IEA Reference	Audit Finding	Audit Recommendation	Moolarben Coal Operations (MCO) Response	Estimated Completion Date
Non-Compliances				
Project Approval 05_0117 Schedule 3 Condition 31	From 1 October 2022 to 11 October 2022, out of specification treated water was released through the Bora Creek location (LDP 01). A total of 91.8 megalitres of treated water was released gradually.	Investigative and remedial actions have been undertaken. No further action required.	MCO completed an investigation and implemented remedial actions to mitigate the risk of recurrence. No further action required.	Complete
Project Approval 05_0117 Schedule 3 Condition 33	EPL DP01 was not sampled for oil & grease and TSS during discharge in December 21 and EPL DP01 EPL discharge point 01 was not sampled for TSS. Self- reported incident in April 2023. Auditors viewed notification to and responses from the Department and EPA for both incidents.	MCO completed investigations into the cause of the incident and have taken appropriate action. No further action required.	MCO completed an investigation and implemented remedial actions to mitigate the risk of recurrence. No further action required.	Complete
Project Approval 08_0135 Schedule 3 Condition 7	Airblast overpressure exceeded the relevant noise criteria during the audit period. 2022: Sighted Annual Review (Section 6.3 and Appendix 3c) and Monthly Compliance Monitoring Reports. Airblast overpressure exceeded 115dB(Lin Peak) on five occasions, but not more than 5% of total blasts over the 12-month period including one event above 120dBL at BM5 on 20 May 2022 (124.1dBL). 2024: Sighted Monthly Environmental Monitoring Reports for January to March. One air blast overpressure event noted on 8 February 2024 at 125.8dBL at BM8.	Implement remedial actions as proposed to the Department.	MCO completed an investigation into the blast overpressure event on the 20th of May 2022 and the 8th of February 2024 and continue to implement remedial actions as proposed to the Department, including: - Engagement of specialist consultants - Review of pre-blast design and overpressure modelling - Review of pre-blast assessments and meteorological checks	Ongoing

IEA Reference	Audit Finding	Audit Recommendation	Moolarben Coal Operations (MCO) Response	Estimated Completion Date
Project Approval 08_0135 Schedule 3 Condition 21	Overburden material was placed beyond the approved disturbance boundary of the Open Cut 4 area on 28 March 2023. The incident was rectified as soon as MCO became aware of the issue.	Implement remedial actions as proposed to the Department.	MCO completed an investigation and implemented remedial actions to mitigate the risk of recurrence. No further action required.	Complete
Project Approval 08_0135 Schedule 4 Condition 5	Monitoring lines G,H,I and Essential Energy Monitoring Line were not monitored during October 2021 as required by the Subsidence Monitoring Plan. The Subsidence Monitoring Program requires each Monitoring Line to be monitored within 3 months following completion of longwall recovery from each longwall. Monitoring line G, H, and the Essential Energy Monitoring line were monitored in January 2022, and Monitoring Line I was monitored during December 2021 in December 2021.	No further actions are required. Mining in UG1 is complete and no active subsidence is occurring.	Noted.	N/A
EPL No. 12932 Condition L1.1	From 1 October 2022 to 11 October 2022 out of specification treated water was released through the Bora Creek location (LDP 01). A total of 91.8 megalitres of treated water was released gradually.	Investigative and remedial actions have been undertaken. No further action required.	MCO completed an investigation and implemented remedial actions to mitigate the risk of recurrence. No further action required.	Complete
EPL No. 12932 Condition L6.3	Exceedances of 120 dB air blast overpressure occurred on 20 May 2022 and 8 February 2024.	Appropriate investigative action and notification occurred. No further action required.	MCO completed an investigation into the blast overpressure event on the 20th of May 2022 and the 8th of February 2024 and continue to implement remedial actions as proposed to the Department, including:	Ongoing

IEA Reference	Audit Finding	Audit Recommendation	Moolarben Coal Operations (MCO) Response	Estimated Completion Date
			 Engagement of specialist consultants Review of pre-blast design and overpressure modelling Review of pre-blast assessments and meteorological checks 	
EPL No. 12932 Condition O5.1	Waste oils were observed stored on unbunded pallets adjacent to a sump at the rear of the main workshop area. While secondary containment was not present, this area is confined to the internal mine water network.	Consideration may be given to storage of waste oils in a covered hardstand area.	MCO will review waste hydrocarbon storage practices and implement improvements in accordance with Australian Standard and Legislative requirements.	31 July 2025
EPL No. 12932 Condition M2.4	Point 1 was not sampled for oil & grease or TSS during discharge in December 2021. Point 1 was again not sampled for TSS in April 2023. Sampling has been compliant with this condition at all other periods throughout the audit period.	MCO completed investigations into the cause of the incident and have taken appropriate action. No further action required.	MCO completed an investigation and implemented remedial actions to mitigate the risk of recurrence. No further action required.	Complete
ML1715 Condition 102	An air blast overpressure exceedance of the absolute 120 dB limit occurred at Ridge Road in May 2022.	Implement the remedial actions proposed to the Department.	MCO completed an investigation into the blast overpressure event on the 20th of May 2022 and continue to implement remedial actions as proposed to the Department, including: - Engagement of specialist consultants	Complete

IEA Reference	Audit Finding	Audit Recommendation	Moolarben Coal Operations (MCO) Response	Estimated Completion Date
			 Review of pre-blast design and overpressure modelling Review of pre-blast assessments and meteorological checks 	
Water Licence 20BL173935 Condition 1	The Form A's for PZ236A (installed 26/10/2022, submitted 13/01/2023), PZ239A (installed 21/09/2023, submitted 23/11/2023) and PZ239B (installed 21/11/2023, submitted 17/04/2024) were submitted outside the 2-month time frame.	Ensure bore notifications are sent to DPI within the prescribed period.	MCO will provide notifications to the DPI within two (2) months of construction of new production bores.	As Required

OFI Reference	Opportunities for Improvement	Moolarben Coal Operations Response	Estimated Completion Date
Opportunities for Im	provement		
OFI02	It is important to clarify and communicate the requirements for the agricultural rehab areas, regarding Rural Land Capability commitments versus Land and Soil Capability measurements, given there is inconsistency between the PA and RMP. This will likely need to be addressed within the next audit period to ensure compliance.	MCO will undertake works to clarify any inconsistencies between the Project Approval (PA) and the Rehabilitation Management Plan (RMP).	Ongoing
OFI03	Some waste oils were observed stored on unbunded pallets adjacent to a sump at the rear of the main workshop area. While this area is confined to the internal mine water network, and oils and other liquids were typically stored on bunded pallets, it is recommended that MCO review the location and storage practices for waste oils and other liquids and consider whether these items should be stored on hardstand areas or other appropriate location.	MCO will review waste hydrocarbon storage practices and implement improvements in accordance with Australian Standard and Legislative requirements.	31 July 2025