



Independent Biodiversity Audit

Maules Creek Coal Pty Ltd

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Independent Biodiversity Audit

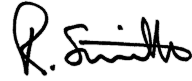
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ACRONYMS AND ABBREVIATIONS

Acronym	Description
BCS	Biodiversity Conservation and Science Directorate
BOA	Biodiversity Offset Area
CCC	Community Consultative Committee
CoA	Condition of Approval
DCCEEW	Department of Climate Change, Energy, the Environment and Water (both State and Commonwealth)
DPE Water	Department of Primary Industry Water
ERM	Environmental Resources Management Australia Pty Ltd
IBA	Independent Biodiversity Audit
LLS	Local Land Services
MCCM	Maules Creek Coal Mine
PCT	Plant Community Type
WHC	Whitehaven Coal Limited

1. INTRODUCTION

1.1 BACKGROUND

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Biodiversity Audit (IBA) of the Maules Creek Coal Mine (MCCM) for Maules Creek Coal Pty Ltd, which is responsible for management of the mine and is a wholly owned entity of Whitehaven Coal Limited (WHC). The mine is contained on leases CL375, ML1719, and ML1701, on the north-western slopes of New South Wales (NSW) approximately 18 kilometres (km) north-east of Boggabri in the Narrabri Local Government Area (LGA). The regional centres of Narrabri and Gunnedah are situated approximately 45 km to the north-west and 55 km to the south of MCCM respectively.

The purpose of the audit is to satisfy Project Approval PA 10_0138 Modification 9 of March 2024, specifically the Minister for Planning and Infrastructure's Condition of Approval (CoA). It requires the commissioning of an independent biodiversity audit by the end of June 2017 and every 5 years thereafter, unless the Planning Secretary agrees otherwise.

1.2 AUDITOR

Dr. Toivo Zoete (lead auditor) undertook the site visit and was approved by the Department of Planning, Housing and Infrastructure (together with its predecessors hereafter referred to as the Department) to conduct the audit (refer to correspondence from the DPHI in Appendix A). Qualifications and experience are as follows:

Toivo Zoete – Lead Auditor

Qualifications: BSc (Hons, MAppSc (Hons), PhD, EMS 14001 Lead Auditor (2015) (Exemplar)

Experience: Toivo is a Principal Consultant within ERM's Sustainable Mining Team. He is an environmental professional with 30 years' experience in a range of environmental studies, including mine closure, environmental audits, environmental impact studies, ecological assessments, among others in Australia, the Asia Pacific region, and Algeria. Relevant projects have included audits for resource developments (legal compliance, Towards Sustainable Mining, HSEC, and ISO 140001 certification), environmental impact assessments for resource and infrastructure developments, and numerous projects in NSW (including compliance audits). He has provided expert evidence at several Land and Environment Court cases in NSW.

1.3 AUDIT OBJECTIVES AND SCOPE

The objective of this IBA was to assess the environmental performance of the project and assess whether it is complying with the requirements of CoA 56 of Project Approval PA 10_0138 Modification 9 of March 2024. The CoA states that the audit must cover the following aspects:

a) include consultation with:

- NSW Resources Regulator;
- NSW Department of Planning and Environment Crown Lands (Crown Lands);
- NSW Biodiversity Conservation and Science Directorate (BCS);

- Community Consultative Committee (CCC);
- Local Land Services (LLS); and
- Commonwealth Department of Climate Change, Environment, Energy and Water (DCCEEW).

b) assess the performance of the revegetation in the rehabilitation area completed to date against the completion criteria in the Rehabilitation Management Plan;

c) assess the performance of management and restoration in the off-site Biodiversity Offset Strategy areas completed to date against the completion criteria in the Biodiversity Management Plan;

d) identify any measures that should be implemented to improve the performance of rehabilitation, management and restoration within the rehabilitation and biodiversity offset areas;

e) if the completion criteria have not been met, or are not adequately trending towards being met, determine the likely ecological value of the rehabilitation and restoration once completed, and recommend additional measures to augment the Biodiversity Offset Strategy to ensure that it adequately offsets the project's impacts on biodiversity.

1.4 AUDIT PERIOD

The Independent Biodiversity Audit covers the period 12 August 2023 to 14 May 2026. The site inspection was conducted on 13 May 2026.

1.5 LIMITATIONS

This disclaimer, together with any limitations specified in the report, apply to this report and its use.

This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on: (a) client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM does not accept responsibility for omissions or inaccuracies in the client/third party information; and (b) information taken at or under the particular times and conditions specified, and ERM does not accept responsibility for any subsequent changes.

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2. AUDIT METHODOLOGY

2.1 SELECTION AND ENDORSEMENT OF AUDIT TEAM

Prior to the commencement of the audit, approval of nominated audit personnel was sought from the Department. These were approved as per letter from the Department to WHC, dated 25 March 2026 (attached in Appendix A). Declarations of Independence are included in Appendix B.

2.1 SCOPE CONSULTATION AND DEVELOPMENT

2.1.1 AGENCIES CONSULTED

The Terms of Reference were developed in consultation with WHC and submitted to the agencies and stakeholders listed in CoA 56 (a) on 2 April 2026 to obtain feedback and draw attention to any key issues, within the agreed scope of the audit.

External stakeholders consulted included the following:

- NSW Resources Regulator
- NSW Department of Planning and Environment Crown Lands (Crown Lands)
- NSW Biodiversity Conservation and Science Directorate (BCS)
- Community Consultative Committee (CCC)
- Local Land Services (LLS)
- Commonwealth Department of Climate Change, Environment, Energy and Water (DCCEEW)

In each case, an email was sent to representatives of each agency requesting feedback on those issues considered most relevant by their department at the time of the audit.

2.1.2 SUMMARY OF CONSULTATION RESULTS

The results of the consultation referred to in the section above are as follows:

- The NSW Resources Regulator required the audit to note observations where rehabilitation procedures, practices and outcomes represent best industry practice from a biodiversity management perspective;
- The DCCEEW - Water would be interested in the audit's review of the biodiversity status of riparian vegetation and groundwater dependent ecosystems and any links to hydrological changes; and
- The DCCEEW - BCS considered the audit approach satisfactory without further comments or concerns at this stage.

Consultation responses received are included in Appendix C. No comments were received from the CCC, LLS, or Commonwealth DCCEEW.

Further, as noted in Section 2.1, the DPHI responded approving the auditor and noting that the IBA must be prepared, undertaken, and finalised in accordance with the requirements of Schedule 3, Condition 56 of the MCCM consent.

2.2 AUDIT PROCESS

2.2.1 PROCESS SUMMARY

The Independent Biodiversity Audit was conducted against CoA 56 of Schedule 3 of Approval Development Consent PA 10_0138 Modification 9. The IBA process included:

- Off-site planning for the site audit;
- Collection of relevant background documentation;
- An opening meeting;
- Collecting audit evidence through information gathering, observations and interviews;
- Site inspections;
- A close out meeting;
- Evaluating audit documentation and rating performance with the relevant criteria; and
- Compiling this audit report.

2.2.2 OPENING MEETING

The opening meeting was held at the MCCM site office on 12 May 2026. The opening meeting was attended by the auditor Dr. Toivo Zoete, and Emma Bulkeley (MCCM Environmental Superintendent), Andrew Wright (Group Manager Biodiversity) and Angus Frend (Environmental Advisor). The audit objectives were discussed and MCCM presented an overview of the rehabilitation at the mine to date.

2.2.3 SITE INSPECTION

Site inspections were undertaken by Dr. Toivo Zoete. Site inspections included observations of internal and external elements of the site, including:

- MCCM Mine Site – rehabilitation areas; and
- MCCM Biodiversity Offset Areas (BOA) – revegetation, restoration, and enhancement areas.

The WHC Group Manager Biodiversity and the MCCM Superintendent Environment provided assistance with collecting audit evidence by providing ERM with appropriate documentation for each approval condition before the audit, over the course of the visit, and in the weeks following the completion of the audit.

2.2.4 CLOSING MEETING

A brief closing meeting was conducted between Dr. Toivo Zoete of ERM and Andrew Wright on 14 May 2026 and included a discussion of preliminary audit findings.

2.2.5 AUDIT REPORT

An assessment of the biodiversity characteristics and actions undertaken against the criteria listed in the Rehabilitation Management Plan (mine site) and Biodiversity Management Plan (offset areas) is provided in Section 3. ERM note the audit report is based on objective evidence.

MCCM is required to submit a copy of this independent audit report to the Department, together with its response to any recommendations contained in the independent audit report.

2.3 COMPLETION CRITERIA

Key requirements of the CoA 56 are to assess the performance of biodiversity aspects against completion criteria, including:

- (b) assess the performance of the revegetation in the rehabilitation area completed to date against the completion criteria in the Rehabilitation Management Plan; and
- (c) assess the performance of management and restoration in the off-site Biodiversity Offset Strategy areas completed to date against the completion criteria in the Biodiversity Management Plan.

2.3.1 MINE SITE

Draft completion criteria included in Table 9 of the Rehabilitation Management Plan (MCCM 2026) for the mine site rehabilitation area are based on the objective to regenerate White Box grassy woodland (PCT 1383) and Narrow-leaved Ironbark - cypress pine - White Box shrubby open forest (PCT 592). Numerical values for completion and performance criteria are provided in:

- Table 10: Mean and minimum targets are set to allow for ecosystem and land use establishment phase to be achieved within 6 years of initial seeding (performance criteria); and
- Table 11: Ecosystem and land use development phase (completion criteria)

With first revegetation occurring in 2019, that rehabilitation is currently in Year 6, still in the ecosystem and land use establishment phase. Completion and performance criteria are shown together with the findings in Table 3-1 of this report.

2.3.2 OFFSET AREAS

Performance and completion criteria for the off-site Biodiversity Offset Strategy are included in the Biodiversity Management Plan (MCCM 2025, approved 5 June 2025). Completion criteria have been devised for several monitoring attributes as follows (Tables 5-6 to 5-8 of the Biodiversity Management Plan):

Management objectives to enhance existing and restore self-sustaining woodland/forest:

- Native Plant Species Richness (NPS)
- Native Overstorey Cover (NOS)
- Native Mid-Storey Cover (NMS)
- Native Ground Cover - Grasses (NGCG)
- Perennial Exotic Plant Cover (PEPC)

The criteria vary depending on the vegetation class targeted. While numerical values for NPS, NOS, NMS, and NGCG are listed in Appendix H of the Biodiversity Management Plan, those used to assess the 2025 annual spring monitoring results are based on Appendix B of the Integrated Monitoring Strategy (Ecoplanning 2025), approved on 22 October 2025 by the Biodiversity Conservation Trust (NSW DCCEEW). The Integrated Monitoring Strategy is an updated form of the draft Integrated Monitoring Strategy (Ecoplanning 2024) used in the preparation of the Biodiversity Management Plan, as noted in Section 5.17.1 of the Biodiversity

Management Plan. The Integrated Monitoring Strategy contains some changes to Keith class¹ (for PCT 101 & PCT 55), target PCT updated mapping (revegetation targets) and BGW mapping relative to the draft and, hence, the Biodiversity Management Plan, which is yet to be updated with these changes. Closure criteria numerical values used in this IBA are therefore those listed in the Integrated Monitoring Strategy rather than those listed in the Biodiversity Management Plan.

¹ Keith Vegetation Classification is a framework used to map native ecosystems across NSW and the ACT

3. RESULTS

3.1 MINE SITE REHABILITATION AREA

Rehabilitation has been undertaken since 2019 at MCCM, with additional areas added to the total area rehabilitation each year (Figure 3-1). As of April 2026, of the 1870ha total disturbance footprint, a total of 336ha was in the ecosystem and land use establishment phase. However, under planned expansion of MCCM eastwards, most of the rehabilitation established in 2019, 2021, and 2022 will be removed to make way for additional mining.

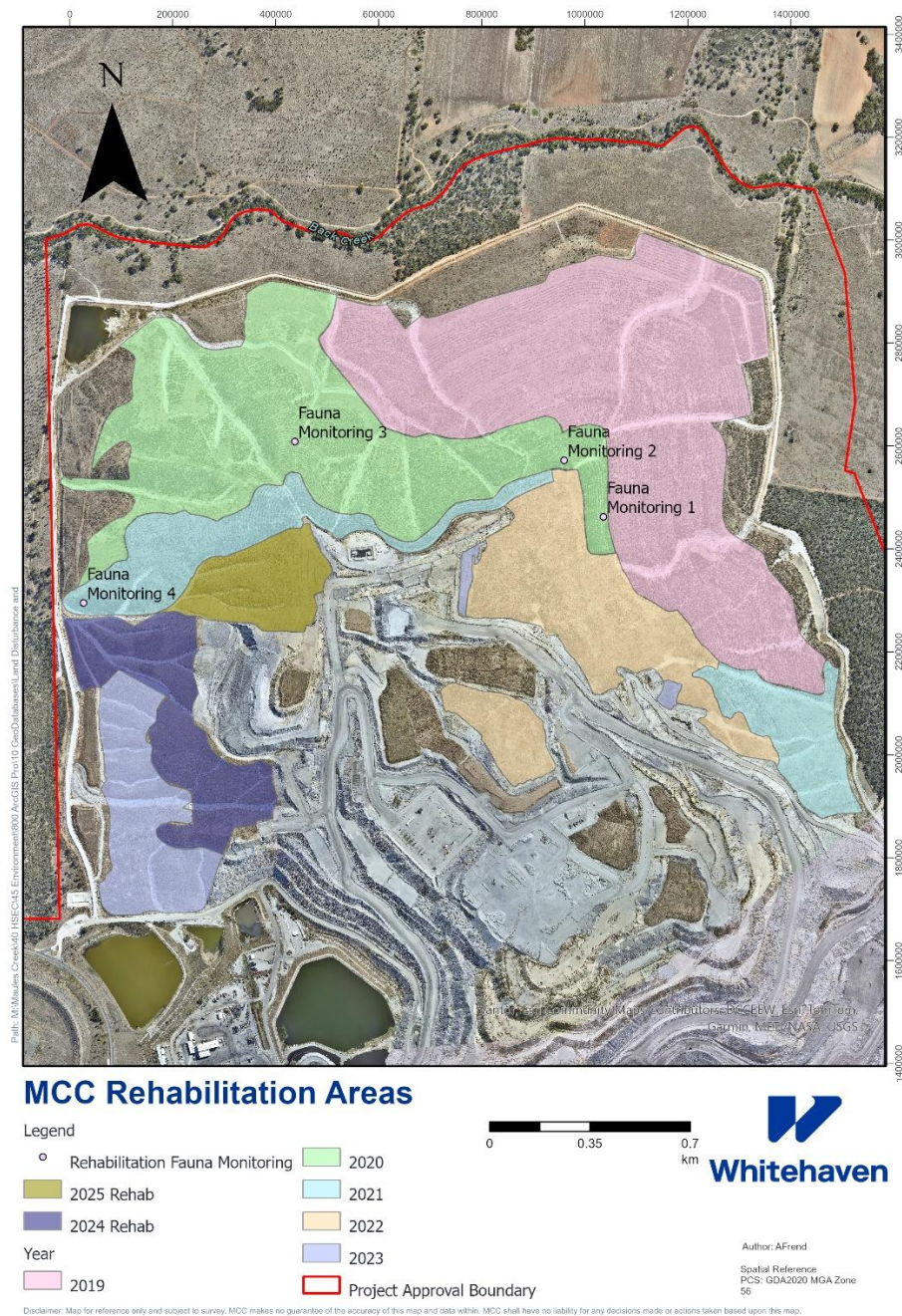


FIGURE 3-1 MAP SHOWING YEARS OF REHABILITATION AND FAUNA MONITORING POINTS

3.1.1 SPRING VEGETATION MONITORING

Rehabilitation monitoring at MCCM occurs in the spring each year. The latest monitoring report available for the rehabilitation at MCCM is from monitoring undertaken 12 to 17 November 2025 (Greenfields Agricultural and Environmental Services 2025). First revegetation occurred in 2019, with further revegetation every year since. All revegetation to date has been to re-establish PCT 1383. The results of the latest monitoring event are shown in Table 3-1, together with the completion and performance criteria for the ecosystem and land use establishment phase relevant to the year of rehabilitation.

The results indicate that only 20 of the 92 (22%) plots achieved the completion criteria metrics. Completion criteria may well have been achieved by more sites if the levels of weed cover had been less than the average of 57% recorded in the plots, with over 75% in eight plots. Weeds compete with native species, and a high level of weed infestation can inhibit the establishment of a native ecosystem, particularly the native ground layer.

Nevertheless, 100% of the plots were above the minimum targets for all attributes for their respective years, and above mean targets for native species richness and ground cover. Mid- and over-storey species recorded included constituent over storey species of White Box-Yellow Box -Blakely's Red Gum Grassy Woodland, including *Eucalyptus melliodora* (Yellow Box) and *Eucalyptus albens* (White Box), the latter of which was recorded in 11 of the 13 plots revegetated before 2022. The presence of these species suggests that the older rehabilitated sites are on a trajectory to the target PCT 1383 community. It is possible that eucalypt seed within the soil seedbank in the younger rehabilitation has not yet germinated, awaiting favourable conditions. However, it is also possible that the presence of a dense weed cover (average 67%) in these plots and grazing as evident from the grey kangaroos and wild goats observed on and around the MCCM would also have contributed to the absence of these species here.

The above finding indicates that the annual monitoring undertaken at the MCCM mine site is effective in determining weaknesses in the revegetation undertaken to date. Section 10 of the Rehabilitation Management Plan provides for Intervention and Adaptive Management to address underperformance of rehabilitation at MCCM. Table 19 includes a Trigger Action Response Plan (TARP) for a suite of rehabilitation risks, including for native species richness, native groundcover (grasses) and exotic plant (weed) cover. Two trigger levels are based on non-achievement of mean or minimum performance criteria for native species richness and native groundcover. For exotic plant cover and pest animal control, trigger levels are provided in Table 19, as described below.

TABLE 3-1 2025 REHABILITATION MONITORING RESULTS, COMPLETION, AND PERFORMANCE CRITERIA (BELOW TARGET IN RED)

Sites	Native Species Richness	Over-storey Cover (%)	Mid-storey Cover (%)	Native Groundcover (%)
Completion Criteria (Mean/Min)	33/28	17/-	2/-	45/-
MR1	15	26	25	20
MR2	17	28	37	13
MR3	13	24	27	16
MR4	17	0	23	18
MR5	24	9	39	22
MR6	23	7	41	31
MR7	23	8	26	34
MR8	27	2	36	54
MR9	16	8	30	43
MR10	12	2	36	16
MR11	27	14	67	66
8MR12	19	6	37	28
MR13	18	4	68	18
MR14	19	0	0	8
MR15	23	0	0	29
MR16	24	0	8	25
MR17	13	0	0	7
MR18	9	0	0	8
MR19	12	0	0	21
MR20	11	0	0	17
MR21	10	0	0	12

Sites	Native Species Richness	Over-storey Cover (%)	Mid-storey Cover (%)	Native Groundcover (%)
MR22	11	0	0	81
MR23	9	0	0	72
Year 6 Criteria (Mean/Min)	5/4	8/0	2/0	12/9
MR1	15	26	25	20
MR2	17	28	37	13
MR3	13	24	27	16
Year 5 Criteria (Mean/Min)	5/3	6/0	1/0	10/8
MR4	17	0	23	18
MR5	24	9	39	22
MR6	23	7	41	31
MR7	23	8	26	34
MR8	27	2	36	54
MR9	16	8	30	43
MR10	12	2	36	16
MR11	27	14	67	66
Year 4 Criteria (Mean/Min)	4/3	5/0	1/0	8/6
MR12	19	6	37	28
MR13	18	4	68	18
Year 3 Criteria (Mean/Min)	3/2	4/0	1/0	6/5
MR14	19	0	0	8
MR15	23	0	0	29
MR16	24	0	8	25
Year 2 Criteria (Mean/Min)	2/1	3/0	1/0	4/3
MR17	13	0	0	7

Sites	Native Species Richness	Over-storey Cover (%)	Mid-storey Cover (%)	Native Groundcover (%)
MR18	9	0	0	8
MR19	12	0	0	21
MR20	11	0	0	17
MR21	10	0	0	12
Year 1 Criteria (Mean/Min)	1/1	1/0	0/0	2/2
MR22	11	0	0	81
MR23	9	0	0	72

As per the monitoring results for 2025, no actions are required for native species richness, as both mean and minimum performance criteria are met. However, as noted above, continued monitoring is required to determine the emergence in the post 2022 plots of over-storey species characteristics of target communities. If these are not forthcoming in the next 1-2 years, re-seeding or tubestock planting is recommended to boost the abundance of these species. The MCCM Environmental Superintendent noted that infill planting in some of these areas had already commenced and will be ongoing into September 2026.

As per 1st level trigger for native groundcover in Table 19 (less than mean target criterion), actions to be undertaken include:

- Review methods used by revegetation contractor; seed or seedling quality, soil quality or weather conditions since time of revegetation to determine if it is the cause of delayed native groundcover (grasses).

The MCCM Environmental Superintendent noted that reseedling is scheduled for the affected area in late August/September 2026. Whereas agricultural fertilizer was used in the past, current soil testing indicates that chicken manure will provide a more appropriate form of soil amelioration in the 2026 rehabilitation areas.

As per 2nd level trigger for exotic plant cover (weeds) (more than 10% of domain area and/or significant weed invasions), actions to be undertaken include:

- Engage weed management contractor to remove introduced weed species. Investigate management measures to improve native plant establishment and weed suppression including additional soil amelioration, establishment and retention of cover crops until weed presence is at acceptable levels; and
- Implement recommendations as appropriate.

The MCCM Environmental Superintendent noted that the high incidence of weeds present is a reflection of the ideal climatic conditions for weed growth in the last year or so. Weed contractors had been engaged, while ongoing weed monitoring and management is undertaken.

Herbivorous pests, including macropods (grey kangaroos, wallaroos) and wild goats may cause damage to seedlings and young plants. While no new pest species have been identified (2nd level trigger), when there is an increase in pest animal presence, the 1st level trigger requires the identification of pest animal issues and review the need for further control measures. As per interview with the Environmental Superintendent, goats are collected on an ongoing basis and sold. The WHC Group Manager Biodiversity noted that it is intended to cull macropods to reduce grazing pressure within BOAs in the near future, which will reduce macropod numbers within the MCCM also.

3.1.2 AUDIT SITE INSPECTION

An inspection was undertaken for this audit, comprising rehabilitated areas of various ages on waste rock emplacements. Conditions encountered were very dry, with below average rainfall at the MCCM in the months leading up to the audit. Some parts of the rehabilitation exhibited die-back likely as a result of the dry conditions (Figure 3-2).

While weeds covered large areas, grazing by macropods was also evident, inhibiting growth of the native groundlayer. Trees and shrubs were, however, in good health, with regeneration of

eucalypts and other native species observed within the 2019 rehabilitation as well as within chutes (Figure 3-3).

Installed wildlife habitat features were noted throughout, including standing stags and on-the-ground coarse woody debris and exposed boulders and rocks (Figure 3-4, Figure 3-5). Motion detection camera monitoring is undertaken at several locations within the rehabilitation to assess pest and native animal levels (Figure 3-1).

No major erosion was observed during the site inspection.



FIGURE 3-2 DIE-BACK IN SOME OF THE REVEGETATION



FIGURE 3-3 REGENERATION OF NATIVE SHRUBS IN CHUTE



FIGURE 3-4 COARSE WOODY DEBRIS WITHIN REHABILITATION



FIGURE 3-5 STAGS PLACED WITHIN RECENT REHABILITATION

3.1.3 RIPARIAN VEGETATION

3.1.3.1 ANNUAL MONITORING

Annual monitoring of six plots along Back Creek has been undertaken to assess vegetation health since 2015 (Ecoplanning 2026b). One site (VS13) with three plots is located upstream and one (VS14) with three plots is located downstream of areas potentially affected by water management at the mine.

All plots met the completion criteria for five attributes monitored (Table 3-2). Data recorded indicate that native overstorey cover has steadily increased at both sites. Trends for native plant species richness, native midstorey cover, native grass cover, and exotic plant cover are less clear, with variations ascribed to climatic variations (Ecoplanning 2026b). No clear difference was visible between the two sites, suggesting that impacts (if any) relating to water management at Maules Creek are insufficiently significant to affect the riparian vegetation at Back Creek.

3.1.3.2 GROUNDWATER DEPENDENCE

Detailed investigations were conducted in October 2023 of the stream and riparian vegetation health assessments at sites along Namoi River, Maules Creek, and Back Creek upstream and downstream of MCCM (Ecological Australia 2023, DPM Envirosiences 2023). The objectives of these surveys were to determine whether activities associated with mining were having an impact on aquatic invertebrate communities and on riparian and ecological health.

Field assessments involved vegetation surveys (Biodiversity Assessment Method - BAM) and assessment of leaf and soil water potential. The results indicated that vegetation on the banks of creeks are likely to be groundwater dependent, whereas those on the floodplain appear to source groundwater intermittently. Of the four tree species commonly encountered within the riparian vegetation, Black tea tree (*Melaleuca bracteata*) was most often associated with groundwater usage, River Red Gum (*Eucalyptus camaldulensis*) less so, and Poplar Box (*E. populnea*) and Yellow Box (*E. melliodora*) least.

The riparian vegetation encountered by the above investigations was disturbed by grazing within the catchment, although the ground layer was considered relatively healthy and dominated by native species along Back Creek. The vegetation appeared to have recovered from a previous drought after some months of rainfall prior to the assessment.

3.1.3.3 AUDIT SITE INSPECTION

As part of the MCCM audit, Back Creek was briefly inspected at monitoring site VS14 (Figure 3-6, Figure 3-7, Figure 3-8). The vegetation was in good health, with low levels of exotic plant infestations. The creek was dry during the inspection.



FIGURE 3-6 MONITORING SITE VS14 AT BACK CREEK (EASTERN END OF TRANSECT)



FIGURE 3-7 BACK CREEK NEAR VS14 LOOKING UPSTREAM



FIGURE 3-8 BACK CREEK NEAR VS14 LOOKING DOWNSTREAM

3.2 BIODIVERSITY OFFSET AREAS

3.2.1 SITE CONDITIONS

As for the mine site, biodiversity monitoring at the MCCM offsets occurs in the spring each year. During the 2025 event, 115 plots in a total of 17 Vegetation Zones (VZ) were monitored across the Maules Creek Biodiversity Offset Area (BOA). Results are presented in Table 3-2. Monitoring at plots located in vegetation zone 10 was discontinued in 2025, as five-year average completion criteria were met in 2024.

Native species richness pass rates decreased slightly between 2024 and 2025, potentially related to successive winters with above rainfall allowing growth of competitive annual exotic species.

Native overstorey and mid-storey pass rates were generally higher in 2025 relative to 2024. Changes may have been related to relocation of some plots prior to the 2025 surveys as well as assessor bias. Ongoing growth of the midstorey of some plots caused these to progress into the overstorey attribute category, thus increasing overstorey and decreasing midstorey values.

Native grass species cover slightly declined in 2025 with many sites also experiencing decline in 2024. Lower native grass cover compared to previous years has also been noted elsewhere and within reference sites, suggesting that climatic conditions may contributed.

All plots at least partially achieved the completion criteria in 2025, with full achievement (all five attributes) recorded at 28 plots, including all plots in VZ 40 and VZ 41. No site achieved less than four of the five attribute completion criteria in VZ 4, VZ 13, VZ 12, and VZ 39.

Criteria were met for the average values of each of the five variables for vegetation zones 5, 6, 12, 40, and 41.

Achievement of completion criteria was most complete for the native grass cover and perennial exotic grass cover attributes. These were achieved by the average values of all VZs (93% and 97% of all plots, respectively), except for VZ 9 where several plots had high perennial exotic plant cover.

The criterion relating to native species richness was achieved by 9 of the 17 VZs (and 65% of all plots), that of native overstorey by 11 VZs (58% of all plots), and that of native mid-storey cover by 10 VZs (56% of plots).

The overall completion criteria pass rate in 2025 for all 115 plots and all five attributes was 74% (423 of the 575 metrics).

Comparing results with annual performance criteria (Appendix J of the Biodiversity Management Plan) indicates that 106/115 plots (92%) achieved the performance target for native species richness metrics were, 83/115 (72%) for native overstorey cover, 71/115 (62%) for native mid-storey cover, 112/115 (97%) for native ground cover, and 110/115 (96%) for perennial exotic plant cover.

The relatively low scores for native overstorey and native mid-storey have not changed significantly since 2024. A TARP is provided in Table 5-12 of the Biodiversity Management Plan for each of the five variables. With respect to the overstorey and the midstorey cover, the TARP prescribes review of factors leading to below benchmark performance and potentially undertake supplementary planting or other additional management. It is recommended that these be enacted.

A BOA inspection was undertaken for this audit through 14 of the 18 MCCM BOAs to confirm documentation sighted. Photographs are presented in the report. Time series photographs showing progress of revegetation samples over time are provided in Figure 3-9 to Figure 3-11.

3.2.2 BIODIVERSITY OFFSET MANAGEMENT ACTIONS

Management intervention is likely to be required to facilitate remaining achievement and ongoing achievement of completion criteria within envisaged timeframes. Table 5.1 of the MCCM Biodiversity Management Plan lists management actions to be undertaken during the implementation of the offset. This list is reproduced in Table 3-3 of this report, together with an assessment of relevant activities undertaken during the audit period.

Given the high rate of achievement of the completion criteria at the MCCM BOA, management actions are appropriate with results trending towards desirable outcomes.

TABLE 3-2 BIODIVERSITY OFFSET AREA AND BACK CREEK VEGETATION MONITORING DATA FOR 2025 (BELOW TARGET IN RED)

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
Maules Creek Biodiversity Offset Area								
1	Floodplain Transition Woodland – DNG/Cleared (PCT 101 / BR189; PCT 244 / BR190)	Criteria=>	25	6-25	0-5	20-30	<20%	
		TEN-1	10	1.5	0.0	68	0.4	60
		TEN-2	12	0.0	0.0	90	0.8	60
		TEN-3	12	15.3	0.0	0	3.0	60
		VEE-4	18	4.0	0.0	20	0.4	60
		VEE-5	16	3.5	0.0	46	5.7	60
		WOL-1	30	17.0	0.0	66	1.5	100
		WOL-2	38	2.8	7.6	50	0.4	80
		Average	19.4	6.3	1.1	48.6	1.7	60
2	New England Dry Sclerophyll Forests – Good (non-BGW)	Criteria=>	33	25-40	6-25	18-20	<20%	
		MTL-1	52	24.5	0.5	40	1.3	60
		MTL-2	53	26.0	2.1	10	0.1	60
		MTL-3	45	32.0	1.1	30	0.3	80
		MTL-4	50	35.5	1.0	26	0.6	80
		MTL-5	52	28.5	0.4	52	2.3	80
		MTL-6	45	32.0	6.4	64	0.1	100
		MTL-7	50	31.5	2.7	58	15.3	80
		Average	49.6	30.0	2.0	40.0	2.9	80
3	North-west Slopes Dry Sclerophyll Woodlands -	Criteria=>	26	6-25	6-25	20-30	<20%	
		ONA-1	19	0	0	34	1.2	40

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
	DNG/Cleared (BBS, non-BGW) PCT 413/ BR346/ NA348	ONA-2	21	0	0	68	0.9	40
		ONA-3	21	0	0	76	0.1	40
		ONA-4	23	0	0	70	0.5	40
		WOL-3	25	7.5	0	56	1.0	60
		WOL-4	12	7.5	0	48	0.4	60
		WOL-5	19	6	0	84	8.7	60
		Average	20.0	3.0	0.0	62.3	1.8	60
4	North-west Slopes Dry Sclerophyll Woodlands – Good (NAN, non-BGW) PCT 1165/NA206, PCT 563/ NA393	Criteria=>	26	6-25	6-25	20-30	<20%	
		MTL-10	36	37.5	1.5	56	0.1	80
		MTL-8	43	37	0.2	20	0.2	80
		MTL-9	49	41.5	0.5	48	15.3	80
		WIR-1	48	13.2	7.2	96	1.1	100
		WIR-2	46	17.9	4.0	58	0.7	80
		WIR-3	56	21.5	2.8	44	0.1	80
		WIR-4	53	24.7	14.0	12	1.0	80
		WIR-5	42	32.5	1.5	58	0.4	80
		Average	46.6	28.2	4.0	49.0	2.4	80
5	Western Slopes Dry Sclerophyll Forests – Good (BBS, Non-BGW) PCT 592/ BR317/ NA316, PCT 581/ BR369/ NA373	Criteria=>	30	25-40	6-25	20-30	<20%	
		KEL-1	32	20.3	3.3	16	3.2	40
		ONA-5	47	44	0	54	0.4	80
		ONA-6	38	27	0	50	0.7	80
		TES-1	54	25	12	64	0.4	100
		TES-2	39	33.5	8	38	0.2	100

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
		TRA-1	44	29.5	12.5	56	0.4	100
		WOL-6	46	17.5	25	46	0.3	80
		Average	42.9	28.1	8.7	46.3	0.8	100
6	Western Slopes Dry Sclerophyll Forests – Good (NAN, non-BGW) PCT 592/ BR317/ NA316	Criteria=>	30	25-40	6-25	20-30	<20%	
		BIM-7	55	34	1	60	0.1	80
		ROS-2	50	23.5	20.5	66	0.2	80
		ROS-3	45	19.5	5.6	68	6.0	60
		ROS-4	54	25.3	10	48	0.6	100
		ROS-5	40	39	1	54	4.5	80
		WIR-6	70	24	8.3	56	0.3	80
		WIR-7	46	18.5	6.7	48	0.3	80
		WIR-8	59	28.5	14.6	60	0.8	100
		Average	52.0	25.5	9.5	57.1	1.8	100
7	North-west Slopes Dry Sclerophyll Woodlands – DNG/Cleared (BBS, Potential BGW) PCT 435/ BR239/ NA397	Criteria=>	26	6-25	6-25	20-30	<20%	
		CAT-1	13	0	0	34	0.0	40
		CAT-2	14	8.2	0	48	0.7	60
		TES-3	10	11	0	28	0.1	60
		VEE-2	17	0.1	0	74	0.5	40
		VEW-1	7	5.2	0	48	0.2	40
		VEW-3	14	5.7	0	46	1.1	40
		WOL-7	18	9	0	62	1.4	60
		Average	13.3	5.6	0.0	48.6	0.6	40
8		Criteria=>	26	6-25	6-25	20-30	<20%	

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
	North-west Slopes Dry Sclerophyll Woodlands - DNG/Cleared (NAN, Potential BGW) PCT 435/ BR239/ NA397	BIM-1	22	19.2	0	46	5.7	80
		BIM-10	26	13.9	2.5	68	2.4	80
		BIM-8	29	5.1	0.4	36	2.5	60
		BIM-9	13	1.5	0	48	0.3	2/5
		ROS-6	26	12.6	0	34	20.9	60
		ROS-7	13	6.9	1.5	28	0.3	60
		Average	21.5	9.9	0.7	43.3	5.4	60
9	New England Grassy Woodlands - DNG/Cleared (NAN, BGW) PCT 510/ NA258, PCT 571/ NA332	Criteria=>	25	6-25	0-5	30-40	<20%	
		MTL-11	37	9.7	1.5	90	0.6	100
		MTL-12	28	0	0	62	0.2	80
		MTL-13	17	0	0	86	36.1	40
		MTL-14	19	0	0	82	2.3	60
		MTL-15	15	10.8	4	14	87.2	40
		WIR-10	14	0.8	0	58	45.5	40
		WIR-9	11	5.5	0	34	5.4	60
		Average	20.1	3.8	0.8	60.9	25.3	40
11	North-west Slopes Dry Sclerophyll Woodlands - DNG/Cleared (NAN, GW) PCT 435/ BR239/ NA397	Criteria=>	26	6-25	6-25	20-30	<20%	
		BIM-2	19	18.5	0	44	0.2	60
		WIR-13	16	2.2	0	74	11.2	40
		WIR-14	29	5.5	0	42	15.1	60
		WIR-15	11	6.7	0	78	48.3	40
		WIR-16	26	0.5	7	82	7.1	80
		WIR-17	18	14.1	0	90	17.3	60

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
		WIR-18	21	2.2	0	82	1.7	40
		Average	20.0	7.1	1.0	70.3	14.4	80
12	North-west Slopes Dry Sclerophyll Woodlands – Good (BBS, BGW) PCT 435/ BR239/ NA397	Criteria=>	26	6-25	6-25	20-30	<20%	
		LOU-1	39	3.9	12.5	32	0.3	80
		LOU-2	38	15.2	11.5	36	0.1	100
		TES-4	52	0	23.4	52	0.4	80
		THO-1	54	12	6	70	0.5	100
		WOL-8	54	22.7	11.5	34	0.3	100
		WOL-9	54	27	3	44	0.4	80
		Average	48.5	13.5	11.3	44.7	0.3	100
13	North-west Slopes Dry Sclerophyll Woodlands – Good (NAN, BGW) PCT 435/ BR239/ NA397, PCT1306/ NA222	Criteria=>	26	6-25	6-25	20-30	<20%	
		BIM-3	45	2.2	10.6	46	4.6	80
		BIM-4	58	11.3	5.1	66	0.6	80
		BIM-5	58	24.5	1.5	64	0.8	80
		BIM-6	57	21.2	5.6	64	0.7	80
		ROS-1	36	30	9.5	70	1.6	100
		TRI-9	45	23.5	0.2	70	1.2	80
		WIR-19	44	22	0.5	70	0.4	80
		WIR-20	46	16.5	1.5	66	5.4	80
		Average	48.6	18.9	4.3	64.5	1.9	80
39	Western Slopes Grassy Woodlands – DNG/Cleared (NAN, BGW)	Criteria=>	23	6-25	0-5	30-40	<20%	
		TRI-1	35	0	0	62	6.3	80
		TRI-2	31	0	0	32	11.9	80

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
	PCT 590/ BR391 BGW). PCT 589/ NA395, PCT 590/ BR391, PCT 599/ NA257	TRI-3	23	0	0	100	0.7	80
		Average	29.7	0.0	0.0	64.7	6.3	80
40	Western Slopes Grassy Woodlands – Good (NAN, BGW) PCT 589/ NA395, PCT 590/ BR391, PCT 599/ NA257	Criteria=>	23	6-25	0-5	30-40	<20%	
		COO-3	46	36	3.2	54	10.2	100
		COO-4	42	32.5	4.7	56	5.3	100
		NER-4	37	23	8.5	46	0.6	100
		NER-5	50	40.5	0	54	0.9	100
		NER-6	51	21.5	5.5	56	0.6	100
		TRI-4	50	20.8	8.6	62	12.8	100
		TRI-5	50	31.5	0	30	5.8	100
		TRI-6	43	22	0.7	76	4.7	100
		Average	46.1	28.5	3.9	54.3	5.1	100
41	New England Grassy Woodlands – Good (NET, BGW) PCT 510/ NA258	Criteria=>	25	6-25	0-5	30-40	<20%	
		LON-1	55	21	2.1	62	1.1	100
		LON-2	38	14.2	0	86	1.2	100
		LON-3	44	9.8	4.1	92	1.3	100
		LON-4	36	19.3	2	62	0.8	100
		LON-5	41	18.5	3.4	80	0.5	100
		LON-6	26	21.5	0	66	9.7	100
		LON-7	49	18.3	0	76	3.7	100
		Average	41.3	17.5	1.7	74.9	2.6	100
42		Criteria=>	20	6-25	0-5	20-30	<20%	

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
	North-west Floodplain Woodlands – DNG/Cleared (BBS, Non-BGW) PCT 55/ BR102	TES-5	19	0.5	0	4	0.4	40
		TES-6	16	5	0	50	0.3	60
		VEW-2	11	13	0	24	0.0	80
		VEW-4	14	0	1	18	0.3	40
		VEW-5	5	0	0	4	0.2	40
		Average	13.0	3.7	0.2	20.0	0.2	60
		43	Western Slopes Grassy Woodlands – DNG/Cleared (NAN, Potential BGW) PCT 590/ BR391	Criteria=>	23	6-25	0-5	30-40
COO-1	20			0	0	70	16.6	60
COO-2	15			0	0	88	0.9	60
NER-1	24			0	0	60	0.1	80
NER-2	31			0	0	78	1.8	80
NER-3	23			0	0	60	0.1	80
TRI-7	27			0	0	40	8.7	80
TRI-8	19			0	0	74	3.0	60
Average	22.7			0.0	0.0	67.1	4.5	60
Back Creek Riparian								
-	Western Slopes Grassy Woodlands (PCT 599/ NA257) - Good	Criteria=>	18-23	6-25	0-5	30-40	<20%	
		VS-13.1	50	22.9	0.3	32.0	0.1	100
		VS-13.2	41	22.5	9.0	50.0	0.2	100
		VS-13.3	41	30.5	4.0	36.0	1.5	100
-	Floodplain Transition Woodlands (PCT 101/ BR189) - Good	Criteria=>	20	6-25	0-5	20-30	<20%	
		VS-14.1	29	19.0	0.0	30.0	0.1	100
			30	23.0	0.5	64.0	0.3	100

Veg Zone ID	Vegetation Zone / PCT	Plot ID	Native Plant Species (No.)	Native Over-storey Cover (%)	Native Mid-storey Cover (%)	Native Ground-cover Grass Cover (%)	Perennial Exotic Plant Cover (%)	Proportion of Criteria Met (%)
			24	21.0	18.0	48.0	1.0	100



FIGURE 3-9 WIRRADALE PLATEAU REVEGETATION DEVELOPMENT 2018 (LEFT) TO 2026 (RIGHT)



FIGURE 3-10 WOLLONDILLY REVEGETATION DEVELOPMENT 2019 (LEFT), 2023 (MIDDLE), 2026 (RIGHT)



FIGURE 3-11 BIMBOORIA REVEGETATION DEVELOPMENT 2023 (LEFT) AND 2026 (RIGHT)

TABLE 3-3 IMPLEMENTATION ACTIONS

Management Action	Implementation Assessment
Seed Management	Sighted BioBankSeed Seed Collection Summary (years 2023, 2024, 2025), showing seed collected at the MCCM BOAs. Seed are collected from a number of WHC Offset Properties in the vicinity of the MCCM BOAs.
Revegetation Management	- As per the Biodiversity Management Plan, active revegetation (direct seeding and/or seedling planting) is undertaken to restore self-sustaining woodland within existing areas of Box-Gum Woodland CEEC and derived native grassland. Additionally, the restoration of self-sustaining woodland and/or forest including derived native grasslands and 'non-native' areas will provide a significant area of additional habitat for the Regent Honeyeater, Swift Parrot, Corben's Long-eared Bat and <i>Tylophora linearis</i>. - Revegetation has been undertaken at various MCCM BOAs, commencing in 2016 and largely completed prior to the current audit period. A total of over 3,000 ha has been planted to date. - Annual spring surveys are undertaken to monitor the progress of the revegetation towards the target PCT. The most recent monitoring results are presented in Table 3-2.
Ecological Thinning	- Not triggered. The Stage 2 Leard Forest Regional Biodiversity Strategy (Umwelt 2017) considered adaptive management such as ecological thinning for Box Gum Woodland restoration. However, the Stage 1 Ecological Thinning Assessment (AMBS 2020) concluded that there was no evidence of direct impacts from <i>Callitris</i> sp. regrowth to native plant species richness or density within remnant Box Gum Woodland vegetation communities. The Stage 2 Ecological Thinning Assessment (AMBS 2022) concluded that no areas supported inappropriate <i>Callitris</i> regrowth therefore ecological thinning management could not be justified at this point in time. - The Stage 3 Ecological Thinning Assessment (AMBS 2024) did not find any substantive change between <i>Callitris</i> regrowth and biodiversity values, supporting the conclusion that ecological thinning is not required, though the assessment should be repeated in 5 years' time to re-evaluate the potential correlation between cover and diversity of <i>Callitris</i> in Box Gum Woodland over time.
Habitat Augmentation	- Sighted installed salvaged habitat resources during site inspection undertaken for this audit, including rock boulders and large woody debris, both on ground and standing as stags. - As per the 2025 Maules Creek Offset Cohort Annual Audit Report produced for the Conservation Agreement 2025 reporting, a total of 952 nest boxes have been installed on the MCCM BOAs, including 154 nest boxes installed over 2025. AMBS Ecology and Heritage (2026) provides a report on nest box installation and performance: Rate of use is used to evaluate the efficacy of the nest box program. Rate of use is defined as any nest box with signs that native fauna had utilised the box divided by the number of boxes checked. Use of nest boxes remained patchy throughout the offset properties and trends varied by property. - Declining trends observed at Mt Lindesay most likely reflect that a larger proportion of nest boxes monitored at this property were deployed in Augmentation treatment sites. Such placements are designed to provide roosting resources as revegetation develops and as such, are hypothesised to have low rates of use until revegetation matures. Kelso nest box occupancy rates have decreased

Management Action	Implementation Assessment
	significantly as a large area of Control treatment boxes, all of which had high occupancy in 2024, were not able to be inspected this 2025 monitoring season due to adverse weather conditions. The results at the remaining properties are steady. No properties exceeded the target rate of use defined in the RBS. As per AMBS Ecology and Heritage (2023), the 80% criterion appears unrealistic, as nest box installation targets revegetation sites in which fauna populations are less numerous than in remnant habitat, particularly compared to more coastal sites.
Heritage Management	- As per the 2024 Annual Review, a total of 227 archeological heritage sites occur within the MCCM BOAs. Annual heritage inspections were completed (Aboriginal archaeological) sites within the MCCM BOA (Whincop Archaeology 2023, 2024, 2025). Heritage sites are maintained with demarcation fencing around the heritage site perimeter and signage to mitigate access and inadvertent disturbance. During the 2025 inspection, it was noted that fence maintenance is required at some sites, mostly due to damage by wildlife and some from natural erosion. - As reported in the 2025 Annual Review, the Aboriginal Heritage Conservation Strategy (AHCS) was approved by the Department in November 2017 in accordance with PA 10_0138 Schedule 3 Condition 57 outlining an approach for conserving regional Aboriginal heritage values within the Boggabri-Tarrawonga-Maules Creek mines and associated BOAs including assessing Cultural Values. The initial Cultural Values Surveys was acknowledged by the Department on 29 June 2020 as fulfilling a number of commitments of the AHCS including endorsement by Registered Aboriginal Participants involved in the survey. Following other Biodiversity Offset Strategy revision and Conservation Agreement registration in 2024 within the Boggabri-Tarrawonga-Maules Creek mines, the Cultural Values Surveys were completed and a final Cultural Values Report was consulted with the Registered Aboriginal Participants and acknowledged by the Department on 1 September 2025 as satisfying several keys commitments of the AHCS. The Department accepted that WHC will now supersede the previous AHCS to formally document the implementation and completion of all AHCS actions and commitments including an 'On-Country' event with access and educational opportunities (email from WHC Group Manager Biodiversity 14 May 2026) (Figure 3-12).
Weed Management	- Sighted Ecoplanning Annual Spring Flora Monitoring Summaries for the years 2023, 2024, 2025 showing exotic plant cover at each monitoring site through the years. - Sighted Ecoplanning Seasonal Weed Assessment Reports from Q3 2023 to Summer 2025/2026, showing detail of weed surveys for individual monitoring events. - Sighted Annual Biodiversity Summary Reports (WSP 2023, 2024) containing information on weed and pest records and issues. These reports are prepared for and shared between WHC and Idemitsu Mines as part of the BTM (Andrew Wright pers.comm.). Sighted sample of monthly minutes (18/12/2025, 29/01/2026, 26/02/2026) showing evidence of weed and pest information discussed at BTM Mine Environmental personnel meetings. - Sighted dead Prickly Pear (<i>Opuntia</i> spp.) resulting from weed management (spray) during inspection undertaken for this audit.

Management Action	Implementation Assessment
Pest Animal Management	- Sighted Quarterly Pest Animal Monitoring Reports (AMBS 2023-2026) and Pest Animal Reports (Stewart Surveys January – December 2025) showing pest animal actions taken and incidence of pest species recorded. - Section 4.2 of the latest quarterly report (FY2026 Q1) notes that the records indicate overall declining trend for most pest species, though with occasional short-term increase in abundance or activity levels likely related to seasonal and stochastic events beyond management control. At the MCCM BOAs, no pest species was increasing, with foxes, goats and pigs decreasing, and cats, deer, and rabbit steady. - Goat and pig trapping devices were observed during the site inspection undertaken for this audit (Figure 3-13). - Numerous pest animals were observed during the inspection undertaken for this audit, including goats, pigs and large groups of grey kangaroos. Pig numbers are expected to decrease during ongoing dry conditions. Goats are caught on an ongoing basis and sold. It is intended to cull grey kangaroo to reduce grazing pressure within its BOAs in the near future (A.Wright pers. comm.) - As per Section 5.9 of the Biodiversity Management Plan, control measures are implemented by mine staff or by an appropriate Pest Control Contractor(s). All personnel involved in pest animal control will be required to hold relevant and valid licences/permits, including any relevant chemical licences for pesticide use or a firearms licence for shooting. Pest animal control will be undertaken in consideration of the control recommendations outlined in the Ecology and Management of Vertebrate Pests in NSW (DPI, 2018b). Additional control methods targeting specific pest animals are listed in Table 5-8, including prescriptions published by government agencies and academic institutions.
Noisy miner control	Sighted letter report from AMBS (2025) on Noisy Miner Monitoring and Control. Noisy Miner populations at the MCCM BOA's Long Gully, Neranghi North, Coonoor, Triangle and Thornfield have been monitored by WHC to assess detrimental effects of this species on other native bird species (notably target species Regent Honeyeaters and Swift Parrots) when reaching population densities of 0.44-0.83 per hectare. This level was reached at Thornfield/Wollandilly, Triangle, and Long Gully BOAs during 2024 monitoring, and control was undertaken in 2025 after consultation with the BCT and the National Parks and Wildlife Service. Post control monitoring indicate reduced numbers, though densities were calculated as being still above the target threshold. Follow-up control is likely to be required in 2026 to reduce numbers below target and to maximise the chance of achieving longer lasting improvements in ecosystem function.
Erosion and Soil Management	- Sighted Minesoils (2024 to 2026) WHC Biodiversity Track Erosion Inspection for years 2023, 2024, and 2025. A number of issues for action were reported. Tracks sighted during site inspection undertaken for this audit appeared in good order and easily trafficable, without signs of major erosion, and, in places, exhibiting evidence of recent repair work. - An eroded spillway at a dam at Wirradale was repaired over the audit period involving significant earthworks as shown in Figure 3-14
Agriculture Management	N/A

Management Action	Implementation Assessment
Access and infrastructure management	Sighted Minesoils (2024 to 2026) WHC Biodiversity Track Erosion Inspection for years 2023, 2024, and 2025. A number of issues for action were reported. Tracks sighted during site inspection undertaken for this audit appeared in good order and easily trafficable, without signs of major erosion, and, in places, exhibiting evidence of recent repair work.
Inspection of fire breaks and access trails	Sighted Minesoils (2024 to 2026) WHC Biodiversity Track Erosion Inspection for years 2023, 2024, and 2025. A number of issues for action were reported. Tracks sighted during site inspection undertaken for this audit appeared in good order and easily trafficable, without signs of major erosion, and, in places, exhibiting evidence of recent repair work.
Maintenance of fire breaks and access trails	Access trails and fire breaks observed during field inspection undertaken for this audit were in good condition. Active track maintenance was observed during the audit inspection (Figure 3-15). Access to the Triangle BOA by a grader has been impeded from time to time when the Manilla River is in flood during wet weather (A.Wright pers.comm.). Fire danger would typically not be high during such times.
Fuel load monitoring	Sighted annual Assessment of Fuel Loads and Fuel Characteristics (LRM Fire and Rescue 2023, 2024, 2025) showing monitored fuel loads, a risk assessment, and recommendations for fuel management. In the most recent 2025 assessment, the overall trend between 2019 and 2025 fuel loads showed that overall bushland and grass fuel load generally had varied until 2021 whereafter almost all offsets have had an increase in fuels.
Controlled (Ecological) burns	Sighted annual Assessment of Fuel Loads and Fuel Characteristics (LRM Fire and Rescue 2023, 2024, 2025) showing monitored fuel loads, a risk assessment, and recommendations for fuel management. The 2025 assessment recommended management of fuel loads at Mt Lindesay and Wirradale woodland areas given their proximity to the Mt Kaputar National Park. Evidence of the April 2026 fuel reduction burn at Wirradale was observed during the inspection for this audit (Figure 3-16).
Management of <i>Tylophora linearis</i>	Sighted Ecoplanning (2024, 2025) <i>Tylophora linearis</i> Restoration and Translocation Strategy Annual Reports. As noted in the most recent report, <i>T. linearis</i> continues to occur within multiple enclosures across the WHC BOAs, indicating healthy populations, with a high number of stems observed, including flowers and at least 20 mature follicles. <i>T.linearis</i> was salvaged from the mine site and translocated to BOAs in 2024 (Figure 3-17). Twenty stems were translocated to the Teston South BOA, of which 19 were observed to be growing after translocation. Of the 23 seeds collected in 2024, 11 germinated and three plants remained alive for translocation. Little is known about the reproductive ecology of this species and further investigations into the relationship of follicle production to weather patterns and response to ecological burns was recommended.
Management of <i>Pomaderris queenslandica</i>	Sighted Ecoplanning (2024, 2025) <i>Pomaderris queenslandica</i> Restoration and Translocation Program Annual Reports. As per the most recent Annual Report, 593 translocated <i>P.queenslandica</i> survived to the end of 2024.

Management Action	Implementation Assessment
	Findings of the program indicate that older translocated plants have become resilient to dry conditions. Continued propagation of seed held in storage should be undertaken to augment the current translocated populations of this species in order to minimise reduced genetic and demographic outcomes associated with small populations.
Flora Monitoring	Sighted Ecoplanning (years 2023, 2024, 2025) reporting on monitoring consistent with BBAM. Results are provided in Section 3.2.1 of this report.
Fauna Monitoring	Sighted Fauna Monitoring of the Whitehaven Coal Biodiversity Offset Properties – July 2023 to June 2025 AMBS (2025). According to Table 4.4, 80% nest box occupancy has been achieved for micro-bats, but not for birds and reptiles. Offset properties are showing changes in species composition that reflect improving habitat value for woodland fauna species. TARP measures have been undertaken to remediate.
Monitoring for Regent Honeyeater and Swift Parrot	- Sighted Ecoplanning Winter Bird Survey Reports (2023-2025) for both Swift Parrot and Regent Honeyeater. The surveys covered an area of 30,489ha in 2025. The Commonwealth Department of Agriculture, Water and Environment (DAWE) was consulted to finalise survey methods. - While the 111 bird species recorded in 2025 was higher compared to the previous four surveys (2021 to 2024) no Swift Parrot or Regent Honeyeater were detected.
Monitoring for Corben's Long-eared Bat	Sighted Fauna Monitoring of the Whitehaven Coal Biodiversity Offset Properties – July 2023 to June 2025 (AMBS 2025), describing results of general fauna surveys, including microbats and Corben's Long-eared Bat. Capture rates for this species at MCCM have varied, but had increased across the long-term trend. It was recorded for the first time in a revegetated paddock at Bimbooria. As noted by AMBS (2025), "this species is known for gleaning invertebrates around the canopies of trees and shrubs (as opposed to active hunting above canopy). Its presence within the revegetation supports the conclusion that a wider range of microbat foraging guilds are utilising the revegetated Box Gum Woodland. Species richness values in revegetated Box Gum Woodland sites continue to trend towards expected values for the habitat type in the region".



FIGURE 3-12 NEWLY INSTALLED CULTURAL PRECINCT NEXT TO ONAVALLE GRINDING GROOVES SITE GG1



FIGURE 3-13 PIG BAITING STATION



FIGURE 3-14 WIRRADALE DAME SPILLWAY EROSION REMEDIATION



FIGURE 3-15 TRACK MAINTENANCE



FIGURE 3-16 EVIDENCE OF APRIL 2026 ECOLOGICAL BURN WIRRADALE



FIGURE 3-17 *TYLOPHORA LINEARIS* ENCLOSURE

4. CONCLUSION

A summary of the audit results including relevant recommendations is provided in Table 4-1.

In addition, it is suggested that the following document be updated:

- Biodiversity Management Plan (2025): The Integrated Monitoring Strategy (Ecoplanning 2024) was used in the preparation of the Biodiversity Management Plan, as noted in Section 5.17.1 of this Plan. The Integrated Monitoring Strategy contains some changes to Keith class (for PCT 101 & PCT 55), target PCT updated mapping (revegetation targets) and BGW mapping relative to the draft and, hence, the Biodiversity Management Plan, which is yet to be updated with these changes.

TABLE 4-1 RESULTS SUMMARY

Criterion CoA 56	Results
a) include consultation with BCS, North West LLS, DPIE water, DCCEEW, CCC and Resources Regulator	Consultation has been undertaken, with several responses received (Appendix C).
b) assess the performance of the revegetation in the rehabilitation area completed to date against the completion criteria in the Rehabilitation Management Plan	At the MCCM mine site rehabilitation, a total of 22% of the vegetation metrics monitored represented achievement of the completion criteria. However, given the relatively young age of this rehabilitation, comparison with the performance criteria for the respective age of the rehabilitation is more appropriate to assess consistency with the trajectory towards the target community. Monitoring results indicate that 100% of the vegetation metrics were at or above the minimum performance criteria. No actions are required for native species richness, as both mean and minimum performance criteria are met. However, as noted above, continued monitoring is required to determine the emergence in the post 2022 plots of over-storey species characteristics of target communities. If these are not forthcoming in the next 1-2 years, re-seeding or tubestock planting is recommended to boost the abundance of these species. Growth of such species would also enhance overstorey and mid-storey cover. Monitoring at the Back Creek indicates no clear difference between the upstream and downstream monitoring site, suggesting that impacts (if any) relating to water management at Maules Creek are insufficiently significant to affect the riparian vegetation at Back Creek.
c) assess the performance of management and restoration in the off-site Biodiversity Offset Strategy areas completed to date against the completion criteria in the Biodiversity Management Plan	Completion criteria were achieved for 74% of the vegetation metrics monitored within the MCCM BOAs. Performance criteria for the respective ages of the vegetation monitored were achieved in 92% of the metrics assessed. The relatively low scores for native overstorey and native mid-storey have not changed significantly since 2024. A TARP is provided in Table 5-12 of the Biodiversity Management Plan for each of the five variables. With respect to the overstorey and the midstorey cover, the TARP prescribes review of factors leading to below benchmark performance and potentially undertake supplementary planting or other additional management. It is recommended that these be enacted.
d) identify any measures that should be implemented to improve the performance of rehabilitation, management and restoration within the rehabilitation and biodiversity offset areas	Management measures in the Rehabilitation Management Plan and the Biodiversity Management Plan are effective in improving rehabilitation outcomes. The following additional measures are as recommended above, including: Mine site:

Criterion CoA 56	Results
	- Re-seed or plant tubestock of target canopy species at the more recent rehabilitation sites if such species do not emerge within 1-2 years. Ensure topsoil stockpiles remain free of weeds and/or only harvest topsoil in areas that are relatively free of weeds, ideally for direct placement - Consider a trial to revegetate without or with reduced application of manure or fertilizer to discourage the incidence of weeds - Consider a trial to delay the planting of tubestock until rehabilitation area is (largely) weed free. Planting tubestock within weed infested areas subjects tubestock to competition from weeds and limits weed control options Biodiversity Offset Areas: - Continue planning and implement supplementary planting in vegetation zones where the overstorey and midstorey cover monitoring results are below the performance targets, as recommended by Ecoplanning (2026). These include vegetation zones 3, 7, 9, 39, 42, 43 for overstorey cover, and vegetation zones 2, 3, 4, 7, 8, 11, 13 for mid-storey cover.
f) if the completion criteria have not been met, or are not adequately trending towards being met, determine the likely ecological value of the rehabilitation and restoration once completed, and recommend additional measures to augment the Biodiversity Offset Strategy to ensure that it adequately offsets the project's impacts on biodiversity	Revegetation is progressing adequately towards the completion criteria with the measures as outlined above. No additional measures are required to augment the Biodiversity Offset Strategy to ensure that it adequately offsets the project's impact on biodiversity.

5. REFERENCES

AMBS Ecology and Heritage (2020) Whitehaven Vegetation Thinning Requirements, Strategy, and Program Stage 1. Prepared by AMBS Ecology and Heritage Pty Ltd for Whitehaven Coal.

AMBS Ecology and Heritage (2022) Whitehaven Vegetation Thinning Stage 2 Final Report. Prepared by AMBS Ecology and Heritage Pty Ltd for Whitehaven Coal.

AMBS Ecology and Heritage (2023) WHC Biodiversity Habitat Augmentation Project: Implementation and Monitoring August 2022 to July 2023. Prepared by AMBS Ecology & Heritage for Whitehaven Coal.

AMBS Ecology and Heritage (2024) Whitehaven Vegetation Thinning Program Stage 3 Review & Assessment. Prepared by AMBS Ecology & Heritage for Whitehaven Coal.

AMBS Ecology and Heritage (2025) Noisy Miner (*Manorina melanocephala*) Control and Monitoring 2025.

AMBS Ecology and Heritage (2025) Fauna Monitoring of the Whitehaven Coal Biodiversity Offset Properties – July 2023 to June 2025

AMBS Ecology & Heritage (2023-2026) Quarterly Pest Animal Monitoring Report – FY2023 Q1 to FY2026 Q2. Prepared for Whitehaven Coal.

Ecoplaning (2023-2026) Seasonal Weed Assessment Reports 2023-2025

Ecoplaning (2026) Annual Spring Flora Monitoring 2026. Whitehaven Coal, Biodiversity Offset Areas. Prepared for Whitehaven Coal.

Ecoplaning (2023-2025) Winter Bird Survey Report.

Ecoplaning (2024, 2025) Pomaderris queenslandica Restoration and Translocation Program Annual Reports

Ecoplaning (2024, 2025) Tylophora linearis Restoration and Translocation Strategy Annual Reports.

Ecoplaning (2026) Annual Revegetation Assessment (FY 2026)

LRM Fire and Rescue (2023 – 2025) Assessment of Fuel Loads and Fuel Characteristics for Whitehaven Coal Biodiversity Offset Areas.

Minesoils (2024 – 2026) WHC Biodiversity Track Erosion Inspection Annual Update. Prepared for Whitehaven Coal.

Stewart Surveys (2023-2025) Pest Animal Sightings & Control – 1080 Baiting, Hoggone Baiting, Sodium Nitrate Baiting, Pig Trapping & Goat Harvesting (monthly reports). Prepared for Whitehaven Coal.

Stringybark Ecological Pty Ltd (2023-2025) Seed Assessments for Whitehaven Coal.

Umwelt (2017) Leard Forest Biodiversity Strategy Stage 2

Whincop Archaeology (2023-2025) Biodiversity Offset Areas Aboriginal Cultural Heritage Sites Inspections (annual reports). Prepared for Whitehaven Coal.

Whincop Archaeology (2023-2025) Biodiversity Offset Areas Historic Heritage Sites Inspections (annual reports). Prepared for Whitehaven Coal.

Whincop Archaeology (2025) Aboriginal Cultural Heritage Sites Inspection of Barraba Offsets. Prepared for Whitehaven Coal.



APPENDIX A APPROVAL OF AUDIT TEAM

Department of Planning, Housing and Infrastructure



Reference: MP10_0138-PA-149

Andrew Wright
Group Manager Biodiversity
Whitehaven Coal Limited
25/03/2026

Sent via the Major Projects Portal only

Subject: Auditor endorsement – 2026 Biodiversity Audit - Maules Creek Coal Mine and Tarrawonga Coal Mine

Dear Mr Wright

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the Independent Biodiversity Audits of the Maules Creek Coal Mine and Tarrawonga Coal Mine, submitted as required by Schedule 3, Condition 56 of MP10_0138 as modified (the Maules Creek consent) and Schedule 3, Condition 50 of MP11_0047, as modified (the Tarrawonga consent) to NSW Department of Planning, Housing and Infrastructure (the Department) on 25 March 2026.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

In accordance with Schedule 3, Condition 56 of the Maules Creek consent and Schedule 3, Condition 50 of the Tarrawonga consent, and the Department's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Toivo Zoete – Lead Auditor
- Heather McKay – Auditor / Project Manager

For your reference, the Technical Reviewer is not required to be endorsed by the Planning Secretary.

Please note:

- This correspondence must be appended to the Independent Biodiversity Audit report/s.
- The Independent Biodiversity Audit must be prepared, undertaken, and finalised in accordance with the conditions of consents and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the 2026 Independent Biodiversity Audits only. Additional approval must be sought from the Planning Secretary for other independent audits of the developments.

Department of Planning, Housing and Infrastructure



- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact me on 02 65753401 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader - Hunter
Compliance

As nominee of the Planning Secretary



APPENDIX B DECLARATION OF INDEPENDENCE

6. Appendices

Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor	
Project Name	Maules Creek Coal Project
Consent Number	PA10_0138
Description of Project	Maules Creek Mine
Project Address	TERRIBRI ROAD, BOGGABRI, NSW, 2382
Proponent	Aston Coal 2 Pty Limited
Date	02/03/2026

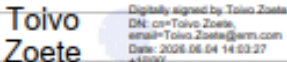
I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

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

Name of Proposed Auditor	Toivo Zoete
Signature	 Toivo Zoete
Qualification	BSc Hons, MAppSI, PhD
Company	Environmental Resources Management Australia Pty Ltd



APPENDIX C CONSULTATION RESPONSES

Re: Independent Biodiversity Audit Tarrawonga/Maules Ck



Maules Creek Coal CCC <maulescreekcoalccc@gmail.com>
To Toivo Zoete

Reply Reply All Forward

Wed 20/05/2026 1:50 PM

You replied to this message on 20/05/2026 1:51 PM.
If there are problems with how this message is displayed, click here to view it in a web browser.

EXTERNAL MESSAGE

Afternoon Toivo,

Apologies for not advising you earlier - however for the record, I did not receive any comments or submissions from either the Tarrawonga Coal or Maules Creek Coal CCCs in respect of the Independent Biodiversity Audit.

Regards,

Michael J Silver OAM

Independent Chair
Maules Creek Coal Community Consultative Committee
P.O. Box 37
Gunnedah NSW 2380

M: 0427723747
E: maulescreekcoalccc@gmail.com

NSW DCCEEW Water : Independent Biodiversity Audit Tarrawonga and Maules Creek Mines



Tim Baker <tim.baker@dcceew.nsw.gov.au>

To Toivo Zoete

Cc DCCEEW Water Assessments Mailbox

Reply

Reply All

Forward



Tue 7/04/2026 4:14 PM

You forwarded this message on 7/04/2026 4:16 PM.



ERM Audit Terms of Reference - Biodiversity Audit Tarrawonga Maules Creek Mine.pdf
.pdf File

You don't often get email from tim.baker@dcceew.nsw.gov.au. [Learn why this is important](#)

EXTERNAL MESSAGE

Hi Toivo,

Thanks for advising of the upcoming biodiversity audit at Maules Creek and Tarrawonga Mines. NSW DCCEEW Water would be interested in the audits review of the biodiversity status of riparian vegetation and groundwater dependent ecosystems and any links to hydrological changes. Further opportunity to comment would be appreciated on completion of the audit.

Regards

Tim

Tim Baker

Senior Project Officer, Water Assessments

Planning and Knowledge Division

[Department of Climate Change, Energy, the Environment and Water](#)

RE: Independent Biodiversity Audit Tarrawonga and Maules Creek Mines



Liz Mazzer <Liz.Mazzer@dceew.nsw.gov.au>

To Toivo Zoete

Cc Andrew Wright; OEH ROGHD ROG North West Mailbox

Reply

Reply All

Forward

Mon 20/04/2026 1:05 PM

General\General - Anyone (unrestricted)

EXTERNAL MESSAGE

Hi Toivo

Thank-you for giving the Conservation Planning and Assessment Branch (CPA) an opportunity to provide input to the biodiversity audit for Tarrawonga and Maules Creek Mines.

We note that the Terms of Reference are focussed on reviewing progress of the rehabilitation and offset areas towards completion criteria. CPA considers that this approach is satisfactory, and we have no further comments or concerns at this stage.

Regards

Liz

Liz Mazzer

Senior Conservation Planning Officer

Regional Conservation - North

Conservation Planning and Assessment

Conservation Planning and Offsets

NSW Department of Climate Change, Energy, the Environment and Water

T 02 6883 5325 E liz.mazzer@dceew.nsw.gov.au

48 Wingewarra St Dubbo NSW 2830

PO Box 2111 Dubbo NSW 2830

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AREQ0073694 | Tarrawonga Coal Mine | Enquiry (external) | Other Enquiry | 02 Apr 2026 12:50:19



info@sys.resources.nsw.gov.au
To Toivo Zoete

Reply

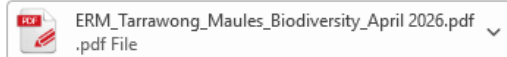
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EXTERNAL MESSAGE

Dear Mr Zoete,

Please find attached the Regulator's response to your request for consultation on the independent biodiversity audits to be undertaken of the Tarrawonga and Maules Creek Coal Mines.

Regards,

Jenny Ehmsen
Principal Compliance Auditor
MAI - Enforcement | Resources Regulator
T 02 4931 6420 M 0438 735 010



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The Department of Primary Industries and Regional Development acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for Elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.



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Ref:MSG1947853_NnemnYPTYg8wlOOn0F56

24 April 2026

Mr Toivo Zoete
ERM. Pty Ltd
By email: Toivo.Zoete@erm.com

Re: Tarrawonga/Maules Creek – Independent Biodiversity Audit

Dear Mr Zoete,

Thank you for your email dated 2 April 2026 (our reference: AREQ0073694) requesting consultation on the independent biodiversity audits to be undertaken of the Tarrawonga and Maules Creek Coal Mines.

The audit should note observations where rehabilitation procedures, practices and outcomes represent best industry practice from a biodiversity management perspective. It would be appreciated if a copy of the final audit report could be sent to the Regulator at info@sys.resources.nsw.gov.au upon completion of the audit.

Sincerely

Jenny Ehmsen
Principal Compliance Auditor
NSW Resources Regulator



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Item No	Assessment Requirement	Comment	MCC Response and Status
Sch.3-56 (b)	Assess the performance of the revegetation in the rehabilitation area completed to date against the completion criteria in the Rehabilitation Management Plan	At the MCCM mine site rehabilitation, a total of 22% of the vegetation metrics monitored represented achievement of completion criteria. However, given the relatively young age of this rehabilitation, comparison with the performance criteria for the respective age of the rehabilitation is more appropriate to the assess consistency with the trajectory towards the target community. Monitoring results indicate that 100% of the vegetation metrics were at or above the minimum performance criteria. No actions are required for native species richness, as both mean and minimum performance criteria are met. However as noted above the continued monitoring is required to determine the emergence in the post 2022 plots of over storey species characteristics of target communities. If these are not forth coming in the next 1-2 years, re seeding or tubestock planting is recommended to boost the abundance of these species.	Approximately 10,000 trees were planted across rehabilitation areas in June 2026 to supplement overstorey establishment. Additional reseeded of rehabilitation areas is scheduled for Q4 2026 in conjunction with the 2026 rehabilitation commitments. Monitoring will continue to assess establishment and rehabilitation trajectory against the age-based performance criteria and ultimate completion criteria. Status: Ongoing
Sch.3-56 (d)	Identify any measures that should be implemented to improve the performance of rehabilitation, management and restoration within the rehabilitation and biodiversity offset areas	Management measures in the Rehabilitation Management Plan and the Biodiversity Management Plan are effective in improving rehabilitation outcomes, The following additional measures are as recommended above including: Mine Site: Re seed or plant tubestock to target canopy species at the more recent rehabilitation sites if such species do not emerge within 1 – 2 years. Ensure topsoil stockpiles remain free of weeds and or only harvest topsoil in areas that are relatively free of weed, ideally for direct placement. Consider a trial to revegetate without or with reduced application of manure or fertilizer to discourage the incidence of weeds	Approximately 10,000 trees were planted across rehabilitation areas in June 2026 to supplement overstorey establishment. Additional reseeded of rehabilitation areas is scheduled to be undertaken in Q4 2026 in conjunction with the 2026 rehabilitation commitments. Chicken manure was applied at a reduced rate of approximately 10 m³/ha within the 2026 rehabilitation areas. These areas will be monitored to assess weed emergence and rehabilitation performance compared with previous rehabilitation areas and to inform future manure and fertiliser application rates. Tubestock establishment and weed competition will continue to be monitored to inform the timing of future supplementary planting. Status: Ongoing

Item No	Assessment Requirement	Comment	MCC Response and Status
		Consider a trial to delay the planting of tubestock until rehabilitation area is (largely) weed free. Planting tubestock within weed infested areas subjects tubestock to competition from weeds and limits weed control options.	
Sch.3-56 (d)		Biodiversity Offset Areas: Continue planning and implement supplementary planting in vegetation zones where the overstorey and midstorey cover monitoring results are below the performance targets. These include vegetation zones 3, 7, 9, 39, 42, 43 for overstorey cover, and vegetation zones 2, 3, 4, 7, 8, 11, 13 for mid-storey cover.	Progressing maintenance revegetation actions to address vegetation zones identified through the 2025 TARP assessment as being below overstorey and/or midstorey performance targets. Following the FY26 Annual Revegetation Assessment, species selection and planting requirements were determined for priority revegetation areas. Seedling orders were placed with specialist nursery suppliers in December 2025 and February 2026 for approximately 73,000 overstorey and midstorey seedlings. Priority was given to larger revegetation paddocks and species with demonstrated nursery propagation success. Supplementary and maintenance planting will be undertaken progressively as seedlings become available from the nursery to address the identified TARP actions and improve vegetation performance against target thresholds. Status: Ongoing
General	Conclusion	Biodiversity Management Plan (2025): The Integrated Monitoring Strategy (Ecoplanning 2024) was used in the preparation of the Biodiversity Management Plan, as noted in Section 5.17.1 of this Plan. The Integrated Monitoring Strategy contains some changes to Keith class (for PCT 101 & PCT 55), target PCT updated mapping (revegetation targets) and BGW mapping relative to the draft and, hence,	A standalone MCC Offset Management Plan is currently being prepared to incorporate the recommendations arising from the Integrated Monitoring Strategy (Ecoplanning, 2024), including updates to Keith Class assignments, target PCT mapping for revegetation areas, and Box Gum Woodland (BGW) mapping. The plan will also address recommendations from the pending Leard RBS Stage 3 Review (Umwelt, in preparation).

Item No	Assessment Requirement	Comment	MCC Response and Status
		the Biodiversity Management Plan, which is yet to be updated with these changes.	The updated Offset Management Plan is forecast to be submitted to DPHI in October 2026 and will provide a consolidated framework for the management, monitoring and reporting of biodiversity offset areas. Status: Ongoing.