Table 1: Response to Independent Environmental Audit Non-compliances

Unique Finding Identifier	Aspect	Recommendation	Proponent's Proposed Action/Action Taken/Response (as applicable)	Proposed Action Due Date (if applicable)
IA26-01	Minimise Harm	The auditee appears to have self-reported a number of issues since late 2024. The auditee is currently responding to a clean-up notice issued by the EPA and a notice of incomplete actions. Closing out these ongoing matters is required to demonstrate compliance with requirement to prevent and/or minimise any harm to the environment.	Recommendation noted. Castlereagh Coal is actively closing out non-compliances at Cullen Valley Mine and will continue to action and report on actions monthly until all non-compliances are addressed. No further action is proposed.	
IA26-02	Terms of Approval	none	n/a	n/a
IA26-06	Identification of Boundaries	Undertake survey to confirm boundaries and submit to DPHI	Castlereagh Coal have engaged an external resource to confirm boundaries on Cullen Valley Mine. These will be submitted to DPHI in due course.	Within 6 months of DPHI approval of IEA
IA26-08	Blast Monitoring	Noting that the auditee indicated that blasting has not occurred and is unlikely to occur, consultation with the required parties is recommended to confirm the application of this condition	Recommendation noted. Castlereagh Coal will consult with DPHI to confirm the application of this condition.	Within 6 months of DPHI approval of IEA
IA26-09	Air Quality – Impact Assessment Criteria	The auditee has undertaken regular monitoring of air quality. Reported exceedances have been correlated to external factors and not the mine (e.g. bushfire), however the auditee is required to ensure that air pollution generated by the development does not cause any additional exceedances of the criteria listed in Tables 6, 7, and 8 at any privately owned land. It is recommended that as mining production recommences that dust mitigation measures are reestablished.	Recommendation noted. As Castlereagh Coal recommence active mining at Cullen Valley Mine, dust mitigation measures as detailed in the Air Quality Management Plan will be implemented. No further action is proposed.	
IA26-10	Air Quality – Operating Conditions	This matter is causing ongoing issues and requires mitigation. It is noted that CVM have prepared a subsurface heating remediation strategy in February 2026 and commenced implementation of this plan.	Recommendation noted. Castlereagh Coal is actively implementing the intent of the Subsurface Heating Remediation Strategy and will continue to do so into the future. No further action is proposed.	Within12 months of DPHI approval of IEA

		First actions completed include aerial thermal imagery mapping to confirm scope.		
IA26-11	Air Quality – Monitoring	It is noted that the air quality monitoring program is generally consistent with the intent of Sch. 4 condition 25 air quality monitoring requirements and the mine has been proactive since 2024 in self-reporting non-compliances. It is recommended that the mine confirm with EPA/ DPHI the frequency requirements or a suitable correlation	Recommendation noted. Castlereagh Coal recognises the non-compliance with Sch.4 condition 25 and will consult with DPHI and EPA on implementation of continuous monitoring for PM10 at Cullen Valley Mine.	Within 12 months of DPHI approval of IEA
IA26-12	Offensive Odour	This matter is causing ongoing issues and requires resolution as per the Heating area strategy prepared in 2026.	Refer to IA26-10 Action	
IA26-13	Flora and Fauna – Compensatory Habitat	Confirm and implement a method to conserve, manage and maintain the compensatory habitat area at least 50Ha.	Castlereagh Coal is undertaking actions to address the shortfall of compensatory habitat area (CHA) at Cullen Valley Mine	Within 6 months of DPHI approval of IEA
IA26-17	Surface Water – Discharge Limits	Review dam suitability, sizing and management to meet discharge criteria in line with draft surface water management report 2026. Refer top hydrogeologist recommendation in section 3.6.3 of this report. The site surface water management plan update has been approved to EOT until 31/08/2026 - this report would aim to address these issues.	Castlereagh Coal have engaged a suitably qualified expert to complete the SWMP following consultation with Government Authorities. The updated SWMP will provide for dam suitability, sizing and management to meet discharge criteria	Within 12 months of DPHI approval of SWMP
IA26-18	Surface Water – Monitoring	The auditee generally monitors surface water discharge and provides results on the website monthly as required by condition 4-41(b). It is noted that the auditee has installed a flowmeter at dam 002 and is working to rectify issues at dam004 to meet compliance with 4-41(a). The site surface water management plan update has been approved to EOT until 31/08/2026 - this report would aim to address these issues.	Refer to IA26-17 Action No further action is proposed	
IA26-19	Site Water Management Plan	Complete consultation and submit plan by revised submission date to demonstrate compliance. It is noted that the auditee has since sought and received approval for another extension of time for these plans	Refer to IA26-17 Action	31/08/2026

		(Letter DPHI to CVM DA 200-5-2003-PA-68 EOT approved to 31/08/2026)		
IA26-22	Notify Landowners	For all future exceedances, the notification requirements of this condition are to be implemented	Recommendation noted No further action is proposed	
IA26-24	Incident Notification	It is noted that the self-reporting has been implemented more frequently since 2024/25 and this is a positive improvement. It is recommended that this continues as the active issues around surface water, dust and odour are rectified. Record keeping generally has improved and this should be maintained.	Recommendation noted No further action is proposed	

Table 2: Response to Independent Environmental Audit Observations

Unique Finding Identifier	Aspect	Recommendation	Proponent's Proposed Action/Action Taken/Response (as applicable)	Proposed Action Due Date (if applicable)
IA26-03	Terms of Approval	Review and update induction as mine moves back into operation to include up to date environmental requirements arising from DA200-5-2003	Recommendation noted. Castlereagh Coal will review and revise the site induction for Cullen Valley Mine prior to active mining recommencement	Prior to recommencement of active operations at Cullen Valley Mine
IA26-04	Limits of Approval	Update data records to accurately confirm limits of disturbance (refer to Non-compliance against IA26-06 condition 4-1)	Recommendation noted. Castlereagh Coal have engaged a contractor to survey the premises including disturbance limits and boundaries. Castlereagh Coal will then confirm current disturbances against disturbance limits	Within 6 months of DPHI approval of IEA
IA26-05	Operation of Plant and Equipment	Retired plant should be appropriately scrapped and removed to remove risks	Recommendation noted. Castlereagh Coal will endeavour to scrap retired plant progressively following recommencement of activity at Cullen Valley Mine	Within 24 months of recommencement of operations at Cullen Valley Mine

IA26-07	Noise Monitoring	Confirm with EPA this requirement as the previous approval to waive this is 20 years old.	Castlereagh Coal will consult with the EPA regarding the currency of the previous approval to waive the requirement to continuously monitor noise at Cullen Valley Mine	Within 6 months of DPHI approval of IEA
IA26-14	Flora and Fauna Management Plan	Resubmit current plan to DPHI and undertake consultation with CPHR as required in current conditions.	Castlereagh Coal will resubmit the FFMP and consult with CPHR following the update of the Plan in response to conserving, managing and maintaining 50Ha of land for Compensatory Habitat. The updated Plan will then be resubmitted to DPHI for approval	Within 6 months of DPHI approval of IEA
IA26-15	Flora and Fauna Management Plan – Compensatory Habitat	Confirm and implement a method to secure the compensatory habitat area at least 50Ha and update plan	Refer to IA26-13 for Action. Castlereagh Coal will update the FFMP – Compensatory Habitat on confirmation of security of the required area	Within 6 months of DPHI approval of IEA
IA26-16	Surface Water – Pollution of Water	Note that this matter is currently under a Clean Up Notice issued by the EPA 10/04/2026 (#3515373) and requires actions. Also, the auditee is to respond to Notice of incomplete actions issued by EPA 27/02/2026 relating to Pollution Reduction Program EPL condition U1.1	Castlereagh Coal completes monthly updates to the EPA in regard to outstanding actions relating to the PRP. Castlereagh Coal will continue to liaise with the EPA in regard to actions taken under Clean-up Notice 3515373 with the intent to close the Notice	
IA26-20	Aboriginal Archaeology	Confirm location of buffer zones and ensure do not disturb is communicated	Castlereagh Coal will confirm location of buffer zones around Aboriginal heritage items and places and ensure appropriate measures are taken to ensure disturbance is avoided	Within 12 months of DPHI approval of IEA
IA26-21	Greenhouse Gas	As the mine moves back into operation, investigate and implement measures to minimise greenhouse emissions	Castlereagh Coal will undertake a Greenhouse Gas Emission Minimisation Workshop, investigate strategies and implement ongoing measures to minimise GHG emissions at Cullen Valley Mine	Within 24 months of recommencement of operations at Cullen Valley Mine
IA26-23	Community Consultative Committee	Ensure submission of future minutes and retain records for each audit period	Recommendation noted. Castlereagh Coal is currently setting up a new CCC under the 2023 CCC Guidelines for State Significant Developments and will maintain compliance with the requirements of those guidelines	Within 6 months of DPHI approval of IEA

IA26-25	Pollution Reduction Program	Complete the revision of site water management plans and implement feasible recommendations to cease seepage issues as stipulated in U1.1. It is noted that the auditee has since sought and received approval for another extension of time Site water management plan (Letter DPHI to CVM DA 200-5-2003-PA-68 EOT approved to 31/08/2026) - to address this issue.	Castlereagh Coal has commissioned the revision of the SWMP and is implementing measures to prevent seepage in accordance with the PRP. CC will rebuild the north-east wall of the North Void to ensure long term prevention of seepage from the site.	31/8/26 30/10/26
IA26-26	Minimise Harm	A number of actions require following up and progress from the rehabilitation risk assessment. The potential for ongoing subsurface heating poses a risk to the success of rehabilitation and requires remediation and updating of rehabilitation plans as per division 3 clause 11 (c)	Castlereagh Coal will update the Rehabilitation Strategy and Rehabilitation Management Plan on receipt of approved ROBJ from the Resources Regulator. Updated plans will address outcomes from the Rehabilitation Risk Assessment conducted in 2025.	Within 6 months of receipt of approved ROBJ from the Resources Regulator
IA26-27	Notice to Landholders (ML1455 renewal 31/5/23)	Confirm issuing of this letter to all required landholders.	Castlereagh Coal will confirm that notification to landholders of the 31/5/23 renewal of ML1455 occurred	Within 6 months of DPHI approval of IEA
IA26-28	Annual Returns – Groundwater Take	Groundwater extraction must be in line with requirements and reporting as per WAL	Recommendation noted. Annual Returns will be completed as per WAL	Within 6 months of DPHI approval of IEA