GWMP.</p>
EPL 396	Condition L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the	Non-Compliant	Two discharges to water occurred that were not in compliance with the conditions of this license during the audit period. This non-compliance include:	No further actions recommended.

Reference	Relevant Condition	Condition Requirement	Compliance Status	Findings	Recommendation(s)
		Protection of the Environment Operations Act 1997.		<ul style="list-style-type: none"> An exceedance of the TSS limit at license discharge point 1 on 6 and 7 July 2022. Passive spilling of a mine water dam on 5 July 2022. <p>The required reporting process was followed.</p>	
EPL 396	Condition L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Non-Compliant	<p>EPL discharge monitoring results for the audit period indicate the following exceedances of concentration limits:</p> <ul style="list-style-type: none"> The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 6 July 2022. The recorded TSS concentration on this date was 35 mg/L. The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 7 July 2022. The recorded TSS concentration on this date was 42 mg/L. <p>These are the only exceedances recorded during the monitoring period. TSS concentrations following the exceedances returned to levels that were more in line with the historic average. The event is document in the 2022 Annual Review. Environmental impacts as a result of the exceedances are likely to be negligible.</p>	No further actions recommended.
EPL 396	Condition M6.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below.	Administrative Non-Compliance	<p>Monitoring results for EPL discharge point 1 and point 2 indicate that the volume of liquid discharged to water has been monitored at the frequency required under Condition M6.1 using the sampling method specific. Discharge volumes are reported as megalitres per day (ML/day) as opposed to kilolitres per day (kL/day).</p> <p>The discharge limit for point 1 is 40,000 kL/day. The maximum recorded discharge volume is 40 ML/day. All reported</p>	<p>Discharge volumes in the EPL monitoring reports and any other reporting of discharge volumes should be reported using the unit of measure specified under this condition (kilolitres per day). Calculated discharge volumes should</p>

Reference	Relevant Condition	Condition Requirement	Compliance Status	Findings	Recommendation(s)
		POINT 1 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day By calculation (volume flow rate or pump capacity multiplied by operating time) POINT 2 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day In line instrumentation		discharge volumes appear to be rounded to the nearest 5 ML. It is unclear whether volumes reported as 40 ML/day have been rounded up or down. There was a data logger failure on 5 January 2022 that resulted in the inability to calculate the discharge flow volume at discharge point 2. Actions have been taken (such as installation of backup power supply) to reduce the risk of this occurring in the future.	be provided to at least three significant figures.

TABLE 2 REVIEW OF WATER MANAGEMENT PLAN COMMITMENTS

Relevant Plan	Commitment	Commitment Fulfilled (Yes/No)?	Findings and Recommendations
ESCP	Erosion and sediment control inspections and associated reporting is to be undertaken as per Table 1 of the ESCP.	No	<p>Records of erosion and sediment control inspections were provided for 2022 and 2023 (document references: <i>Sed Traps_2022.pdf</i>, <i>Sed Traps_May 2023.pdf</i> and <i>Sed Traps_June 2024.pdf</i>). The documents are dated 5 April 2022, 9 May 2023 and 4 June 2024, indicating that the frequency of inspections is yearly. This is inconsistent with the requirements of the ESCP. No other evidence was provided to indicate that inspections have been undertaken more frequently.</p> <p>In response to the above observation, Bloomfield stated:</p> <p><i>“Documented sediment dam inspections were not recorded at the frequency. Bloomfield operators charged with cleaning out sediment dams undertake the works as part of their routine taking ownership of the works and do not always wait to be instructed.”</i></p> <p>It is noted that inspections could have been undertaken more frequently than what is indicated by the documents (i.e. yearly) and not documented. However, the required frequency specified for inspections and reporting is monthly. No evidence was provided to indicate that reporting of inspections has been undertaken monthly, even if they did occur.</p>
SWMP	Surface water quality monitoring is to be undertaken at the monitoring locations outlined in Table 1 of the SMWP. The frequency of monitoring and the parameters to be tested as part of the monitoring program are specified in Table 2 of the SWMP.	Yes	Water quality results reported in the 2021, 2022 and 2023 annual reviews indicates that monitoring was undertaken at the required frequency for the specified analytes during the reporting period.
SWMP and GWMP	Aquatic ecology surveys of Four Mile Creek are to be undertaken every five years: <ul style="list-style-type: none"> Assess the quality of aquatic ecology and riparian vegetation in sites up- and down-stream of the EPL discharge point; 	Yes	The Four Mile Creek aquatic ecology survey was completed in 2022 by Marine Pollution Research Pty Ltd and is documented in the report titled <i>Aquatic Ecology Survey Four Mile Creek Autumn 2022</i> . The report includes all of the components required as part of this commitment.

Relevant Plan	Commitment	Commitment Fulfilled (Yes/No)?	Findings and Recommendations
	<ul style="list-style-type: none"> Identify measurable differences in these attributes between up- and down-stream pools and determine whether these differences are attributable to the EPL discharge point; Assess whether the aquatic resources provide suitable and sustained aquatic habitat for fish and other aquatic biota and whether the streams continue to provide suitable fish passage; and Identify protected or threatened aquatic species or communities residing within the study area. 		
SWMP	<p>In the event the monitoring results show an exceedance of the adopted water quality trigger values, an investigation into the potential sources and/or causes will be undertaken. The response actions listed below will be initiated. An action plan will be prepared to reflect these actions</p> <ul style="list-style-type: none"> Once an exceedance is detected the circumstances of the event will be immediately investigated including a review of relevant monitoring data, meteorological conditions etc An assessment will be made to determine the reason for the exceedance, the potential magnitude of the impact and the level of future risk If assessed as being caused by the mining operation, and it is further assessed to be likely to cause an adverse impact on an existing beneficial or environmental use of surface water, then an appropriate preventative and/or remedial strategy will be prepared for discussion with relevant authorities including the Department of Planning, which may comprise: <ul style="list-style-type: none"> additional monitoring including assessment of ecological aspects modification of mine water management procedures modification to mine water management facilities (If appropriate) no change to operations A response/mitigation plan will be implemented to the satisfaction of the relevant 	No	<p>Monitoring results presented in Appendix C of the 2023 Annual Review indicate that multiple pH values recorded at monitoring location WM5 were below the lower pH trigger during the audit period. Minimal explanation of these exceedances is provided in the body of the report. The body of the report states:</p> <p><i>“The low pH levels at WM5 are attributed to stagnate evaporating pools during drier non-flow periods.”</i></p> <p>Flow conditions are recorded in the ‘comments’ column in the tables presented in Appendix C. Comment is made when the location is dry or has no flow. On some dates (25 February 2022, 25 April 2022 and 29 August 2022) when an exceedance of the lower pH trigger has occurred there appears to have been flow in the system as no comments of dry or no flow conditions have been included.</p> <p>Similarly, monitoring results presented in Appendix C of the 2023 Annual Review indicate that six conductivity values recorded at monitoring location WM13 exceeded the conductivity trigger. No commentary relating to the exceedances is included in the annual reviews.</p> <p>No evidence was provided to indicate that the response actions listed as part of this commitment were initiated in response to the exceedances.</p>

Relevant Plan	Commitment	Commitment Fulfilled (Yes/No)?	Findings and Recommendations
	<ul style="list-style-type: none"> If it is found that downstream water users have been adversely impacted, a compensation strategy would be developed in consultation with the landholder(s). This may include the provision of an alternative water supply, adequate compensation made available or some other appropriate agreement negotiated between the parties (for example, installation of an irrigation system, dam or stock water point). The timeframe for implementation of the compensation strategy would be agreed with the landholder(s). In the event that agreement cannot be reached regarding the compensation to be provided, the matter may be referred to the Department of Planning, Industry and Environment for resolution. 		
SWMP	Exceedances are to be reported as per Section 2.3 of the SWMP.	No	No evidence was provided to indicate that the exceedances outlined above were reported as per Section 2.3 of the SWMP.
SWMP	Incident reporting will be undertaken in accordance with Condition 6 of Schedule 5 for the Project. The proponent will notify the Secretary and any other relevant agencies of any incident associated with the Project as soon as practical after the incident is identified. A detailed report of the incident will be provided to the Secretary and any relevant departments within 7 days of identifying the incident	No	No evidence was provided to indicate that the exceedances were reported to the Secretary in accordance with Condition 6 of Schedule 5.
GWMP	Groundwater quality and level monitoring is to be undertaken as per Table 4 of the GWMP.	Yes	Groundwater monitoring results presented in Appendix D of the 2021, 2022 and 2023 Annual Reviews indicates that monitoring has been undertaken as per Table 4 of the GWMP.
GWMP	<p>The following information will be included in the Annual Review Report (ARR) in accordance with Condition 3 Schedule 5 of the Project Approval:</p> <ul style="list-style-type: none"> A summary of the monitoring results for the project during the past year An analysis of these monitoring results against the relevant: <ul style="list-style-type: none"> Impact assessment criteria/limits 	Yes	The 2021, 2022 and 2023 Annual Reviews include the details listed as part of this commitment.

Relevant Plan	Commitment	Commitment Fulfilled (Yes/No)?	Findings and Recommendations
	<ul style="list-style-type: none"> Monitoring results from previous years Predictions in the EA <ul style="list-style-type: none"> Identification of any trends in the monitoring results over the life of the project. <p>Incident reporting will be undertaken in accordance Condition 3 Schedule 5 of the Project Approval.</p>		
GWMP	<p>In the event of any exceedance, the following response action would be initiated:</p> <ul style="list-style-type: none"> Initiate immediate review of circumstances including results of monitoring Assessment undertaken to determine the likely reason(s) for the exceedance If assessed as being caused by the mining operation, and it is further assessed to be likely to cause an adverse impact on an existing beneficial or environmental use of surface water or groundwater, then an appropriate preventative and/or remedial strategy would be recommended, which may comprise: <ul style="list-style-type: none"> Additional monitoring Provision of alternative water supply or other negotiated agreement with landholders if found to be adversely impacted or (If appropriate) no change to operations. The above response program will be carried out in consultation with the Department of Planning, Industry and Environment. 	Yes	The 2021, 2022 and 2023 Annual Reviews indicate that no exceedances occurred during the reporting period.

TABLE 3 REVIEW OF 2021 IEA ACTIONS

Reference	Condition	Action Type	Recommendation (Umwelt, 2021)	Recommendation Addressed (Yes/No)?	Findings and Recommendations
PA07_0087	Schedule 2, Condition 15	Corrective Action	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).	N/A	The WMP (AECOM, 2021) has not been updated since the 2021 IEA, as such, this action has not been triggered.
PA07_0087	Schedule 3, Condition 21	Corrective Action	It is recommended that sediment dams be dewatered to the site water management system as required by Managing Urban Stormwater: Soils and Construction Volume 2E – Mines and Quarries (DECC 2008) and that this requirement be appropriately documented in the WMP and site EMS.	No	A dewatering procedure has not been documented in the WMP. A dewatering procedure has not been documented in the EMS. This recommendation should be actioned.
PA07_0087	Schedule 3, Condition 21	Corrective Action	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.	No	<p>Bloomfields stated in their response to this action:</p> <p><i>“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.”</i></p> <p>The area should be reviewed to determine whether there is an erosion risk. If an erosion risk is identified, the area should be shaped and rehabilitated prior to mine closure. The WMP should be updated to remove the recommendation upon completion, or, if the recommendation will not be actioned until mine closure.</p>

Reference	Condition	Action Type	Recommendation (Umwelt, 2021)	Recommendation Addressed (Yes/No)?	Findings and Recommendations
PA07_0087	Schedule 3, Condition 23 (f)	Corrective Action	It is recommended that the Groundwater Management Plan be revised to include procedures for the verification of the groundwater model as required.	No	The GWMP has not been updated since the 2021 IEA. Non-compliance with this condition was identified during the current audit period. Recommendations relevant to this condition are provided in Table 1 .
PA07_0087	Schedule 3, Condition 23 (f)	Recommendation	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.	No	The GWMP has not been updated since the 2021 IEA.
PA07_0087	Schedule 3, Condition 25	Recommendation	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.	Yes	The capping strategy for the U-Cut tailings dam is included in the Bloomfield Rehabilitation Management Plan (Bloomfield, 2022).
PA07_0087	Schedule 3, Condition 25A	Recommendation	It is recommended to develop a rehabilitation plan for the remediation of the gullyng observed to the east of U Cut Tailings Dam.	Yes	<p>In the 2021 Annual Review, Bloomfields stated in their response to this action:</p> <p><i>“Gully observed in existing rehabilitation scheduled to be repaired as part of 2022 rehabilitation program.”</i></p> <p>The Bloomfield Mine Annual Rehabilitation Report provided in Appendix E of the 2023 Annual Review states that:</p> <p><i>“4 ha on the southern section of the U Cut Tailings Facility has been prepared for rehabilitation and will be progressed</i></p>

Reference	Condition	Action Type	Recommendation (Umwelt, 2021)	Recommendation Addressed (Yes/No)?	Findings and Recommendations
					<i>to ecosystem and land use establishment during the 2025 reporting period."</i>
PA07_0087	Schedule 3, Condition 27	Recommendation	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.	Yes	Bloomfield has advised that: <i>"Adequate topsoil volumes are available for rehabilitation. Topsoil volume stockpiled 867,000 m3. Total active disturbance 411 Ha. Based on 0.15 m depth of application there is enough volume for 573 Ha."</i>
PA07_0087	Schedule 5, Condition 6	Recommendation	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.	Yes	Bloomfield stated in their response to this recommendation: <i>"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."</i>
Water Management Plan	-	Recommendation	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	Yes	Bloomfield stated in their response to this recommendation:

Reference	Condition	Action Type	Recommendation (Umwelt, 2021)	Recommendation Addressed (Yes/No)?	Findings and Recommendations
			ensure that water management covers Bloomfield operations within the Bloomfield Infrastructure Site		<i>“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.”</i>
Water Management	-	Recommendation	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.	Yes	During the site inspection carried out as part of this audit the resizing of the Overland Dam was verified.
Water Management	-	Recommendation	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.	No	The WMP has not been updated since the 2021 IEA.

Improvement Opportunities

Improvement opportunities identified during the audit are tabulated in Table 4.

TABLE 4 IDENTIFIED IMPROVEMENT OPPORTUNITIES

Number	Reference	Relevant Condition(s)	Improvement Opportunity
OFI1	PA07_0087	Schedule 5, Condition 6	<p>In the 2021 IEA it was 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.</p> <p>Bloomfield stated in their response to this recommendation:</p> <p><i>“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.”</i></p> <p>While it is noted that the exceedance was a non-compliance under EPL 396, Schedule 5 Condition 6 of PA07_0087 states that the:</p> <p><i>“The Proponent must notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.”</i></p> <p>Non-compliances of the EPL are considered incidents associated with the Project and it is recommended that any incidents reported under the EPL are also reported to the Department as soon as practicable.</p>
OFI2	Water Management Plan	-	<p>The WMP provided on the Bloomfield website appears to be in draft format. The document has error references and highlighted text throughout. When the WMP is updated to capture actions from this audit, the formatting of the document should be reviewed.</p>

SUMMARY OF WATER RELATED PERFORMANCE

Documents assessed during the audit period indicate that Bloomfield has implemented reasonable and feasible water management related measures to prevent and/or minimise harm to the environment as a result of the operation. Of the water related Conditions assessed during the audit, 6 were identified as non-compliances, 3 of which were administrative in nature. Internal documents governing the management of water on site (i.e. the WMP inclusive of all subcomponents) are generally robust and clearly articulate how water should be managed on site to prevent and minimise environmental harm provide an adequate level of detail. Water management on site could be further improved if recommended updates to WMP listed in this document are actioned and Bloomfield ensures that all commitments made in the WMP are fulfilled.

ASSUMPTIONS AND LIMITATIONS

Assumptions and limitations relevant to this assessment include:

- It is assumed that all reporting documents and data provided for the purpose of the assessment are provide an accurate representation of the performance of Bloomfield during the audit period.

- Assessment of compliance is limited to the availability of data at the time of the audit. Where there is insufficient data to demonstrate compliance, it is assumed that a non-compliance has occurred.

Regards,



Adam Wyatt

Principal Engineer

Enc. *Attachment A – Detailed Audit Commentary for Project Approval PA07_0087, EPL 396 and Mining Leases*

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ATTACHMENT A - DETAILED AUDIT COMMENTARY FOR PA07_0087, EPL 396 AND MINING LEASES

Reference	Condition	Condition Details	Audit Findings	Comments
Project Approval				
PA07_0087	Schedule 2, Condition 1	The Proponent must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	Compliant	It is considered that the proponent has implemented reasonable and feasible measures to prevent and/or minimise harm to the environment as a result of the operation.
PA07_0087	Schedule 2, Condition 8	With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	Noted	Noted.
PA07_0087	Schedule 2, Condition 9	The Proponent must prepare revisions of any strategy, plan or program required under this project approval if directed to do so by the Secretary. Such revisions must be prepared to the satisfaction of, and within a timeframe approved by, the Secretary.	Noted	Noted.
PA07_0087	Schedule 2, Condition 10	With the approval of the Secretary, the Proponent may integrate any strategy, plan, program, review, audit or committee required by this approval with any similar requirement under the development consent for the Donaldson Coal Mine and the project approval for the Abel Coal Mine	Noted	Noted.
PA07_0087	Schedule 3, Condition 18	Except as may be expressly provided for by an EPL, or in accordance with section 120 of the Protection of the	Compliant	No discharges of mine affected water from dams operated under PA07_0087 occurred during the audit period.

Reference	Condition	Condition Details	Audit Findings	Comments
		Environment Operations Act 1997, the Proponent must not discharge any mine water from the site. However, water may be transferred between the site and the adjoining Donaldson Coal Mine and/or Abel Coal Mine, in accordance with any approved Water Management Plan (see below).		
PA07_0087	Schedule 3, Condition 19	<p>The Proponent must prepare a Water Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with EPA and DoI and be submitted to the Secretary for approval within 6 months of the date of this approval; (b) be prepared by suitably qualified expert/s whose appointment/s have been approved by the Secretary; and (c) include: <ul style="list-style-type: none"> a Site Water Balance; an Erosion and Sediment Control Plan; a Surface Water Monitoring Plan; a Ground Water Monitoring Program; and a Surface and Ground Water Response Plan. <p>The Proponent must implement the Water Management Plan as approved by the Secretary.</p>	Non-Compliant	<p>The current approved Water Management Plan (WMP) for the site is the <i>Bloomfield Mining Operations Water Management Plan, Revision D</i> (AECOM, 2021).</p> <p>The document was developed by published 10 August 2021. The NSW Department of Planning and Environment (DPE) approved the plan on 23 August 2022.</p> <p>Page 1 of the WMP (AECOM, 2021) states “in accordance with Condition 19(a) the WMP has been prepared in consultation with the EPA and [DPE].” Proof of the correspondence with these agencies is provided in Appendix F of the WMP (AECOM, 2021).</p> <p>Page 1 of the WMP (AECOM, 2021) states “In accordance with Condition 19(b) the WMP has been prepared by a suitable qualified consultant as approved by the Department.” Proof of the correspondence with the department verifying this is provided in Appendix F of the WMP (AECOM, 2021)</p> <p>The WMP (AECOM, 2021) includes the following components:</p> <ul style="list-style-type: none"> a Site Water Balance in Appendix B; an Erosion and Sediment Control Plan in Appendix C; a Surface Water Monitoring Plan in Appendix D; and a Ground Water Monitoring Program in Appendix E; a Surface and Ground Water Response Plan captured in Appendix D and Appendix E. Commitments in the plan were reviewed to determine whether the Proponents has implemented the WMP as approved by the Secretary. The review is documented in

Reference	Condition	Condition Details	Audit Findings	Comments
				Table 2 and indicates that not all of the commitments made in the plan have been fulfilled.
PA07_0087	Schedule 3, Condition 20	<p>The Site Water Balance must:</p> <p>(a) include details of:</p> <ul style="list-style-type: none"> • sources and security of water supply; • water use and management on site; • any off-site water transfers or discharges; and • reporting procedures; and <p>(b) describe measures to minimise water use by the project.</p>	Compliant	<p>Section 2 of the main body of the WMP (AECOM, 2021) addresses each of the requirements under part (a) of this condition. The Site Water Balance is provided in Appendix B of the WMP (AECOM, 2021) and captures each of the requirements. The Site Water Balance provided in Appendix B of the WMP (AECOM, 2021) indicates that Bloomfield is a water surplus site and that all demands can be met by water in the water management system without the need for the import of water from external sources. The report details how Bloomfield reuses water to minimise water use and how clean water is diverted around the mine water management system to reduce the amount captured.</p>
PA07_0087	Schedule 3, Condition 21	<p>The Erosion and Sediment Control Plan must:</p> <p>(a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction (Volume 2E – Mines and Quarries) manual (DECC 2008), or its latest version;</p> <p>(b) identify activities that could cause soil erosion and generate sediment;</p> <p>(c) describe measures to minimise soil erosion and the potential for transport of sediment downstream;</p> <p>(d) describe the location, function and capacity of erosion and sediment control structures; and</p> <p>(e) describe what measures would be implemented to maintain the structures over time.</p>	Administrative Non-Compliance	<p>The Erosion and Sediment Control Plan (ESCP) is provided in Appendix C of the WMP (AECOM, 2021).</p> <p>Section 1.4 of the ESCP outlines activities that could cause soil erosion and generate sediment.</p> <p>Section 2 of the ESCP describes measures to minimise soil erosion and the potential for transport of sediment downstream.</p> <p>Figure 1 of the ESCP shows the location of the ESC structures. The function of each of the structures is outlined throughout Section 2 of the ESCP. While the document references that the ESCs should be designed to the design standards outlined in the Managing Urban Stormwater Soils and Construction Vol 2 Mines and Quarries (the 'Blue Book'), the capacity of the erosion and sediment control structures is not listed.</p> <p>Maintenance of the erosion and sediment control structures is outlined in Section 4.0 of the plan.</p>

Reference	Condition	Condition Details	Audit Findings	Comments
PA07_0087	Schedule 3, Condition 22	The Surface Water Monitoring Program must include: (a) detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project; (b) surface water and stream health impact assessment criteria; (c) a program to monitor the impact of the project on surface water flows, water quality and stream health; and (d) reporting procedures for the results of the monitoring program.	Compliant	<p>The Surface Water Monitoring Program (SWMP) is provided in Appendix D of the WMP (AECOM, 2021).</p> <p>Detailed baseline data on surface water quality in creeks and other waterbodies that could potentially be affected by the project is provided in Section 1.4 of the SWMP. Bloomfield has advised that there is no baseline flow data available, as such, baseline flow data is unable to be included in the SWMP.</p> <p>Surface water and stream health impact assessment criteria is provided in Section 1.5 of the SWMP.</p> <p>A program to monitor the impact of the project on surface water flows, water quality and stream health is provided in Section 2 of the SWMP.</p> <p>Reporting procedures for the results of the monitoring program are outlined in Section 2 of the SWMP.</p>
PA07_0087	Schedule 3, Condition 23	The Groundwater Monitoring Program must include: (a) further development of the regional and local groundwater model; (b) detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality (including at any privately owned bores in the vicinity of the site); (c) groundwater impact assessment criteria; (d) a program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation; (e) procedures for the verification of the groundwater model; and (f) reporting procedures for the results of the monitoring program and model verification.	Administrative Non-Compliance	<p>The Groundwater Monitoring Program (GWMP) is provided in Appendix E of the WMP (AECOM, 2021).</p> <p>Section 2.1 of the GWMP outlines further development of the regional and local groundwater model.</p> <p>Detailed baseline data to benchmark the natural variation in groundwater levels, yield and quality is provided in Section 2.2 of the GWMP.</p> <p>A program to monitor the impact of the project on groundwater levels, yield, quality, groundwater dependent ecosystems and riparian vegetation is outlined in Section 2.4 and Section 3 of the GWMP.</p> <p>Section 5.3 of the WMP states that <i>“the following circumstances would trigger further development or refinement of the groundwater model:</i></p> <ul style="list-style-type: none"> • a significant change to the mine plan

Reference	Condition	Condition Details	Audit Findings	Comments
				<ul style="list-style-type: none"> acquisition of new hydrogeological information, such as groundwater levels and aquifer properties (i.e. hydraulic conductivity) which are different to calibrated values used in the model groundwater drawdown and inflows which significantly exceed model predictions for that stage of mining." <p>This is not considered a procedure for the verification of the groundwater model.</p> <p>Reporting procedures for the groundwater monitoring program are outlined in Section 2.5 of the GWMP. There is no reporting procedure included for model verification included in the GWMP.</p>
PA07_0087	Schedule 3, Condition 24	The Surface and Groundwater Response Plan must describe the measures and/or procedures that would be implemented to: <ul style="list-style-type: none"> (a) investigate, notify and mitigate any exceedances of the surface water, stream health and ground water impact assessment criteria; (b) compensate landowners of privately-owned land whose water supply is adversely affected by the project; and (c) mitigate and/or offset any adverse impacts on groundwater dependent ecosystems or riparian vegetation. 	Compliant	<p>A Surface and Groundwater Response Plan is incorporated in Appendix D and Appendix E of the WMP (AECOM, 2021). Section 6 of the WMP (AECOM, 2021) also outlines how the items relevant to Schedule 3, Condition 24 are addressed.</p> <p>Section 6.2 outlines the procedure for investigating, notifying and mitigating any exceedances of the surface water, stream health and ground water impact assessment criteria. This section also outlines the commitment to compensate landowners of privately owned land in the event that their supply is adversely affected by the project and a procedure for mitigating/offsetting adverse impacts on groundwater dependent ecosystems or riparian vegetation.</p>
PA07_0087	Schedule 5, Condition 2	<p>The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures/criteria; 	Compliant	The WMP (AECOM, 2021) includes the components listed under Schedule 5 Condition 2.

Reference	Condition	Condition Details	Audit Findings	Comments
		<ul style="list-style-type: none"> the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> impacts and environmental performance of the project; effectiveness of any management measures (see (c) above); <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to continually improve the environmental performance of the project over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and <p>(h) a protocol for periodic review of the plan.</p>		
PA07_0087	Schedule 5, Condition 3	<p>Each year, the Proponent must review the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the works that were carried out in the past year, and the works that are proposed to be carried out over the next year;</p> <p>(b) include a comprehensive review of the monitoring results and</p>	Compliant	A review of the environmental performance of the project is provided in Annual Review each year. The 2021, 2022 and 2023 Annual Reviews have been approved by the Secretary. Surface and groundwater related performance is described in Section 7 of the Annual Review documents.

Reference	Condition	Condition Details	Audit Findings	Comments
		<p>complaints records of the mine complex over the past year, which includes a comparison of these results against the</p> <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years; and the relevant predictions in the documents listed in condition 2 of Schedule 2; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measure will be implemented over the next year to improve the environmental performance of the project.</p>		
PA07_0087	Schedule 5, Condition 9	<p>From the end of 2009, the Proponent must make the following information publicly available on its website:</p> <p>(a) a copy of all current statutory approvals for the project;</p> <p>(b) a copy of the current environmental management strategy and associated plans and programs;</p> <p>(c) a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</p> <p>(d) a complaints register, which is to be updated on a monthly basis;</p> <p>(e) a copy of the minutes of CCC meetings;</p> <p>(f) a copy of any Annual Reviews (over the last 5 years);</p> <p>(g) a copy of any Independent Environmental Audit, and the</p>	Compliant	<p>All of the information listed under Schedule 5 Condition 9 is publicly available on the Bloomfield website at https://www.bloomcoll.com.au/sustainability/environmental-management/bloomfield-assessments. The information on the website appears to have been progressively added and is up to date. It is noted that the website was accessed on 29 November 2024 and</p>

Reference	Condition	Condition Details	Audit Findings	Comments
		Proponent's response to the recommendations in any audit; and (h) any other matter required by the Secretary.		
Environmental Protection Licence				
EPL 396	Condition A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Noted	Noted.
EPL 396	Condition A2.1	The licence applies to the following premises: BLOOMFIELD COLLIERY FOUR MILE CREEK ROAD, ASHTONFIELD, NSW 2323 AS DESCRIBED BY COORDINATES AND MAP ON DOCUMENT DATED DEC-14 AND REGISTERED IN THE EPA RECORDS SYSTEM AS DOC17/425999	Noted	Noted.
EPL 396	Condition A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and	Noted	Noted.

Reference	Condition	Condition Details	Audit Findings	Comments
		Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		
EPL 396	Condition P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Noted	Noted.
EPL 396	Condition P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Noted	Noted.
EPL 396	Condition P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for the emission of noise from the premises.	Noted	Noted.
EPL 396	Condition L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Non-Compliant	Two discharges to water occurred that were not in compliance with the conditions of this license during the audit period. This non-compliance include: <ul style="list-style-type: none"> An exceedance of the TSS limit at license discharge point 1 on 6 and 7 July 2022. Passive spilling of a mine water dam on 5 July 2022.
EPL 396	Condition L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must	Non-Compliant	EPL discharge monitoring results for the audit period indicate the following exceedances of concentration limits: <ul style="list-style-type: none"> The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 6 July 2022. The recorded TSS concentration on this date was 35 mg/L.

Reference	Condition	Condition Details	Audit Findings	Comments
		not exceed the concentration limits specified for that pollutant in the table.		<ul style="list-style-type: none"> The concentration limit for TSS (30 mg/L) at discharge point 1 was exceeded on 7 July 2022. The recorded TSS concentration on this date was 42 mg/L. <p>These are the only exceedances recorded during the monitoring period. TSS concentrations following the exceedances returned to levels that were more in line with the historic average. The event is document in the 2022 Annual Review. Environmental impacts as a result of the exceedances are likely to be negligible.</p>
EPL 396	Condition L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Compliant	All samples for pH at Point 1 and Point 2 were within the specified range.
EPL 396	Condition L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.	Noted	Noted.
EPL 396	Condition L2.4	Water and/or Land Concentration Limits	-	-
EPL 396	Condition L3.1	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area.	Compliant	EPL discharge monitoring results for the audit period indicate that there were no exceedances of volume limits specified under Condition L3.1 (40,000 kL/day for discharge point 1).
EPL 396	Condition L3.2	Discharge from Point 1 as referred to in Condition L3.1 is only permitted under the following conditions: - in wet weather conditions following 10mm or greater 24 hours rainfall event in the catchment in the first 24 hour period	Compliant	EPL discharge monitoring results for the audit period indicate that discharges from EPL point 1 occurred only when the rainfall conditions under Conditions L3.1 were met.

Reference	Condition	Condition Details	Audit Findings	Comments
		following the rainfall event; and - in wet weather conditions following a 15mm or greater 24 hours rainfall event in the catchment in the second 24 hour period following the rainfall event; and - in wet weather conditions following a 20mm or greater 24 hours rainfall event in the catchment in the third 24 hour period following the rainfall event.		
EPL 396	Condition M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Compliant	Monitoring results provided indicate compliance with this condition.
EPL 396	Condition M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant	Monitoring results from 2012 onwards (i.e., greater than 4 years) are provided on the Bloomfield website. Monitoring results are provided in a legible tabulated format.
EPL 396	Condition M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Compliant	Water discharge monitoring results from VGT Laboratories Pty Ltd indicate compliance with this condition. The monitoring results include the date and time that the sample was collected, the point at which the sample was taken and the name of the person who collected the sample.
EPL 396	Condition M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of	Compliant	Monitoring results for EPL discharge point 1 and point 2 indicate that monitoring (including the pollutants measured, units of measure, monitoring frequency and

Reference	Condition	Condition Details	Audit Findings	Comments
		each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:		sampling method) has been undertaken in accordance with the requirements of condition M2.2.
EPL 396	Condition M2.2	<p>Water and/ or Land Monitoring Requirements</p> <p>POINT 1</p> <p>Pollutant Units of measure Frequency Sampling Method</p> <p>Conductivity micrograms per centimetre Daily during any discharge Grab sample</p> <p>Filterable iron milligrams per litre Daily during any discharge Grab sample</p> <p>pH pH Daily during any discharge Grab sample</p> <p>Total suspended solids milligrams per litre Daily during any discharge Grab sample</p> <p>POINT 2</p> <p>Pollutant Units of measure Frequency Sampling Method</p> <p>Conductivity micrograms per centimetre Daily during any discharge Grab sample</p> <p>pH pH Daily during any discharge Grab sample</p> <p>Total suspended solids milligrams per litre Daily during any discharge Grab sample</p>	Compliant	As outlined in Condition M2.1.
EPL 396	Condition M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Compliant	The Environmental Water Management Procedure (Bloomfield, 2023) outlines water sampling procedures. The specified sampling procedure is in accordance with the Approved Methods Publication.

Reference	Condition	Condition Details	Audit Findings	Comments
EPL 396	Condition M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Compliant	A register of complaints for each year is published on the Bloomfield Website. The complaints register is updated intermittently throughout the year. As at 29 November 2024, the 2024 complaints register was most recently updated on 15 November 2024. No water related complaints were received during the audit period.
EPL 396	Condition M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Compliant	Records provided in the complaints registers published on the Bloomfield website include the details required under Condition M4.2
EPL 396	Condition M6.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. POINT 1 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day By calculation	Administrative Non-Compliance	Monitoring results for EPL discharge point 1 and point 2 indicate that the volume of liquid discharged to water has been monitored at the frequency required under Condition M6.1 using the sampling method specific. Discharge volumes are reported as megalitres per day (ML/day) as opposed to kilolitres per day (kL/day). The discharge limit for point 1 is 40,000 kL/day. The maximum recorded discharge volume is 40 ML/day. All reported discharge volumes appear to be rounded to the nearest 5 ML. It is unclear whether volumes reported as 40 ML/day have been rounded up or down. There was a data logger failure on 5 January 2022 that resulted in the inability to calculate the discharge flow volume at discharge point 2. Actions have been taken

Reference	Condition	Condition Details	Audit Findings	Comments
		(volume flow rate or pump capacity multiplied by operating time) POINT 2 Frequency Unit of measure Sampling Method Daily during any discharge kilolitres per day In line instrumentation		(such as installation of backup power supply) to reduce the risk of this occurring in the future.
EPL 396	Condition R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Compliant	Annual returns for 2021, 2022 and 2023 have been supplied to the EPA in the approved form and include the details required under Condition R1.1.
EPL 396	Condition R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Compliant	No written reports were requested during the audit period.
EPL 396	Condition R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant	Compliant	No written reports were requested during the audit period.

Reference	Condition	Condition Details	Audit Findings	Comments
		<p>discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>		
EPL 396	Condition R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Compliant	No written reports were requested during the audit period.
Mining Leases				
AMA1001	Schedule B, Condition 1	<p>The activity(s) prescribed as ancillary mining activities by clause 7 of the Mining Regulation 2016, listed below:</p> <p>The maintenance and use of dams associated with water management (excluding Possum's Puddle).</p>	Compliant	The use of dams associated with the water management is documented in Section 3.3.9 of the Mine Operations Plan (MOP) 2021-2023 (Bloomfield, n.d.). The MOP references the WMP which documents maintenance.

Reference	Condition	Condition Details	Audit Findings	Comments
AMA1001	Schedule B, Condition 2	<p>Schedule B, Condition 1</p> <p>The activity(s) prescribed as ancillary mining activities by clause 7 of the Mining Regulation 2016, listed below:</p> <p>The maintenance and use of drains associated with water management</p>	Compliant	The use of drain associated with the water management is documented in Section 3.3.5 and 3.3.5 of the Mine Operations Plan (MOP) 2021-2023 (Bloomfield, n.d.). The MOP references the WMP which documents maintenance.
CCL761	Condition 2 (a)	(a) The lease holder must implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or rehabilitation of any activities under this lease.	Compliant	It is considered that the proponent has implemented reasonable and feasible measures to prevent and/or minimise harm to the environment as a result of the operation.
CCL761	Condition 5	<p>The lease holder must report any environmental incidents. The report must:</p> <p>(i) be prepared according to any relevant Departmental guidelines;</p> <p>(ii) be submitted within 24 hours of the environmental incident occurring;</p> <p>(b) For the purposes of this condition, environmental incident includes:</p> <p>(i) any incident causing or threatening material harm to the environment</p> <p>(ii) any breach of Conditions 1 to 9 and 11 to 24;</p> <p>(iii) any breach of environment protection legislation; or,</p> <p>(iv) a serious complaint from landholders or the public.</p> <p>(c) For the purposes of this condition, harm to the environment is material if:</p> <p>(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</p> <p>(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, where loss</p>	Compliant	Passive spilling of a mine water dam occurred on 5 July 2022. The department was notified within 24 hours of the event occurring and a report was provided on 12 July 2022. It is considered that no other water related incidents occurred that meet the description of an environmental incident under this condition.

Reference	Condition	Condition Details	Audit Findings	Comments
		includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.		
ML1738	Schedule 2, Condition 5 (a)	<p>(a) The lease holder must notify the Department of all:</p> <ul style="list-style-type: none"> (i) breaches of the conditions of this mining lease or breaches of the Act causing or threatening material harm to the environment; and (ii) breaches of environmental protection legislation causing or threatening material harm to the environment (as defined in the Protection of the Environment Operations Act 1997), arising in connection with significant surface disturbing activities, including mining operations, mining purposes and prospecting operations, under this mining lease. The notification must be given immediately after the lease holder becomes aware of the breach. <p>Note. Refer to www.resources.nsw.qov.au/environment for notification contact details.</p> <p>(b) The lease holder must submit an Environmental Incident Report to the Department within seven (7) days of all breaches referred to in condition 5(a)(i) and (ii). The Environmental Incident Report must include:</p> <ul style="list-style-type: none"> (i) the details of the mining lease; (ii) contact details for the lease holder; (iii) a map identifying the location of the incident and where material harm to the environment has or is likely to occur; (iv) a description of the nature of the incident or breach, likely causes and consequences; (v) a timetable showing actions taken or planned to address the incident and to prevent future incidents or breaches referred to in 5(a). (vi) a summary of all previous incidents or breaches which have 	Compliant	As per Condition 5 of mining lease CC761.

Reference	Condition	Condition Details	Audit Findings	Comments
		<p>occurred in the previous 12 months relating to significant surface disturbing activities, including mining operations, mining purposes and prospecting operations under this mining lease. Note. The lease holder should have regard to any relevant Director General's guidelines in the preparation of an Environmental Incident Report Refer to www.resources.nsw.gov.au/environment for further details.</p> <p>(c) In addition to the requirements set out in conditions 5(a) and (b), the lease holder must immediately advise the Department of any notification made under section 148 of the Protection of the Environment Operations Act 1997 arising in connection with significant surface disturbing activities including mining operations, mining purposes and prospecting operations, under this mining lease.</p>		