

## Charbon Coal Response to Auditor's Recommendations – April 2018.

As required under Schedule 5 Condition 8 of the Charbon Coal Project Approval (PA 08\_0211), Table 1 below provides a response to the recommendations outlined in the 2018 Independent Environmental Audit Report.

**Table 1: Charbon Coal Response to Auditor's Recommendations – April 2018.**

Condition	Description	Risk	Charbon Coal Response
Schedule 3 Condition 29 of PA 08_0211	Continue to discuss with DPE the need for the revised Water Management Plan to be approved along with its contained Erosion and Sediment Control Plan, Surface Water and Groundwater Monitoring Programs.	<b>Medium</b>	Centennial will consult with DPE regarding the approval of the Water Management Plan currently being assessed by the department.
Schedule 3 Condition 29 of PA 08_0211	Continually review the performance of the site in managing surface waters and meeting discharge criteria so as to assess the ongoing performance of the implementation of measures introduced under the PRP. If required, consider and implement further controls to maintain discharge water within EPL discharge criteria.	<b>Medium</b>	Centennial will continue to undertake inspections to identify the capacity of water management dams and will continue to report on water discharged at licenced discharge points in monthly Environmental Monitoring Data reports.
Schedule 3 Condition 29 of PA 08_0211	Given the high reliance of manual intervention to manage water in dams across the site; consider how more automation could be included into the system to reduce this reliance.	<b>Medium</b>	Centennial will consider options to install monitoring equipment with remote access to data at licenced discharge points located at water management dams at Charbon.
Schedule 3 Condition 29 of PA 08_0211	Improve drainage within and below the Trunk 2 ROM stockpile area to fix ongoing erosion and sedimentation in the catchment.	<b>Medium</b>	Centennial has constructed diversion drains and a sediment basin at the Trunk 2 ROM stockpile area.
Schedule 5 Condition 4 of PA 08_0211	Reviews of strategies, plans and programs should be documented regardless of whether or not a revision is required. Charbon to ensure revisions are in line with requirements of the condition.	<b>Low</b>	Noted.

Condition	Description	Risk	Charbon Coal Response
Schedule 5 Condition 4 of PA 08_0211	Continue to discuss with DPE the need for the revised Management Plans to be approved.	<b>Low</b>	Centennial will consult with DPE regarding the approval of management plans currently being assessed by the department.
Schedule 3 Condition 19 PA 08_0211	Charbon to consider if further actions are required to ensure monitoring is able to be consistently undertaken by the HVAS.	<b>Not Verified</b>	The power supply to the HVAS was reconfigured during 2017. The HVAS will continue to be audited and calibrated.
Schedule 3 Condition 19 PA 08_0211	Either ensure the dust depositional gauge is operational at DM-HL or secure another monitoring location.	<b>Not Verified</b>	The Air Quality Management Plan currently being assessed by the department does not include a dust deposition gauge at DM-HL.
Erosion and Sediment Control	Improvements in drainage in the 2 Trunk Stacker area are considered to be required in order to reduce erosion and sedimentation in this area.	<b>Improvement</b>	Centennial has constructed diversion drains and a sediment basin at the 2 Trunk Stacker area.
Erosion and Sediment Control	Long term solutions to erosion of the former waste rock dump upstream of the Stacker Sediment Dam Lower is required to gain a stable landform.	<b>Improvement</b>	Noted. This area is identified to be rehabilitated in the Rehabilitation and Closure MOP for Charbon Colliery.
Weed Control	Consider proactive control of the woody weed (possibly African Box Thorn) which is prolific at the site entrance administration building.	<b>Improvement</b>	The control of weeds will continue to be undertaken at Charbon Colliery.
Environmental Management Strategy	That the EMS be updated with the most recent approvals following approval by the Department of the management plans submitted for approval during 2017 e.g. the most recently approved MOP (2017) for Charbon.	<b>Improvement</b>	Centennial will update the Environmental Management Strategy with the most recent approvals following approval by the Department of the management plans submitted during 2017.

Condition	Description	Risk	Charbon Coal Response
Air Quality Management Plan	Continue to liaise with DPE on the need for the revised Air Quality Management Plan to be approved.	<b>Improvement</b>	Centennial will consult with DPE regarding the approval of the Air Quality Management Plan currently being assessed by the department.
Noise Management Plan	Incorporate recent variations of the EPL into the Noise Management Plan (specifically changes in the specified EPL noise limit criteria). Following the update resubmit the Noise Management Plan to DPE for approval.	<b>Improvement</b>	Centennial will update the Noise Management Plan with the recent variations to the noise limit criteria prescribed in the EPL and submit the Noise Management Plan to DPE for approval.
Water Management Plan	Continue to liaise with DPE on the need for the revised Water Management Plan, along with the Erosion and Sediment Control Plan, to be approved.	<b>Improvement</b>	Centennial will consult with DPE regarding the approval of the Water Management Plan currently being assessed by the department.
Water Management Plan	In subsequent revisions to the Water Management Plan, fully reflect variations of the EPL into the Plan (specifically changes in the rainfall event criteria and LDP discharge volume limits).	<b>Improvement</b>	Noted.
Water Management Plan	Consider periodic monitoring of LDP4 discharges (given that this is the higher risk catchment containing the Reject Emplacement Area) for a broad spectrum of analytes to verify that the pollution of waters by any pollutant other than those specified in the EPL is not occurring.	<b>Improvement</b>	Monitoring of discharged water at LDP4 will be undertaken in accordance with the monitoring requirements outlined in the Water Management Plan currently being assessed by the department.
Rehabilitation	Continue rehabilitation monitoring to ascertain rehabilitation performance of each area of rehabilitation; so that performance can be assessed and modifications made to ongoing rehabilitation efforts as required.	<b>Improvement</b>	Noted. The current monitoring program is undertaken to monitor the progress of rehabilitation against the rehabilitation objectives outlined in the Rehabilitation and Closure MOP for Charbon Colliery.

Condition	Description	Risk	Charbon Coal Response
Rehabilitation	Continue ongoing implementation of the two MOPs as required.	<b>Improvement</b>	Noted.
Greenhouse Gas and Energy Management Plan	Continue to discuss with DPE the need for the revised Greenhouse Gas and Energy Management Plan to be approved.	<b>Improvement</b>	Centennial will consult with DPE regarding the approval of the Greenhouse Gas and Energy Management Plan currently being assessed by the department.
Environmental Management Strategy	Continue to liaise with DPE to gain approval of the updated Environmental Management Strategy	<b>Improvement</b>	Centennial will consult with DPE regarding the approval of the Environmental Management Strategy currently being assessed by the department.
Access to Information	Consider including on the website the EPBC Approval (Commonwealth), Mining Leases, Water Licences, revised 2015 Annual Review, proponent's response to 2012 IEA and the Community Complaints Register prior October 2016.	<b>Improvement</b>	Noted. Centennial will continue to maintain access to information as prescribed Condition 7 of Schedule 5 in Project Approval 08_0211.