Item No	Assessment Requirement	Audit Comments	Audit Classification	Audit Recommendations	NCO Response/Action	Due Date
Air Quality Management Plan (Rev0B- 16 August 2023)						
5.5.3	Once every six days, each HVAS pre-weighed filter will be removed, replaced, and sent to a NATA accredited laboratory for analysis. If there is a technical fault, power outage or any other unplanned event that may cause delays in the HVAS unit replacement (e.g. adverse weather event), NCOPL will remove and replace the preweighted filter as soon as reasonably practicable following the unplanned event.	Sec 4.4.2 (p16) PM10 is required to be monitored every six days in accordance with the Air Quality Management Plan. NCO did not collect PM10 data from site ND10 on 23 April 2023, 29 April 2023, 29 May 2023 and 4 June 2023 due to mechanical failure of the HVAS, representing a non-compliance with the Air Quality Management Plan. NCO replace the HVAS at ND10 on 09 June 2023. The Environmental Event Report on this event notes that the assessment undertaken by an external specialist concluded that the criterion would unlikely have been exceeded on any of the missed days for a number of reasons. As a result of this event, the Air Quality Monitoring Procedure was revised by adding detail on catch-up days when minimum sample runtime is not achieved, while a question was added to the field sheet to prompt checking minimum runtime achieved, and, if Not, to escalate to NCO Environment team to organise a catch-up sample.	NC (Low Risk)	Nil. (Non-compliance reported to DPHI and corrective actions completed during 2023)	N/A	Item closed
Ministers Conditions of Approval Pa 08_0144						
3.2	The Proponent shall ensure that the project does not cause any exceedances of the performance measures in Table 2, to the satisfaction of Resources Regulator. *Table 2: Subsidence Impact Performance Measures* ***Built Features*** All built features: Always safe. Serviceability should be maintained wherever practicable. Loss of serviceability must be fully compensated. Damage must be fully repairable, and must be fully repaired or else replaced or fully compensated. ***Public Safety*** Public Safety: No additional risk. *Notes:* *1) The Proponent will be required to define more detailed performance indicators for each of these performance measures in Built Features Management Plans or Public Safety Management Plan (see condition 4 below).* *2) Requirements regarding safety or serviceability do not prevent preventative or mitigatory actions being taken prior to or during mining in order to achieve or maintain these outcomes.* *3) Compensation required under this condition includes any compensation payable under the Mine Subsidence Compensation Act 1961 and/or the Mining Act 1992.*	These documents are approved and are undergoing continual review. Most LW 201-202 and 203-206 documents were last updated in 2022 and 2024 respectively with two updated during the audit period: • Subsidence Monitoring Program LW107 to LW110 – last updated 9/05/2025 & reviewed 6/06/2024. • Subsidence Monitoring Plan LW203 to LW206 – last reviewed 21/08/2024. Documents that should have been updated every 3 years, but have not been, are: • Extraction Plan Subsidence Risk Assessment Report - last updated 30/09/2016 • Water Management Plan LW107 to LW110 – last updated 6/04/2017 -superseded by Water Management Plan LW203 to LW206 dated 24 Jan 2025 • Public Safety Management Plan LW107 to LW110 – last updated 6/04/2017 - superseded by Public Safety Management Plan LW203-206 dated 24 August 2024 • Built Features Management Plan LW107 to LW110 – last updated 6/04/2017 – superseded by Built Features Management Plan LW203-206 dated 10 August 2024. Subsidence monitoring confirmed that all built features remained safe during and after longwall extraction (LW203–206). No loss of serviceability and no damage or repair or compensation found. No additional public safety risks identified with no emergency procedures activated. Subsidence impacts within predicted limits however the limits do not seem to be updated for 2024 and beyond.	C (Obs)	Reviewed documents should be updated to reflect that a review has been undertaken even when there are no changes.	Strategies, Plans & Programs are reviewed in accordance with SSD-10269 condition E7. Where the review indicates a revision is required the plan will be updated and submitted for approval as per condition E8. A record of management plan reviews will be maintained in an Excel register.	Item closed
3.4	The Proponent shall prepare and implement Extraction Plans for any second workings to be mined to the satisfaction of the Secretary. Each Extraction Plan must: (a) be prepared by a team of suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be approved by the Secretary before the Proponent carries out any of the second workings covered by the plan; (c) include detailed plans of the proposed first and second workings and any associated surface development; (d) include detailed performance indicators for each of the performance measures in Tables 1 and 2; (e) provide revised predictions of the potential subsidence effects, subsidence impacts and environmental consequences of the proposed second workings, incorporating any relevant information obtained since this approval; (f) describe the measures that would be implemented to ensure compliance with the performance measures in Tables 1 and 2, and manage or remediate any impacts and/or environmental consequences; (g) include the following to the satisfaction of Resources Regulator: • a Coal Resource Recovery Plan that demonstrates effective recovery of the available resource; • a Subsidence Monitoring Program to: - provide data to assist with the management of the risks associated with subsidence; - validate the subsidence predictions; and - analyse the relationship between the subsidence effects and impacts under the plan and any ensuing environmental consequences; • a Built Features Management Plan to manage the potential subsidence impacts and/or environmental consequences of the proposed second workings, and which: - addresses in appropriate detail all items of public infrastructure and all classes of other built features; and - has been prepared following appropriate consultation with the owner/s of potentially affected feature/s; • a Public Safety Management Plan to ensure public safety in the mining area; and • appropriate revisions to the Landscape Management Plan required under condition 3 of Schedule 5; and (h) include a: • Water Management Plan, which has been prepared in consultation with EPA and DPIE Water, which provides for the management of the potential impacts and/or environmental consequences of the proposed second workings on surface water resources, groundwater resources and flooding, and which includes:	During the auditor inspection significant surface cracking due to mine subsidence was observed over LW108 (mining completed in 2020) in similar areas noted in the 2019 and 2022 auditor inspections (monitoring of Line 108 ceased in 2022) and over LW110 in areas not inspected in previous auditor inspections. Inspections by the responsible subsidence engineer appear to be infrequent. The auditor team was shown the new subsidence impact management system called INX InViron which includes: • details of cracking and other impacts observed during routine inspections, including: • location by hand-held GPS (built into mobile phone devices) • depth by manual measurement • photographs • changes in recorded features over time • date and of remediation when required with photographs of finished works. All data is coordinated in ArcGIS which is accessible on a range of devices including 'smart' phones. Climate data is recorded, managed and shared through a Sentek database system. Thus, system appears to be effective. A selection of identified impacts was chosen from the database and examined during the audit inspection. All of the records examined indicated that remedial works had been completed in pace with mining and within the required completion timeframe of one month. The system was found to be reasonably effective with some exiting features being able to be located during the site inspection in the presence of auditors. There were some issues with the system, however, summarised as follows: • the subsidence management system relies upon mobile phone reception to record and then relocate impacts • simple GPS devices can often exhibit a very low location accuracy due to limited satellite coverage or interference such as dense vegetation or nearby sources of electromagnetic radiation. • Detection of cracking relies heavily on access. However, much of the land above longwalls is heavily vegetated and covered with floor litter making visual detection of cracks problematic Mobile phone coverage has improved over the audit period due to transmission tower upgrades and appears to give acceptable coordinate accuracy. The recoding of surface topography LiDAR appears to be effective in capturing ponding caused by subsidence and other impacts such as changes to vegetation with demonstrated resolution of around 0.1 m. During the on-site inspection the auditor noted: • Inspections were being undertaken fortnightly • Additional inspections were being undertaken after 'significant' rainfall events of 38.4 mm over 5 days though this could not be confirmed in the data provided by NCO post-inspection. Note: all built features not owned by Whitehaven Coal lie outside of the 20 mm subsidence limit and are therefore not monitored. Subsidence data provided to the auditor shows general agreement with summary values reported in annual reviews. Notable exceptions to this are:	C (Obs)	It is recommended that Annual Reviews document the use of the INX InViron system including capabilities and its limitations given the heavy reliance on this system to record and manage impacts.	Annual Review will include description on the use of subsidence monitoring applications	Item closed

	- surface and groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse impacts on water resources or water quality; - a program to monitor and report groundwater inflows to underground workings; and - a program to manage and monitor impacts on groundwater bores on privately -owned land; • Biodiversity Management Plan, which has been prepared in consultation with BCS and Resources Regulator, which provides for the management of the potential impacts and/or environmental consequences of the proposed second workings on flora and fauna; • Land Management Plan, which has been prepared in consultation with any affected public authorities, to manage the potential impacts and/or environmental consequences of the proposed second workings on land in general; • Heritage Management Plan, which has been prepared in consultation with BCS and relevant stakeholders for Aboriginal heritage, to manage the potential environmental consequences of the proposed second workings on heritage sites or values; and (i) include a program to collect sufficient baseline data for future Extraction Plans. *Notes:* *Management plans prepared under condition 4(h) should address all potential impacts of proposed underground coal extraction on the relevant features. Other similar management plans required under this approval (e.g. under conditions 13 and 23 of schedule 4 or condition 3 of schedule 5) are not required to duplicate these plans or to otherwise address the impacts associated with underground coal extraction.*	• the maximum subsidence over the H line recorded in 2022 of 2.655 m compared to 2.55 m as reported in the Annual Review 2022. This value still remains below the predicted value of 2.75m.				
4.25D	The Proponent must implement the approved Shuttle Bus Traffic Control Protocol.	As noted in the previous IEA, the Shuttle Bus Traffic Control Protocol requires the bus driver to coordinate phone contact with the CHPP control room to receive advice on coal train movements. No records of such contact are maintained to verify this occurs. The protocol also requires that where coal train movements may impact on the bus access to the site, the driver must not queue on the Kamilaroi Highway and Kurrajong Creek Road intersection. Drivers must continue along the highway and park at a safe place to wait the coal train to clear. This requirement has not been tested. It is noted that these requirements are reproduced in the Stage 3 Traffic Management Plan, which also refers to the Shuttle Bus Traffic Control Protocol. Training is provided to all personnel via the Traffic Management Module of the Whole of Mine Training 2025, as observed by the auditor during the site visit.	C (Obs)	It is recommended that NCO develop and maintain records of a verification process to ensure the protocol is being adhered to.	NCOPL will review monitoring requirements and ensure that ongoing communications are undertaken in accordance with the approved Traffic Management Plan.	Item closed
5.2	To the extent that mining operations permit, the Proponent shall carry out rehabilitation progressively, that is, as soon as reasonably practicable following the disturbance.	Progressive rehabilitation is prescribed in the Rehabilitation Management Plan. Rehabilitation is carried out as soon as practicable. Ecologists are on site every 2 weeks to monitor rehabilitation sites and works completed are documented using Survey 123 and recorded in the NCO Environmental and Rehabilitation Hub in ArcGIS.	C (Obs)	To ensure timely revegetation of rehabilitated areas, additional seeding and/or tubestock planting is indicated. Topsoil storage methods may also need to be reviewed to ensure that topsoil seedbanks are preserved.	Addressed via Action listed against Mining Lease- Standard Conditions- 5.	N/A
Environment Protection Licence 12789						
L2.5	The Total Suspended Solids concentration limits specified for Points 11, 13, 18, ~~and~~ 27 and 43 may be exceeded for water discharged provided that: a) the discharge occurs solely as a result of rainfall measured at the premises that exceeds 38.4 millimetres over any consecutive 5 day period immediately prior to the discharge occurring; and b) all practical measures have been implemented to dewater all sediment dams within 5 days of rainfall such that they have sufficient capacity to store run off from a 38.4 millimetre, 5 day rainfall event. Note: 38.4 mm equates to the 5 day 90%ile rainfall depth for Gunnedah sourced from Table 6.3a Managing Urban Stormwater: Soils and Construction Volume 1: 4th edition, March 2004.	Noted. Triggered during the following periods: • Point 18: sampled on 30 March 2023 with rainfall exceeding 38.4mm on 29 March 2023; • Point 43: sampled on 1 June 2024. The footnote on this page notes rainfall exceeding 38.4mm on 5 April 2024. This is a type error, as rainfall data shows high rainfall on 1/6/2024 • Point 43: sampled on 2 December 2024, with rainfall exceeding 38.4mm on 29 November 2024 • Point 11: sampled on 30 March 2025, with rainfall exceeding 38.4mm on 28 March 2025; • Point 13: sampled on 29 March 2025 and 3 April 2025, with rainfall exceeding 38.4mm on 28 March 2025; • Point 43: sampled on 29 March 2025, with rainfall exceeding 38.4mm on 28 March 2025	Note (Obs)	Footnote in EPL Monitoring Report for TSS sampling at Point 43 to read 1 June 2024, rather than 5 April 2024	NCOPL have amended June 2024 EPL Monitoring Report and republished to website.	Item closed
Mining Lease - Standard Conditions (Schedule B, Division 1)						
5	**Rehabilitation to occur as soon as reasonably practicable after disturbance** The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.	Rehabilitation observed during the site visit is progressing in accordance with current Forward Program with results reported in the relevant Annual Rehabilitation Report and Annual Review. Rehabilitation activities during the audit period have included decommissioning of drill holes, grading landforms, and revegetation was primarily achieved via natural regeneration during the audit period, with topsoil respread over areas prepared for rehabilitation and fertilisers applied. Maintenance activities include weed management programs and feral animal control program.	C (Obs)	To ensure timely revegetation of rehabilitated areas, additional seeding and/or tubestock planting is recommended. Topsoil storage methods may also need to be reviewed to ensure that topsoil seedbanks are preserved.	NCOPL will update the Rehabilitation Management Plan to include: - further detail of the rehabilitation monitoring program that is in place, in particular formalising an establishment monitoring program, prior to long term monitoring, to identify early failures and maintenance requirements (eg seeding and/or tubestock planting). - further detail for ensuring the quality and suitability of seedbank stored in topsoil stockpiles.	30 June 2026
13	**Forward program and annual rehabilitation report** (1) The holder of a mining lease must prepare a program (a ***forward program***) for the mining lease that includes the following— (a) a schedule of mining activities for the mining area for the next 3 years,	(1) (a) Forward Program 2025-2027 describes the mining schedule and development of for 2025, 2026 and 2027. The Forward Program lists the planned mine production and extraction forecasts.	C (Obs)	Statement as required in 1(c) to be included in future Forward Programs	Auditors observation noted. NCO will continue to execute rehabilitation in compliance with Condition 1(c) as evidenced.	Item closed

	(b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years, (c) a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs. (2) The holder of a mining lease must prepare a report (an ***annual rehabilitation report***) for the mining lease that includes— (a) a description of the rehabilitation undertaken over the annual reporting period, (b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period, (c) a report demonstrating progress made towards the achievement of the following— i. the objectives set out in the rehabilitation objectives statement, ii. the criteria set out in the rehabilitation completion criteria statement, iii. for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan. (3) If a rehabilitation outcome document has not been approved by the Secretary, the holder of the mining lease must rely on a proposed version of the document. (4) The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary. (5) In this clause—***annual reporting period*** means each period of 12 months commencing on— (a) the date on which the mining lease is granted, or (b) if the Secretary approves another date in relation to the mining lease—the other date.	(b) A summary of the spatial progression of rehabilitation is provided as both tables and figures as part of the forward program. (c) No statement to the effect of this requirement could be found in the Forward Program by the auditor. However, Manager Environment notes that over 95% of all areas available have been rehabilitated, providing evidence of rehabilitation as soon as reasonably practical. (2) (a) Annual reports include a description of rehabilitation undertaken during the reporting period. (b) Annual reports include progress made the rehabilitation phases (c) Objectives and Criteria are addressed directly in the Annual Rehabilitation Reports with reference to FLRP. It notes that rehabilitation is progressing well against these, providing details. (3) The 2023 and 2024 Annual Rehabilitation Reports relied on the outcome documents incorporated into the 2023 Rehabilitation Management Plan. New FLRP and objectives were submitted in July-September 2025 and will be relied upon for the 2025 Annual Rehabilitation Report. Rehabilitation objectives and criteria have not yet been approved (4) Forward Programs and Annual Reports are submitted in the approved form and way during the audit period. (5) Noted.				
Statement of Commitments						
3.17	Install up to four lysimeters on the downslope side of the Reject Emplacement Area. (If saline leachate is generated by CPP reject).	The High Risk Notification for the REA notes that it is unlikely that leachate from the rejects would be a source of surface or groundwater contamination. An acid forming potential assessment of the reject material indicates that the rejects to be emplaced are not likely to be a source of acid leachate generation. Three standpipe piezometers (P51, P52, P53) have been installed around the perimeter of the REA to identify if any saline leachate is being generated from the REA. These bores are monitored monthly quarterly for water level and field parameters (pH, EC and temperature). To date, no leachate has been positively identified, and therefore this condition is Not Triggered, although the recently increasing EC levels in P53 may indicate infiltration of water from the REA (AGE 2025)	NT	Increasing EC in Bore P53 may indicate infiltration of water from REA. It is recommended to continue monitoring in this area, as per AGE (2025).	NCOPL will continue to monitor and report any exceedances as defined by the site Water Management Plan.	Item closed