

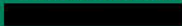
Prepared for
Anglo Coal (Capcoal Management) Pty Limited
ABN: 73 010 037 564



Grasstree Independent EPBC Compliance Audit Report 2021

Grasstree Mine Extension Project

29-Apr-2022
Grasstree Mine Extension Project



Grasree Independent EPBC Compliance Audit Report 2021

Grasree Mine Extension Project

Client: Anglo Coal (Capcoal Management) Pty Limited

ABN: 73 010 037 564

Prepared by

[Redacted]

29-Apr-2022

Job No.: [Redacted]

[Redacted] in Australia and New Zealand is certified to ISO9001, ISO14001 and ISO45001.

[Redacted]

Quality Information

Document Grasree Independent EPBC Compliance Audit Report 2021

Ref [REDACTED]

Date 29-Apr-2022

Prepared by [REDACTED]

Reviewed by [REDACTED]

Revision History

Rev	Revision Date	Details	Authorised	
			Name/Position	Signature
0	27-Apr-2022	Draft for Client Review	[REDACTED]	
A	29-Apr-2022	Final Issue	[REDACTED]	[REDACTED]

Table of Contents

Executive Summary	i
1.0 Introduction	1
1.1 Audit Period	1
1.2 Audit Scope	1
1.3 Background	1
2.0 Audit Methodology	4
2.1 Documents Reviewed	4
2.2 Audit Personnel	4
2.3 Site Inspection	4
2.4 Audit Compliance Performance Categories	5
3.0 Audit Findings	6
3.1 EPBC Act Approval (2018/8171)	6
Appendix A	
DAWE Approval of Independent Auditor	A
Appendix B	
Audit Criteria and Outcomes	B
Appendix C	
Site Observations Photo Log	C

Executive Summary

[REDACTED] was engaged by Anglo Coal (Capcoal Management) Pty Limited (Anglo Coal) to undertake the 2021 Independent Audit of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval (EPBC approval 2018/8171), for the Grasstree Mine Extension Project (the Project). The Project is a conventional longwall coal mining operation with a single shaft access and forms part of Anglo American's Capcoal Mines Complex that mines the German Creek coal formation.

The audit is a requirement of Annexure A, Part B, Conditions 16, 17 and 18 of EPBC approval 2018/8171.

The previous third-party EPBC approval audit was the initial audit for the Project, inclusive of the 12-month period from Project commencement on 15 February 2019 to 14 February 2020. The current audit is inclusive of the 12-month period from 15 February 2020 to 14 February 2021. [REDACTED] undertook the site inspection on 16 and 17 March 2022, which falls outside of the audit period¹.

The audit was conducted in accordance with the Department of the Environment and Energy² (DoEE) (2019) *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the EPBC Act* (DoEE (2019) Independent Audit and Audit Report Guideline). The audit included a desktop assessment and site inspection of the Project site and the Picardy Station offset area.

Anglo Coal complied with the majority of the Conditions of the EPBC approval 2018/8171. The site's overall compliance status is summarised in Table ES 1 below.

Table ES 1 Overall compliance summary

Relevant Approval	No. of Conditions Compliant	No. of Conditions Non-compliant	No. of Conditions Not Triggered
EPBC Approval 2018/8171	24	1	26

Recommendations to improve environmental performance on site are summarised in Tables ES 2.

Table ES 2 Summary of recommendations relating to non-compliances

Condition	#	Recommendation / Opportunity for Improvement
Part A - 4	-	Table 10 of the OMP requires the annual Picardy Station: Offset Implementation Monitoring Report, for the reporting period 1 May – 30 April, to be submitted to DAWE by 30 June for the first three years and then every 5 years after that until 2046. As there was no record of submission of the report to the Department, this condition has been found to be non-compliant. Anglo Coal identified that the 2019/2020 report was not submitted on 27 July 2021 (outside this current audit reporting period). Anglo Coal notified DAWE, of the failure to submit the annual monitoring report on time on 29 July 2021. The 2019/2020 report was subsequently submitted to DAWE on the 10 August 2021, together with an investigation report detailing the non-compliance, potential impacts (which were determined to be an administrative non-compliance and unlikely to have potential for environmental harm) and corrective actions implemented (refer to Appendix B, Part A – 4 for additional details). No recommendations as corrective actions have been implemented.

¹ The Department of Agriculture, Water and the Environment (DAWE) provided written approval of the nominated [REDACTED] Team and audit criteria on 21 December 2021. The approval letter also stated the audit report must be submitted to the Department within 6 months from the date of the letter (refer to Appendix A).

² Currently known as the Department of Agriculture, Water and the Environment (DAWE)

1.0 Introduction

[REDACTED] was engaged by Anglo Coal (Capcoal Management) Pty Limited (Anglo Coal) to undertake the 2021 Independent Audit of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval (EPBC approval 2018/8171), for the Grasstree Mine Extension Project (the Project).

The audit is a requirement of Annexure A, Part B, Conditions 16, 17 and 18 of EPBC approval 2018/8171.

This compliance report summarises the findings from the 2021 EPBC approval audit.

1.1 Audit Period

The previous EPBC approval third-party audit was the initial audit for the Project, inclusive of the 12-month period from Project commencement on 15 February 2019 to 14 February 2020. The current audit is inclusive of the 12-month period from 15 February 2020 to 14 February 2021. [REDACTED] undertook the site inspection on 16 and 17 March 2022, which falls outside of the audit period³.

1.2 Audit Scope

This audit was conducted in accordance with the requirements set out in Annexure A, Part B, Conditions 16, 17 and 18 of EPBC approval 2018/8171, as detailed in Table 1.

Table 1 Scope of work

Condition	Requirement
Part B - 16	The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from the commencement of the action and for every subsequent 12 month period until this approval expires, or as requested in writing by the Minister.
Part B - 17(a)	For each independent audit, the approval holder must provide the name and qualifications of the independent auditor and the draft audit criteria to the Department.
Part B - 17(b)	For each independent audit, the approval holder must only commence the independent audit once the audit criteria have been approved in writing by the Department.
Part B - 17(c)	For each independent audit, the approval holder must submit an audit report to the Department within the timeframe specified in the approved audit criteria.
Part B - 18	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website until the end date of this approval.

1.3 Background

The Project is a conventional longwall coal mining operation with a single shaft access and forms part of Anglo American's Capcoal Mines Complex that mines the German Creek coal formation. The complex is located in the Bowen Basin in Central Queensland, 19 km south-west of Middlemount (refer to Figure 1).

The Anglo American's Capcoal Mines Complex operates under several mining leases (ML) covering a combined total area of 27,343 ha (ML1831, ML1998, ML70047, ML70311 and Mineral Development Licence No. 170). The Project site is located on ML1831.

³ The Department of Agriculture, Water and the Environment (DAWE) provided written approval of the nominated [REDACTED] Team and audit criteria on 21 December 2021. The approval letter also stated the audit report must be submitted to the Department within 6 months from the date of the letter (refer to Appendix A).

The district is an established grazing, farming and coal mining area and lies predominantly within the Isaac Regional Council. The landscape is generally low relief at between 150 m and 250 m above sea level, with tablelands rising above the floodplains of several large streams. German Creek, an ephemeral watercourse, meanders through the site in a south-easterly direction.

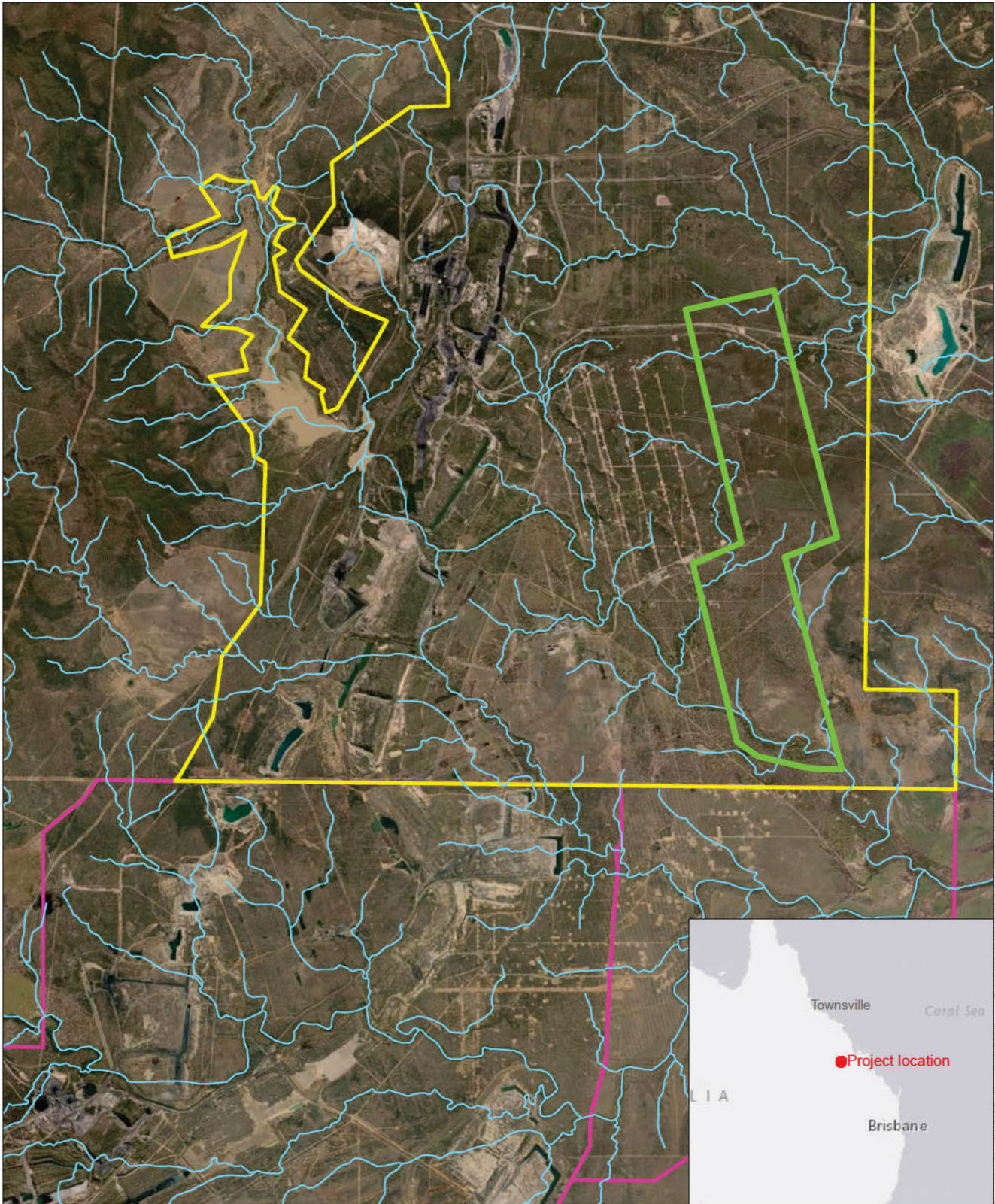


Figure 1: Project location

Legend

- Watercourses
- Grasstree Extension Project Mining Area
- Mining Lease 1831
- Other Mining Leases

Copyright: Copyright in material relating to the base layers (contextual information) on this page is licensed under a Creative Commons Attribution 3.0 Australia licence © Department of Finance, Services & Innovation 2017, (Digital Cadastral Database and/or Digital Topographic Database).

The terms of Creative Commons Attribution 3.0 Australia License are available from <https://creativecommons.org/licenses/by/3.0/au/legalcode> (Copyright Licence)

[Redacted] for the Department of Finance, Services & Innovation make any representations or warranties of any kind, about the accuracy, reliability, completeness or suitability or fitness for purpose in relation to the content (in accordance with clause 5 of the Copyright Licence). [Redacted] has prepared this document for the sole use of its Client based on the Client's description of its requirements having regard to the assumptions and other limitations set out in this report, including page 2.

Source: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community



2.0 Audit Methodology

The audit was conducted in accordance with the Department of the Environment and Energy⁴ (DoEE) (2019) *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the EPBC Act* (DoEE (2019) Independent Audit and Audit Report Guideline). The audit included a desktop assessment and site inspection of the Project site and the Picardy Station offset area.

Prior to commencing the audit, [REDACTED] provided the below documentation to Anglo Coal, for submission to DAWE for approval:

- Audit Criteria and Methodology
- Auditors Declaration of Independence.

DAWE provided written approval on 21 December 2021, also stating the audit report must be submitted to the Department within 6 months from the date of the letter (refer to Appendix A).

Following DAWE approval, an Audit Plan and Request for Information (RFI) were provided to Anglo Coal prior to the audit site inspection.

2.1 Documents Reviewed

The following documents were reviewed during the audit process:

- ArcGIS mapping layers
- Disturbance tracking files/spreadsheets
- Permit to disturb documentation
- Management plans
- Selected correspondence with relevant government agencies and stakeholders (as provided and as relevant to the audit)
- Relevant reports, including internal environmental reports and technical reports prepared by specialist consultants.

2.2 Audit Personnel

In accordance with Part B, Condition 16 of the EPBC Act approval, the audit is to be conducted by an appropriately qualified third party. The Audit Team consisted of the following personnel listed in Table 2.

Table 2 Audit team

Name	Position	Organisation	On Site
[REDACTED]	Lead Auditor	[REDACTED]	N/A
[REDACTED]	Auditor	[REDACTED]	16 – 17 March 2022

The nominated [REDACTED] audit team was approved by DAWE on 21 December 2021 (Appendix A).

2.3 Site Inspection

The site inspection was conducted on 16 and 17 March 2022 at the Project site. The inspection was attended by [REDACTED] Auditor [REDACTED] and comprised:

- opening meeting with the Anglo Coal Environmental Contractor
- document reviews
- site inspection of Project extension area on ML1831

⁴ Currently known as the Department of Agriculture, Water and the Environment (DAWE)

- site inspection of the Picardy Station offset area
- closing meeting with the Anglo Coal Mine Rehab Co-ordinator and Environmental Contractor.

Personnel interview during the site visit included the following:

- [REDACTED] – Anglo Coal Mine Rehab Co-ordinator
- [REDACTED] – Anglo Coal Environmental Contractor
- [REDACTED] – Earthtrade Managing Director.

Following the site inspection, Anglo Coal provided the auditor access to the required RFI documents. A desktop review of the evidence provided was conducted by the auditor.

2.4 Audit Compliance Performance Categories

In accordance with the Department of Environment and Energy (DoEE⁵) Independent Audit and Audit Report Guidelines (DoEE, 2019b), audit findings have been categorised as per the below performance categories in Table 3.

Table 3 Audit Compliance Performance Categories

Performance Category	Definition
Compliance	A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition. Sufficient verifiable evidence was available to demonstrate that the intent and all elements of the requirement of the regulatory instrument had been complied with within the scope of the audit.
Non-compliance	A rating of 'non-compliance' is given when the auditee has not met a condition or an element of a condition. Sufficient verifiable evidence was available to demonstrate that the intent of one or more specific elements of the regulatory instrument have not been complied with within the scope of the audit.
Observation	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.
Not applicable	A rating of 'not applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.

⁵ Currently known as the Department of Agriculture, Water and the Environment (DAWE)

3.0 Audit Findings

Performance against each condition of the EPBC approval 2018/8171, including relevant corrective actions or recommendations has been summarised in Section 3.1 below. A detailed assessment of compliance against each condition is provided in Appendix B.

3.1 EPBC Act Approval (2018/8171)

Recommendations relating to non-compliances have been summarised in Table 4 below.

Table 4 Summary of recommendations relating to non-compliances

Condition	#	Recommendation / Opportunity for Improvement
Part A - 4	-	<p>Table 10 of the OMP requires the annual Picardy Station: Offset Implementation Monitoring Report, for the reporting period 1 May – 30 April, to be submitted to DAWE by 30 June for the first three years and then every 5 years after that until 2046. As there was no record of submission of the report to the Department, this condition has been found to be non-compliant.</p> <p>Anglo Coal identified that the 2019/2020 report was not submitted on 27 July 2021 (outside this current audit reporting period). Anglo Coal notified DAWE, of the failure to submit the annual monitoring report on time on 29 July 2021. The 2019/2020 report was subsequently submitted to DAWE on the 10 August 2021, together with an investigation report detailing the non-compliance, potential impacts (which were determined to be an administrative non-compliance and unlikely to have potential for environmental harm) and corrective actions implemented (refer to Appendix B, Part A – 4 for additional details).</p> <p>No recommendations as corrective actions have been implemented.</p>

Appendix A

DAWE Approval of
Independent Auditor



Australian Government
**Department of Agriculture,
Water and the Environment**

Our reference: E [REDACTED]

[REDACTED]
Environmental Coordinator (Acting)
CAPCOAL Underground Operations – Grasstree Mine
Environment Department
Private Mail Bag
Middlemount, QLD 4746

Dear [REDACTED]

Re: *Grasstree Mine Extension project, Queensland (EPBC 2018/8171) – Approval of auditor and audit criteria for independent compliance audit*

I refer to your letter dated 4 November 2021 in which you submitted details of the proposed independent auditors and the proposed audit criteria for the independent compliance audit of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2018/8171.

Officers of the Department of Agriculture, Water and the Environment (the department) have reviewed the details of the proposed independent auditors and the audit criteria. The department considers that the auditors have sufficient skills and experience, and the audit criteria provides sufficient scope for an assessment of compliance with the conditions of the EPBC Act approval

As delegate of the Minister for the Environment, I am writing to inform you that I approve the nominated auditors and the audit criteria.

The audit report must be submitted to the department within six months from the date of this letter as per condition 17 of the EPBC Act approval. I look forward to receiving a copy of the audit report.

Should you require any further information, or like to discuss this matter further, please contact [REDACTED] or email [REDACTED]

Yours sincerely

[REDACTED]

Appendix B

Audit Criteria and Outcomes

Appendix B Audit Criteria and Outcomes

Grasstree Mine Extension Project (EPBC 2018/8171) Anglo Coal (Capcoal Management) Pty Limited

Date of Report: 8 April 2022

Report Prepared By: [REDACTED]

Report Approved By: [REDACTED]

Conditions of EPBC Act Approval (EPBC 2018/8171) (D&EE, 2018a)

EPBC Approval Condition No.

Part A - Conditions specific to the action

Impact Limits

Impact Limits	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>Part A - 1</p> <p>The approval holder must undertake the action within the Grasstree Extension project area.</p>	<ul style="list-style-type: none"> Review of available aerial imagery/GIS mapping/LIDAR data Undertaking a visual site inspection 	<p>Monthly tracking of clearing is undertaken within excel workbook (GT Extension EPBC Disturbance Tracking). Workbook provides details on maximum clearing extent of each regional ecosystem for each relevant Matter of National Environmental Significance (MNES), number of hectares cleared to date and remaining allowable hectares.</p> <p>Clearing is also tracked and mapped through ArcGIS. Auditor sighted mapping layers and current disturbance (including exploration areas). Mapping showed clearing was contained within Grasstree Extension project area.</p> <p>A permit to disturb procedure is in place to manage all proposed clearing activities. Prior to any disturbance a request for a permit to disturb must be made with the environmental department (pers comm. Environmental Contractor). A selection of Permit to Disturb documents sighted as evidence which included checks of disturbance limits against MNES habitat.</p> <p>Visual site inspection of the Project extension area was undertaken on 17 March 2022. No unauthorised clearing was apparent at the time of the inspection.</p> <p>Auditor sighted ArcGIS mapping layers for Koala.</p> <p>Monthly tracking of vegetation types relevant to Koala within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit (March 2022) total disturbance to Koala habitat was approximately 92.36 ha, which is below the 171 ha impact threshold</p> <p>Sighted W:Drive files (each MNES has own folder with containing surface clearing spatial files).</p>	<ul style="list-style-type: none"> 2022 03 GT Extension EPBC Disturbance Tracking (excel workbook). ArcGIS mapping / total clearance shape files Permit to Disturb (1588) dated 03/09/2020 Permit to Disturb (1602-1) dated 01/09/2020 	<p>Review of documentation and visual inspection determined that the action, defined in EPBC approval 2018/8171, was contained within the Grasstree Extension project area during the audit period.</p>	<p>Compliance</p>
<p>Part A - 2(a)</p> <p>The approval holder must not impact more than 171 hectares (ha) of Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat.</p>	<ul style="list-style-type: none"> Review of available GIS mapping/LIDAR data Review of permit to disturb documentation Undertake a visual site inspection 	<p>Visual site inspection of the Project extension area was undertaken on 17 March 2022. No unauthorised clearing was apparent at the time of the inspection.</p> <p>Auditor sighted ArcGIS mapping layers for Koala.</p> <p>Monthly tracking of vegetation types relevant to Koala within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit (March 2022) total disturbance to Koala habitat was approximately 92.36 ha, which is below the 171 ha impact threshold</p> <p>Sighted W:Drive files (each MNES has own folder with containing surface clearing spatial files).</p>	<ul style="list-style-type: none"> 2022 03 GT Extension EPBC Disturbance Tracking (excel workbook). ArcGIS mapping / total clearance shape files for Koala habitat. Permit to disturb (refer to Condition Part A-1). 	<p>At the time of the audit (March 2022) total disturbance to Koala habitat was approximately 92.36 ha, which is below the 171 ha impact threshold.</p>	<p>Compliance</p>

Conditions of EPBC Act Approval (EPBC 2018/8171) (D-cEE, 2019a)		Evidence		Documents Sighted		Determination		Compliance Finding	
EPBC Approval Condition No.	Verification Method								
Part A - 2(b)	The approval holder must not impact more than 171 ha of Greater Glider (<i>Petauraidea volans</i>) habitat.	Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.	Auditor sighted ArcGIS mapping layers for Greater Glider. Monthly tracking of vegetation types relevant to Greater Glider within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit Feb 2022) total disturbance to Greater Glider habitat was approximately 92.36 ha, which is below the 171 ha impact threshold. Sighted W Drive files (each MNES has own folder with containing surface clearing spatial files). Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.	<ul style="list-style-type: none"> 2022.03 GT Extension EPBC Disturbance Tracking (excel workbook). ArcGIS mapping / total clearance shape files for Greater Glider habitat. Permit to disturb (refer to Condition Part A-1). 	At the time of the audit Feb 2022) total disturbance to Greater Glider habitat was approximately 92.36 ha, which is below the 171 ha impact threshold.	Compliance			
Part A - 2(c)	The approval holder must not impact more than 171 ha of Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) foraging habitat.	Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.	Auditor sighted ArcGIS mapping layers for Squatter Pigeon (Southern) habitat. Monthly tracking of vegetation types relevant to Squatter Pigeon (Southern) within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit Feb 2022) total disturbance to Squatter Pigeon (Southern) habitat was approximately 92.8 ha, which is below the 171 ha impact threshold. Sighted W Drive files (each MNES has own folder with containing surface clearing spatial files). Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.	<ul style="list-style-type: none"> 2022.03 GT Extension EPBC Disturbance Tracking (excel workbook). ArcGIS mapping / total clearance shape files for Squatter Pigeon (Southern) habitat. Permit to disturb (refer to Condition Part A-1). 	At the time of the audit Feb 2022) total disturbance to Squatter Pigeon (Southern) habitat was approximately 92.8 ha, which is below the 171 ha impact threshold.	Compliance			
Part A - 2(d)	The approval holder must not impact more than 9 ha of Ornamental Snake (<i>Denisonia maculata</i>) important habitat.	Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.	Auditor sighted ArcGIS mapping layers for Ornamental Snake habitat. Monthly tracking of vegetation types relevant to Ornamental Snake within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit total disturbance to Ornamental Snake habitat was approximately 7.21 ha, which is below the 9 ha impact threshold. Sighted W Drive files (each MNES has own folder with containing surface clearing spatial files).	<ul style="list-style-type: none"> 2022.03 GT Extension EPBC Disturbance Tracking (excel workbook). ArcGIS mapping / total clearance shape files for Ornamental Snake habitat. Permit to disturb (refer to Condition Part A-1). 	At the time of the audit total disturbance to Ornamental Snake habitat was approximately 7.21 ha, which is below the 9 ha impact threshold.	Compliance			

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)		Evidence		Verification Method		Documents Sighted		Determination		Compliance Finding	
Part A - 3	The approval holder must not impact more than 8 ha of Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) ecological community.	<p>Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.</p> <p>Auditor sighted ArcGIS mapping layers for Brigalow ecological community.</p> <p>Monthly tracking of vegetation types relevant to Brigalow ecological community within 'EPBC 20188171 Approved Limits' tab (GT Extension EPBC Disturbance Tracking Workbook). At the time of the audit total disturbance to Brigalow ecological community was approximately 7 075 ha, which is below the 8 ha impact threshold.</p> <p>Sighted W Drive files (each MINES has own folder with containing surface clearing spatial files). Permit to disturb procedure in place. Refer to Condition Part A-1 for permit to disturb examples sighted.</p>	<p>2022.03 GT Extension EPBC Disturbance Tracking (excel workbook).</p> <p>ArcGIS mapping / total clearance shape files for Brigalow ecological community habitat.</p> <p>Permit to disturb (refer to Condition Part A-1).</p>	At the time of the audit total disturbance to Brigalow ecological community was approximately 7,075 ha, which is below the 8 ha impact threshold.	Compliance						
Offset Management Plan											
Part A - 4	The approval holder must submit an Offset Management Plan for the written approval of the Minister at least three (3) months prior to any likely impact of the action on EPBC Act listed threatened species. The approved Offset Management Plan must be implemented. The Offset Management Plan must be prepared by a suitably qualified person in accordance with the Department's Environmental Management Plan Guidelines.	<p>Review of documentation providing evidence of Offset Management Plan (OMP) submission date/ qualifications of author/ approval/acceptance by the Department of Environment and Energy (DoEE) (now the Department of Agriculture, Water and the Environment (DAWE))</p> <p>Proof of OMP implementation through review of mitigation measures outlined in OMP and verifying these measures are implemented adequately onsite.</p>	<p>The 2020 independent audit report completed by [redacted] verified the OMP was prepared by a suitably qualified person and submitted to the Minister in accordance with this condition (refer to Appendix C of the 2020 independent audit report). Mitigation measures outlined in the OMP have continued to be implemented during the current audit period. Evidence of implementation is provided in the following reports:</p> <ul style="list-style-type: none"> Annual Picardy Station Implementation Monitoring Reports, prepared by specialist consultant Environmental Offset Solutions Pty Ltd trading as [redacted] Annual Picardy Offset Area Monitoring Reports, prepared by specialist consultant [redacted] Consulting Pty Ltd [redacted] <p>The monitoring requirements listed in Table 9 of the OMP (specially targeted surveys, habitat quality assessments and ecological conditions) were undertaken by [redacted] during the audit period. The results of monitoring conducted in accordance with Table 9 of the OMP (specially the Quarterly Landholder/Authority Holder Records of Monitoring Requirements) are documented in Appendix B of the Annual Picardy Station: Offset Implementation Monitoring Reports. The 2021 report was sighted as evidence of continued implementation, noting the submission date falls outside of the current audit period.</p>	<ul style="list-style-type: none"> [redacted] 2020 EPBC 20188171 Independent Compliance Audit – Grassfree Mine (EPBC Audit 2018.8171) Final Issue March 2021 [redacted] Picardy Station: Offset Implementation Monitoring Report. Final Issue June 2020 [redacted] Picardy Station: Offset Implementation Monitoring Report. Final Issue July 2021 [redacted] Picardy Offset Area Monitoring Report. Final Issue 12 January 2021 Email correspondence to DAWE EPBC 20188171 Potential Non-Compliance with Offset Management Plan Commitment. Dated 10/08/2021 (with 2019/2020 Earthtrade Picardy Station: Offset Implementation Monitoring Report attached) Initial Notification Letter: Capcoal Underground Operators – Grassfree Mine – EPBC 20188171 – 2019/2020 Picardy Offset Area Report – Potential Non-Compliance with Offset Management Plan 	<p>The OMP was found to have been generally implemented during the audit period, however this condition is non-compliant as there was no record of submission of the 2019/2020 Implementation Monitoring Report to the DAWE by 30 June 2020.</p>	Non-compliance					

Conditions of EPBC Act Approval (EPBC 2018/8171) (D-cEE, 2019a)		Evidence		Documents Sighted		Determination		Compliance Finding	
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding				
	meet the requirements of the EPBC Act Environmental Offsets Policy.								
Part A - 4(d)	The Offset Management Plan must include a field validation survey and baseline description of the current condition (prior to any management activities) of the offset areas, including existing vegetation.	validation survey documentation (and evidence of dates conducted)	Details relating to this condition are contained with Section 3 of the OMP. This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Appendix A2, Section 2 of the OMP.						
Part A - 4(e)	The Offset Management Plan must include a description and map (including shapefiles) to clearly define the location and boundaries of the proposed offset areas, accompanied by the offset attributes.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 5.1.1 of the OMP.						
Part A - 4(f)	The Offset Management Plan must include information about how the proposed offset areas provide connectivity with other relevant habitats and biodiversity corridors.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Appendix A2, Section 5.2.1 of the OMP.						
Part A - 4(g)	The Offset Management Plan must include a description of the management measures (including timing, frequency and duration) that will be implemented in each proposed offset areas.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 9 of the OMP.						
Part A - 4(h)	The Offset Management Plan must include a discussion of how proposed management measures take into account relevant approved conservation advice and are consistent with the measures contained in relevant recovery plans and threat abatement plans.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 3.2 of the OMP.						
Part A - 4(i)	The Offset Management Plan must include completion criteria and performance targets for evaluating the effectiveness of the Offset Management Plan implementation, and criteria for triggering corrective actions.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 9 of the OMP.						
Part A - 4(j)	The Offset Management Plan must include a program to monitor, report on and review the effectiveness of the Offset Management Plan.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 10 of the OMP.						
Part A - 4(k)	The Offset Management Plan must include a description of potential risks to the successful implementation of the environmental offsets, and contingency measures that would be implemented to mitigate against these risks.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 8 of the OMP.						
Part A - 4(l)	The Offset Management Plan must include details of the mechanism to legally secure the environmental offset/s.		This condition was found to be compliant under the 2020 independent audit completed by [redacted]. Details relating to this condition are contained with Section 7 of the OMP.						
Part A - 5	The approval holder must legally secure the environmental offset/s described in the Offset Management Plan within two (2) years from the commencement of the action.	<ul style="list-style-type: none"> Review of relevant offset documents/and titles and dates Review of evidence verifying purchase of offset site e.g. invoice or contract of sale. 	<ul style="list-style-type: none"> This condition was found to be compliant under the 2020 independent audit completed by [redacted] refer to Appendix C of the independent audit report). 	<ul style="list-style-type: none"> [redacted] 2020 EPBC 2018/8171 Independent Compliance Audit – Grasstree Mine (EPBC Audit 2018-8171) Final Issue March 2021 	Closed out in the 2020 audit.	Compliance			

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)		Evidence		Documents Sighted		Determination		Compliance Finding	
EPBC Approval Condition No.		Verification Method		Documents Sighted		Determination		Compliance Finding	
Part A - 6	The approval holder must not impact any EPBC Act listed threatened species habitat identified in condition 2 until the Offset Management Plan has been approved by the Minister.	<ul style="list-style-type: none"> Visual site inspection of offset areas/s Review of initial permit to disturb documents/dates Review of OEMP approval date and evidence of approval from the Minister Review of aerial photographs of site 	This condition was found to be compliant under the 2020 independent audit completed by [redacted] (refer to Appendix C of the independent audit report).	<ul style="list-style-type: none"> 2020 EPBC 2018/8171 Independent Compliance Audit – Grassfree Mine (EPBC Audit 2018:8171) Final Issue March 2021 	Closed out in the 2020 audit.	Compliance			
Part B - Standard administrative conditions									
Notification of date of commencement of the action									
Part B - 7	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	<ul style="list-style-type: none"> Review of notification documents/ emails submitted to the Department Review date of commencement 	This condition was found to be compliant under the 2020 independent audit completed by [redacted] (refer to Section 3.3.9, Table 3-2 of the independent audit report).	<ul style="list-style-type: none"> 2020 EPBC 2018/8171 Independent Compliance Audit – Grassfree Mine (EPBC Audit 2018:8171) Final Issue March 2021 	Closed out in the 2020 audit.	Compliance			
Part B - 8	If the commencement of the action does not occur within five (5) years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	<ul style="list-style-type: none"> Review of documentation/written approvals Review date of commencement 	This condition was found to be compliant under the 2020 independent audit completed by [redacted] (refer to Section 3.3.9, Table 3-2 of the independent audit report).	<ul style="list-style-type: none"> 2020 EPBC 2018/8171 Independent Compliance Audit – Grassfree Mine (EPBC Audit 2018:8171) Final Issue March 2021 	Closed out in the 2020 audit.	Compliance			
Compliance records									
Part B - 9	The approval holder must maintain accurate and complete compliance records.	<ul style="list-style-type: none"> Environmental Management System (EMS) and compliance records 	<p>The Anglo-American Metallurgical Coal Safety Health Environment Management System (SHEMS) Document Map provides an overview of the document management structure for site, including compliance records relevant to the to the EPBC approval.</p> <p>W Drive Folder: 4.3.2 Legal and other Requirements was reviewed by the auditor during the site inspection. Sufficient records were maintained at the time of the audit and included the following:</p> <ul style="list-style-type: none"> EPBC obligations tracking EPBC mapping/tracking spreadsheet EPBC approval documents Relevant technical reports/ annual reports relevant to the EPBC approval Correspondence records relevant to the EPBC approval 	<ul style="list-style-type: none"> Anglo-American Metallurgical Coal Safety Health Environment Management System (SHEMS) Document Map W Drive Folder: 4.3.2 Legal and other Requirements (selection of inclusions within the folder below): <ul style="list-style-type: none"> 2022.03 GT Extension EPBC Disturbance Tracking (excel workbook). Anglo-American EPBC Act 1999 Approval Compliance Report Grassfree Mine (Reporting Period 15 February 2020 to 14 February 2021) Final issue 14 May 2021 [redacted] Sturdy Station: Offset Implementation Monitoring 	Sufficient records reviewed to satisfy this condition.	Compliance			

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)		Evidence		Verification Method		Documents Sighted		Determination		Compliance Finding	
EPBC Approval Condition No.											
Part B - 10	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	<ul style="list-style-type: none"> Review of email correspondence and compliance documentation Discussion with site personnel / environmental department 	<p>The Department did not make any written requests for compliance records during the audit period. The Environmental Contractor confirmed this via email correspondence with the previous Environmental Officer (responsible for environmental department during the audit period).</p> <p>Auditor reviewed the W Drive Folder: 4.3.2 Legal and other Requirements during the site inspection.</p>	<ul style="list-style-type: none"> Report, Final Issue June 2020 Earthtrade Picardy Station: Offset Implementation Monitoring Report, Final Issue July 2021 Email correspondence dated 18 March 2021 W Drive Folder: 4.3.2 Legal and other Requirements 	This condition was not triggered during the audit period.	Not applicable					
Preparation and publication of the Offset Management Plan											
Part B - 11(a)	The approval holder must submit the Offset Management Plan electronically to the Department for the written approval by the Minister.	<ul style="list-style-type: none"> Review of electronic submission/email correspondence 	<p>This condition was found to be compliant under the 2020 independent audit completed by [redacted] refer to Section 3.3.9, Table 3-2 of the independent audit report).</p>	<ul style="list-style-type: none"> [redacted] 2020 EPBC 2018/8171 Independent Compliance Audit – Grasstree Mine (EPBC Audit 2018.8171) Final Issue March 2021 	Closed out in the 2020 audit	Compliance					
Part B - 11(b)	The approval holder must publish the Offset Management Plan on its website within 20 business days of the date the Offset Management Plan is approved by the Minister or of the date a revised Offset Management Plan is submitted to the Minister, unless otherwise agreed to in writing by the Minister.	<ul style="list-style-type: none"> Review date/record of upload onto company website 	<p>The OMP was approved prior to the audit period commencing. No updates to the OMP occurred during the audit period.</p> <p>While the auditors did verify the OMP was available on the Anglo Coal company website the element of this condition falls outside of the audit period.</p>	<ul style="list-style-type: none"> [redacted] 2020 EPBC 2018/8171 Independent Compliance Audit – Grasstree Mine (EPBC Audit 2018.8171) Final Issue March 2021 	The element of this condition was triggered prior to the audit period commencing. This condition is therefore not applicable.	Not applicable					
Part B - 11(c)	The approval holder must exclude or redact sensitive ecological data from the Offset Management Plan published on its website or provided to a member of the public.	<ul style="list-style-type: none"> Review of relevant documentation and/or interview relevant personnel Review of publicly available OEMP 	<p>This condition was found to be not applicable under the 2020 independent audit completed by [redacted] refer to Section 3.3.10, Table 3-3 of the independent audit report).</p>	<ul style="list-style-type: none"> [redacted] 2020 EPBC 2018/8171 Independent Compliance Audit – Grasstree Mine (EPBC Audit 2018.8171) Final Issue March 2021 	Closed out in the 2020 audit	Not applicable					
Part B - 11(d)	The approval holder must keep the Offset Management Plan published on its website until the end date of this approval.	<ul style="list-style-type: none"> Review of company website 	<p>The OMP was published on the company website on 13 December 2019 and was still available for download at the time of the audit site inspection.</p>	<ul style="list-style-type: none"> Link to OMP location: https://australia.environment.gov.au/sustainability/environmental-management Email correspondence RE: Upload of Grasstree Offset Management Plan, Dated December 13 2019 	This condition is considered compliant.	Compliance					
Part B - 12	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under condition 4, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to	<ul style="list-style-type: none"> Review of email correspondence (incl relevant supplied data) with reference to the OMP/ Department's 	<p>This condition was found to be compliant under the 2020 independent audit completed by [redacted] refer to Section 3.3.9, Table 3-2 of the independent audit report).</p>	<ul style="list-style-type: none"> [redacted] 2020 EPBC 2018/8171 Independent Compliance Audit – Grasstree Mine (EPBC Audit 2018.8171) Final Issue March 2021 	Closed out in the 2020 audit	Compliance					

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)		Evidence		Documents Sighted		Determination		Compliance Finding			
EPBC Approval Condition No.		Verification Method		Evidence		Documents Sighted		Determination		Compliance Finding	
	the Department in accordance with the requirements of the Offset Management Plan.	<ul style="list-style-type: none"> Guidelines for biological survey and mapped data (2018) Review of monitoring data, surveys, maps and spatial data 									
Annual compliance reporting											
Part B - 13	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister.	<ul style="list-style-type: none"> Review of annual compliance report and dates 	<p>Annual compliance report prepared in accordance with this condition.</p> <p>The [redacted] 2020 independent audit noted an opportunity for improvement (OFI) to reference the date range of the assessment period in future reports. This has been actioned and detailed on the report for the current audit period.</p>	<ul style="list-style-type: none"> Anglo-American EPBC Act 1999 Approval Compliance Report <i>Grasstree Mine</i> (Reporting Period 15 February 2020 to 14 February 2021). Final issue 14 May 2021 	This condition is considered compliant, and the identified OFI actioned.	Compliance					
Part B - 13(a)	The approval holder must publish each compliance report on its website within 60 business days following the relevant 12 month period.	<ul style="list-style-type: none"> Review date/record of upload onto company website 	<p>The annual compliance report for the reporting period 15 February 2020 to 14 February 2021 is available on the company website.</p> <p>The annual compliance report was uploaded to the company website on 14 May 2021 (which is less than 60 business days following the relevant 12 month period). Auditor sighted email correspondence to DAWE confirming report upload to company website.</p>	<ul style="list-style-type: none"> Link to annual compliance report location (15 February 2020 to 14 February 2021): https://australia.environment.gov.au/sustainability/environmental-management Email correspondence to DAWE EPBC 1999 Approval Compliance Report - Grasstree Extension Project (EPBC Approval No: 2018/8171). Dated 18 May 2021 	This condition is considered compliant.	Compliance					
Part B - 13(b)	The approval holder must notify the Department by email that a compliance report has been published on its website within five (5) business days of the date of publication.	<ul style="list-style-type: none"> Review of notification record/email to the Department 	<p>Auditor sighted email correspondence to DAWE confirming report upload to company website. The email correspondence is dated 18 May 2021 (which is less than 5 business days from the publication date).</p>	<ul style="list-style-type: none"> Email correspondence to DAWE EPBC 1999 Approval Compliance Report - Grasstree Extension Project (EPBC Approval No: 2018/8171). Dated 18 May 2021 	This condition is considered compliant.	Compliance					
Part B - 13(c)	The approval holder must keep all compliance reports publicly available on its website until this approval expires	<ul style="list-style-type: none"> Review of company website 	<p>The annual compliance report was published on the company website on 14 May 2021 and was still available for download at the time of the audit site inspection.</p>	<ul style="list-style-type: none"> Link to annual compliance report location (15 February 2020 to 14 February 2021): https://australia.environment.gov.au/sustainability/environmental-management 	This condition is considered compliant.	Compliance					
Part B - 13(d)	The approval holder must exclude or redact sensitive ecological data from compliance reports published on its website.	<ul style="list-style-type: none"> Review of relevant documentation and/or interview relevant personnel 	<p>No sensitive ecological data was required to be excluded in the annual compliance report (pers. comm Anglo Coal Environmental Contractor)</p>		This condition was not triggered during the audit period.	Not applicable					
Part B - 13(e)	The approval holder must where any sensitive ecological data has been excluded from the version published, submit the full	<ul style="list-style-type: none"> Review of email correspondence 	<p>No sensitive ecological data was required to be excluded in the annual compliance report (pers. comm Anglo Coal Environmental Contractor)</p>		This condition was not triggered during the audit period.	Not applicable					

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)					
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Reporting non-compliance					
	(incl relevant supplied data)				
	compliance report to the Department within five (5) business days of publication.				
Part B - 14	<ul style="list-style-type: none"> Interview with relevant personnel Review of Incident database Review of Annual compliance report Review of EMS and compliance records Review of Department correspondence/dates 	<p>Isometrix database used to log and track incidents. Auditor viewed database within audit date range. No incidents relating to the EPBC approval were recorded.</p> <p>Auditor reviewed W Drive Folder: 4.5.3 Nonconformity, corrective action and preventative records, which contains all site related incident records. No incidents relating to the EPBC approval were recorded in this folder within the audit period.</p> <p>The annual compliance report for the reporting period 15 February 2020 to 14 February 2021 reported no incidents or non-compliances to date.</p> <p>One non-compliance occurred during the audit period in relation to the late submission of the 2019/2020 Implementation Monitoring Report (Reiter findings against Part A - 4). Anglo Coal became aware of this non-compliance in July 2021, outside the audit period. The non-compliance was reported to DAWE however as it falls outside of the audit period it is not applicable to this audit and should be captured in the next independent audit period.</p>	<ul style="list-style-type: none"> Final Issue 14 May 2021 Isometrix Database W Drive Folder: 4.5.3 Nonconformity, corrective action and preventative actions Anglo-American EPBC Act 1999 Approval Compliance Report Grasstree Mine (Reporting Period 15 February 2020 to 14 February 2021). 	<p>This condition was not triggered during the audit period.</p> <p>The OMP non-compliance identified on 27 July 2021 falls outside of this current audit period and will be captured in the subsequent audit (15 February 2021 to 14 February 2022) in relation to this condition.</p>	Not applicable
Part B - 14(a)	The notification must specify the condition which is or may be in breach.	<ul style="list-style-type: none"> Review content of relevant notification records 	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable
Part B - 14(b)	The notification must specify a short description of the incident and/or non-compliance.	<ul style="list-style-type: none"> Review incident / non-compliance investigation reports Review of EMS, compliance records and relevant Department correspondence/dates 	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable
Part B - 15	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in the Offset Management Plan as soon as practicable but no later than 10 business days after becoming aware of the incident or non-compliance.	<ul style="list-style-type: none"> Review content of relevant notification records 	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable
Part B - 15(a)	Specifying any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future.	Not applicable: Refer to Part B - 14	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable
Part B - 15(b)	Specifying the potential impacts of the incident or non-compliance.	Not applicable: Refer to Part B - 14	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)						
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
Part B - 15(c)	Specifying the method and timing of any remedial action that will be undertaken by the approval holder.	Not applicable: Refer to Part B - 14	Not applicable: Refer to Part B - 14	This condition was not triggered during the audit period.	Not applicable	
Independent audit						
Part B - 16	The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from the commencement of the action and for every subsequent 12 month period until this approval expires, or as requested in writing by the Minister.	<ul style="list-style-type: none"> Review of existing independent audit reports Review of email correspondence/dates and company website Review evidence of audit report submitted to the Department 	<p>The action commenced on 15 February 2019. Letter from DAWE sighted confirming date of action commencing.</p> <p>The 2020 independent audit is inclusive of the period between 15 February 2019 and 14 February 2020.</p>	<ul style="list-style-type: none"> DAWE letter (reference 2018/8171) Commencement of the Action Grassreef Mine Extension Project EPBC 2018/8171. Dated 13 March 2019 2020 EPBC 2018/8171 Independent Compliance Audit – Grassreef Mine (EPBC Audit 2018:8171) Final Issue March 2021 	This condition is considered compliant.	Compliance
Part B - 17(a)	For each independent audit, the approval holder must provide the name and qualifications of the independent auditor and the draft audit criteria to the Department.	<p>2019-2020 Audit Period Names and qualifications of the independent auditor and the draft audit criteria for the 2019/2020 audit were provided to the Department on 21 September 2020. Auditor sited DAWE approval letter which includes reference to the date the Department were provided the required information.</p> <p>2020-2021 Audit Period (this audit report) Names and qualifications of the independent auditor and the draft audit criteria for the 2020/2021 audit (this audit report) were provided to the Department on 4 November 2021. Auditor sighted DAWE approval letter which includes reference to the date the Department were provided the required information.</p>	<ul style="list-style-type: none"> 2020 EPBC 2018/8171 Independent Compliance Audit – Grassreef Mine (EPBC Audit 2018:8171) Final Issue March 2021 DAWE approval letter of independent auditor and draft audit criteria (dated 6 October 2020) DAWE approval letter of independent auditor and draft audit criteria (dated 21 December 2021) (refer to Appendix A) 	This condition is considered compliant.	Compliance	

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)					
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Part B - 17(b)	For each independent audit, the approval holder must only commence the independent audit once the audit criteria have been approved in writing by the Department.	<p>2019-2020 Audit Period The 2020 independent audit was approved in writing by the Department on 6 October 2020.</p> <p>Section 2.2, Table 2-1 of the 2020 independent audit report details receipt of RFI documentation on 27 September (prior to the Department approval date of 6 October 2020). The site inspection occurred on 16-17 November 2020 (after the Department approval date).</p> <p>2020-2021 Audit Period (this audit report) The 2021 audit criteria was approved in writing by the Department on 21 December 2021.</p> <p>The 2021 RFI Document Checklist to Anglo Coal on 24 February 2021 (after DAWE written approval) and complete the site inspection on 16-17 March 2021.</p>	<ul style="list-style-type: none"> DAWE approval letter of independent auditor and draft audit criteria (dated 6 October 2020) 2020 EPBC 2018/8171 Independent Compliance Audit – Grassfree Mine (EPBC Audit 2018/8171) Final Issue March 2021 DAWE approval letter of independent auditor and draft audit criteria (dated 21 December 2021) Small correspondence Grassfree EPBC Audit - Document Checklist and Audit Plan. Dated 24 February 2022 	<p>This condition is considered compliant.</p> <p>Preparation work, such as provision of information and pre-audit planning appears to have been completed prior to approval of the 2020 audit criteria being received from DAWE. The auditors were unable to verify the date of commencement for the previous audit, however the site inspection did occur after approval was received from DAWE. The auditors consider the previous audit generally complied with the requirements of this condition.</p>	Compliance
Part B - 17(c)	For each independent audit, the approval holder must submit an audit report to the Department within the timeframe specified in the approved audit criteria.	<p>The 2020 independent audit report was submitted to the Department on 12 April 2021 (no submission timeframe was specified in the DAWE approval letter).</p>	<ul style="list-style-type: none"> Anglo Coal submission letter to DAWE Capcoal Underground Operators – Grassfree Mine – Grassfree Extension Project 2018/8171 – Part B Schedule 17c. Dated 12 April 2021 DAWE approval letter of independent auditor and draft audit criteria (dated 6 October 2020) 	<p>This condition is considered compliant.</p>	Compliance
Part B - 18	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website until the end date of this approval.	<p>The 2020 independent audit report was approved by the Department on 27 August 2021. Auditor sighted screenshot (png file) of company website containing the 2019/2020 EPBC Independent Audit with a date stamp of 1 September 2021 (within the required timeframe stated in this condition).</p>	<ul style="list-style-type: none"> DAWE approval letter of independent audit report Re: Grassfree Mine Extension Project (EPBC 2018/8171) – Approval of independent audit report. Dated 27 August 2021 Screenshot (png file) of 2019/2020 EPBC Independent Audit. Dated 1 September 2021 Link to 2019/2020 Independent Audit Report (Grassfree-EPBC Independent Compliance Audit- May 2021): https://australia.apolloamericas.com/sustainability/environmental-environmental-management/ 	<p>This condition is considered compliant.</p>	Compliance
Revision of the Offset Management Plan					
Part B - 19	The approval holder may, at any time, apply to the Minister for a variation to the Offset Management Plan approved by the Minister under condition 4, or as subsequently revised in	<p>This condition was not triggered during the current audit period. The original OMP is still the current</p>	<ul style="list-style-type: none"> Review of relevant OMP variation/s and 	<p>This condition was not triggered during the audit period.</p>	Not applicable

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)					
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	<p>accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves the revised Offset Management Plan then, from the date specified, the approval holder must implement the revised Offset Management Plan in place of the previous Offset Management Plan.</p>	<ul style="list-style-type: none"> approval notifications/emails Proof of revised OMP implementation 	<p>version (pers. comm Anglo Coal Environmental Consultant).</p>		
Part B - 20	<p>The approval holder may choose to revise the Offset Management Plan approved by the Minister under condition 4, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised Offset Management Plan would not be likely to have a new or increased impact.</p>	<ul style="list-style-type: none"> Review of relevant OMP variations/ Proof of revised OMP implementation 	<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)	<p>If the approval holder makes the choice under condition 20 to revise the approved Offset Management Plan without submitting it for approval, the approval holder must notify the Department in writing that the approved Offset Management Plan has been revised.</p>	<ul style="list-style-type: none"> Review of notification records, dates, electronic copies of OMP (revised and mark-up versions) 	<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)(i)	<p>Provide the Department with an electronic copy of the revised Offset Management Plan.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)(ii)	<p>Provide the Department with an electronic copy of the revised Offset Management Plan marked up with track-changes to show the differences between the approved Offset Management Plan and the revised Offset Management Plan.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)(iii)	<p>Provide the Department with an explanation of the differences between the approved Offset Management Plan and the revised Offset Management Plan.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)(iv)	<p>Provide the Department with the reasons the approval holder considers that taking the action in accordance with the revised Offset Management Plan would not be likely to have a new or increased impact.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(a)(v)	<p>Provide the Department with written notice of the date on which the approval holder will implement the revised Offset Management Plan (revised Offset Management Plan implementation date), being at least 20 business days after the date of providing notice of the revision of the Offset Management Plan, or a date agreed to in writing with the Department.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 21(b)	<p>If the approval holder makes the choice under condition 20 to revise the approved Offset Management Plan without submitting it for approval, the approval holder must subject to condition 23, implement the revised Offset Management Plan from the revised Offset Management Plan implementation date.</p>		<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>
Part B - 22	<p>The approval holder may revoke its choice to implement the revised Offset Management Plan under condition 20 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 20, the approval</p>	<ul style="list-style-type: none"> Review of relevant notifications/emails 	<p>Not applicable – Refer to Part B - 19</p>	<p>This condition was not triggered during the audit period.</p>	<p>Not applicable</p>

Conditions of EPBC Act Approval (EPBC 2018/8171) (DcEE, 2019a)					
EPBC Approval Condition No.	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	holder must implement the previous Offset Management Plan approved by the Minister				
Part B - 23(a)	<ul style="list-style-type: none"> If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised Offset Management Plan would be likely to have a new or increased impact, then condition 20 does not apply, or ceases to apply, in relation to the revised Offset Management Plan. 	<ul style="list-style-type: none"> Review of relevant notifications/emails 	Not applicable – Refer to Part B - 19	This condition was not triggered during the audit period.	Not applicable
Part B - 23(b)	<ul style="list-style-type: none"> If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised Offset Management Plan would be likely to have a new or increased impact, then the approval holder must implement the Offset Management Plan specified by the Minister in the notice. 		Not applicable – Refer to Part B - 19	This condition was not triggered during the audit period.	Not applicable
Part B - 24	<ul style="list-style-type: none"> At the time of giving the notice under condition 23, the Minister may also notify that for a specified period of time, condition 20 does not apply for the Offset Management Plan. 		Not applicable – Refer to Part B - 19	This condition was not triggered during the audit period.	Not applicable
Completion of the action					
Part B - 25	<ul style="list-style-type: none"> Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data. 	<ul style="list-style-type: none"> Review of relevant notifications/emails (if applicable) 	This condition was not triggered during the current audit period (pers. comm Anglo Coal Environmental Consultant).	This condition was not triggered during the audit period.	Not applicable

Appendix C

Site Observations Photo Log

Appendix C Site Observations Photo Log



Plate 1: Picardy Station offset area. Monitoring Site M9



Plate 2: Picardy Station offset area. Monitoring Site M3



Plate 3: Picardy Station offset area. Monitoring Site M2



Plate 4: Picardy Station offset area. Monitoring Site M7





Plate 5: Within Picardy Station offset area along Stephens Creek



Plate 6: Within Picardy Station offset area at the headwater of Stephens Creek and Scott Creek





Plate 6: Within Picardy Station offset area along Scott Creek

