

Independent Audit for Department of Planning & Infrastructure Audit Recommendations and Response Table

| Clause | Requirement | Compliance | Recommendation | BHOP Response | Proposed Action | Target Completion Date | Responsibility |
|------------------|---|------------|---|--|---|---|----------------|
| PROJECT APPROVAL | | | | | | | |
| S2.2 | The Proponent shall carry out the project generally in accordance with the: EA; Response to Submissions and PPR; Statement of Commitments; and conditions of this approval. If there is any inconsistency between the documents listed in this condition, the most recent document in the relevant condition shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency. | C | S2.2.1 The recommendations in the body of this audit should be addressed as appropriate to cover the non-compliance with this condition. Ranking: N | | | | |
| S2.8b | Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works; and Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. | NC | S2.8b.1 Copies of construction and occupation certificates for mine buildings should be made available in BHOP's records. Ranking: N | GRES advised that no such certificates were required for the project from BHCC. | N/A | | |
| S2.11 | Within six months of the commencement of works the subject of this approval, the Proponent shall surrender all existing development consents applying to the site in accordance with sections 75YA and 104A of the EP&A Act. | NC | S2.11.1 Copies of correspondence with DoPI in relation to the surrender of existing development consents should be available in BHOP's records. Ranking: N | The only development consent that related to the site was DA 264/2009 for ancillary mining activities including crushing stockpiling of ore. This DA was not acted on. | N/A | | |
| S3.6 | The Proponent shall seal and maintain the roads listed in Table 6 to the satisfaction of the Director-General. The roads shall be sealed prior to the commencement of ore extraction, unless otherwise agreed by the Director-General. | C | See recommendation C87.1 and C87.2. | See recommendation C87.1 and C87.2. | | | |
| S3.11c (l) | Air Quality Management Plan The Plan must include an air quality monitoring program that provides for periodic point source monitoring at Point 1 (Ventilation Shaft – Little Kintore Pit) and Point 2 (Process Enclosure/ Baghouse Stack). | O | S3.11c (l).1 The Air Quality Monitoring Program should be revised to include Point 1 and Point 2 as monitoring locations listed within Table 6. Ranking: I | Monitoring points to be added at a later date once monitoring has been completed. | Consultants have been to complete work. | Consultants on site 26/2/13 Report due 14/4/13 | B.J. |

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| S3.11f | Air Quality Management Plan The Plan must include provision for regular review of dust monitoring data, with comparison of monitoring data with that assumed and predicted in the documents referred to under S2.2. | O | S3.11f.1 The annual environmental performance reviews referred to in the AQMP should be completed and provided to DoPI in a timely manner, i.e. not more than 3 months after the period to which they relate. Ranking: I | Annual review needs to coincide with the AEMR which will need to be altered to address the requirements for reporting as listed in the project approval. | AEMR is due 30/4/2013 | 30/10/2013 | B.J. |
| S3.11h | Air Quality Management Plan The Plan must include specific complaints management procedures in the event that dust monitoring indicates elevated off-site impacts. | C | See Recommendations C7.1 - C7.4. | See Recommendations C7.1 - C7.4. | | | |
| S3.11j | Air Quality Management Plan The Plan must include protocols for regular maintenance of plant and equipment to minimise the potential for elevated dust generation, leaks and fugitive emissions. | NC | S3.11j.1 A protocol should be established in the AQMP for regular maintenance of plant and equipment to minimise the potential for elevated dust generation, leaks and fugitive emissions. Ranking: I | The AQMP states that this is addressed in the Air Quality Monitoring Program in section 4 however in review of section 4 this item is missing. | Statement will be added in reference to maintenance programs which are used in BHOP's system "Pronto". | 30/10/13 | B.J |
| S3.11k | Air Quality Management Plan The Plan must include a contingency plan should an incident, upset or other initiating factor lead to elevated dust impacts, whether above normal operating conditions or above environmental performance goals/ limits. | NC | S3.11k.1 A revised incident reporting and investigation procedure reflecting current practice should be completed and issued as soon as possible. Ranking: U S3.11k.2 The AQMP should be revised to include a contingency plan for incidents leading to elevated dust impacts. Ranking: I | | New incident reporting investigation is underway. | 28/2/13 | P.W. |
| S3.13b | Lead Management Plan This plan must be submitted to the Director-General for approval by 30 June 2011. | NC | S3.13b.1 The Lead Management Plan (undated) and the Community Lead Management Plan (issued as a draft on 22/11/2011) should be finalised as a matter of urgency and submitted to the Director-General for approval. Ranking: U | The Community Lead Management Plan was submitted to the Broken Hill Lead Reference Group for comment as per project approval. It was submitted to the DoP in February 2012. | N/A | | |

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| S3.13f | Lead Management Plan This plan must include a detailed communication strategy, that outlines how the relevant dust and blood level monitoring data would be reported on the Proponent's website along with any relevant public education material. | O | S3.13f.1 Appropriate links reporting the relevant dust and blood level monitoring data should be established on CBH Resources website when available on the NSW Health website. Ranking: I | Relevant dust monitoring data is located on the BHOP/CBH website. This is updated monthly. BHOP is still waiting for link to be developed by NSW Health Dept so it can be established. | Again ask NSW health when link will be available. | 30/10/13 | B.J. |
| S3.17 | Noise Limits The Proponent shall ensure that the noise generated by the project does not exceed the criteria in Table 7. Table specifies operational noise criteria at 14 receiver locations. | NC | S3.17.1 The requirement for noise monitoring at 14 receiver locations specified in Table 7 of the Project Approval should either be complied with, or approval should be sought from the Director-General to reduce the monitoring locations to the 5 off-site locations currently monitored. Ranking: I | There is no requirement to monitor all 14 noise receptor locations. There has been no noise complaints in the 6 months of production. | BHOP will monitor all 14 locations quarterly as part of its monitoring program. | 2013 | B.J. |
| S3.20b | Noise Management Plan This plan must describe the noise mitigation measures that would be implemented to ensure compliance with the relevant conditions of this approval, including a real-time noise management system that employs both reactive and proactive mitigation measures. | O | S3.20b.1 The NMBP should be revised to correct the reference in Table 2 to 'Management Strategies for Noise and Blasting' to read section 7 instead of section 8.1. | | Management Plan will be updated | 30/10/13 | B.J. |
| S3.20c (l) | Noise Management Plan This plan must include a noise monitoring program that uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the project. | O | S3.20c (l).1 The reference to the Noise Monitoring Program in the NBMP should be changed from Appendix A to BHO-ENV- PRM-002. Ranking: I | | Monitoring Program will be updated | 30/10/13 | B.J. |
| S3.20d | Noise Management Plan This plan must describe the blast mitigation measures that would be implemented to ensure compliance with the relevant condition of this approval. | O | S3.20d.1 The reference to the BVO Monitoring Program in the NBMP should be changed from Appendix B to BHO-ENV- PRM-003. Ranking: I | | Monitoring Program will be updated. | 30/10/13 | B.J. |
| S3.20e | Noise Management Plan This plan must describe the measures that would be implemented to ensure that the public can get up-to-date information on the proposed blasting schedule on-site. | NC | S3.20e.1 The blasting schedules that are published weekly on the CBH Resources website should be referenced within the NBMP. Ranking: I | | Reference will be added into the NBMP | 30/10/13 | B.J. |
| S3.22a | Water Supply The Proponent shall ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of mining operations to match its water supply. | NC | S3.22a.1 The SWMP should be revised to include adjusting the scale of mining operations to match its water supply in case of drought. | Project approval does not mention drought- only to match operations to water supply. | SWMP is a goldier document. BHOP can get Golder to enter a reference to water supply management | 30/10/13 | B.J. |

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| S3.22b | Water Supply The Proponent is required to obtain the necessary water licences for the project under the Water Act 1912 and/or Water Management Act 2000. | NC | S3.22b.1 Condition 2 (a), (b), (c) and (d) noted in the Bore Licence Certificate #85BL256109 should be completed. This includes furnishing to NSW Office of Water: details of the work completed by a licensed driller; a location plan; details of any pumping tests carried out; and details of any water analysis Ranking: U | Monitoring bores have been constructed. | Locations will be forwarded onto NSW office of water for their records. | 30/10/13 | B.J. |
| S3.31 | The Proponent shall: minimise the visual impacts, and particularly the off-site lighting impacts, of the project; take all practicable measures to further mitigate off-site lighting impacts from the project; and ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting, or its latest version, to the satisfaction of the Director-General. | O | S3.31.1 In the event that the site includes legacy lighting installed prior to the re-opening of the mine, such lighting should be investigated for compliance with the Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting. Ranking: N | | Legacy lighting for Rasp will be investigated. | 31/10/13 | B.J. |
| S3.32b | The Proponent shall ensure that the waste generated by the project is appropriately stored, handled, and disposed of, to the satisfaction of the Director-General. | O | S3.32b.1 All unbanded liquid waste should be relocated and stored in banded storage containers or in banded areas. Ranking: E | Unbanded liquid that was noticed was being used at the time. | All employees are given hydrocarbon management inductions including storage. | 28/2/13 | B.J. |
| S3.34b | Rehabilitation Objectives The Proponent shall achieve the following rehabilitation objectives: - sealing and/ or treating 'free areas' of the site and other potential sources of wind-blown dust to prevent the emission of dust following closure; - preserving the heritage value of the site; and -making the site suitable for commercial and/ or educational uses, to the satisfaction of the Director-General of I&I NSW. | O | S3.34b.1 The Mine Closure Plan should address progressive rehabilitation activities to be undertaken over the life of the mine. Ranking: I | The Mine Closure Plan (Rehabilitation Mang Plan) will provide a general description of progressive rehabilitation. Details of specific year by year rehabilitation needs to be agreed, budgeted and documented each year. | Mine Closure Plan due for completion April 2013 | 30/10/13 | G.W. |
| S3.35a | Rehabilitation Management Plan The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of the Director-General of I&I NSW. This plan must be prepared in consultation with the Department, DECCW, NOW, Council and I&I NSW. | C | S3.35a.1 Development of the Mine Closure Plan should proceed, so far as possible, in accordance with the agreed timetable. Ranking: I | The completion of the Rehabilitation Management Plan is waiting for the completion of the Conservation MP. | Conservation MP due to completed 30/4/13 | 30/10/13 | B.J. |

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| S3.35f | Rehabilitation Management Plan This plan must be submitted to the Director-General of I&I NSW for approval by the end of December 2011. | C | See Recommendation S3.35a.1. | See Recommendation S3.35a.1. | | | |
| S4.1e (v) | Environmental Management Strategy This strategy must describe the procedures that would be implemented to respond to emergencies. | O | S4.1e(v).1 The Pollution Incident Response Management Plan (PIRMP) should be referenced within section 9 'Environmental Emergency Response' of the Environmental Management Strategy. Ranking: I | Pollution Emergency Response MP is being finalised. | Comments from EPA need to be added. They were received on 18/3/13. | 31/5/13 | B.J. |
| S4.1f (l) | Environmental Management Strategy This strategy must include copies of any strategies, plans and programs approved under the conditions of this approval. | NC | S4.1f(l).1 Review the Environmental Management Strategy to include copies of any strategies, plans and programs approved under the conditions of the Project Approval. Ranking: I | The only strategies, plans and programs are the environment management plans/programs. These have already been provided to DoP. | If DoP require any more information this will be provided. | | |
| S4.2e | Management Plan Requirements The Proponent shall ensure that the management plans include a contingency plan to manage any unpredicted impacts and their consequences. | NC | S4.2e.1 An Emergency Response Plan for the site should be developed and implemented. Ranking: U S4.2e.2 Relevant Management Plans such as the AQMP and NBMP should be modified to include specific actions that will be taken in an environmental emergency, or a reference to the Emergency Response Plan. Ranking: I | The Pollution Incident Response Management Plan will cover actions for environmental emergency's. | The PIRMP will be completed by May 2013 | 31/5/13 | B.J. |
| S4.2f | Management Plan Requirements The Proponent shall ensure that the management plans include a program to investigate and implement ways to improve the environmental performance of the project over time. | O | S4.2f.1 Consideration should be given to incorporating programs to investigate and implement ways to improve the environmental performance of the project over time, which should be cross referenced as appropriate in relevant documents. Ranking: N | | Reference will be made in the Environment Strategy for environment improvement. | 31/5/13 | B.J. |
| S4.2h | Management Plan Requirements The Proponent shall ensure that the management plans include a protocol for periodic review of the plan. | O | S4.2h.1 The WMP should be revised to include details on periodic review. Ranking: I | | The WMP will be updated with details of periodic review. | 30/10/13 | B.J. |

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| S4.3b (iii) | Annual Review The review must include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the relevant predictions in the documents referred to in S2.2. | O | S4.3b (iii).1 The monitoring results and complaints records should be compared in future reports with the predictions in the documents referred to in S2.2 when more longer term data is available. Ranking: N | The project only commenced operation in May 2012. | BHOP intends to undertake a review of actual with predicted data following a completion of normal operations (eg 18 months) | 31/12/13 | B.J. |
| S4.3c | Annual Review The review must identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance. | O | S4.3c.1 A regulatory Compliance Assurance Program should be established that periodically reviews compliance with the conditions of regulatory documents. Ranking: I | Non compliances are identified during the Annual Return report to EPA. This document is signed of by the General Manager. | N/A | | |
| S4.3d | Annual Review The review must identify any trends in the monitoring data over the life of the project. | NC | S4.3d.1 The identification of trends in the monitoring data over the life of the project should be included in future AEMRs. | The project commenced operation in May 2012. The AEMR was for the period 1/1/11 – 31/3/12. | BHOP intend to review data after completion of 18 months. | 31/12/13 | B.J. |
| S4.3e | Annual Review The review must identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies. | O | S4.3e.1 The AEMR must identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies. Ranking: I | At the time of the Preferred Project Plan it was agreed that re-modelling of air quality would relate to operations. Dust generation during construction was not re-modelled. | BHOP intend to review all data after 18 months. | 31/12/13 | B.J. |
| S4.4 | Revision of Strategies, Plans & Programs Within three months of: the submission of an annual review under Condition 3 above; the submission of an incident report under Condition 5 below; the submission of an audit report under Condition 7 below, or any modification of the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director- | O | S4.4.1 The Strategies, Plans and Programs required under the Project Approval should be reviewed and also revised if necessary as soon as possible, and repeated three months after the submission of the annual AEMR, the submission of an incident report under Condition 5; the submission of an audit report under Condition 7, or any modification of the conditions of the Project Approval. Ranking: U | The site was still in the throes of organizing to meet operational needs and with no real data to base any changes, it was not practical to conduct a review. | N/A | | |

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| S4.6 | <p>Regular Reporting</p> <p>The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans or programs of the conditions of this approval.</p> | O | <p>S4.6.1 The AEMR 2011-2012 should be uploaded onto the CBH Resources website. Ranking: U</p> <p>S4.6.2 Monthly monitoring reports should be uploaded to the CBH Resources website within 2 weeks of the end of the month to which they relate. Ranking: I</p> <p>S4.6.2 Monthly monitoring reports should include information necessary for the interpretation of the reported results including the location of monitoring points and relevant trigger values, when available. Ranking: N</p> | All documents and performance are reported on the website. | Website will be updated with 2011-2012 AEMR | 30/4/2013 | B.J. |
| S4.9a | <p>From the end of March 2011, the Proponent shall make copies of the following publicly available on its website:</p> <ul style="list-style-type: none"> - the documents referred to in S2.1; - all current statutory approvals for the project; - all approved strategies, plans and programs required under the conditions of this approval; - the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans or programs; - a complaints register, updated on a monthly basis; - the annual reviews of the project; - any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; and - any other matter required by the Director-General. | NC | See recommendations C7.4 and S4.6.1. | All data is available on the website apart from from annual review, AEMR and independent audit. | These documents will be uploaded once finished. | 30/4/2013 | B.J. |

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| EPL 12559 | | | | | | | |
| L3.1 | <p style="text-align: center;">Waste</p> <p>The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.</p> | C | <p>L3.1.1 In accordance with the commitment made in the WMP, a comprehensive Waste Inventory containing information on all wastes generated, handled and disposed of should be developed for the site. Ranking: N</p> <p>L3.1.2 Waste Management documentation should include a statement that no waste generated outside the premises shall be received. Ranking: N</p> | | | | |
| O1.1 | <p>Activities must be carried out in a competent manner Licensed activities must be carried out in a competent manner. This includes:</p> <p style="padding-left: 20px;">the processing, handling, movement and storage of materials and substances used to carry out the activity; and the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p> | O | <p>O1.1 A copy of the BHOP standard for waste management – BHO-SAF-STD-014 which applies to the site should be available on site. Ranking: N</p> | | <p>Waste Management Plan will be available on the BHOP intranet.</p> | 30/4/13 | B.J. |
| M1.2 | <p style="text-align: center;">Monitoring records</p> <p>All records required to be kept by this licence must be: in a legible form, or in a form that can readily be reduced to a legible form; kept for at least 4 years after the monitoring or event to which they relate took place; and produced in a legible form to any authorised officer of the EPA who asks to see them.</p> | O | <p>M1.2.1 A records management procedure should be considered incorporating a requirement to keep records for at least 4 years after the monitoring or event to which they relate took place. Alternatively this requirement should be documented in each Management Plan.</p> | | <p>A records management procedure will be developed covering how long records will be kept for.</p> | 31/10/13 | B.J. |
| M1.3 | <p style="text-align: center;">Monitoring Records</p> <p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p style="padding-left: 20px;">the date(s) on which the sample was taken; the time(s) at which the sample was collected; the point at which the sample was taken; and the name of the person who collected the sample.</p> | O | <p>M1.3.1 The table retained in the 23 folders should be revised to include the information required by this condition. Ranking: I</p> | <p>All monitoring records have the listed information.</p> | N/A | | |

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|---|--|------------|--|---|--|------------------------|----------------|
| M5.3 | Recording of pollution complaints The record of a complaint must be kept for at least 4 years after the complaint was made. | O | M5.3.1 The complaints procedure should include a statement such as "the record of a complaint must be kept for at least 4 years after the complaint was made" to ensure staff do not delete records. Ranking: I See also recommendation M1.2.1. | | The complaints procedure will be updated with 'all records to be kept for 4 years'. | 31/5/2013 | B.J. |
| M6.1 | Telephone complaints line 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. | NC | See recommendation C7.2 and C7.3. | Telephone complaints line is available during all work hours. After hours it is diverted to mail box and checked regularly by ESO staff. If complaint is deemed to be urgent Environment staff are notified | | | |
| M6.2 | Telephone complaints line 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. | C | See recommendation C7.3. | | | | |
| R1.7 | 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. | O | See recommendation M1.2.1. | All annual returns are available in the annual return folder.. | | | |
| R1.8 | Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: the licence holder; or by a person approved in writing by the EPA to sign on behalf | NC | R1.8.1 A signed copy of annual returns submitted to the EPA should be retained in BHOP's records. Ranking: I | Signed copies are kept at head office in Sydney | | | |
| Revised Statement of Commitments - Preferred Project Report, September 2010 | | | | | | | |
| C1 | Continued support of the Community Consultation Group who will continue to meet on a regular basis. | NC | C1.1 A Community Consultation Group should be established as required by this condition, and arrangements made to hold regular meetings. Ranking: U | Consultation is completed through the Broken Hill Lead reference Group. All consultation is through the information hotline | A consultation Group is looking to be established to raise any concerns from the public. | 31/12/13 | B.J. |

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| C2 | Provision of the Rasp Mine News Updates to local neighbours surrounding the mine to outline information on activities. | NC | C2.1 The Rasp Mine Newsletter should be re-established and provided to local neighbours surrounding the mine and to the wider community and other interested parties to outline information on activities. Ranking: U | | Information will be available on the notice board. If any other information is deemed to be relevant it will be put into a newsletter. | 31/12/13 | B.J. |
| C3 | Rasp Mine information notice board to be located at the Café and Miner's Memorial. | NC | C3.1 The 2013 budget for a Rasp Mine information notice board to be located at the Café and Miner's Memorial should be confirmed and an action plan prepared for its construction and installation. Ranking: U | | Noticeboard is due for installation in March | 31/3/13 | B.J. |
| C4 | Annual distribution of a Rasp Mine magazine providing a summary of environmental monitoring, initiatives and activities. | NC | C4.1 As an alternative to a Rasp Mine magazine, consideration should be given to incorporating a summary of environmental monitoring, initiatives and activities in the Rasp Mine Newsletter recommended in C2.1, possibly as a reference to the AEMR published annually on the CBH Resources website. Ranking: I | | Magazine is to be produced in cooperation with the annual return at the end of each calendar year. It will be a summary of all monitoring data and anything else deemed to be relevant. | 31/12/13 | B.J. |
| C5 | Targeted consultation involving presentations and briefings on specific issues as they arise. | NC | C5.1 Targeted consultation involving presentations and briefings on specific issues as they arise could be provided through the Community Consultation Group recommended in C1.1, as well as general community presentation nights as required. Ranking: I | Targeted consultation groups have been established for certain issues. These include Ryan Street dam and blasting along Crystal St. | BHOP will continue to complete target groups when issue arise. | | |
| C6 | Consultation with relevant stakeholders during the preparation of the final closure plan. | C | C6.1 Relevant stakeholders who would have an interest in the preparation of the final closure plan should be identified and documented to ensure that all interested parties are included. Ranking: N | | | | |

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| C7 | Continued implementation of the complaints procedure to address individual issues as they arise. | NC | <p>C7.1 The update of the Complaints Procedure to reflect current practice should be completed and a revised procedure issued as soon as possible. Ranking: U</p> <p>C7.2 The telephone Complaints Hotline system should be reviewed and if considered necessary, after hours diversion to a 24 hour operator's telephone or an appropriate mobile phone should be established to make it operational during operating hours. The Complaints Procedure should also reflect this change. Ranking: U</p> <p>C7.3 The Rasp Mine Complaints Hotline telephone number should be more prominent on the CBH Resources website to make it easier to find. Ranking: I</p> <p>C7.4 The Rasp Mine Complaints Summary on the CBH Resources website should be kept up to date. Ranking: U</p> | <p>BHOP updated its complaints procedure from manual to digital.</p> <p>Complaints line is deemed to be available 24hours.</p> <p>Number is available on website. It is also advertised in the local newspaper 2 a year. It is also displayed on sign at entrance to site.</p> <p>Complaints summary is updated monthly.</p> | Update complaints procedure accordingly. | 30/4/13 | B.J. |
| C9 | Re-location of mine ventilation fans to Little Kintore Pit and away from residential and commercial areas and installing noise suppression on the fan units. | C | <p>C9.1 Consideration should be given to using shotcrete or some other sealant on the wall of the Little Kintore Pit that will be directly impacted by the airflow from the fans, in order to ensure the elimination of dust generation when the ventilation system is operational. Ranking: I</p> | If dust is noticed this will be addressed. | | | |

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| C10 | Smaller stope designs to reduce blast vibrations, designing blasts and arranging firing times to minimise potential community impacts. | C | C10.1 As blasting has been identified as the most significant environmental issue for the Rasp Mine, and attracts the greatest number of complaints, methods should continue to be investigated to minimise vibration from blasting and its impacts on the local community. Ranking: I | Blasting schedule is available on BHOP website. This is updated fortnightly. | | | |
| C28 | Extensive sealing of haul roads and other primary roadways in accordance with the included schedule. | O | C28.1 The Roadway Dust Management Procedure should be reviewed to ensure that Appendix 1 is included. The numbering should also be revised (6.1.29 and 6.1.30 are missing). There are three Appendices (A, B and C) listed at the end of the Procedure and none of these are attached. Ranking: I | Appendix 1 is already included. It is a list of roadways to be sealed. | | | |
| C29 | Application of chemical dust suppression as per the manufacturer's specification, or more often as required, on all "free areas" of the site. | O | C29.1 Existing free areas as defined that have not been treated in accordance with the procedure BHO-ENV-PRO-003 should be treated in accordance with a timetable to be developed by Rasp mine. Ranking: I | Dust trial is already documented including free areas around the CML7. | | | |
| C38 | Identification and remediation of areas where fines or silt has built up (typically after heavy rain storms). | NC | C38.1 A survey should be undertaken to identify and document any areas on site where fines or silt may build up and measures established to remediate them through appropriate actions to prevent dust generation when they dry out. Ranking: U C38.2 The after-rain checklist should be reviewed for completeness and inspection of roads and associated drainage should be added. Also add inspection of any areas identified through recommendation C38.1. Ranking: I | This is related to all water collection basins which are listed in the Site Water Management Plan. | After rainfall checklist will include water collection basins for review. | 30/10/2013 | B.J. |

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| C39 | Remediation of disturbed areas including but not limited to, removal and burial of fine material, capping with inert waste rock, or use of dust suppressants. | NC | C39.1 A remediation action plan should be prepared as part of the Mine Closure Plan (see C98 for details). Rating: I | Rehabilitation Management Plan will provide all details for remediation. | Rehabilitation Plan to be completed | 31/10/2013 | G.W. |
| C40 | Undertaking sampling to quantify road surface silt loadings on an ongoing basis. | NC | C40.1 Add sampling to quantify road surface silt loadings on an ongoing basis to the Procedure – Roadway Dust Management. Ranking: I | All roadway silt is collected by the regular streetsweeping.. | Collection of dirt will be attempted before street sweeper goes over it | 31/10/2013 | B.J. |
| C44 | Regular maintenance of pollution control equipment to ensure that it is functioning at optimal performance levels. A maintenance schedule will be documented and implemented for all pollution control equipment as part of an environmental management plan. | NC | C44.1 A maintenance schedule should be documented and implemented for all pollution control equipment, including actions to be taken, timetables and responsibilities. Ranking: U C44.2 An environmental management plan, program or EMS should be considered to formalise environmental management on site, and to incorporate a pollution control and monitoring equipment maintenance schedule. Ranking: I | Such schedule is available with the maintenance program used, Pronto The Environment Management Strategy together with management plans and procedures form the site EMS. | | | |
| C50 | Efficiency of all new mobile and fixed equipment will be considered during procurement for both diesel and electric powered equipment. | NC | C50.1 A Procedure should be developed to assess the efficiency of all new mobile and fixed equipment during procurement for both diesel and electric powered equipment. Ranking: I | | Energy efficiency will be added into the procurement process. | 31/10/2013 | B.J. |

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| C55e | The lead management plan will include requirements for inspections and housekeeping for each operational area to minimise dust buildup and the potential for subsequent off-site movement. | C | C55e.1 Documented procedures should be prepared for inspections and housekeeping for each operational area to minimise dust buildup and the potential for subsequent off-site movement. The procedures should include the action to be taken, responsibility, frequency and reporting requirements, as well as maintenance requirements (to be entered into Pronto if appropriate). Ranking: U | | | | |
| C57 | If the dust suppressant chosen to be used at the site is not included in the Screening Assessment undertaken as part of the EAR (Annexure I(b)), then a new health risk assessment of the dust suppressant will be undertaken and forwarded to Greater Western AHS and NSW Health for approval prior to its use on-site. | NC | C57.1 The requirement for a new health risk assessment of the dust suppressant to be undertaken and forwarded to Greater Western AHS and NSW Health for approval prior to its use on-site should be documented in a procedure and implemented if the dust suppressant chosen to be used at the site is not included in the Screening Assessment undertaken as part of the EAR (Annexure I(b)). Ranking: I | All products which have been used at Rasp have undertaken the health screen | If any new products were to be used the same process would be used. | | |
| C66 | Provision and location of spill kits and requirements for training. | NC | C66.1 Verification should be obtained that spill kits provided are suitable for recovering spills of substances located at the location of the spill kit, e.g. are only hydrocarbons stored or are other chemicals present as well. Ranking: I C66.2 Training should be planned and provided either by the supplier or site trainers, for personnel who are likely to use the spill kits. Ranking: I | Spill kits are located around all risk areas. Spill training is provided during the general induction. | Targeted spill training is planned for 2013 | 31/12/13 | B.J. |

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| C67 | Design and installation of chemical storage to include bunds with suitable sumps, and where appropriate roofed to prevent stormwater entry. | O | C67.1 An inventory of chemicals stored on site should be developed and maintained, including a plan, documenting where chemicals are stored, the types and quantities at each location, and the type of storage facilities (roofed, inside building, outdoors, type of bunding and drainage etc). A risk assessment should be undertaken to determine if facilities are adequate and whether improvements should be made. Ranking: I | Inventory of all chemicals has now been completed. This was part of the PIRMP. | | | |
| C70 | Management of sediment and sludge from vehicle washing facilities. | C | C70.1 A procedure or other document should be developed requiring the pumpout of sediment and sludge from all vehicle washing facilities including at the boom gate, workshop and processing plant for concentrate trucks and containers, and records of pumpout activities should be maintained. Ranking: I | | | | |
| C72 | Monitor the quality and quantity of water captured by the toe drains on the Tailings Storage Facility (TSF). | NC | C72.1 The quality and quantity of water captured by the toe drains on the TSF should be monitored in accordance with the requirements of the Monitoring of Tailings Trench Procedure. Ranking: U C72.2 The Monitoring of Tailings Trench Procedure should be reviewed for accuracy. It is filed under Procedure - Monitoring Trench Integrity, and is titled in the header Application of Dust Suppression Procedure BHO-ENV-PRO-010 Ranking: I | This was related to TSF1 which is not in use. The drain which has been constructed has nothing to do with the commitment. | | | |
| C73 | Monitor the movement of seepage sourced from the TSF and to monitor the quality of the local groundwater system. | C | See recommendation C72.1. | | | | |

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| C77 | All necessary licences under the Water Act 1912 will be obtained prior to the commencement of activities on site. | C | C77.1 All Licences under the Water Act 1912 including those held for groundwater monitoring bores should be listed in the AEMR and the Site Water Management Plan (Golder Associates, 2012) when revised, as well as in other documentation. All licences, permits, approvals etc should be referenced by their official number, as well as the Rasp Mine number. Ranking: I | | | | |
| C79a | The Conservation Management Plan will include a photographic record of listed heritage buildings. | NC | C79a.1 The final Conservation Management Plan should include the photographic record of listed heritage buildings from the existing Inventory of Heritage Items, and any additional archival photographic record produced. Ranking: I | Photographic is being constructed with the Conservation MP | | 31/10/2013 | B.J. |
| C79b | The Conservation Management Plan will include programmes for each building for adaptive reuse outlining measures to maintain its structural stability and identify requirements for retention, renovations, permitted re-use and ongoing maintenance. | O | C79b.1 The final Conservation Management Plan should include the Inventory of Heritage Items and the Heritage Inventory Forms. Ranking: I C79b.2 The Inventory of Heritage Items should be completed and put into a final format as soon as possible. Ranking: U | The CMP does include and Inventory of Heritage items | | 31/10/2013 | B.J. |
| C79c | The Conservation Management Plan will include preservation requirements for buildings not to be reused. | NC | C79c.1 The Inventory of Heritage Items should be reviewed and completed to include preservation requirements for all buildings not to be reused. Ranking: U | Actions for each heritage building not to be reused is included in the CMP | | 31/10/2013 | B.J. |

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| C79e | The Conservation Management Plan will include inventory of all mobile items remaining on site. | NC | C79e.1 The results of Recommendation 9 in the Draft CMP proposing that all portable or movable heritage items should be documented at the time of a dilapidation study outlined in Recommendation 5 of the CMP should be included or referenced in the Final Conservation Management Plan. Ranking: I | Most mobile equipment was removed by the Line of Lode in 2007. | | 31/10/2013 | |
| C79f | The Conservation Management Plan will include agreement with a mining history organisation to preserve and care for relocated items. | NC | C79f.1 A suitable mining history organisation should be identified and an agreement entered into to preserve and care for relocated items. Ranking: I | | Local museums and organizations will be consulted with to preserve items. | 31/10/2013 | B.J. |
| C80 | The Conservation Management Plan will outline specific requirements for the management of historical heritage. | C | See recommendation C79b.2. | | | | |
| C83 | Where possible, avoid the use of highly reflective materials and colours on the site, unless necessary for safety reasons. | C | C83.1 A procedure, standard, policy or other document should be prepared incorporating a requirement that where possible, the use of highly reflective materials and colours on the site should be avoided, unless necessary for safety reasons. Ranking: I | | | | |
| C84 | Lighting being kept to a minimum necessary to safely carry out operations. | C | C84.1 A procedure, standard, policy or other document should be prepared incorporating a requirement that lighting being kept to a minimum necessary to safely carry out operations. Ranking: I | | | | |

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| C85 | Lighting being directed away from residences through the use of directional lighting equipment and shielding. | C | C85.1 A procedure, standard, policy or other document should be prepared incorporating a requirement that lighting is directed away from residences through the use of directional lighting equipment and shielding. Ranking: I | | | | |
| C87 | Sealing of all main traffic routes including the roads indicated in the table located at 3.4. | C | C87.1 The generation of dust from the haul road due to haul trucks passing on a pavement that is not wide enough to accommodate two trucks should be investigated as soon as possible. Ranking: E C87.2 If necessary, the haul road should be widened, or passing bays should be constructed at strategic locations to enable trucks to remain on a sealed surface at all times. Ranking: E | | | | |
| C89 | Requiring heavy vehicles associated with deliveries to the mine to use approved B-Double routes. | NC | C89.1 A procedure should be prepared requiring that heavy vehicles associated with deliveries to the mine use approved B-Double routes, which should be clearly marked on a street map of the area. A method of conveying this requirement to the owners and drivers of heavy transport contracted by the mine or its suppliers should be included in the procedure. Ranking: I | Local information is given to all truck drivers who deliver freight to site. | N/A | | |
| C98 | Preparing and implementing a Rehabilitation Environmental Management Plan (or any such plan as required by the project approval), which addresses all aspects of rehabilitation and mine closure. | C | See Recommendation S3.35a.1. | See Recommendation S3.35a.1. | | | |

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| C99a | The rehabilitation and mine closure strategy will include development of a conceptual mine closure plan. | C | See Recommendation S3.35a.1. | See Recommendation S3.35a.1. | | | |
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