Annual Environmental Management Report

1st July 2020 to 30th June 2021

Table of Figures

1.0 Title Block

Name of Operation	Port Kembla Coal Terminal Project
Name of Operator	Port Kembla Coal Terminal Ltd
Development consent / project approval #	08_0009
Name of holder of development consent / project approval	Port Kembla Coal Terminal Ltd
Land #	Lot 22 DP 1128396
Name of holder of land lease	NSW Ports (rented from)
Environment Protection Licence #	EPL 1625
Planning Approval start date	12th June 2009
AEMR start date	1st July 2020
AEMR end date	30th June 2021

I, Luke Pascot, certify that this audit report is a true and accurate record of the compliance status of Port Kembla Coal Terminal Ltd for the period 1st July 2020 to 30th June 2021 and that I am authorised to make this statement on behalf of Port Kembla Coal Terminal Ltd.

Note.

a) *The Annual Review is an 'environmental audit' for the purposes of section 122B (2) of the Environmental planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.*

b) *The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement – maximum penalty 5 years imprisonment); sections 307A, 370B and 307C (False or misleading applications/information/documents – maximum penalty 2 years imprisonment or $22,000, or both).*

Name of authorised reporting officer	Luke Pascot
Title of authorised reporting officer	Environmental Specialist
Signature of authorised reporting officer	Luke Pascot
Date	26/07/2021

2.0 STATEMENT OF COMPLIANCE

Figure 1: Statement of compliance

Development Approval / Licence	Compliant?
Development Approval 08_0009	Yes
EPL 1625	Yes

Figure 2: Non-compliances

Development Approval / Licence	Condition #	Condition description (Summary)	Compliance status	Comment	Where addressed in Annual Review
EPL 1625	n/a	n/a	compliant	n/a	n/a
Development Approval 08_0009	n/a	n/a	compliant	n/a	n/a

3.0 INTRODUCTION

3.1 Purpose

The purpose of this Annual Environment Management Report (AEMR) is to provide the Department of Planning, Industry and Environment (DPI&E), formally Department Planning and Environment, and other stakeholders a report of Port Kembla Coal Terminal's (PKCT's) environmental performance together with actions taken in relation to environmental control and regulatory compliance across the July 2020 to June 2021 reporting period.

3.2 Scope

This AEMR provides information on PKCT's compliance with the requirements of the PKCT Major Project Approval 08_0009 which was granted on the 12th June 2009. The approval requires PKCT to prepare an annual AEMR. By letter of 25th March 2010, The DPI&E (formerly the Department of Planning and Infrastructure (DP&I)) approved a PKCT request for the submission date to be the 31st July annually to facilitate financial year reporting.

This report has been prepared with reference to the NSW Department of Planning and Environment's guideline for the post-approval requirements for State significant mining developments – Annual Review Guideline (2015).

This report will be submitted to the DPI&E. Following DPI&E feedback, it will be forwarded to the Environment Protection Authority (EPA) and the Department of Trade and Investment (DT&I) or as required by the respective agencies. A copy of this AEMR will also be made available to the public via the PKCT website.

3.3 Background

PKCT is located on Lot 1 DP1125445, Lot 3 DP1125445, Lot 22 in DP 1128396 and Lot 8 DP 1154760 on the northern side of the Inner Harbour of Port Kembla, Wollongong.

On the 31st May 2013, NSW Ports acquired a long-term lease for Port Kembla and Port Botany through which the current leasing arrangement with PKCT remains. Land is leased to PKCT under a 20 year, plus 20 year option. The lease commenced in August 1990 and PKCT has executed this option taking the lease period to 2030.

In October 2020, NSW Ports, PKCT and Australian Industrial Energy (AIE) agreed to a surrender of the southernmost portion of the PKCT to AIE for construction and operation of a Liquid Natural Gas (LNG) Terminal. The surrender became active on 31st March 2021. As a result of the reduced site boundary, PKCT reviewed and resubmitted for approval all Management Plans required under Approval 09_0009 and EPL 1625. Subsequently, the EPA and DPI&E approved the revised plans and Licence.

Six equal shareholders, namely Illawarra Services Proprietary Limited (South 32), Oakbridge Proprietary Limited (Glencore), Centennial Coal Company Limited, Simec Mining, Metropolitan Collieries Proprietary Limited (Peabody) and Wollongong Coal Limited (formerly Gujarat NRE), form the Board of PKCT. South 32, reporting to the PKCT Board,

manages PKCT under a management contract. PKCT is the major coal intermodal facility in southern NSW for the transfer of coal from rail and road to ship.

PKCT is responsible for receiving, assembling and loading coal from the southern and western NSW coalfields and for transport by ship to international and domestic markets, see Figure 4. Following the surrender of Berth 101 and the southern portion of the terminal land to AIE in March 2021, PKCT now has a single bulk handling facility being; a high capacity Coal Berth (Berth 102) that handles the loading of coal. See Figure 3.

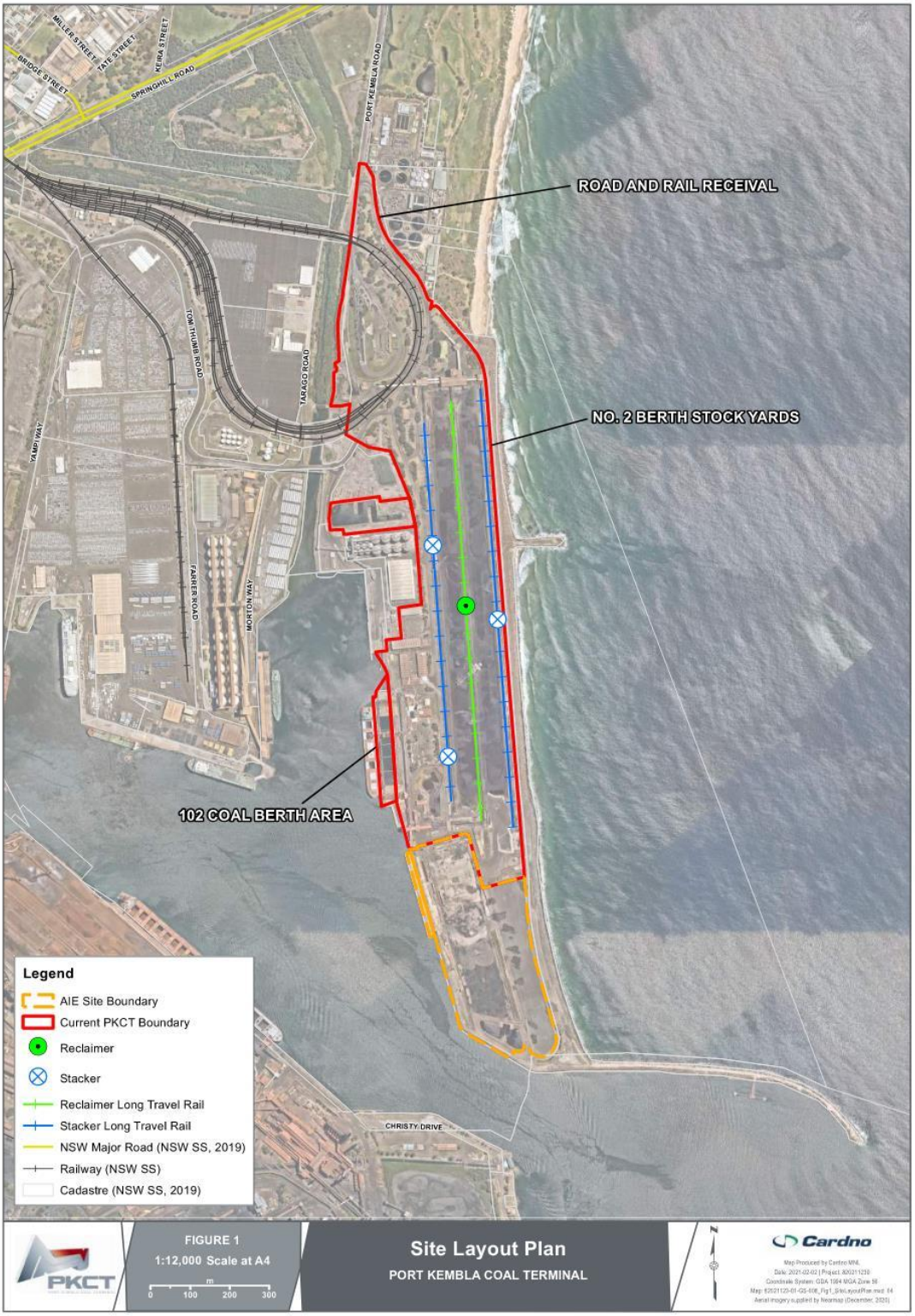


Figure 3: PKCT site boundary and surrounding land use

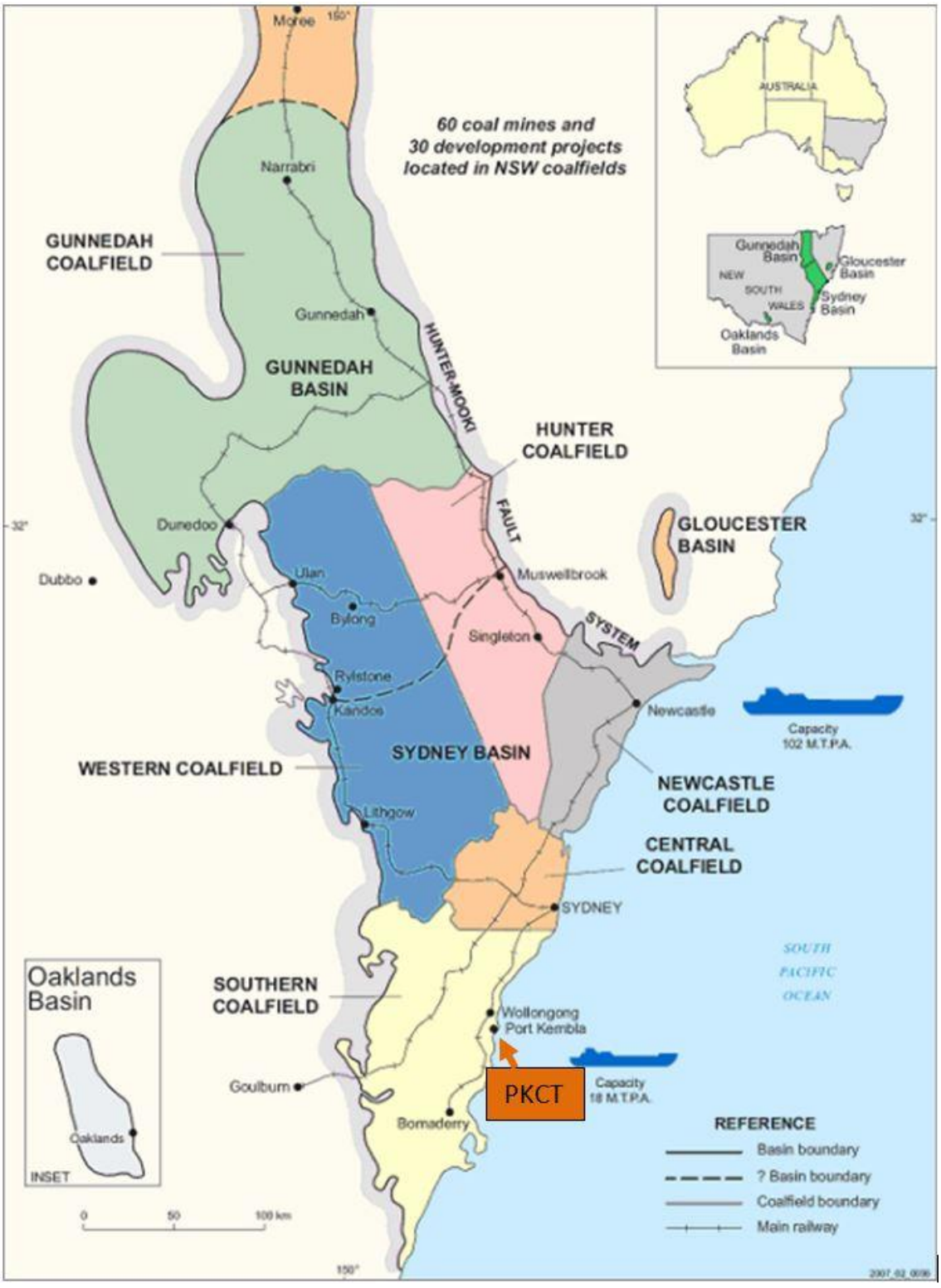


Figure 4: PKCT regional context (source; NSW Department of Planning and Environment Resources and Energy website 2017)

PKCT's Coal Berth 102 was constructed in the early 1980's following construction and opening of the Port Kembla Inner Harbour on 28th November 1960. A historical image of the harbour is shown below in Figure 5.

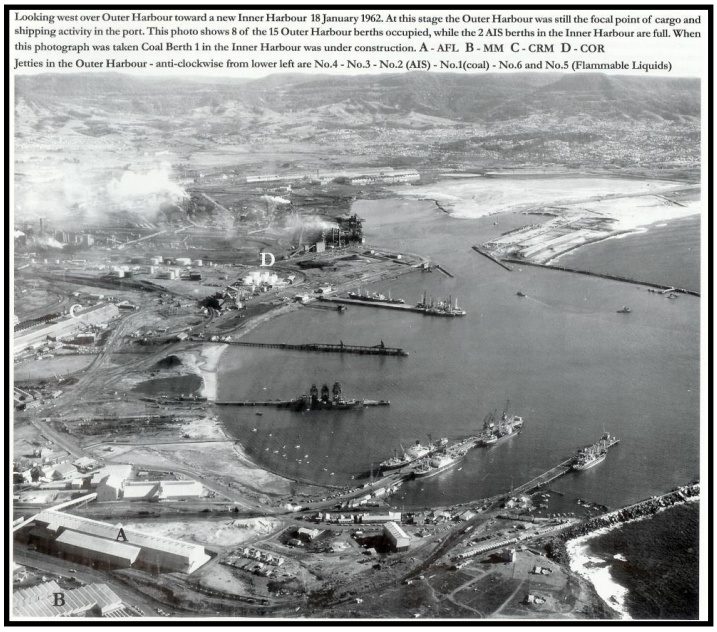


Figure 5: Early image of Port Kembla Inner Harbour. Image referenced from "Roadstead to World Class Port", Port Centenary Committee 1999.

PKCT entered the lease to operate the facility in accordance with a development consent from Wollongong City Council (WCC) and EPA Environment Protection Licence (EPL) number 1625.

In 2008, PKCT commenced preparation of a Major Project Application under Part 3A of the Environmental Planning and Assessment Act (EPAA) 1979, seeking consent to alter coal receival arrangements by public road.

Consultation with the DPI&E resulted in the remit of the application with the scope being increased to include consent for PKCT's existing operations. The Environmental Assessment (EA) submitted with the Major Project Application included an assessment of all environmental impacts associated with the current and ongoing PKCT activities.

In June 2009, the DPI&E conditionally approved PKCT's Major Project Application (08_0009) for Existing Operations & Increased Road Receival Hours. This consent replaces the previous development approval from WCC and sets new conditions for environmental impacts, management and reporting.

3.4 Objectives

The objective of this AEMR is to provide a report that outlines the environmental monitoring, mitigation, assessments and management actions undertaken by PKCT over the July 2020 to June 2021 reporting period.

3.5 Environment Management

PKCT has an Environment Management System (EMS) in place to meet its environmental obligations. The EMS is certified to AS/NZS ISO 14001:2015 and is supported by policies, standards, an environment management strategy, management plans and procedures. Key documents of the EMS include the following:-

- Sustainable Development Policy PO.BM.291
- Environment Policy PO.HS.85
- Quality Policy PO.BM.236
- Environment Management Strategy MP.HS.464
- Noise Management Plan MP.HS.387
- Air Quality Management Plan MP.HS.386
- Driver Code of Conduct Implementation Plan MP.BM.453
- Water Management Plan MP.HS.462
- Green and Golden Bell Frog Management Plan MP.HS.109
- Landscape Management Plan MP.HS.470
- Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461
- Waste Management Plan MP.HS.460
- Fire Management Plan MP.HS.459

Policies are published on PKCT's web site. Management Plans required under Project Approval 08_0009 are also published once DPI&E approval is obtained.

3.6 Terminal Contact

Figure 6 below identifies relevant contacts at PKCT.

PKCT Employee & Position	Contact Details
Mr. David Richards General Manager	(02) 4221 1802 David.Richards@pkct.com.au
Mr. Gerard McConochie Operations Manager	(02) 4221 1157 Gerard.McConochie@pkct.com.au
Mr. Mark Beale Planning and Logistics Lead	(02) 4221 1821 Mark.Beale@pkct.com.au
Mr. Luke Pascot Environmental Specialist	(02) 4221 1155 Luke.Pascot@pkct.com.au
Mr Michael Curley HSER Superintendent	(02) 4221 1863 Michael.Curley@pkct.com.au
Community Hotline	1800 111 448 communitylinks@pkct.com.au

Figure 6: PKCT contacts

3.7 Actions Arising From Previous AEMR Review

The 2019/2020 AEMR was submitted to the DPI&E as required in July 2020.

There was no specific feedback or improvements suggested by the DPI&E following their review of the 2019/2020 AEMR submission. All actions and recommendations from previous reviews by the DPI&E remain fully incorporated within the current AEMR reporting structure.

Action Required from Previous AEMR	Requested by	Action taken by PKCT	Where discussed in AEMR
No actions required from the 2019/2020 Review			

Figure 7: Actions required from the previous AEMR

4.0 ADMINISTRATIVE CONDITIONS

Under Schedule 2 of PKCT's Major Project Approval 08_0009, PKCT has 14 Administrative Conditions. The Administrative Conditions are listed under the headings outlined in Figure 8. The following section outlines PKCT's compliance with these across the reporting period.

Administrative Condition	AEMR Section
Obligation to Minimize Harm to the Environment	4.1
Terms of Approval	4.2
Limits on Approval	4.3
Management Plans / Monitoring Programs	4.4
Surrender of Consents	4.5
Structural Adequacy	4.6
Demolition	4.9
Operation of Plant and Equipment	4.8
Dispute Resolution	4.9

Figure 8: Administrative conditions

4.1 Obligation to minimize harm to the Environment

1. The Proponent shall implement all reasonable and feasible measures to prevent and/or minimize any harm to the environment that may result from the operation of the project.

The condition is consistent with PKCT's policies and management standards including a commitment to meet legal and other requirements.

PKCT has in place an Environmental Aspects and Impacts Register. This document provides a framework whereby PKCT identifies, records, risk-ranks and provides controls for activities associated with the operation that have the potential to cause harm to the environment. The register is reviewed at least annually. The register was last reviewed on 24th May 2021.

4.2 Terms of Approval

2. The Proponent shall carry out the project generally in accordance with the:
   (a) EA;
   (b) Response to Submissions;
   (c) Statement of Commitments (See Appendix 2); and
   (d) Conditions of this approval
3. If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.
4. The Proponent shall prepare revisions of any strategies, plans or programs required under this consent if directed to do so by the Director-General. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by, the Director-General.
5. The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:
   (a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this approval; and
   (b) The implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.

The requirements of this condition were met across the reporting period. The Environment Management Strategy (EMS) has been developed to facilitate the means by which DPI&E approval conditions are met. The AEMR provides an annual compliance report.

4.3 Limits on Approval

6. The Proponent shall not receive more than 7.5 million tonnes of coal and bulk products at the site by public road in any calendar year without the written approval of the Director-General. In Seeking this approval, the Proponent shall submit a report to the Director-General that:
   (a) reviews the transport related impacts associated with the trucks being used to deliver coal and bulk products to the terminal;
   (b) demonstrates that these impacts are generally consistent with the predicted and/or approved impacts; and
   (c) examines whether there are any other reasonable and feasible measures that could be implemented to minimise these impacts.

   Once this approval has been obtained, the Proponent shall not receive more than 10 million tonnes of coal and bulk products at the site by public road in any calendar year.
7. The Proponent shall only receive coal dispatched from NRE No 1 Colliery at Russell Vale if that coal has been dispatched between the hours of:
   (a) 7 am to 10 pm Monday to Friday; and
   (b) 8 am to 6 pm Saturday and Sunday or Public Holidays

   Unless in accordance with a project approval granted to that Colliery under Part 3A of the EP&A Act.
8. Subject to conditions 6 and 7 of this schedule, coal and bulk products may be received by the Proponent at the site by road delivery twenty four hours per day, seven days per week.

PKCT did not receive more than 7.5 million tonnes of coal and bulk products by public road during the 2020 calendar year.

With regard, Schedule 2, Condition 6, PKCT application to the Director General to receive 10 million tonnes per annum (mtpa) was approved on the 29th September 2013 subject to conditions.

4.4 Management Plans / Monitoring Programs

9. With approval of the Director-General, the proponent may submit any management plan or monitoring program required by this approval on a progressive basis.

In April 2021, PKCT relinquished the southern portion of the Terminal lease to AIE to build a gas import facility. As part of this change, PKCT consulted with the DPI&E and undertook a review of all Management plans to update them to include the renewed PKCT footprint and operational changes resulting from the lease relinquishment. The PKCT Water Management Plan, Drivers Code of Conduct, Green and Golden Bell Frog Management Plan, Air Quality Management Plan, Fire Management Plan, Environment Management Strategy, Greenhouse Gas and Energy Efficiency Management Plan, Landscape Management Plan, Noise Management Plan and Waste Management Plan were revised and submitted to the DPI&E in progressively throughout the reporting period. All plans have been reviewed and approved by DPI&E.

4.5 Surrender of Consents

10. Within 12 months of the date of this approval, the Proponent shall surrender all existing development consents and existing use rights associated with operations at the site in accordance with clause 97 of the EP&A Regulation.

Applicable consents have been surrendered. No action was required in this reporting period.

4.6 Structural Adequacy

11. The Proponent shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.

Facilities maintenance is carried out onsite in accordance with legal and other requirements including applicable Australian Standards and the Building Code of Australia.

4.7 Demolition

12. The Proponent shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.

All demolition works are planned and carried out in accordance with the required Australian Standards.

PKCT did not undertake any major demolition projects this period to trigger the criteria required within Standard 2601-2001: The Demolition of Structures. Small demolition projects that were completed were undertaken generally in accordance with the requirements.

4.8 Operation of Plant & Equipment

13. The Proponent shall ensure that all plant and equipment used onsite is:
    (a) maintained in a proper and efficient condition; and
    (b) operated in a proper efficient manner.

PKCT management and staff have a responsibility to maintain equipment to ensure correct operation and efficiency. PKCT ensures all personnel are suitably qualified, trained and competent to ensure that equipment is operated in a proper and efficient manner.

4.9 Dispute Resolution

14. In the event that the Proponent and the Council or a Government agency, other than the Department, cannot agree on the specification or requirements of this approval, the matter may be referred by either party to the Director-General for resolution, whose determination of the disagreement shall be final and binding on the parties.

PKCT accepts the dispute resolution process. This condition is referenced in the PKCT Environment Management Strategy.

There were no disputes during the reporting period.

5.0 SPECIFIC ENVIRONMENTAL CONDITIONS

This section provides a summary of PKCT's compliance to the Specific Environmental Conditions outlined in Schedule 3 of the PKCT Major Project Approval 08_0009.

Figure 9 below provides an overview of each of the Specific Environmental Conditions and a reference to their location in the AEMR.

Specific Environmental Condition	AEMR Section
Noise	Section 5.1 Noise
Transport	Section 5.2 Transport
Air Quality	Section 5.3 Air Quality
Meteorological Monitoring	Section 5.4 Meteorological
Surface Water	Section 5.5 5.5 Surface Water
Biodiversity	Section 5.6 Biodiversity
Visual Amenity	Section 5.7 Visual Amenity
Greenhouse and Energy Efficiency	Section 5.8 Greenhouse and Energy Efficiency
Waste	Section 5.9 Waste
Hazards	Section 5.10 Hazards
Fire Control	Section 5.11 Fire Control

Figure 9: Specific environmental condition overview

5.1 Noise

5.1.1 Noise Standards and Performance Measures

EPL 1625 and Major Project Approval 08_0009 pertain to noise emissions from PKCT's premises. Noise criteria are outlined as follows;

Impact Assessment Criteria

1. The Proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the criteria specified in Table 1 for the location nearest to that residence.

Table 1: Noise impact assessment criteria dB(A) LAeq (15 min)

Location	Time Period	Limits($LA_{eq,15\ min}$ dB(A)
Cnr Swan St/Kembla St	Day	51
	Evening	50
	Night	49
Cnr Swan St/ Corrimal St	Day	51
	Evening	50
	Night	49
Cnr Keira St/ Fox St	Day	55
	Evening	49
	Night	45

Notes:

(a) To determine compliance with the $LA_{eq,\ (15\ min)}$ *noise level limits in the above table, noise from the project is to be measured at the most affected point within the residential boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.*

(b) The noise emission limits identified in the above table apply under meteorological conditions of:

- *wind speeds of up to 3 m/s at 10 metres above ground level; or*
- *temperature inversion conditions of up to 3ºC/100m, plus a 2 m/s source-to-receiver component drainage flow wind at 10 metres above ground level for those receivers where applicable*

in accordance with the NSW Industrial Noise Policy.

However, if the Proponent has a written negotiated noise agreement with any landowner of the land listed in Table 1, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the noise limits in Table 1 in accordance with the negotiated noise agreement.

Noise Monitoring Program

2. The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:

(a) be developed in consultation with DECC;

(b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and

(c) include a:

- combination of attended and unattended noise monitoring measures;
- noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval; and
- reasonable and feasible best practice noise mitigation measures to ensure project specific noise criteria are met.

Continuous Improvement

3. The Proponent shall:

(a) continue to implement all reasonable and feasible best practice noise mitigation measures;

(b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and

(c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.

5.1.2 Noise Monitoring

5.1.2.1 Noise Monitoring Methodology

Biannual noise monitoring began at PKCT in September 2009. Since this time, monitoring results have been compliant with the noise monitoring criteria set out in PKCT's EPL 1625 and Major Project Approval 08_0009.

As outlined in Section 8.2.3.1 of PKCT's approved Noise Management Plan, if no exceedance of the criteria occurs for 6 years, noise monitoring will not be required to continue.

In August 2016, PKCT made a formal request to the DPI&E to remove the requirement for biannual noise monitoring with the intent to undertake event-based monitoring if noise concerns are raised.

By letter dated 16th March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued.

5.1.2.2 Noise Monitoring Results and Compliance 2020/2021

Notwithstanding there is no longer a requirement to undertake routine noise monitoring, on 26th November 2020, PKCT engaged a consultant to undertake a noise survey to re-confirm that noise levels, following installation of the new yard machines, remained within the required limits outlined in our Planning Approval 08_0009. The results of the survey confirmed that levels remained below the threshold limits.

PKCT received two noise related complaints refer to section 5.12.3 Community Complaints. Both complaints were investigated, none of the complaints were associated with noise from the PKCT operation.

PKCT continues to maintain and utilise Noise Management Plan MP.HS.387. The plan was reviewed during the reporting period as a result of the AIE lease transaction and subsequently approved by the Department. The plan is publically available on PKCT's website.

5.1.3 Trends in Noise Emissions

No biannual noise monitoring campaigns were undertaken. Results of the non-routine noise confirmation survey confirmed that levels remained below the threshold limits.

5.1.4 Noise –Activities undertaken during 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period relating to noise is presented below.

- PKCT continues to look for opportunities to improve noise levels across its operations.
- PKCT's Noise Management Plan remains a live document and is formally reviewed within the Triennial Independent Audit program. This period, the plan was revised and reformatted as a result of surrendering the southern portion of PKCT to the AIE LNG project.

5.1.5 Noise - Activities Planned for 2021/2022 Reporting Period

A summary of actions proposed to be undertaken in the 2021/2022 reporting period is presented below.

- PKCT will continue to undertake noise surveys if noise complaints or issues are raised.

5.2 Transport

5.2.1 Transport Standards and Performance Measures

Monitoring of Coal Transport

3. The Proponent shall keep records of the amount of coal and bulk products received at the site each year, and include these records in the AEMR.

Traffic Management

4. The Proponent shall ensure that vehicles waiting to deliver coal or bulk products to the site do not queue or park on public roads other than Port Kembla Road.

Driver's Code of Conduct

5. The Proponent shall, in consultation with affected mines and principal haulage operators, develop a program to implement the Driver's Code of Conduct (see Appendix 3) to the satisfaction of the Director-General. This program must:
   (a) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General;
   (b) include a driver induction program to cover (but not be limited to) speed limits, compression braking, truck washing, load covering and queuing on local roads; and
   (c) include measures to ensure the Driver's Code of Conduct is enforced.

5.2.2 Transport Monitoring

5.2.2.1 Transport Monitoring Methodology

Shippers to PKCT are signatories to the PKCT Drivers Code of Conduct (DCC). This document was developed in consultation with the PKCT road receival customers, and their associated road transport providers, Roads and Traffic Authority (now Roads and Maritime Services), EPA, and the PKCT Community Consultative Committee (CCC).

The document outlines specific measures focusing on opportunities to minimise, mitigate and manage traffic volume, traffic safety and acoustic impacts. Among others, it specifically covers items such as haulage routes, compression breaking, road delivery standards, truck washing, queuing on Springhill Road, load covering and incident management and reporting.

A Heavy Haulage Induction manual and induction program and a Drivers Code of Conduct Implementation Plan are in place to support DCC implementation.

PKCT monitors compliance against the DCC via an audit program. The monitoring of road transport operations is undertaken by PKCT personnel and by the shippers and their associated road transport providers. Audits are undertaken at the mine site, on route and at

PKCT. Monthly compliance reports are supplied to PKCT. Road transport providers also undertake driver observations within their own businesses.

5.2.2.2 Transport Monitoring Results and Compliance 2020/2021

In accordance with Schedule 3, Condition 4, PKCT is required to keep records of the amount of coal and bulk products received at the site each year. Figure 10 below provides a summary of throughput and receival over the reporting period.

Shiploading July 2020 to June 2021	Coal		Coke	Total
	Coking	Steaming		
Berth 101: Bulk Products Berth (Tonnes)	0	0	0	0
Berth 102: Coal Berth (Tonnes)	6,278,511	1,874,991	0	8,153,502
			Total (tonnes)	8,153,502

Receivals July 2020 to June 2021	Private Road	Public Road	Total
Road Receival (Tonnes)	3,122,753	2,595,848	5,718,601
Rail Receival (Tonnes)			2,185,631
		Total Tonnes	7,904,232

Figure 10: Summary of PKCT throughput 2020/2021

Across the 2020/2021 reporting period, truck companies undertook 3,202 driver observations and 63 audits were completed by PKCT personnel. Driver observations included monitoring of at least 5,531 individual drivers.

A summary of the auditing results is presented in Appendix A: Drivers Code of Conduct Summary.

As part of the monitoring regime, PKCT records and responds to complaints and incidents associated with coal transport to and from PKCT where required. PKCT did not receive any road transport related complaints across the reporting period. Five complaints associated with road haulage were made directly to the PKCT's Road Transport Providers. These complaints were relatively minor in nature and were reviewed and investigated by the road transport companies.

PKCT identified one instance of a truck parked up off to the side of Springhill road for a short period of time during the reporting period. The truck did not pose any risk to traffic flow or to any other aspect of community amenity for the short period it was parked. As the location of the truck was not on Springhill Road, it is not considered a non-compliant action

however, PKCT immediately notified the truck company involved and developed and communicated a "Toolbox Talk" to be shared through the truck company. The observation was captured in our Event management System.

5.2.3 Trends in Transport

Road receival at PKCT remained at near long-term average levels during the reporting period with 5.72Mt of combined private and public road receivals to June 2021, Figure 11.

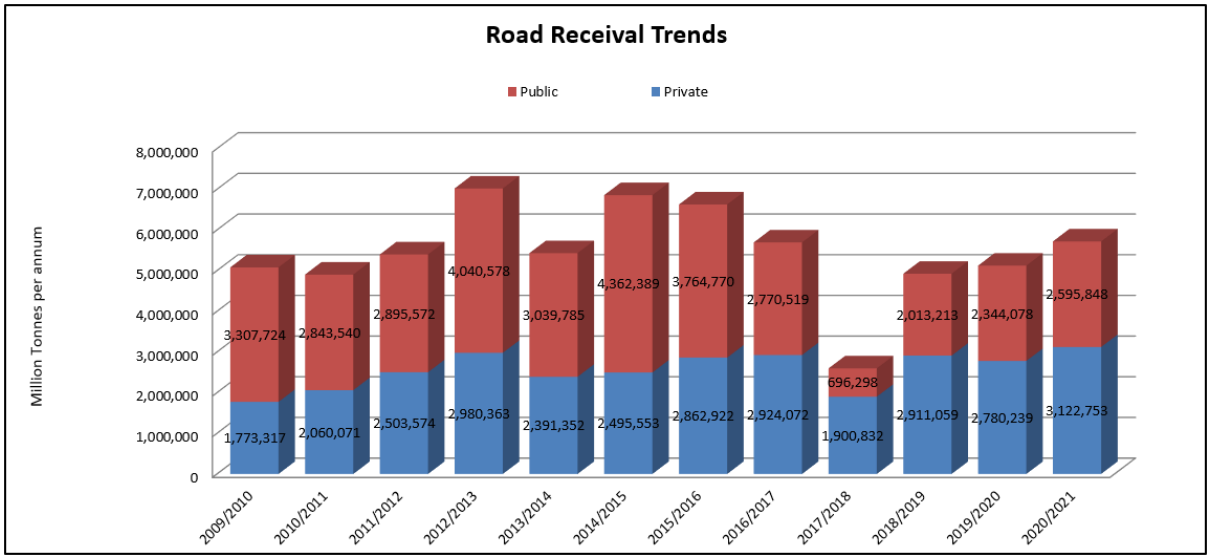


Figure 11: Road receival trends

5.2.4 Traffic –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to traffic is presented below.

- Routine task observations and audits have continued, focussing on compliance against dust drag-out, the Driver's Code of Conduct and PKCT's approval conditions.
- PKCT trialled the use of a high-pressure jet washing truck in addition to the existing road sweeper and water carts to assist with deep cleaning of the outbound roadways and other areas across site. The results of the trial were positive and the unit will be mobilised periodically as needed.
- Drivers' code of conduct was reviewed, updated, and submitted to DPI&E for approval.

5.2.5 Traffic - Activities Planned for 2021/2022 Reporting Period

A summary of the planned actions for the 2021/2022 reporting period related to Traffic is presented below.

- Continue to undertake additional routine Driver's Code of Conduct auditing.

- Focus on cleaning and auditing of outbound road. Investigate options for cleaning public roadway outbound from coal terminal with local council/road owners.

5.3 Air Quality

5.3.1 Air Quality Standards and Performance Measures

EPL 1625 and Major Project Approval 08-0009 pertain to air quality and emissions from PKCT's premises. Air quality criteria are outlined as follows;

Impact Assessment Criteria

7. The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 3 to 5 at any residence.

Table 3: Long term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Total suspended particulate (TSP) matter	Annual	90 μg/m3
Particulate matter < 10 μm (PM10)	Annual	30 μg/m3

Table 4: Short term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Particulate matter < 10 μm (PM10)	24 hour	50 μg/m3

Table 5: Long term impact assessment criteria for deposited dust

Pollutant	Averaging Period	Maximum Increase in Deposited Dust Level	Maximum Total Deposited Dust Level
Deposited Dust	Annual	2 g/m^2/month	4 g/m^2/month

Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS 3580.10.1-1991: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.

However, if the Proponent has a written negotiated air quality agreement with any landowner to exceed the air quality limits in Table 3, 4 and/or 5, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the air limits in Table 3, 4 and/or 5 in accordance with the negotiated air quality agreement.

Operations

8. The Proponent shall:
   (a) ensure any visible air pollution generated by the project is both minimised and recorded, and that operations are modified as required to minimise any resultant air quality impacts on nearby residences;
   (b) ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and
   (c) where dust is generated by the project, that operations are modified and/or stopped as required to ensure compliance with the relevant air quality criteria

   to the satisfaction of the Director-General.

9. During carrying out of the project, the Proponent shall ensure that:
   (a) all loaded trucks entering or leaving the site have their loads covered; and
   (b) trucks associated with the project pass through a truck wash before entering the public road network

   to the satisfaction of the Director-General.

Air Quality Monitoring Program

10. The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must:
    (a) be developed in consultation with DECC;
    (b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and
    (c) include:
        - real-time sampling to monitor the dust emissions of the project;
        - an air quality monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this approval; and
        - reasonable and feasible best practice emissions mitigation measures to ensure project specific assessment criteria are met.

5.3.2 Air Quality Monitoring and Compliance

5.3.2.1 Air Quality Monitoring Methodology

PKCT has an Air Quality Management Plan (AQMP) in place and is operational as follows;

- The AQMP, developed in consultation with the EPA, was submitted to DPI&E by the due date of 9th December 2009. The DPI&E approved the AQMP by letter of 25th March 2010.

- The EPA assisted in developing the AQMP though did not add any new air quality criteria to EPL 1625. In the 2014 EPL review, the EPA included new obligations on PKCT to report on continuous dust against the DPI&E Impact Assessment Criteria and this commenced in the 2014/15 EPL Annual Return.
- PKCT's AQMP contains dust monitoring, assessment, reporting and mitigation and management provisions to ensure necessary actions are undertaken and that dust from PKCT's premises does not exceed the criteria in the Impact Assessment Criteria outlined above.
- PKCT provides 24/7 site operational control via the Main Control Room (MCR). MCR operators monitor site conditions and weather forecasts. If dust is observed, action is taken through the operation of sprays or other available controls. Dust events observed which emanate beyond the immediate source with a potential to have off site impacts are entered into PKCT's event management system, requiring investigation and corrective action. PKCT also has an auditing process in place that includes site observations of dust, dust associated with truck movements and the assessment of associated controls.
- Following surrender of the southern portion of the Terminal to the AIE LNG Project in March 2021, rationalisation of the number and location of the existing depositional and continuous dust monitoring equipment was undertaken. PKCT removed two of the 14 depositional gauges and moved the location of the southern continuous dust monitor to within the new PKCT lease area. PKCT now has a total of 12 depositional dust gauges (9 Industrial and 3 residential) located on site and on adjacent port and residential areas,

and two continuous dust monitors located to the north and south of the site, see Figure 12 below. These locations included in the revised EPL and Project Approval 08_0009. Dust Samples from each dust deposition gauge are collected on a monthly basis by an environmental contractor and sample analysis is performed at a NATA accredited laboratory. Results from the residential depositional gauges are analysed on a monthly basis and compared to the EPA amenity criteria of 4 grams/m²/month. The results are reported on the PKCT website.

Figure 12: PKCT air quality monitoring sites

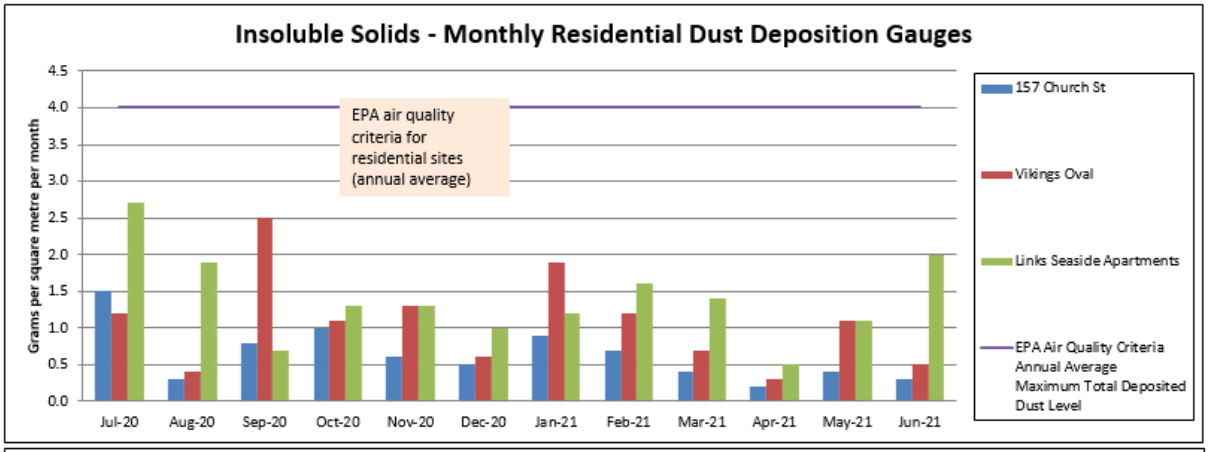
5.3.2.2 Air Quality Monitoring Results and Compliance 2020/2021

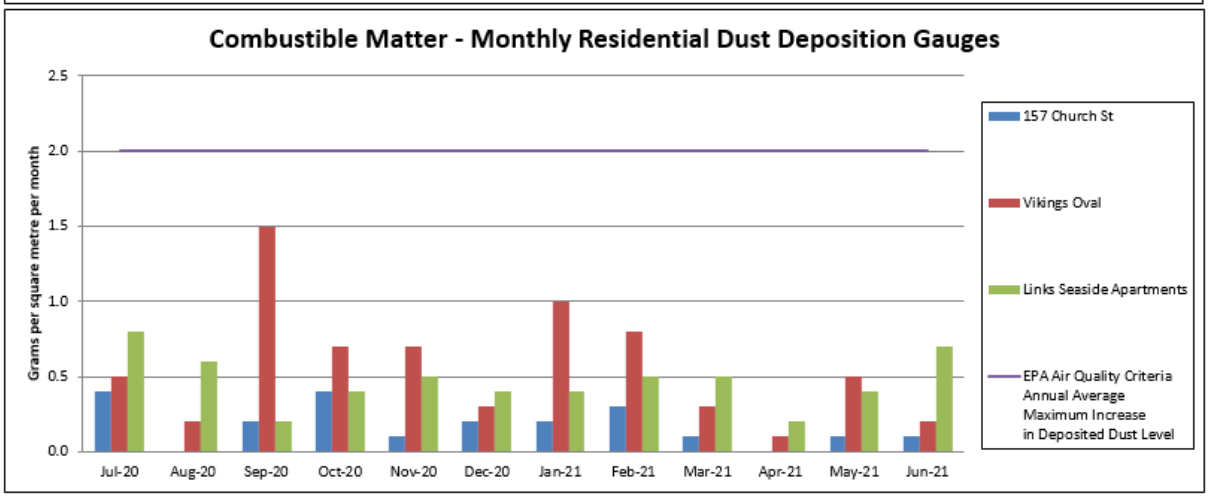
PKCT collects monthly depositional dust records at three residential sites and 11 industrial sites located on or near the PKCT premises.

Across the reporting period, there were no individual months where monitoring results were elevated above the air quality criteria for the three residential depositional gauges.

Overall, all results are within the 12-month rolling average criteria set in the Planning Approval for both Insoluble Solids and Combustible Matter. These results are compliant with the Planning Approval criteria. Monthly dust deposition results for the three residential dust gauges are presented in Figure 13 below.

Twelve month rolling average Insoluble Solids and Combustible Matter results for the 11 PKCT industrial dust gauges are also presented below in Figure 14 and Figure 15.





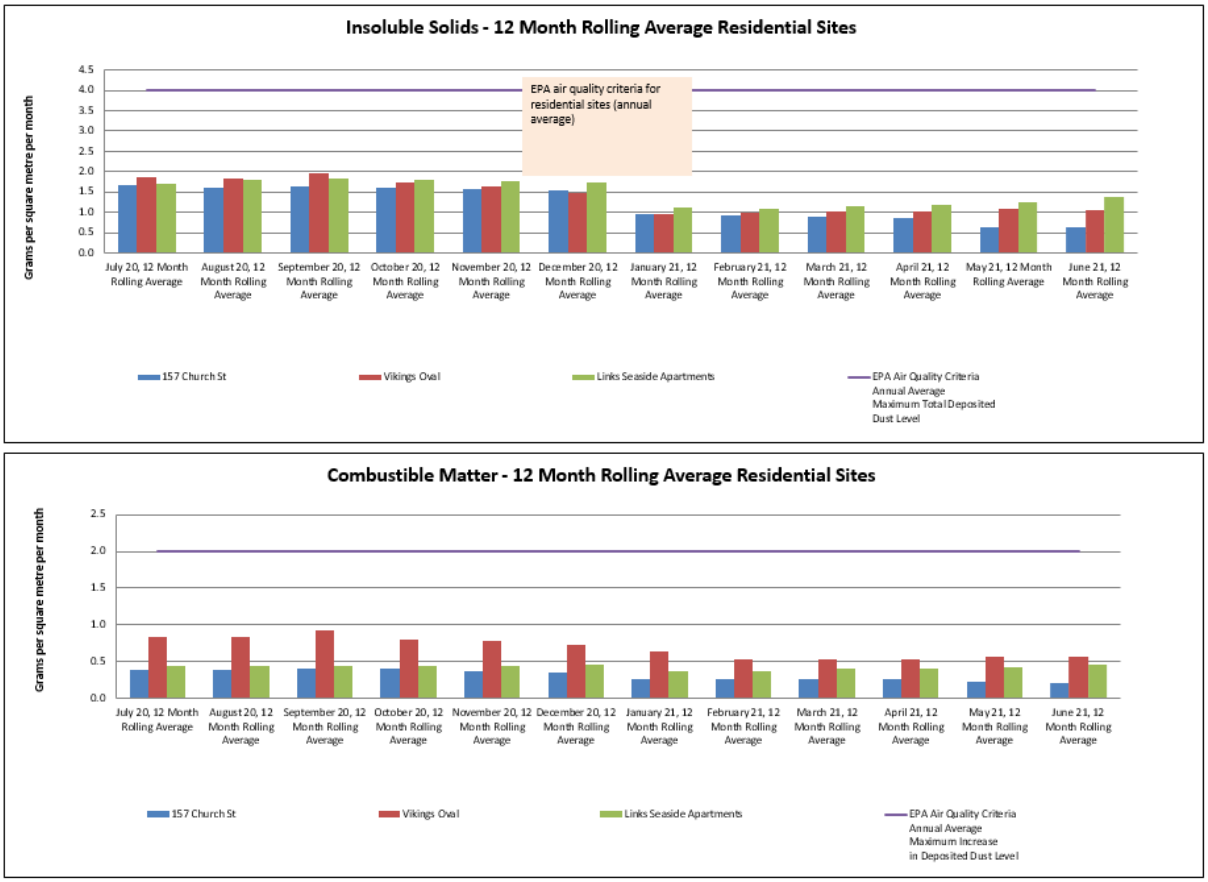


Figure 13: PKCT residential depositional dust gauges data

PKCT utilised eleven Industrial Deposition Gauges (will be nine into next reporting period) around site to assist with managing dust. The results are not used for compliance purposes, however, operational criteria are used to monitor and track deposition trends. A summary of these industrial deposition results is presented below.

Combustible Matter is typically an indicator of coal deposits in a sample. All eleven Industrial sites were within the 12-month rolling average criteria for Combustible Matter and Insoluble Solids for the period ending June 2021. The site, "P8 – Northern Truckwash" was slightly outside the 12-month rolling average criteria of 12 g/m^2/month of Combustible Matter and 15 g/ m^2/month for Insoluble Solids in July 2020 as a result of some higher recordings in the last reporting period.

PKCT has undertaken significant work at the road receival area including improved washing processes, increasing the areas of hardstand around the facility and planting of 600 trees on the western berm wall, adding a washdown attendant on the outbound side of the wash and additional road cleaning processes. These improvements will assist in reducing dust generation from the area in the future.

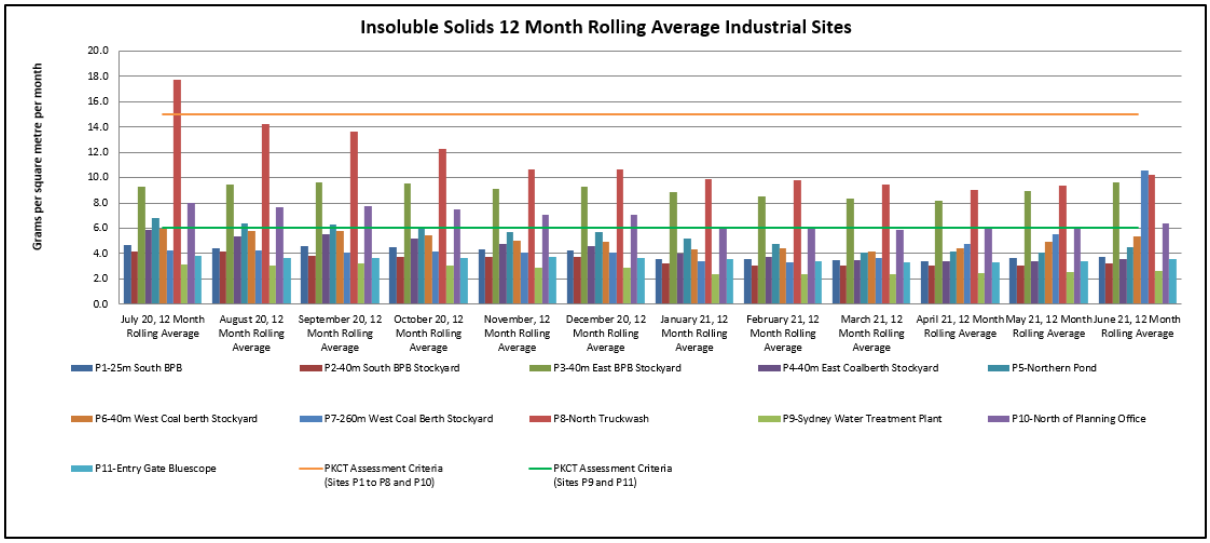


Figure 14: PKCT industrial dust deposition gauges insoluble solids 12 month rolling average.

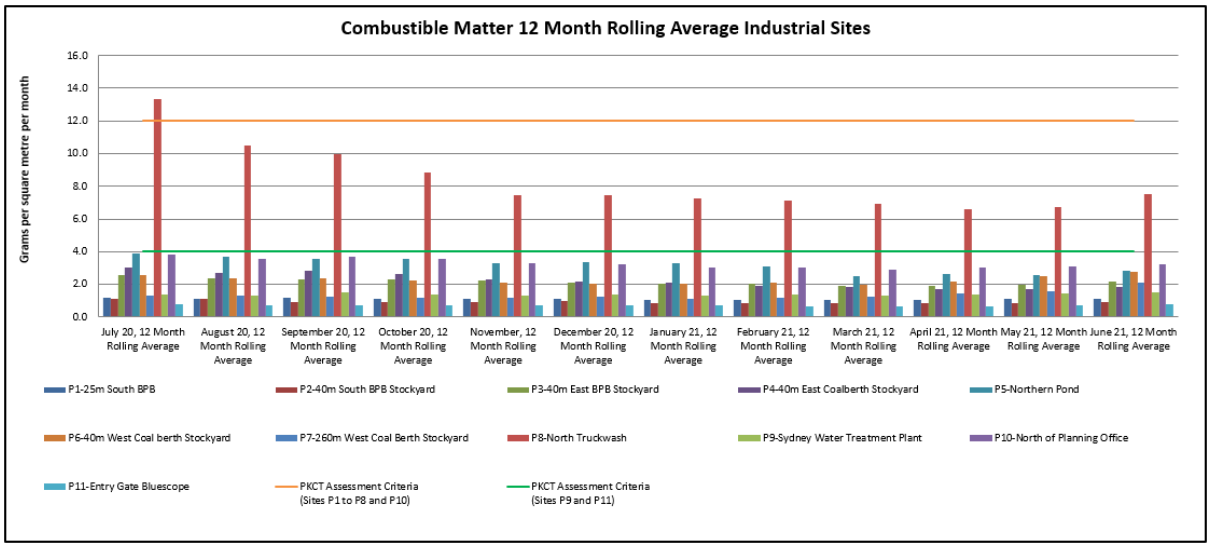


Figure 15: PKCT industrial dust deposition gauges combustible matter 12 month rolling average.

PKCT has in place two continuous dust monitors used to monitor ambient dust conditions. One monitor is located at the southern end of PKCT's premises. The other monitor is located north of PKCT's premises, midway to the residential boundary. During the monitoring period, both monitors were replaced with new units. The new units will allow better integration and alarming within PKCT's HMI system. Data from these monitors is captured and analysed by specialist air quality consultants for PKCT. Data and exceedances related to the northern monitor are presented with wind data in 11.2 Appendix B: Consultant Dust Data Summary and in Figure 16 below. A summary of the air quality data at the northern dust monitor from PKCT's Air Quality consultant is provided below.

The annual average TSP concentration of 28.2 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 90 µg/m³.

The annual average PM10 concentration of 20.9 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 30 µg/m³.

At the northern PKCT monitoring site the trigger level of 90 µg/m³ for the 24-hour average TSP concentration was exceeded on 7 occasions, while the 24-hour average PM10 air quality standard of 50 µg/m³ was exceeded on 21 occasions. Each TSP exceedance day was also a PM10 exceedance day.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to all 7 exceedances of the 24-hour average TSP trigger level at the PKCT northern monitoring site.

PKCT was identified as having made, at most, a minor contribution (i.e. less than 30%) to the 21 exceedances of the 24-hour average PM10 standard at the PKCT northern monitoring site.

PKCT contribution rating	Number of TSP exceedance days	Number of PM_{10} exceedance days
None	2	7
Minimal (0% to 10%)	4	10
Minor (10% to 30%)	1	3
Moderate (30% to 70%)	0	0
Major (70% to 100%)	0	0
Unclassified (missing data)	0	1
Total exceedance days	**7**	**21**

Figure 16: PKCT contribution ratings for exceedance days during July 2020 to June 2021

On average, PKCT was estimated to have contributed 5% to TSP levels at the PKCT northern monitoring site on days when exceedances of the TSP trigger level occurred (excluding days with no corresponding southern monitoring site data).

On average, PKCT was estimated to have contributed 4.5% to PM10 levels at the PKCT northern monitoring site on days when exceedances of the PM10 standard occurred (excluding days with no corresponding southern monitoring site data).

5.3.3 Trends in Air Quality

Comparative data for the PKCT residential depositional dust gauges is presented in Figure 17 below. Each year, 12 samples are collected at each gauge. As is shown in the Figure, the number of exceedances occurring across each year is low and no adverse trend is apparent

in the current data set. It is noted that only occasional monthly dust levels exceeding the DPI&E criteria are recorded with the annual average levels being well within the DPI&E criteria 12 month rolling average criteria. Additionally, the occasional exceedances that are identified within the residential gauges once further analysed are typically not associated with dust generation from PKCT (insect remains, plant matter clays etc.).

Residential Air Quality Criteria Number of Exceedances - Insoluble Solids											
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
Links Seaside Apartments	Criteria 4 g/m²/month	0	0	1	0	0	0	0	0	1	0
Vikings Oval	Criteria 4 g/m²/month	0	2	0	0	1	1	0	0	1	0
157 Church Street	Criteria 4 g/m²/month	0	0	0	0	1	0	0	0	1	0

Residential Air Quality Criteria Number of Exceedances - Combustible Matter											
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
Links Seaside Apartments	Criteria 2 g/m²/month	0	0	0	0	1	0	0	0	0	0
Vikings Oval	Criteria 2 g/m²/month	0	2	0	0	2	1	0	0	1	0
157 Church Street	Criteria 2 g/m²/month	0	0	0	0	1	0	0	0	0	0

Figure 17: Annual residential depositional dust gauge trends

A summary of the 2020/2021 depositional and continuous dust gauge data compared to historical records is presented below in Figure 18.

PKCT's Environmental Assessment on Air Quality undertaken in 2008 predicted that impacts to air quality from PKCT would be well below relevant DECC criteria based on existing PKCT operations and the proposal to receive coal by road over a 24/7 period up to a maximum of 10mtpa. Annual average results for the three residential depositional dust gauges show that for both total insoluble solids and for combustible matter, levels are well within the DECC guidelines on all occasions, see Figure 13. This aligns with the predictions in the Environmental Assessment.

Annual average results for TSP and PM_{10} recorded at the continuous dust gauges are within the relevant DECC guidelines on all occasions except for the PM_{10} annual average in FY2012/2013, and marginally in FY2014/2015 and FY2015/2016, see Figure 18. Both TSP and PM_{10} were within the criteria for the 2020/2021 reporting period. The continuous dust monitors used to record this information cannot discern where the dust source is from, however the data is analysed by a consultant on behalf of PKCT and assesses the likely contribution by PKCT to the results.

PKCT continues to utilise the collected data to minimise and manage dust from its operations.

Location	Standard	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021
		Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average
Residential Depositional Gauges												
Total Insoluble Solids												
Vikings Oval (d)	4 g/m² month	1.4	1.4	1.6*	1.2	1.1	2.6	1.6	1.0	1.1	1.9	1.1
Church Street (d)	4 g/m² month	3.5	1.5	1.3	1.6	1.1	1.8	1.2	1.0	1.0	1.6	0.6
Ross Street (d)	4 g/m² month	-	1.6	1.4	1.4	1.1	1.4	1.6	1.0	1.3	1.5	1.4
Combustible Matter												
Vikings Oval (d)	2 g/m² month	0.8	0.8	0.8*	0.7	0.8	1.7	0.8	0.5	0.4	0.8	0.6
Church Street (d)	2 g/m² month	0.8	0.6	0.6	0.6	0.6	1.2	0.6	0.4	0.4	0.4	0.2
Ross Street (d)	2 g/m² month	-	0.8	0.6	0.7	0.6	0.8	0.8	0.3	0.5	0.4	0.5
Continuous Dust Monitor												
TSP												
Northern (c)	90 ug/m³	32.2	34	62	44.3	45.8	48.3	40.8	34.6	31.1	26.7	28.2
PM10												
Northern (c)	30 ug/m³	25.8	27	47	24.8	30.8	31.6	28.1	24.4	22.0	19.2	20.9

Data for FY 2013 (July 2012 and January 2013) has been omitted for the residential depositional gauge at Vikings Oval. The results received were well outside normal values for this location. Subsequent petrographic analysis confirmed that the main constituents of the sample were plant matter and not related to PKCT operations.

Figure 18: Summary of depositional and continuous dust data against relevant standards

5.3.4 Air Quality –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to Air Quality is presented below.

PKCT has completed a suite of specific dust management environmental improvement initiatives associated with its EPL during the reporting period. A summary of each of these is provided below;

- PKCT trialled the use of a high-pressure jet washing truck in addition to the existing road sweeper and water carts to assist with deep cleaning of the outbound roadways and other areas across site. The results of the trial were positive with the road surfaces notably cleaner after use of the unit. The unit is significantly more expensive to hire than the existing road sweeper and water cart systems already being utilised at the terminal, however PKCT will periodically utilise the jet washing system when auditing identifies a need. See Figure 19 below.

Figure 19: Trial of jet blaster ruck to improve washing process of roadways and hardstand areas.

- In October 2019, a moisture meter was installed in PKCT's Road receival area as part of Environmental Improvement Program EIP U1 "Install Moisture Meters at Road Receival". The meter allows PKCT to gather moisture data on incoming coal and adjust stockpile spray frequencies accordingly to reduce dust lift-off. The EIP was completed by in August 2020. The moisture meter is now active on the PKCT HMI monitoring system and activates alarms if incoming coal is drier than expected. With the additional alarming in place, PKCT is able to quickly add water to a stockpile to improve dust management.

5.3.5 Air Quality - Activities Planned for 2021/2022 Reporting Period

A summary of the planned actions during the 2021/2022 reporting period related to air quality is presented below.

- PKCT will continue to work on improving the effectiveness of its existing dust mitigation infrastructure and will continue the work already undertaken with expert consultants on this matter.

5.4 Meteorological

5.4.1 Meteorological Monitoring Standards and Performance Measures

11. During the life of the project, the Proponent shall ensure that there is a suitable meteorological station on or in the vicinity of the site that generally complies with the requirements in the *Approved Methods for Sampling of Air Pollutants in New South Wales* guideline.

5.4.2 Meteorological Monitoring

5.4.2.1 Meteorological Monitoring Methodology

PKCT primarily utilises an on-site weather station to measure, monitor and record weather variables. The station measures wind speed and direction, rainfall, air pressure, temperature and humidity continuously at the site.

Additionally, PKCT operates two continuous dust monitors that measure PM10, PM2.5, TSP, wind speed and wind direction, see Figure 20 below.

Figure 20: PKCT northern continuous dust monitor

Data from the monitoring stations is used by PKCT personnel to assist with environmental management on site.

5.4.2.2 Meteorological Monitoring Results and Compliance 2020/2021

A summary of the rainfall data recorded at PKCT across the 2020/2021 reporting period is presented below in Figure 21 and Figure 22. An annual wind summary from the northern and southern continuous dust monitors is presented in 11.3 Appendix C: PKCT Annual Wind Summary

Year/Month	Rainfall (mm)
Jul-20	148.2
Aug-20	170.2
Sep-20	13.4
Oct-20	60.4
Nov-20	40.6
Dec-20	56
Jan-21	85.6
Feb-21	83.2
Mar-21	175.6
Apr-21	18.6
May-21	90
Jun-21	38.6

Figure 21: PKCT weather station monthly monitoring data 2020/2021

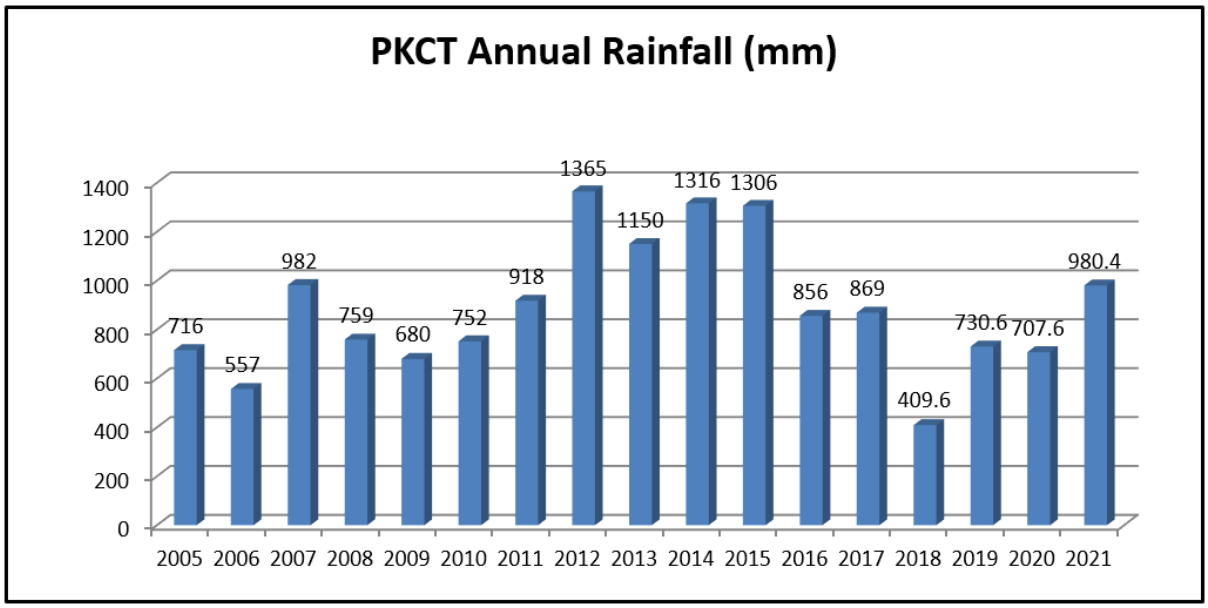


Figure 22: PKCT annual rainfall (financial year)

5.4.3 Trends in Weather

As is shown in Figure 22 above, the 2020/2021 reporting period had an increased level of rainfall compared to last period with 980.4 mm recorded during the financial year (site average for the past 17 years is 885 mm/year).

5.5 Surface Water

5.5.1 Surface Water Standards and Performance Measures

EPL 1625 and Major Project Approval 08-0009 pertain to water quality and discharge limits from PKCT's premises. Water quality criteria are outlined as follows;

Discharge Limits

12. Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the *Protection of the Environment Operations Act 1997*.

Water Management Plan

13. The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director- General. This Plan must:

(a) be prepared in consultation with DECC;

(b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and

(c) include:

- a site water balance, which includes details of sources of water supply, on-site water use and management and off-site water discharges and investigates and describes measures to minimise water use by the project;
- a sediment control plan for surface works on the site that is consistent with the requirements of the *Managing Urban Stormwater: Soils and Construction Manual* (Landcom 2004, or its latest version);
- a surface water monitoring program that includes:
  - stormwater effluent discharge criteria;
  - a monitoring protocol for evaluating compliance with the stormwater effluent discharge criteria; and
  - reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are

met.

5.5.2 Surface Water Monitoring

5.5.2.1 Surface Water Monitoring Methodology

PKCT has a Water Management Plan MP.HS.462 (WMP) which is in operation and DPI&E approved. This plan was submitted to the DPI&E within 12 months of Project Approval 08_0009. PKCT reviewed and updated the plan during the reporting period as a result of the lease handover to the AIE LNG Project. The updated plan was subsequently approved by DPI&E.

This Plan outlines the processes operating currently with regard to water monitoring, assessment, reporting, mitigation and management provisions to ensure necessary actions are undertaken in accordance with DPI&E approval conditions.

The WMP includes reference to PKCT's Water Savings Action Plan (WSAP). This Plan was in place since 2006. PKCT has now met its regulatory obligations and no further reporting is required.

PKCT also operates under EPL 1625. Under this licence, PKCT is required to measure water quality at its Licenced Discharge Point 16 (LDP16). Daily grab samples are taken from LDP16 when harbour discharges occur.

On a monthly basis, PKCT collates and reviews water usage across the site and discharge water quality. LDP16 discharge monitoring data is uploaded to the PKCT website as required under Schedule 4, Condition 9 of Project Approval 08_0009.

In September 2014, PKCT completed a five-yearly review of EPL 1625 with the EPA. Related to water monitoring, the review process added an additional monitoring requirement to sample overflows from PKCT's satellite ponds and to report the data via the Annual Return process. PKCT's pH limits for LDP16 were removed and replaced with a monitoring and reporting requirement and LDP16's Oil and Grease limit was removed and changed to a "visible/not visible" reporting requirement.

In 2021, with the change on lease area, PKCT relinquished two pond locations "South Pond" and "Tower 3 Pond" from the site, and added two new sediment ponds, "South East Pond" and "TS8 Sump". The updates have been incorporated into a revised EPL by the EPA, see here. As a result of the change to the surface area of the site, PKCT reviewed and updated the Water Management Plan and incorporated to the plan a revised water balance model. The revised Management Plan can be found on PKCT's web site https://www.pkct.com.au/community-environment/regulatory-documents

5.5.2.2 Surface Water Monitoring Results 2020/2021

PKCT's licence conditions and limits for LDP16 are presented below in Figure 23

Monitoring Parameter	100 percentile limits
pH	Monitoring only
TSS	50 mg/litre
Oil and Grease	Visible

Figure 23: EPL 1625 water quality parameter limits and compliance

Across the FY2020/2021 reporting period, PKCT recorded a total of 128 discharges from LDP16. Of these discharges, 100% were compliant for TSS and 100% were compliant for Oil and Grease. pH was monitored as required, see Figure 24 below. A summary of all LDP16 discharge monitoring data is presented in Appendix D: LDP16 Discharge Data Summary.

Monitoring Parameter	Number of Overflows	Maximum recorded value	Minimum recorded value	Mean recorded value	Compliant Samples (%)
pH	128	9.1	5.7	7.3	n/a
TSS (mg/l)	128	28	<5	10.5	100%
Oil and Grease (mg/l)	128	6	<5	<5	100%

Figure 24: Water quality monitoring summary for LDP16 discharges

PKCT monitors water usage across the site on a monthly basis. A summary of the water usage for the site compared to the WSAP is presented below in Figure 25. As can be seen, the water usage remains significantly below the WSAP commitment of 42.5ML/month.

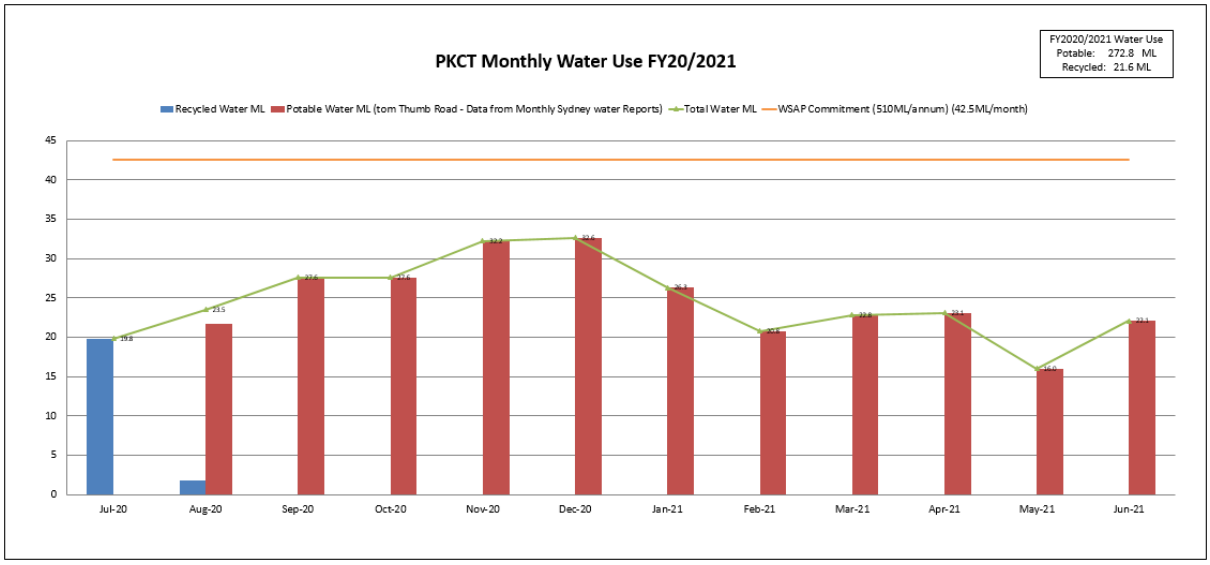


Figure 25: PKCT monthly water use for 2020/2021 reporting period

5.5.2.3 Surface Water Monitoring Compliance

Of the 128 discharges from LDP16 recorded during the 2020/2021 reporting period, PKCT was compliant for 128 (100%) Oil and Grease samples and 128 (100%) TSS samples, and pH was monitored on all 128 overflow occasions as required. This represents a slight improvement on last year's results.

PKCT continues to undertake work on a suite of improvement initiatives associated with ensuring compliance with the LDP16 discharge licence conditions.

5.5.3 Trends in Surface Water Monitoring

Figure 26 below highlights the trends in compliance measured at LDP16 for EPL 1625 water quality parameters of pH, TSS and Oil and Grease. As is shown in Figure 26, compliance has slightly improved compared to last year at 100% for Oil and Grease and 100% for TSS during this reporting period. pH is now monitoring and reporting only.

Monitoring Parameter	2012/2013		2013/2014		2014/2015		2015/2016		2016/2017		2017/2018		2018/2019		2019/2020		2020/2021	
	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %
pH		96		93		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only
TSS (mg/l)	68	91	91	95	143	94	72	100	54	100	17	100	86	98	84	98	128	100
Oil and Grease (mg/l)		100		100		100		100		100		100		100		100		100

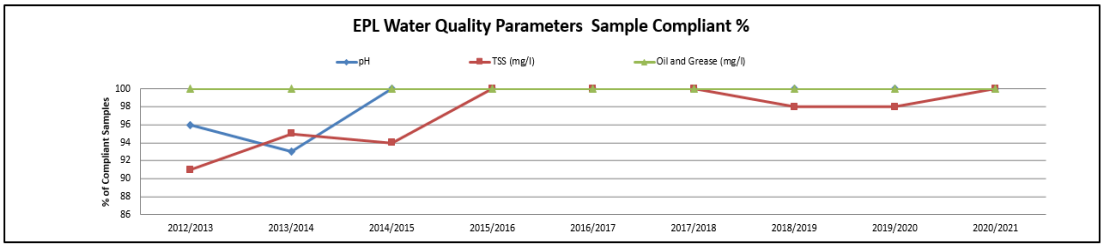


Figure 26: Trends in EPL water quality data at LDP16

Total water (recycled + potable) used this reporting period remained historically low, and comparable to last reporting period, 286.8 ML in 2019/2020, and 294.4 in 2020/2021, Figure 27 below. Potable water used at PKCT in the 2020/2021 period was significantly higher than last period, with the increase related to Recycled water supply issues at the Sydney Water Treatment Plant. Sydney water has not been able to supply TTE since September 2020, the majority of the reporting period. Potable water used across 2020/2021 was therefore 272.8 ML.

There have been a number of activities across the 2020/2021 reporting period that have contributed to the continued reduced water usage observed over the past three reporting periods. These activities include, lower throughput meaning less "coal on the ground" to manage, and the continued isolation and final relinquishment of the southern portion of the site to the AIE LNG Project in March 2021.

Recycled water as a percentage of the total water used has this year decreased unintentionally to a low level of 7% in this reporting period. Again, PKCT did not have any ability to use the recycled water from Sydney Water due to supply issues.

Overall, the use of recycled water is considered a benefit to the environment in its provision of significant potable water savings. PKCT continues to look for water savings across its operations.

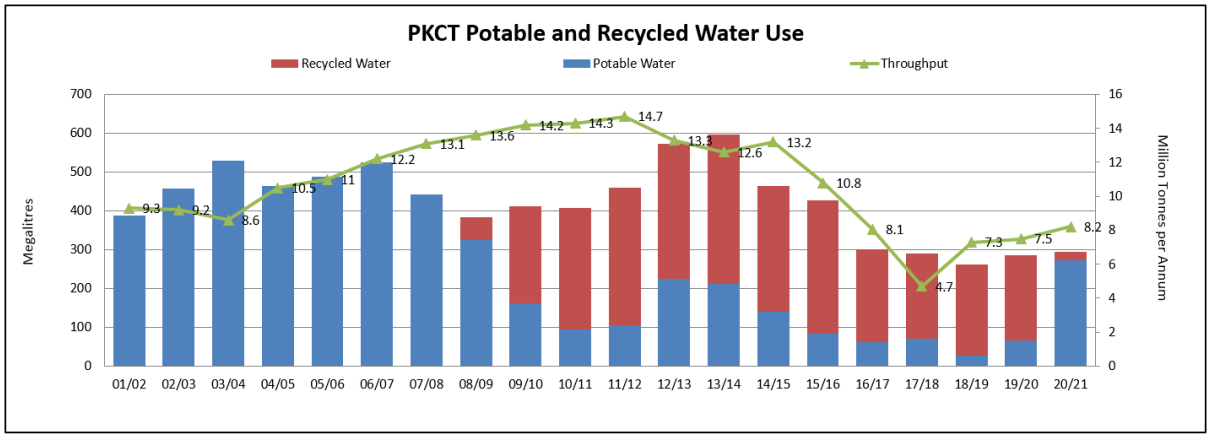


Figure 27: Trends in potable and recycled water use at PKCT

5.5.4 Surface Water –Activities Undertaken During 2020/2021Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to surface water is presented below.

- Continued sediment surveys and sediment removal as needed from the Central Pond and others on an increased frequency has helped to minimise the volume of sediment being transferred across to the Settlement Lagoon which in turn has helped to manage the quality of discharged water through LDP16.

- The lease surrender of the southern portion of PKCT to the AIE LNG Project required design and installation of two new sediment capture ponds on the site. The two new ponds named “TS8 Sump” and “South Eastern Pond” have been built at the southern end of the new PKCT lease to contain and capture sediment and water for initial settling prior to being transferred north into the existing PKCT contaminated water collection system. Both Ponds are operational and will soon have their permanent pumps and electronic control systems installed. See images below in Figure 28: TS8 Sump and Figure 29 : South Eastern Pond below.

Figure 28: TS8 Sump

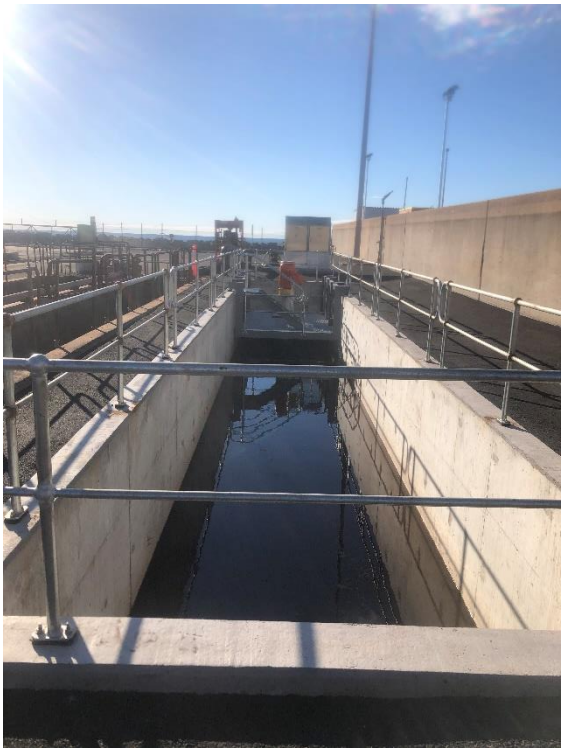


Figure 29 : South Eastern Pond

- In early 2021 a new portable diesel pump was purchased and is now stationed permanently on site for use in emergencies and to assist with cleaning tasks. The pump project included installation of a number of plumbed "tie-in" connections at key locations around site to allow rapid install of the pump during an emergency. The pump is sized so that it has the ability to be used in place of PKCT's permanent pump network,

including a "plug-and play" option for the biggest capacity pump on site. Having the pump permanently on site now improves PKCT's emergency response process in the event of a pump failing and lessens the reliance on external hire companies to promptly bring backup pumps to site during a rain event. See Figure 30 below.

Figure 30 : PKCT's new portable pump.

- PKCT has historically had problems with algal blooms in one of our ponds since the introduction of recycled water in 2009. Elevated algal counts have the potential to add TSS to our discharge water and in high levels potentially exceed our licence conditions. PKCT has engaged a specialist to assist in this space and is currently undertaking a trial in our Settlement Lagoon of an algal control product called Biostim. If successful, the natural, non-toxic product will assist with reducing the extent and frequency of algal blooms is our lagoon and reduce the likelihood of an EPL exceedance as a result. To date monitoring has shown a reduction in the extent and number of algal blooms occurring in the Lagoon. See Figure 31 below.

Figure 31: Biostim Powder satchel used to control algal blooms.

5.5.5 Surface Water - Activities Planned for 2021/2022 Reporting Period

PKCT will continue to utilise the existing tools and measures to ensure non-compliances are avoided. The following activities are planned to improve surface water management in the next reporting period:

- Continue to identify and implement opportunities for improvement related to surface water at PKCT as they arise.

5.6 Biodiversity

5.6.1 Biodiversity Standards and Performance Measures

Green and Golden Bell Frog Management Plan

14. The Proponent shall prepare and implement a Green and Golden Bell Frog Management Plan for the project to the satisfaction of the Director-General. This program must:
    (a) be developed in consultation with DECC; and
    (b) be submitted to the Director-General for approval within 12 months from the date of this approval, or as otherwise agreed by the Director-General.

5.6.2 Biodiversity Monitoring

5.6.2.1 Biodiversity Monitoring, Results and Compliance

A Green and Golden Bell Frog Management Plan MP.HS.109 (GGBFMP) is implemented, in operation and DPI&E approved. The GGBFMP has been developed in consultation with the EPA and PKCT is continuing to work closely with the authority as matters arise. Actions include:-

- Maintenance and monitoring by Wollongong City Council of its Greenhouse Park frog ponds.
- Periodic surveys involving an expert consultant. Surveys to include PKCT premises and Wollongong City Council's greenhouse Park frog ponds.
- Monitoring and reporting by site personnel as part of site operations.
- Ongoing awareness for site personnel through inductions and site communications.

5.6.3 Trends in Biodiversity

PKCT undertakes GGBF surveys and records all sightings in a register. PKCT personnel have not identified any GGBF during normal operations or as a result of focused surveys since 2011. Figure 32 below shows the trend in GGBF sightings at PKCT back to the 2007/2008 financial year.

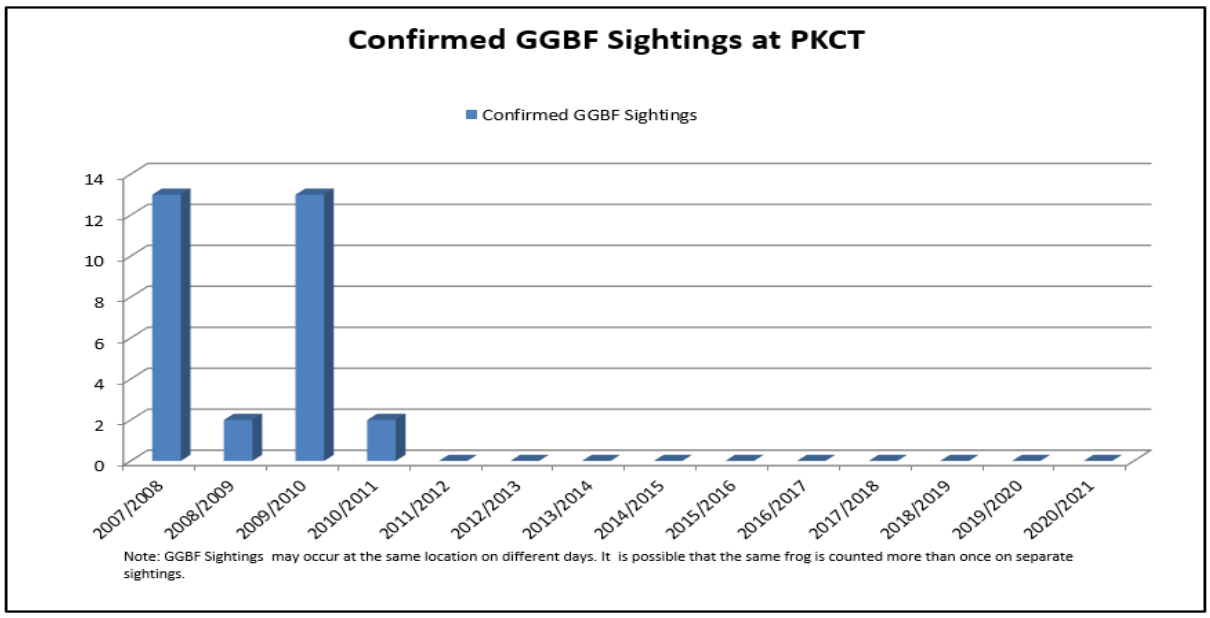


Figure 32 : GGBF sightings at PKCT

5.6.4 Biodiversity –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to biodiversity is presented below.

- PKCT undertook a GGBF survey on the 24th March 2021. The survey was supervised by an expert consultant, with assistance provided by the PKCT Environmental Specialist. The survey confirmed that GGBFs are not currently present on site. The Peron's Tree Frog and the Striped Marsh Frog were the only species of frog found on site during the survey. The Peron's Tree Frogs were present in North Pond at the north of the site while the Striped Marsh Frog was heard calling in the Tower 3 Pond. Inspection of the frog pond in Greenhouse Park was not undertaken due to access restrictions.

- Workers at PKCT are instructed to report and record any GGBF (or other frog) sightings throughout the year. Any frog sightings are recorded in a site database. No GGBFs were identified by the PKCT site personnel in the 2020/2021 reporting period. A number of Peron's Tree frogs were identified in various locations by the workforce during the year.

5.6.5 Biodiversity - Activities Planned for 2021/2022 Reporting Period

PKCT will continue to ensure that the biodiversity standards and performance measures are considered during any planning for future restoration and improvement works. A summary of the planned actions for the 2021/2022 reporting period related to biodiversity is presented below.

- Continued monitoring for GGBF populations at PKCT during site operations

- Undertake further surveys annually or when deemed necessary.

5.7 Visual Amenity

5.7.1 Visual Amenity Standards and Performance Measures

Lighting Emissions

15. The Proponent shall:
    (a) ensure no external lights shine above the horizontal;
    (b) ensure that all external lighting associated with the project complies with *Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting*, or its latest version, and
    (c) take all reasonable and feasible measures to mitigate off-site lighting impacts from the project

    to the satisfaction of the Director-General.

Landscape Management Plan

16. The Proponent shall prepare and implement a Landscape Management Plan to the satisfaction of the Director-General. This Plan must:
    (a) be submitted to the Director-General for approval within 12 months of this approval, or as otherwise agreed by the Director-General; and
    (b) include;
        - details of screening trees to be planted on the road receival earth bund and along the northern site boundary; and
        - an implementation program.

5.7.2 Visual Amenity Monitoring

5.7.2.1 Visual Amenity Monitoring, Results and Compliance.

Lighting - A consultant, undertook a review of site lighting and assessment against the standard in 2011. A report of 4th October 2011 concluded that PKCT was compliant with AS 4282 and no evidence of any detrimental impact was found on residential areas.

PKCT has now completed a major restoration and compliance project on site. As part of the project, all new lighting complies with AS4282. Additionally, the project has generally used LED lighting and ensured light emission is either local to access and stairway areas or, elevated and directed towards the ground or stockpiles in other areas. The lights have been designed so that they are easily accessible allowing for quick adjustment if required.

Following the completion of the Upgrade Project and installation of the new yard machines, in December 2019 PKCT engaged a consultant to undertake a lighting audit of the site to confirm that the existing outdoor lighting system/s comply with Australian Standards AS/NZS 4282-2019. The audit concluded that there was no detrimental impact to residential areas, nor any significant areas of concern with the lighting systems on site.

Landscaping - PKCT's Landscape Management Plan MP.HS.470 (LMP) is in operation and DPI&E approved. This document includes details of proposed tree planting. Implementation is staged and processed through PKCT's project approval process.

PKCT utilises a landscaping contractor to maintain lawns and gardens and control weeds on site. Landscape contractor staff are trained in chemical application and use non-residual

herbicides. All weed spraying undertaken considers prevailing weather conditions and locations, and PKCT is provided with a Weed Spraying Notification Form (WSNF) each time an herbicide is used on site. See 11.5 Appendix E: Weed Spraying Notification Form for an example of a WSNF.

5.7.3 Trends in Visual Amenity

PKCT's lighting survey in 2011 and again in 2019 did not identify any offsite lighting impacts associated with the PKCT operation. There have been no recorded community complaints relating to lighting since PKCT commenced operations in 1990.

5.7.4 Visual Amenity –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to visual amenity is presented below.

- During the reporting period, PKCT relinquished the lease for the southern portion of the terminal to the AIE LNG Project. As part of this relinquishment, PKCT removed a number of large lighting towers historically used to provide lighting to the bulk products area.

- PKCT's Road Receival Landscaping Project was undertaken during January and February this 2019. This major landscaping project aimed at developing a visual screen for residents to the west of the terminal, shielding truck tipping activities through the planting of 600 trees and approximately 200 sedges on the adjacent berm. The trees planted were a mix of native trees, shrubs and sedges and will take around 3-5 years to become established, see Figure 33 and Figure 34 below for an update on the growth of the trees. In addition to the screening, as they grow, the trees will assist with dust reduction in the area.

Figure 33 : Tree Planting - Northern Road Receival Berm 2019

Figure 34 : Tree Plantings – Northern Road Receival Berm June 2021

- PKCT continued to manage the tree planting undertaken in June 2019 as part of the Administration Building Upgrade Project. Refer to Figure 35 below for an update on the growth of the garden.

Figure 35 : **Main Administration Building landscaped gardens, June 2019, June 2020 and June 2021**

- Ongoing maintenance of the landscaped area near the northern transfer station. The garden is now well established in this area, see Figure 36 below.

Figure 36 : Landscaped area near Northern Transfer Station, June 2021

- All new lighting complies with AS4282 and is maintained to ensure minimise off-site impacts. There were no community complaints relating to lighting across the 2020/2021 reporting period.

5.7.5 Visual Amenity - Activities Planned for 2021/2022 Reporting Period

PKCT will continue to ensure that visual amenity and landscape management is maintained and included for consideration during any planning for future restoration and improvement works.

5.8 Greenhouse and Energy Efficiency

5.8.1 Greenhouse and Energy Efficiency Standards and Performance Measures

Operating Conditions

17. The Proponent shall implement all reasonable and feasible measures to minimise:
    (a) energy use onsite; and
    (b) greenhouse gas emissions from the project
    to the satisfaction of the Director-General.

Greenhouse and Energy Efficiency Plan

18. Within 12 months of this approval or as otherwise agreed by the Director-General, the Proponent shall prepare and implement a Greenhouse and Energy Efficiency Plan for the project. This plan must:
    (a) be prepared generally in accordance with the *Guidelines for Energy Savings Action Plans* (DEUS 2005, or its latest version);
    (b) be submitted to the Director-General for approval;
    (c) include a program to estimate/monitor greenhouse gas emissions and energy use generated by the project;
    (d) include a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use at the project;
    (e) describe how the performance of these measures would be monitored over time; and
    (f) report on the project's greenhouse gas emissions and minimisation measures in the AEMR
    to the satisfaction of the Director-General.

5.8.2 Greenhouse and Energy Efficiency Monitoring

5.8.2.1 Greenhouse and Energy Efficiency Monitoring Methodology

In accordance with Condition 18, a Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461 (GGEEMP) was included in the 0910 AEMR submission to DPI&E. It outlines the monitoring and management processes in place, including PKCT's Energy Savings Action Plan (Established under the Energy Administration (Water and Energy Savings) Act 2005), and regulated by EPA).

The GGEEMP remains in operation and is DPI&E approved.

In accordance with legal advice, PKCT, having operational control, is deemed to be the reporting entity under the referenced legislation. Accordingly, PKCT is currently under the reporting threshold.

A consultant was engaged to advise on applicable site activities and energy aspects and to develop a monitoring format. The format developed has been implemented. Though not reporting at this stage, PKCT is recording data and monitoring energy use and greenhouse gas generation. Figure 37 below outlines the volumes of reportable emissions from PKCT operations across the reporting period.

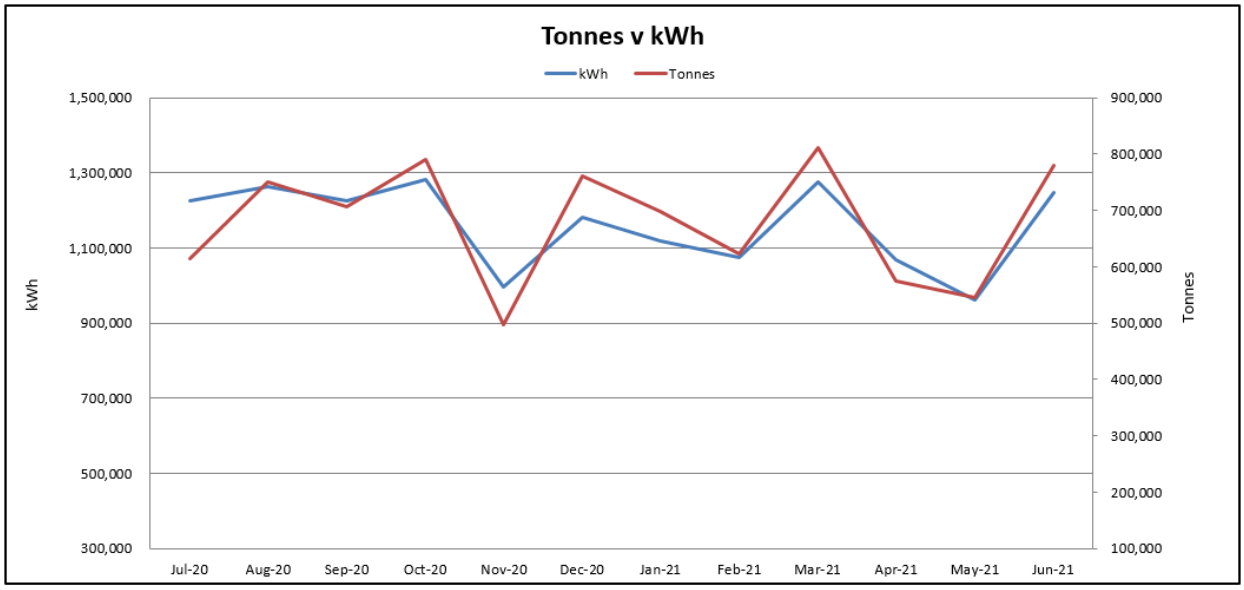
2020/2021 FY (July-June)		A	B	C	D	E
					Gigajoules	tonnes
	Reporting unit	Amount consumed (reporting unit)	Energy content (GJ per reporting unit)	Emissions factor (kg CO2-e per GJ)	Reportable energy (GJ)	Reportable emissions (tonnes CO2-e)
Scope 1 – direct emissions						
Diesel oil(transport)	kL	28	38.60	69.90	1090	76
Diesel oil (stationary energy)	kL	0	38.60	69.50	0	0
Biodiesel B20 (Transport)	kL	0	30.88	69.51	0	0
Petrol (transport)	kL	8	34.20	69.60	283	20
Petroleum based oils	kL	1.52	38.80	27.90	59	2
Petroleum based greases	kL	2.02	38.80	27.90	78	2
Acetylene	m3 *	0	0.0393	51.33	0	0
Scope 2 – indirect emissions						
	Reporting unit		Energy content (GJ per kWh)	Emissions factor (kg CO2-e per kWh)		
Electricity	kWh	13,919,446	0.0036	0.83	50110	11553
Total					51621	11653
Threshold (as per 2020/2021)					100,000	25,000

http://www.cleanenergyregulator.gov.au/NGER/Reporting-cycle/Assess-your-obligations/Reporting-thresholds

Figure 37 : Greenhouse gas report 2020/2021

5.8.2.1 Greenhouse and Energy Efficiency Monitoring, Results and Compliance.

Energy use is measured at PKCT on a monthly basis. Energy use generally follows the same trend as throughput at the site, i.e. when there is an increase in throughput, energy use also increases. Figure 38 below provides monthly energy consumption and tonnes (throughput) for the 2020/2021 reporting period, with month-to-month variation largely continuing to follow this expected correlation.



Month	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21
kWh	1,224,218	1,263,035	1,225,791	1,282,370	994,876	1,181,497	1,118,732	1,074,185	1,277,209	1,069,701	960,730	1,247,102
Tonnes	615,156	750,970	707,149	789,958	497,779	760,311	698,099	622,863	810,839	575,256	545,834	779,288

Figure 38 : PKCT tonnes v kWh

5.8.3 Trends in Energy Efficiency

PKCT measures energy efficiency against its baseline energy efficiency target of 1.655 kWh/tonne. This figure is calculated by dividing the energy used at the premises (kWh) by throughput (tonnes). The 2020/2021 reporting period saw seven months where monthly kWh/tonne exceeded the baseline energy efficiency target, see Figure 39 below. These records correspond with lower than historical throughput across the reporting period. Overall, the site operated at an average monthly energy efficiency level of 1.7 kWh/tonnes for the 2020/2021 reporting period which, while above the baseline energy efficiency target of 1.655kWh/tonne, is trending towards a more efficient result as throughput at PKCT continues to increase. PKCT will be at its most efficient when throughput is high.

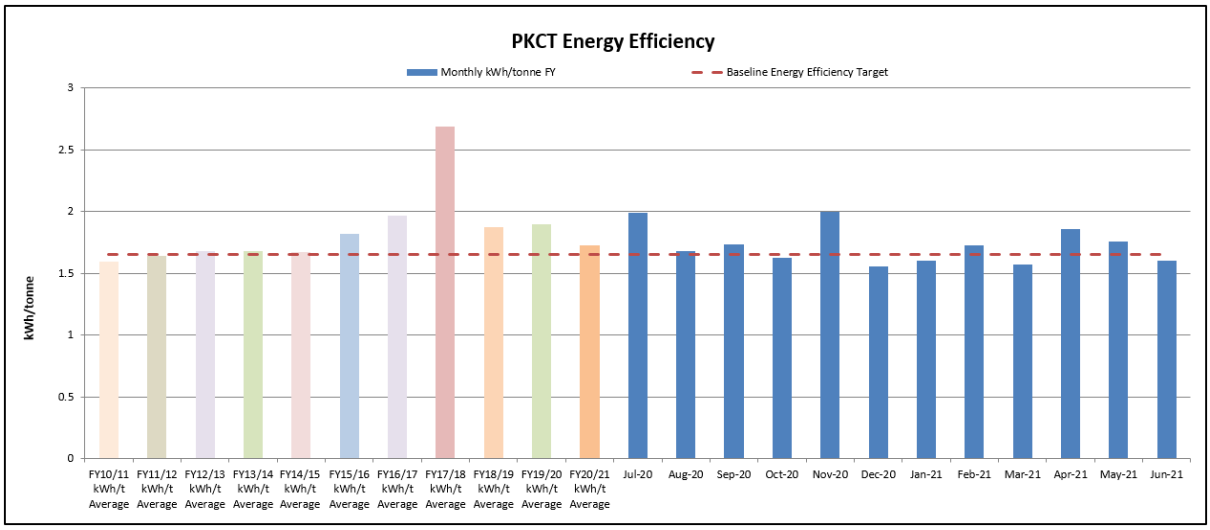


Figure 39 : PKCT energy efficiency trends

PKCT monitors greenhouse gas generated by the site annually. At this stage, greenhouse gas emissions and reportable energy are below the legislated reporting thresholds, see Figure 37.

Reportable energy consumption and greenhouse emissions remain relatively low and well below reporting thresholds for this reporting period. The small increases observed in 2020/2021 reflect the corresponding small increase in throughput for the period. Figure 40 below shows these trends.

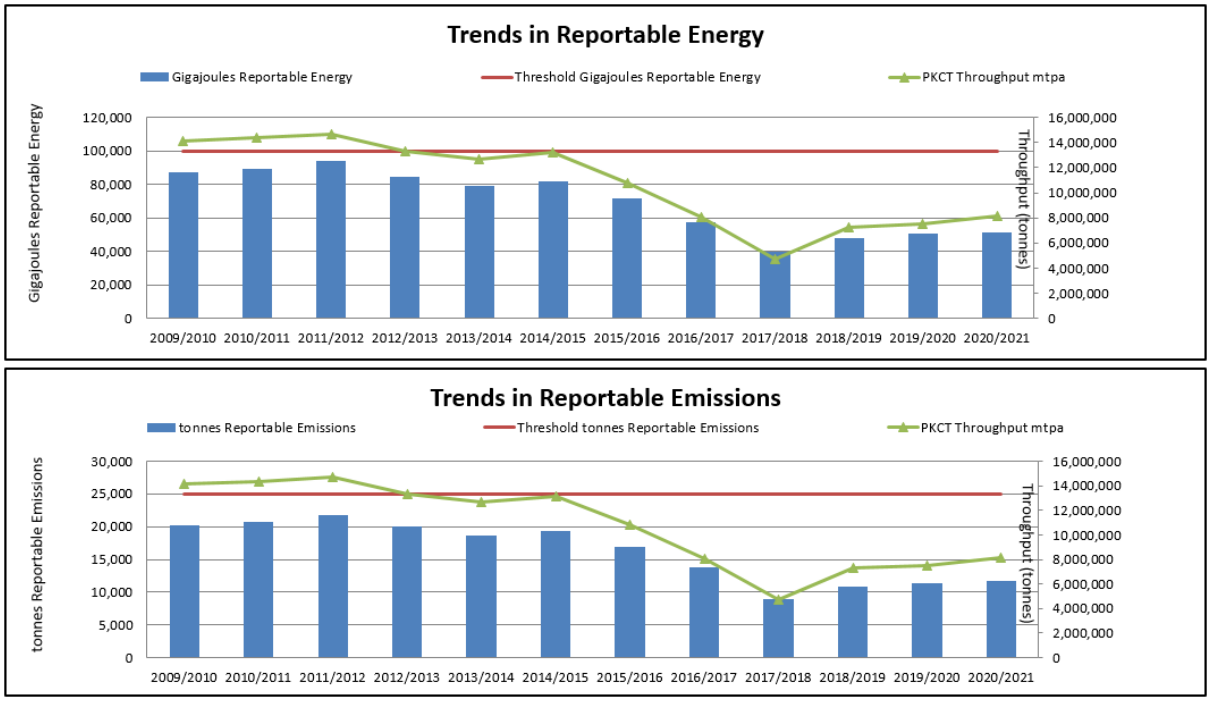


Figure 40: Trends in reportable energy and greenhouse gas emissions

5.8.4 Energy Efficiency –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to Energy Efficiency is presented below.

- PKCT continues to look for energy savings wherever possible. PKCT has revised the Greenhouse Gas and Energy Efficiency Management Plan and has reinstated the review group for the Energy Savings Action Plan.

5.8.5 Energy Efficiency - Activities Planned for 2021/2022 Reporting Period

A summary of these actions planned for the 2021/2022 reporting period is presented below.

- PKCT will continue to ensure that energy efficiency is considered during any planning for future restoration works.

5.9 Waste

5.9.1 Waste Standards and Performance Measures

Operating Conditions

19. The Proponent shall:
    (a) monitor the amount of waste generated by the project;
    (b) investigate ways to minimise waste generated by the project;
    (c) implement reasonable and feasible measures to minimise waste generated by the project; and
    (d) report on waste management and minimisation in the AEMR to the satisfaction of the Director-General.

5.9.2 Waste Monitoring

5.9.2.1 Waste Monitoring Methodology

PKCT's Waste Management Plan MP.HS.460 (WSMP) was submitted to DPI&E with the 0910 AEMR. The plan is in operation. The WSMP contains waste monitoring, assessment, reporting, and mitigation and management provisions to ensure necessary actions are undertaken and that waste from PKCT premises comply with the criteria in the condition above.

The objectives of the WSMP are to;

- Identify waste streams from PKCT normal operations.
- Review waste streams to identify opportunities to reduce waste generation.
- Categorise identified waste streams into reuse, recycle, recovery or disposal.
- Provide a framework for managing waste and educating staff to reduce disposal.
- Provide methodology for waste handling to ensure implementation of framework.
- Ensure availability of waste related data for the PKCT AEMR.
- Monitor the success of the WSMP and continually improve it based on results
- Ensure suitable PKCT Managerial review of the waste management process leading to consideration and/or implementation of suitable improvement opportunities.

5.9.2.2 Waste Monitoring Results and Compliance 2020/2021

PKCT records and tracks waste as it is generated across the site. Waste streams at PKCT are tracked via normal operations and through project specific operations.

General site waste is managed by a waste contractor on behalf of PKCT. An annual summary of the waste generated at PKCT across the reporting period is presented below in Figure 41

Site	General - Landfill	General - Bioreactors	Hazardous (Packaged)	Cardboard	Solvent Waste	Total Waste	Total Diversion	Diversion %	Total Recovery	Diversion + Recovery %
20090383 - PORT KEMBLA COAL TERMINAL LIMITED (	11.61	31.72	6.30	2.59	0.88	53.11	2.59	5.0%	5.24	15.0%
Total	**11.61**	**31.72**	**6.30**	**2.59**	**0.88**	**53.11**	**2.59**	**5.0%**	**5.24**	**15.0%**

Figure 41 : Waste Summary 2020/2021

5.9.3 Trends in Waste

Figure 42 below shows trends in three different waste streams generated at PKCT; steel, general waste and cardboard. The 2020/2021 reporting period saw waste streams remaining relatively stable.

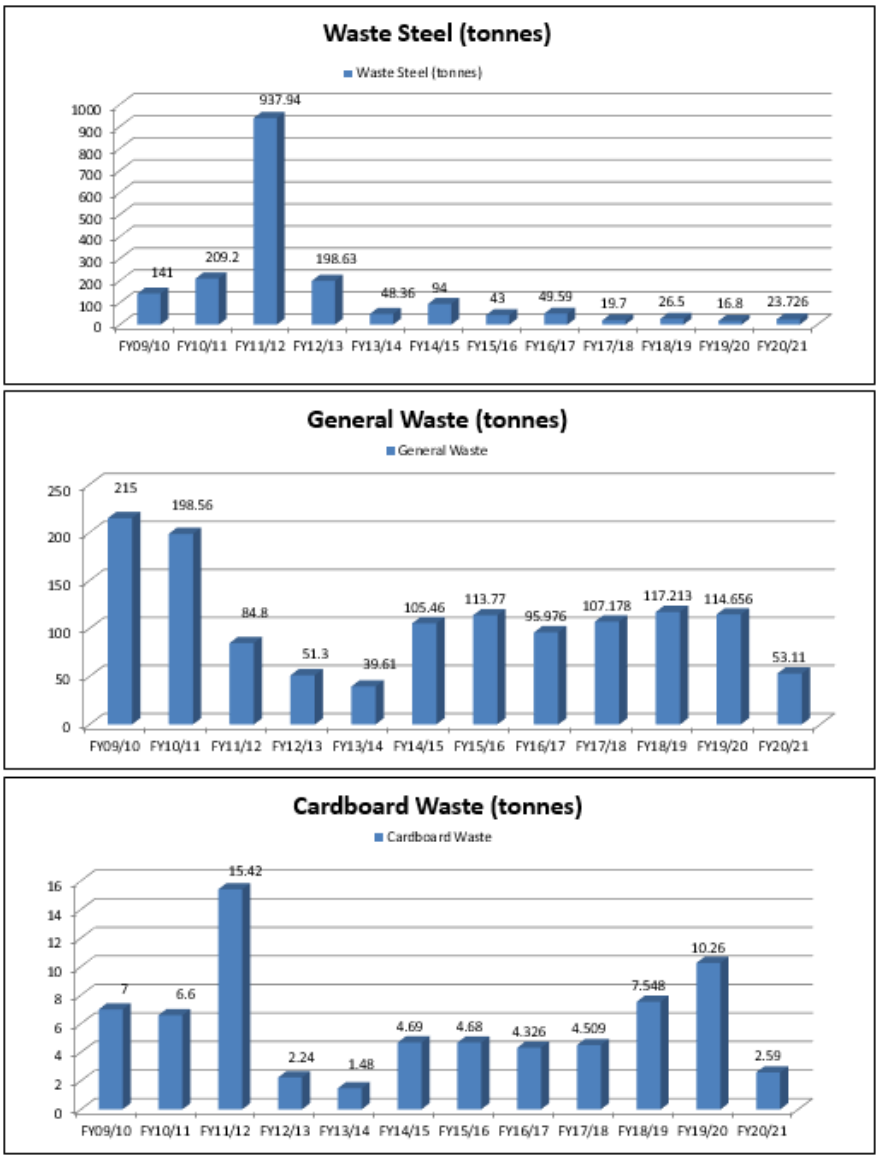


Figure 42 : Waste Trends at PKCT

5.9.4 Waste –Activities Undertaken During 2020/2021 Reporting Period

A summary of the actions undertaken for the 2020/2021 reporting period related to waste is presented below.

- In June 2021, PKCT installed an eWaste recycling bin on site. The bin is used as a common collection point for both PKCT business related eWaste as well as PKCT personnel home generated eWaste. 95% of materials can be recovered from eWaste minimising the load on landfill. Greenacres Industries, who manage this waste recycling service, provide sustainable employment and training opportunities for people with disabilities within the Illawarra area.

5.9.5 Waste - Activities Planned for 2021/2022 Reporting Period

The waste related activities planned for the coming reporting period are outlined below.

- PKCT will undertake an annual review of the Waste Management Plan.
- PKCT will continue to identify areas of waste reduction across the operation.

5.10 Hazards

5.10.1 Hazards Standards and Performance Measures

Dangerous Goods

20. The Proponent shall ensure that storage, handling and transport of dangerous goods are done in accordance with the relevant *Australian Standards*, particularly *AS1940* and *AS1596*, and the *Dangerous Goods Code*.

5.10.2 Hazards Monitoring

5.10.2.1 Hazards Monitoring, Results and Compliance.

PKCT is aware of all dangerous goods onsite and ensures personnel are suitably trained to handle these. Any substances onsite are stored in accordance with AS1940 & AS1596.

PKCT utilises a proprietary chemical database system called ChemAlert to record information on chemicals at the site. Safety Data Sheets (SDS) and substance evaluation forms are available electronically from ChemAlert and PKCTs intranet systems.

Regular environmental auditing is undertaken at PKCT to ensure compliance with relevant standards.

PKCT continues to utilise a mobile refuelling system for its plant machinery and does not store any fuel on site. In February 2014, PKCT decommissioned the underground fuel storage tanks and completed remediation of the site.

5.11 Fire Control

5.11.1 Fire Control Standards and Performance Measures

Fire Control

21. During the project, the Proponent shall:

(a) ensure that it maintains suitable equipment to respond to any fires onsite; and
(b) assist the fire and emergency services as much as possible if there is a fire onsite.

22. The Proponent shall ensure that it maintains a Fire Management Plan for the site.

5.11.2 Hazards Monitoring

5.11.2.1 Fire Control Monitoring, Results and Compliance.

PKCT has a Fire Management Plan MP.HS.459 (FMP) in place, which outlines the processes in place pertaining to fire management associated with the PKCT operations.

5.11.3 Fire Control – Activities Undertaken During 2020/2021 Reporting Period

There were no reportable fires associated with the PKCT operation across the reporting period.

A summary of further activities undertaken associated with fire control across the reporting period is presented below:-

- Ongoing servicing and compliance checks of fire-fighting systems in line with relevant standards, is undertaken by certified external service providers.

5.11.4 Fire Control - Activities Planned for 2021/2022 Reporting Period

PKCT will continue to utilise its FMP and ensure it complies with the stipulated fire control standards and performance measures.

- PKCT will continue to ensure ongoing servicing and compliance checks of fire-fighting systems remain in line with relevant standards and checks are undertaken by certified external service providers.

5.12 Community

5.12.1 Community Engagement Activities

PKCT continues to utilise its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from/to local residents. A summary of the information presented to the PKCT CCC during the reporting period is presented below in Figure 43.

PKCT CCC meeting presentations can be found on the PKCT website, www.pkct.com.au

Meeting Date	Presented Information
21st May 2021	PKCT Operational update, environmental compliance for air and water quality, recent environmental improvements, general business. Site Inspection of new pond and pump locations following AIE lease transfer.

Figure 43: PKCT CCC Meetings

5.12.2 Community Contributions

PKCT continues to support the Port Kembla Branch of the Mission to Seafarers. In the 2020/2021 reporting period, PKCT donated $12,000 to this community organisation.

PKCT also operates a "Win of the Month" program whereby members of the workforce who excel at work during the month are recognised and given the opportunity nominate their preferred charity to which the company then provides a donation. This program contributed a further $3,300 to numerous charities including the Children's Tumour Foundation, St Vincent de Paul Society, The Black Dog Institute and Beyond Blue among others.

5.12.3 Community Complaints

PKCT continues to operate a website including a community hotline and contact email. Typically, any community complaints are received through our hotline. PKCT received five community complaints during the reporting period associated with the operation, road transport companies hauling coal to PKCT also recorded five community complaints. These are outlined below.

PKCT Event Number: EV-03779, 8th September 2020.

Member of public contacted PKCT via the community links website complaining of excessive noise heard from the Terminal from the Port Kembla/Warrawong area.

PKCT reviewed its operations data and weather conditions and did not identify any operational changes or work being undertaken that could account for the described noise. Multiple other active industrial sites exist between the resident and PKCT that may have been the source of the noise. PKCT contacted the community member and discussed the issue. No other interactions or complaints were made by the member of public following the discussion.

PKCT Event Number: EV-03804, 6th October 2020.

On 8th September 2020, a call was made to PKCT's community line by a resident complaining of noise from coal trains across the weekend.

Following review, it was found that PKCT was in the middle of a site wide rail shut, meaning that no trains were delivering to PKCT during or leading up to the weekend of the complaint. PKCT noted that other industrial trains may have been operating and suggested to the resident that they make contact with the local rail transport provider to discuss.

There have been no further communications or complaints associated with this issue.

PKCT Event Number: EV-04175, 30th May 2021.

The EPA received a community complaint reporting coal dust/drag-out onto Springhill Road occurring on Saturday 30th May.

The EPA requested some information to confirm that PKCT systems were operational. PKCT reviewed our truckwash and other control systems and confirmed that they were operational at the time of the complaint. This information was relayed back to the EPA.

PKCT has not received a formal response back from the EPA.

PKCT Event Number: EV-04219, 23rd June 2021.

The EPA contacted PKCT indicating that a member of community had made a complaint about coal spillage on Port Kembla Road.

EPA requested PKCT to clean the road and confirm that the spill had been removed with photos.

By the time the report had been made to PKCT, the road spillage had been cleaned. The EPA was sent photos of the cleaned road as requested. It is noted that the observed spillage was less than a kg of coal on the road.

PKCT Event Number: EV-04228, 18th June 2021, received 25th June.

PKCT received a community compliant on 25th June via the EPA that a resident had complained of dust on Springhill Road on 18th June. As there had been an earlier complaint related to the same issue, by the time this complaint was received, PKCT had already responded to the initial compliant and rectified the issue. Additional controls had been implemented including additional road sweeping and cleaning. This was reported back to the EPA.

PKCT has not received a formal response back from the EPA.

Five complaints associated with road haulage were made directly to the PKCT's Road Transport Providers during the reporting period. Three of the complaints related to broken windscreens on private vehicles, two were other minor incidents. All complaints were recorded and investigated appropriately by the Transport providers.

Any complaints received by PKCT are captured within PKCT's Event Management System for action tracking.

A summary of community complaints by type as received over the past 10 years is presented below in Figure 44.

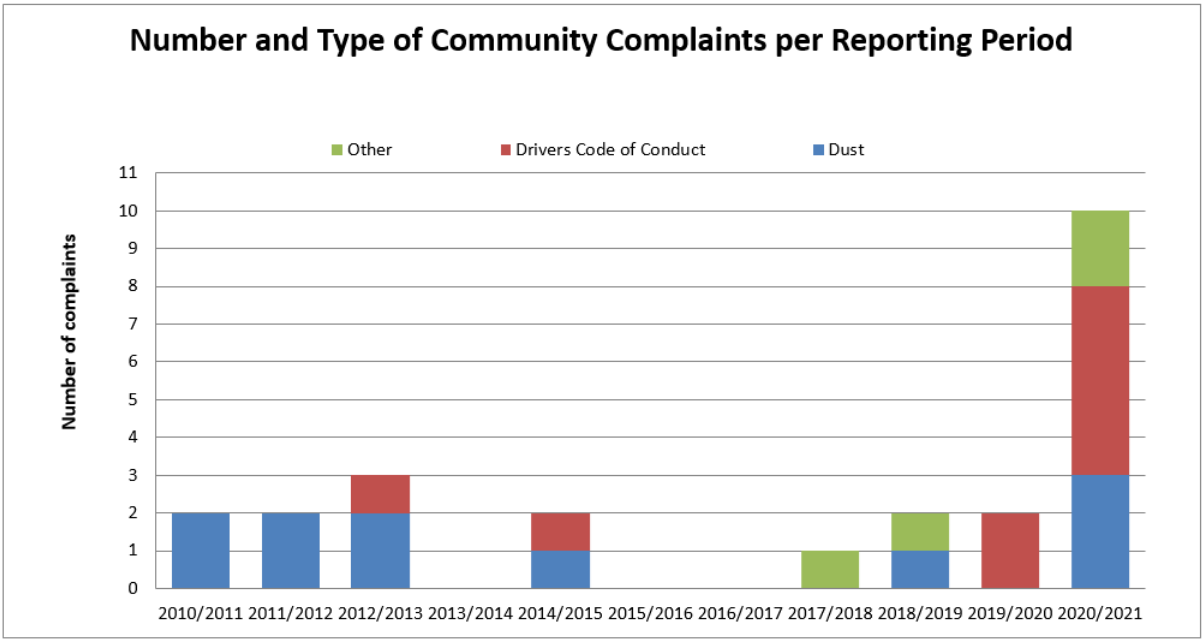


Figure 44 : Community Complaints Summary

6.0 ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

6.1 Environmental Management Performance Measures and Compliance

Environmental Management (Schedule 4, Condition 1)	Relevant section of PKCT EMS
The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:	Refer to the PKCT EMS
a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General	EMS was submitted to the DPI&E with eth 2009/2010 AEMR by the due date of 31st July 2010
b) provide for the strategic context for the environmental management of the project;	Refer to Section 5
c) identify the statutory requirements that apply to the project;	Refer to Section 6
d) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies;	Refer to Section 11 Refer to Section 11 Refer to Section 11.3 Refer to Section 7.6 Refer to Section 7.3 Refer to Section 8.1
e) include an environmental monitoring program for the project that includes all the monitoring requirements of the approval;	Refer to Section 9
f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and	Refer to Section 9
a) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.	Refer to Section 4

Figure 45 : EMS compliance in the AEMR

PKCT has in place an approved Environmental Management Strategy (EMS). The EMS was submitted with the 2009/2010 AEMR to the DPI&E. The EMS details how PKCT complies which each line item of Schedule 4, Condition 1, Environmental Management of Project Approval 08_0009. Figure 45 above references the specific EMS Sections that PKCT utilises for compliance with Schedule 4, Condition 1.

6.2 Reporting - Incident Reporting

Incident Reporting

2. Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.
3. Within 21 days of notifying the Department and other relevant agencies of such an incident, the Proponent shall provide the Department and these agencies with a written report that:
   a) Describes the date, time, and nature of the incident;
   b) Identifies the cause (or likely cause) of the incident
   c) Describes what action has been taken to date: and
   d) Describes the proposed measures to address the incident.

Requirements associated with Schedule 4, Conditions 2 and 3 are referenced in PKCT's EMS and Event Management Procedure. There were no reportable incidents of "material harm" across the 2020/2021 reporting period. PKCT's Pollution Incident Response Management Plan was not activated during the period.

6.3 Reporting - Annual Reporting

Annual Reporting

4. Within 12 months of this approval, and annually thereafter, the Proponent shall submit and AEMR to the Director-General and all relevant agencies. This report must:
   a) Identify the standards and performance measures that apply to the project
   b) Describe the works carried out in the last 12 months;
   c) Describe the works planned to be carried out in the next 12 months;
   d) Include a summary of the complaints received during the past year; and compare this to complaints received in the previous years;
   e) Include a summary of the monitoring results for the project during the past year;
   f) Include an analysis of these monitoring results against the relevant:
      - Impact assessment criteria/limits;
      - Monitoring results from previous years; and
      - Predictions in the EA or other documents listed in condition 2 of schedule 2;
   g) Identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures;

h) Identify any trends in the monitoring results over the life of the project;

i) Identify any non-compliance during the previous year; and

j) Describe what actions were, or are being, taken to ensure compliance.

Following feedback from the DPI&E on the format of the 2012/2013 AEMR, PKCT revised the structure of the 2013/2014 AEMR to better align with the requirements of Schedule 4, Condition 4. Feedback following submission of the 2015/2016 AEMR requested additional inclusions to be added to the 2016/2017 AEMR. These additional inclusions were to;

- Add a map showing the regional context
- Include a summary of any community engagement activities and contributions and
- Detail (i.e. subject, timing or location) of any complaints over the previous reporting periods for the purpose of trend analysis.

Each of these additional components remains included within this AEMR.

There were no further requests from the DPI&E to change the formatting of the 2016/2017 report and this currently remains the standard for subsequent reports.

6.4 Independent Environmental Audit

Independent Environmental Audit

5. By 31 March 2011 and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an independent Environmental Audit of the Project. This audit must:

a) Be conducted by a suitable qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;

b) Include consultation with the relevant agencies;

c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL (Including any strategy, plan or program required under these approvals); and

d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate

e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.

Note: This audit team should be led by a suitably qualified auditor, and include experts in the field of noise, air quality, and traffic management.

6. Within 6 weeks of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit report.

7. Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director-General.

As required under Schedule 4, Condition 5 of Project Approval 08_0009, on 4th and 5th August 2020, Environmental Resources Management Australia Pty Ltd (ERM) undertook a Triennial Independent Environmental Audit at Port Kembla Coal Terminal as per the

requirements of Project Approval 08_0009. By letter dated 26th March 2020, PKCT requested of the DPI&E that the Audit Report submission date be extended to the 30th September 2020 due to escalation of the COVID-19 Pandemic, associated border closures and social distancing directives. This request was approved by DPI&E by letter dated 21st April 2020.

PKCT completed the audit and submitted an Audit Report and associated Action Plan to the DPI&E. PKCT received formal feedback from the DPI&E indicating the submitted Audit Report generally satisfied the requirements of condition 5 of PKCT Approval.

Of the conditions audited from the MCoA (including Statement of Commitments and Drivers Code of Conduct) and PKCT's EPL there were 7 conditions found to be non-compliant and 6 observations. This compares to 12 found to be non-compliant and 43 observations in the 2017 audit.

The submitted Action Plan with further details on the non-compliances is presented in Appendix F: Triennial Independent Audit Findings and Action Plan.

6.5 Access to Information

Access to Information

8. Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:
   a) provide a copy of the relevant document/s to the relevant agencies
   b) place a copy of the document/s on its website; and
   c) remove superseded copies of strategies/plans/programs from its website.

9. During the project, the Proponent shall:
   a) make a summary of monitoring results required under this approval publically available on its website; and
   b) Update these results on a regular basis (at least every 6 months).

As a result of the AIE LNG Project changing the operational area of PKCT, PKCT reviewed all Management Plans associated with the Project during the reporting period. All Plans were approved by the DPI&E and are available publically at www.pkct.com.au.

As required under Condition 9, PKCT makes a summary of its monitoring results publicly available on its website. Monthly monitoring results along with historical PKCT AEMR's can be found on www.pkct.com.au.

Via letter dated 16th March 2017, the Department granted PKCT permission to cease continuation of the Interim EMR as it was deemed that that adequate environmental monitoring data was being made available via other reporting mechanisms (i.e. Annual Return and AEMR).

7.0 STATEMENT OF COMMITMENTS

PKCT prepared and submitted a Statement of Commitments as part of the Environmental Assessment submitted to the DPI&E for the 08_0009 Major Project Application. The DPI&E accepted these commitments and they now form "Appendix 2" of the Approval.

PKCT's compliance with these commitments across the 2020/2021 reporting period is outlined in the following sections.

7.1 Statement of Commitments -Traffic and Transportation

Objective	Commitment
• Transport of coal and bulk products to PKCT to be conducted in a manner which does not adversely impact on public safety or amenity of road users. • Safety standards to be maintained by trucks following designated routes procedures • Internal PKCT roadways to be maintained to minimize coal and bulk products spillage and carry over onto public roadways.	• Public road haulage of coal and bulk products to PKCT will not exceed 10 million tonnes per annum. • Publication of annual throughput tonnes including in-loading method (i.e. road and rail received coal and bulk products). • All trucks delivering coal and bulk products to PKCT must follow designated heavy vehicle transport routes. • A driver's code of conduct will be utilised for all transport companies delivering product to PKCT. • Review effectiveness of truckwash facilities to be undertaken. • Unless further or alternative Approval for NRE No 1 Colliery at Russell Vale is in place, PKCT will only receive coal from the NRE No 1 Colliery if that coal has been dispatched from that Colliery by public road between the hours of 7am to 10pm Monday to Friday and 8am to 6pm Saturday and Sunday or Public Holidays.

A summary of actions undertaken across the 2020/2021 reporting period specific to this Statement of Commitments is presented below. Further details related to the Traffic and Transportation Statement of Commitments can be found under Section 5.2 of the AEMR.

- Coal throughput at PKCT and therefore road related transport remained at near long-term average levels this reporting period. Public road receivals for the reporting period were 2,595,848 tonnes.

- An AEMR is published on the PKCT website every 12 months, making throughput records publicly available.

- PKCT and its associated road transport providers utilise an auditing program to ensure compliance with the PKCT DCC. This includes monitoring of trucks adherence to the specified travel routes.

- PKCT receives monthly DCC compliance reports from its transport providers who provide coal haulage for Wollongong Coal when operating. Wollongong Coal must ensure that coal is dispatched within the designated dispatch hours. The reports highlight any breaches to the designated dispatch hours. No coal was delivered to PKCT from Wollongong Coal via Road this reporting period. No breaches were reported to PKCT as a result, or observed in the 2020/2021 reporting period.

7.2 Statement of Commitments -Air Quality

Objective	Commitment
• Minimise dust emissions from activities carried out on the PKCT site.	• Installation of two continuous dust monitors to monitor airborne dust emissions. • Maintain appropriate dust suppression systems on site to effectively manage dust both on stockpiles and roadways.

A summary of actions undertaken across the 2020/2021 reporting period specific to this Statement of Commitments is presented below. Further details related to the Air Quality Statement of Commitments are found under section 5.3.4 Air Quality –Activities Undertaken During 2020/2021 Reporting Period.

- PKCT has two continuous dust monitors. The existing units, which were at the end of their life, were progressively replaced with new units during the reporting period. Both new and old units remained largely operational throughout the reporting period. The new units will allow PKCT to import data directly into our HMI control system and significantly improve the functionality of alarming within the dust monitoring system.

- PKCT has a preventative maintenance system in place (Works and Assets) which provides for the routine inspection and maintenance of environmental equipment including existing dust suppressions systems, stockpile sprays, truck wash and water cart. Operations shift teams monitor and operate the equipment and, where necessary, provide a breakdown response. Contractors maintain and calibrate our real time dust monitors on a monthly basis in line with the manufacturers' requirements.

7.3 Statement of Commitments -Water Management

Objective	Commitment
• Minimise use of potable water on site. • Effective management of on-site stormwater.	• Reduction of freshwater use on site to be achieved through the implementation of recycled water (Tertiary Treated Effluent) for dust suppression on stockpiles and other non-domestic uses e.g. fire, spillage washdown, conveyor sprays. Staged approach to be implemented which will result in a 360 Megalitre per annum reduction by the end of 2010.

A summary of actions undertaken across the 2020/2021 reporting period specific to this Statement of Commitments is presented below. Further details related to the Water Management Statement of Commitments are found under Section 5.5.4 Surface Water – Activities Undertaken During 2020/2021Reporting Period of the AEMR.

- Recycled water use has continued at PKCT across the reporting period where possible. There was a notable decrease in recycled water usage as a result of supply issues with the Sydney Water Plant from September 2020. PKCT has been advised that Sydney water will be returning the supply of recycled water during the second half of 2021. Full details and summary of volumes are presented in Section 5.5.3 Trends in Surface Water Monitoring.

7.4 Statement of Commitments -Noise Management

Objective	Commitment
• Responsible management of PKCT site operational noise.	• Ensure that ongoing compliance is maintained to the NSW Industrial Noise policy. • Development and implementation of a noise management plan for the PKCT site.

By letter dated 16th March 2017, PKCT received formal notification from the Department that biannual noise monitoring could be discontinued. Subsequently, PKCT undertook no routine noise monitoring surveys across the reporting period. Further details related to the Noise Management Statement of Commitments are found under Section 5.1 of the AEMR.

- Notwithstanding there is no longer a requirement to undertake routine noise monitoring, on 26th November 2020, PKCT engaged a consultant to undertake a noise survey to re-confirm that noise levels, following installation of the new yard machines, remained within the required limits outlined in our Planning Approval 08_0009. The results of the survey confirmed that levels remained below the threshold limits.

- PKCT continues to maintain and utilise Noise Management Plan MP.HS.387. The plan was reviewed during the reporting period as a result of the AIE lease transaction and subsequently approved by the Department. The plan is publically available on PKCT's website.

7.5 Statement of Commitments -Community Relations

Objective	Commitment
• PKCT to be regarded as a responsible corporate citizen by the community.	• Continued operation of the PKCT Community Consultative Committee • Continued advertisement and operation of the telephone hotline.

A summary of actions undertaken across the 2020/2021 reporting period specific to this Statement of Commitments is presented below.

- PKCT utilises its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. With the continued presence of Covid in the community and associated lockdowns, PKCT held one face-to-face meeting within the reporting period on the 1st May 2021. PKCT will continue to hold these forums on a regular basis.

- PKCT received five community complaints associated with the operation during the reporting period. Five complaints were made directly with trucking companies associated with delivery of coal to the terminal. Details of these complaints are outlined under section 5.12.3 Community Complaints.

- PKCT continues to utilise its telephone hotline. The hotline and general contact details for the site are located on the PKCT website, www.pkct.com.au.

7.6 Statement of Commitments – Environmental monitoring

Objective	Commitment
• To ensure compliance to the conditions of PKCT's Department of the Environment and Climate Change licence.	• Development and implementation of a management plan which documents the environmental monitoring requirement of PKCT.

PKCT has in place Environmental Monitoring Strategy MP.HS.464. The Strategy outlines the various monitoring requirements together with references to applicable management plans. General descriptions of PKCT monitoring and monitoring methodology are found throughout the AEMR. Figure 46 below outlines the sections of the AEMR describing Environmental Monitoring.

Environmental Monitoring Area	*Section of AEMR*
Noise	Section 5.1 Noise
Transport	Section 5.2 Transport
Air Quality	Section 5.3 Air Quality
Meteorological	Section 5.4 Meteorological
Surface Water	Section 5.5 5.5 Surface Water
Biodiversity	Section 5.6 Biodiversity
Visual Amenity	Section 5.7 Visual Amenity
Greenhouse Gas and Energy Efficiency	Section 5.8 Greenhouse and Energy Efficiency
Waste	Section 5.9 Waste
Hazards	Section 5.10 Hazards
Fire Control	Section 5.11 Fire Control

Figure 46 : Environmental monitoring area and reference in AEMR

7.7 Statement of Commitments – Environmental Management System

Objective	Commitment
• PKCT to maintain certification o ISO 140001.	• PKCT will continue to be certified to ISO 14001 and will be externally audited against the certification criteria on an annual basis.

A summary of actions undertaken across the 2020/2021 reporting period specific to this Statement of Commitments is presented below.

- PKCT completed two ISO 14001 and ISO 9001 external surveillance audits during the reporting period. One in August 2020, and one in March 2021. Surveillance audits are undertaken on an approximate six monthly basis. PKCT had no environmental non-compliances identified during the audits. PKCT's ISO certificate is included in 11.7 Appendix G: ISO 14001 and 9001 Certificate.

- As previously reported, PKCT completed its triennial independent audit in August 2020. Findings from the audit are presented in 11.6 Appendix F: Triennial Independent Audit Findings and Action Plan.

7.8 Statement of Commitments – Greenhouse Gases

Objective	Commitment
• Minimise the production of greenhouse gas emissions associated with PKCT operations	• PKCT to review onsite electricity use and identify and implement economically viable opportunities for reduced electricity usage.

PKCT undertook a greenhouse gas emission and energy use assessment of the Terminal following the Major Project Approval. The report found that PKCT's use of electricity for powering coal handling infrastructure is by far the largest energy user. As a result, 97% of PKCT GHG emissions are Scope 2 emissions associated with electricity generated by power stations.

Opportunities for energy reduction are pursued when purchasing new equipment and considered when developing improvements.

Further details related to the Greenhouse Gas and Energy Efficiency Statement of Commitments can be found under Section.

7.9 Statement of Commitments – Landscaping

Objective	Commitment
• Improve the visual amenity of PKCT on the surrounding community.	• Improve onsite soft landscaping through the planting of trees on the road receival earth bund and along the northern site boundary.

With reference to the Landscape Management Plan MP.HS.460 (LMP), PKCT has developed a Landscape Concept Plan along the northern boundary. During this reporting period, maintenance of Stage 2 has continued and the area is now well established, see Figure 36.

The nature and timing of further landscaping works requires consideration of major remedial works in development and PKCT's strategic planning to ensure their compatibility. PKCT has continued to maintain the landscaped areas along the truckwash berm that were planted 2018/2019 reporting period. Refer to Section 5.6.4 Biodiversity –Activities Undertaken During 2020/2021 Reporting Period for growth progress of these plantings.

7.10 Statement of Commitments – Flora and Fauna

Objective	Commitment
• Management of Green and Golden Bell Frogs (GGBF)	• Implement Interim Management Plan • Undertake a GGBF Survey and then develop a Long Term Plan of Management.

A Green and Golden Bell Frog Management Plan MP.HS.109 (GGBFMP) is in place. It was developed in consultation with the EPA and is DPI&E approved.

A GGBF survey was undertaken by specialist consultants on 24th March 2021. No GGBF's were found on site.

Further details related to the Flora and Fauna Statement of Commitments can be found under 5.6.4 Biodiversity –Activities Undertaken During 2020/2021 Reporting Period.

7.11 Statement of Commitments – Waste

Objective	Commitment
• Minimise waste generated at the site to reduce the volume of waste requiring disposal to landfill. • Prevent dispersal of waste from the site to receiving environments.	• Develop a Waste Management Plan for the site.

PKCT has a Waste Management Plan MP.HS.459 (WSMP) which identifies the various waste streams generated at PKCT. The Plan outlines the methods used to minimise waste via reuse, recycling and suitable disposal of waste when necessary.

Further details related to the Waste Statement of Commitments are found under Section 5.9.4 Waste –Activities Undertaken During 2020/2021 Reporting Period.

8.0 ENVIRONMENTAL PROTECTION LICENCE 1625

PKCT holds EPL 1625 under the Protection of the Environment Operations Act 1997. This stipulates the emission criteria that PKCT must not exceed. Criteria are outlined for water,

noise and dust. Pollution Reduction Programs (PRPs) are attached to the EPL to identify aspects which may require improvement.

PKCT is required to submit an Annual Return to the EPA reporting performance against licence requirements. The 2020/2021 Annual Return was submitted to the EPA via the online EPA "eConnect" system on the 27th May 2021.

As the specific criteria for water, noise and dust are common to both the EPL and Project Approval 08_0009, all data and discussion associated with these criteria are outlined in other sections of the AEMR.

Figure 47 below provides a summary of the EPL conditions, Project Approval 08_0009 requirements and the section of the AEMR that discusses the criteria.

Component	Reference area in Project Approval 09_0009	Reference area in EPL 1625	Relevant Section of AEMR
Noise	Schedule 3, Condition 1, Condition 2 and Condition 3.	Limit Condition L4, L4.1	Section 5.1 Noise
Air	Schedule 3, Condition 7, Condition 8, Condition 9 and Condition 10.	Monitoring and Recording Conditions M2, M2.1, M2.2	Section 5.3 Air Quality
Water	Schedule 3, Condition 12 and Condition 13.	Limit Condition L2, L2.1, L2.2, L2.3, L2.4 And Monitoring and Recording Condition M2.3.	Section 5.5 5.5 Surface **Water**

Figure 47 : Common Requirements of Project Approval 08_0009 and EPL1625

8.1 Other EPL Matters in the 2020/2021 Reporting Period

- PKCT reviewed and updated the EPL to align with the new site layout resulting from the development of the AIE LNG project.

- PKCT's management and operations personnel were re-familiarised on PKCT's Pollution Incident Response Management Plan via a series of mock exercises during October and November 2020. An external specialist emergency management consultant facilitated the sessions.

- PKCT engaged a consultant to facilitate practical and theoretical training on use of spill kits on site. The sessions were held with all operations teams and were held during May and June 2021.

- As required in our EPL 1625, PKCT has continued to update its website with monthly monitoring data summaries throughout the reporting period, see www.pkct.com.au.

During the reporting period, PKCT submitted an Annual Return as required under its Environmental Protection Licence (EPL). The EPL reporting period is different to the AMER Reporting Period being the period from 1st April 2020 to 31st March 2021.

No non-compliances to PKCT's EPL licence conditions were reported within the Annual Return.

- PKCT has completed the milestones associated with EIP U4 Dust Management Environmental Improvement Program throughout the reporting period. Moisture meters were installed, calibrated at both Road and Rail Receival and final integration into the dust management system was completed. A close out report was submitted to the EPA and by letter dated 18th February 2021, the EPA closed off the EIP and subsequently revised and updated PKCT's licence to reflect the completion of the EIP.

9.0 RESULTS COMPARED TO THE ENVIRONMENTAL ASSESSMENT 2008

An environmental assessment was undertaken as part of PKCT's application associated with Project Approval 08_0009 and submitted to the DPE in a report titled "Environmental Assessment- Existing Operations and increased Road Receival Hours for Port Kembla Coal Terminal 2008" (EA).

This EA focussed on the key environmental issues of PKCT proposal to increase road deliveries to 24/7 for a maximum of 10mtpa. It has also addressed secondary environmental issues to ensure there was a rigorous review of PKCT's existing and proposed operations. It showed that existing and proposed PKCT operations have a small environmental footprint, which is minimised through existing environmental impact mitigation measures. The assessment included predictions for environmental aspects such as noise and dust.

Monitoring results obtained over the 2020/2021 reporting period align with predictions made in the EA. Traffic and noise studies undertaken associated with PKCT's application to the DPE for 7.5 MTPA to 10 MTPA approval also aligned.

Air quality monitoring results are compared to the predictions of the EA in section 5.3 of the AEMR.

10.0 COMPLAINTS

Schedule 4, Condition 4d requires PKCT to include a summary of the complaints received during the past year and compare this to complaints received in previous years. Figure 48 shown below, provides a summary of complaints recorded at PKCT and reported to PKCT by road transport providers.

PKCT received five community complaints associated with the operation during the reporting period. Five complaints were made directly with trucking companies associated with delivery of coal to the terminal. Details of these complaints are outlined under section 5.12.3 Community Complaints.

As can be seen in Figure 48, total complaints made to PKCT have remained relatively consistent at a low level since FY14/15. A slightly higher trend of complaints both within the trucking companies and to PKCT was recorded during his reporting period. PKCT continues to record all complaints in its Event Management System and responds appropriately when a complaint is received. PKCT continues to work with its shippers and road transport providers to ensure complaints are recorded and handled appropriately.

	Number of Complaints recorded by PKCT						
Complaints	FY14/15	FY15/16	FY16/17	FY17/18	FY18/19	FY19/20	FY20/21
General (PKCT)	2	0	0	1	2	0	5
Drivers Code of Conduct related	3	0	0	0	0	2	5
Total	5	0	0	1	2	2	10

Figure 48 : PKCT and DCC complaints.

11.0 CONCLUSION

This Annual Environmental Management Report (AEMR) identifies PKCT's approval and licence conditions and explains how PKCT complies with these requirements. It meets the specific AEMR requirements in Major Project Approval 08_0009 Condition 4 of Schedule 4.

This AEMR demonstrates that PKCT has undertaken appropriate actions to manage its environmental impacts with the overall aim of minimising harm to the environment. This report forms part of PKCT's environmental management system which is directed by PKCT's Environmental Management Strategy. PKCT provides this AEMR to the DPI&E and other stakeholders using information taken from environmental monitoring, assessment and reporting activities undertaken on a regular basis through the reporting period.

This AEMR does not raise any concerns regarding the ongoing ability of PKCT to comply with environmental requirements in the Major Project Approval, Environment Protection Licence 1625 and other regulatory requirements. Further, this AEMR confirms PKCT's commitment to continual improvement in the mitigation of environmental impacts.

11.1 Appendix A: Drivers Code of Conduct Summary

Monthly Reports Summary FY 20/21	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	FY20/21 Total	Comment
Tonnes - Public Road	247,331	171,864	246,923	337,391	255,071	313,123	237,116	175,910	171,820	145,534	101,385	192,380	2,595,848	
Tonnes - Private Road	219,539	299,467	290,071	280,326	172,444	194,914	212,662	293,956	264,414	296,619	217,774	380,567	3,122,753	
Total road tonnes	466,870	471,331	536,994	617,717	427,515	508,037	449,778	469,866	436,234	442,153	319,159	572,947	5,718,601	
Spillage - Public Road	0	0	0	0	0	0	0	0	0	0	0	0	0	No spills reported by shippers or road transport providers
Incident - Other	0	0	0	0	0	0	0	0	0	0	0	0	0	
Impact with other vehicle	0	0	0	0	0	0	0	1	0	0	0	0	1	
Incidents Reported to RTA	0	0	0	0	0	0	0	0	0	0	0	0	0	
Complaints	1	0	0	0	0	0	2	1	1	0	0	0	5	Note: complaints related to DCC only
EPL/ regulatory breaches	0	0	0	0	0	0	0	0	0	0	0	0	0	
Inductions (%)	100	100	100	100	100	100	100	100	100	100	100	100	100	
Hours restrictions breach	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	No delivery from Wollongong Coal this FY
Road Transport Providers (RTP): Observations	182	0	0	0	640	640	239	504	534	110	114	239	3,202	
RTP: Number of drivers observed	182	330	653	789	707	707	662	504	534	110	114	239	5,531	
CTO / Audits at mine sites, at PKCT and on route to PKCT (Shippers & PKCT)													63	Includes data from Shippers and PKCT (via PKCT IAuditor)
RTP system audits													0	Only one transport company delivering by road this FY.

11.2 Appendix B: Consultant Dust Data Summary

Table 9 Exceedances of the 24-hour average TSP trigger level of 90 µg/m³ at the northern PKCT monitoring site during the July 2020 to June 2021 reporting period

Date of exceedance	24-hour average TSP concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage (%) of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				µg/m³	%	Rating	Maximum	Average
5 October 2020	93.2	Possible	25.7	7.9	8%	Minimal	8.0	2.9
28 November 2020	90.6	Possible	21.5	9.7	11%	Minor	6.6	2.9
14 December 2020	96.4	Unlikely	0.7	0.2	0.2%	Minimal	3.3	1.3
15 December 2020	125.8	Unlikely	3.5	4.0	3%	Minimal	3.6	1.4
16 December 2020	103.0	Unlikely	0	0	0.0%	None	6.2	2.9
17 December 2020	159.6	Unlikely	3.5	4.1	3%	Minimal	4.6	2.2
25 January 2021	96.8	Unlikely	0	0	0.0%	None	4.6	2.6

Table notes:
[a] Identified using scatter plots of 10-minute average TSP concentration versus wind direction and wind speed
[b] Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern TSP concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average TSP concentration (0% = no contribution, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)
[c] Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period
[d] For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site
[e] Data for average southerly PM_{10} and TSP concentrations were unavailable for these exceedance dates

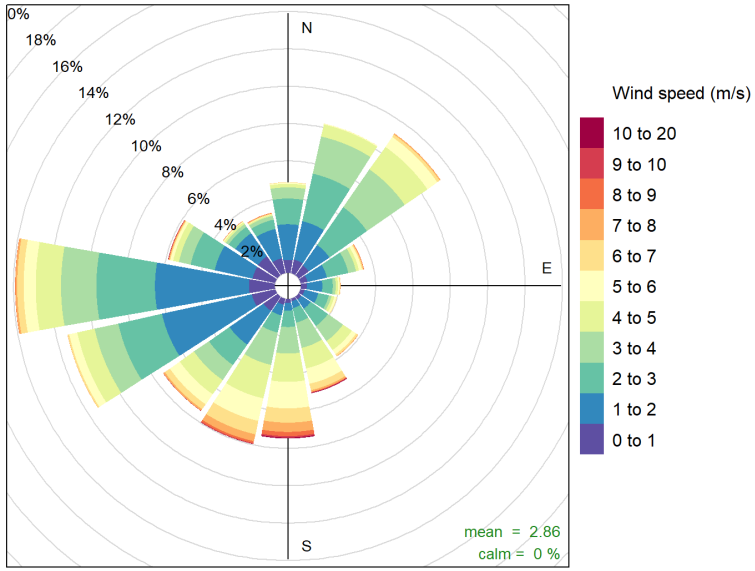
Table 10 Exceedances of the 24-hour average PM_{10} air quality standard of 50 µg/m³ at the northern PKCT monitoring site during the July 2020 to June 2021 reporting period

Date of exceedance	24-hour average PM_{10} concentration (µg/m³)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage (%) of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				µg/m³	%	Rating	Maximum	Average
19 September 2020	58.6	Unlikely	2.1	0.8	1.3%	Minimal	4.2	1.8
20 September 2020	54.6	Unlikely	6.9	1.5	2.7%	Minimal	4.9	2.8
4 October 2020	56.7	Possible	6.3	See table note d		None	5.0	2.3
5 October 2020	68.9	Unlikely	25.7	6.5	9.5%	Minimal	8.0	2.9
7 October 2020	57.5	Possible	44.4	13.7	23.8%	Minor	3.2	1.4
17 October 2020	59.3	Unlikely	3.5	2.3	3.9%	Minimal	5.9	2.1
12 November 2020	66.4	Unlikely	2.1	See table note d		None	4.6	2.6
27 November 2020	52.1	Possible	36.1	1.5	2.8%	Minimal	4.5	2.8
28 November 2020	65.5	Possible	21.5	7.3	11.1%	Minor	6.6	2.9
14 December 2020	69.4	Unlikely	0.7	0.1	0.1%	Minimal	3.3	1.3
15 December 2020	91.4	Unlikely	3.5	2.9	3.2%	Minimal	3.6	1.4
16 December 2020	76.3	Unlikely	0.0	0	0.0%	None	6.2	2.9
17 December 2020	117.4	Unlikely	3.5	2.8	2.4%	Minimal	4.6	2.2
18 December 2020	60.1	Possible	50.0	12.0	20.0%	Minor	5.6	3.0
4 January 2021	64.2	Unlikely	18.1	See table note e			5.1	1.6
25 January 2021	71.8	Unlikely	0.0	0	0.0%	None	4.6	2.6
26 January 2021	62.4	Unlikely	19.4	0.3	0.5%	Minimal	6.3	2.7
30 January 2021	50.6	Unlikely	3.5	0.3	0.5%	Minimal	5.9	2.6
6 February 2021	62.0	Unlikely	2.1	See table note d		None	4.5	2.6
19 February 2021	50.9	Unlikely	1.4	See table note d		None	4.5	1.9
23 March 2021	54.4	Unlikely	0.7	See table note d		None	8.0	3.5

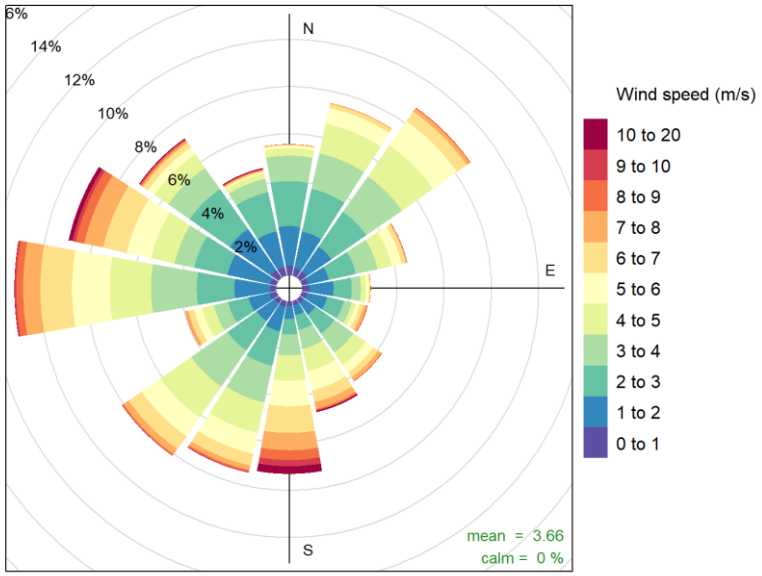
Date of exceedance	24-hour average PM_{10} concentration ($\mu g/m^3$)	Likelihood of PKCT contributing to exceedance levels [a]	Percentage (%) of winds from direction of PKCT (south) during period	Contribution of PKCT to the exceeding 24-hour concentration [b]			Wind speed (m/s) [c]	
				$\mu g/m^3$	%	Rating	Maximum	Average

Table note:
[a] Identified using scatter plots of 10-minute average PM_{10} concentration versus wind direction and wind speed
[b] Identified using scatter plots, percentage of winds from direction of PKCT (south) during exceedance period, and comparison of northern and southern PM_{10} concentrations over periods when the wind is from the south. Contribution based on percentage of total 24-hour average PM_{10} concentration (0% = no contribution, 0-10% = minimal, 10-30% = minor, 30-70% = moderate, >70% = major)
[c] Maximum and average 10-minute average wind speed recorded at the northern PKCT monitoring site during 24-hour exceedance period
[d] For this exceedance day the pollutant concentration decreased on average during periods when the wind passed from the south over the PKCT site
[e] Data for average southerly PM_{10} and TSP concentrations were unavailable for these exceedance dates

11.3 Appendix C: PKCT Annual Wind Summary



Frequency of counts by wind direction (%)



Frequency of counts by wind direction (%)

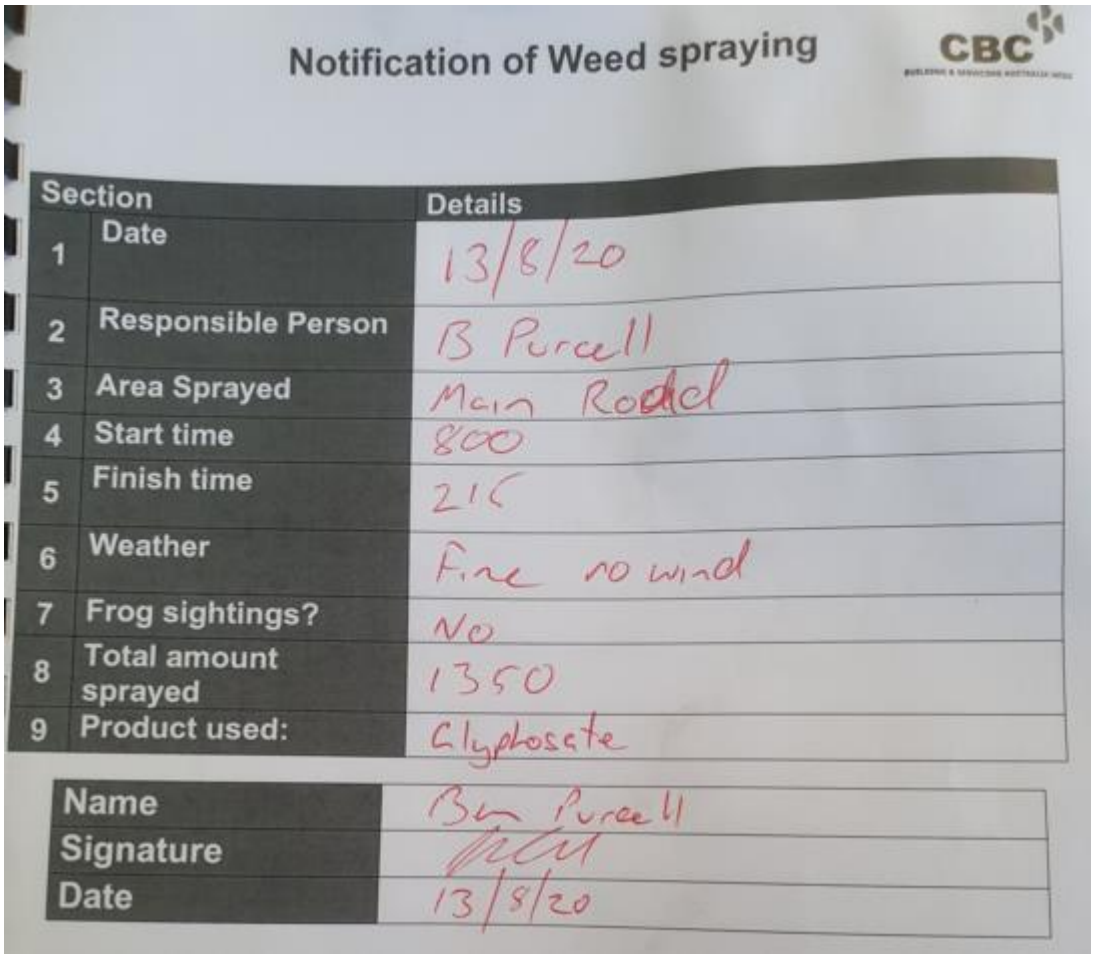
11.4 Appendix D: LDP16 Discharge Data Summary

Date	pH (pH Units)	TSS (mg/litre)	Oil and Grease (mg/litre)
6/07/2020	7.4	9	Not Visible
13/07/2020	8.9	10	Not Visible
14/07/2020	8.5	10	Not Visible
15/07/2020	8.0	<5	Not Visible
24/07/2020	9.0	<5	Not Visible
26/07/2020	8.8	7	Not Visible
27/07/2020	7.8	12	Not Visible
28/07/2020	7.3	20	Not Visible
29/07/2020	7.0	7	Not Visible
31/07/2020	7.2	<5	Not Visible
3/08/2020	7.3	<5	Not Visible
6/08/2020	7.4	<5	Not Visible
7/08/2020	7.4	<5	Not Visible
8/08/2020	7.2	6	Not Visible
9/08/2020	7.3	25	Not Visible
10/08/2020	6.5	7	Not Visible
11/08/2020	7.4	12	Not Visible
12/08/2020	7.5	12	Not Visible
13/08/2020	7.4	18	Not Visible
17/08/2020	7.4	<5	Not Visible
18//08/2020	7.6	<5	Not Visible
19/08/2020	7.7	<5	Not Visible
20/08/2020	7.7	<5	Not Visible
24/08/2020	7.4	8	Not Visible
27/08/2020	7.8	<5	Not Visible
20/09/2020	9.1	<5	Not Visible
24/10/2020	8.0	18	Not Visible
25/10/2020	8.3	8	Not Visible
26/10/2020	7.8	10	Not Visible
27/10/2020	7.7	<5	Not Visible
28/10/2020	7.6	<5	Not Visible
29/10/2020	7.5	<5	Not Visible
31/10/2020	6.9	<5	Not Visible
1/11/2020	7.3	5	Not Visible
5/11/2020	7.2	<5	Not Visible
12/11/2020	7.6	<5	Not Visible
13/11/2020	7.6	6	Not Visible
25/11/2020	7.8	8	Not Visible
3/12/2020	7.5	7	Not Visible
7/12/2020	7.0	<5	Not Visible
11/12/2020	7.9	5	Not Visible
14/12/2020	7.9	12	Not Visible
15/12/2020	7.9	6	Not Visible
16/12/2020	6.5	<5	Not Visible
17/12/2020	8.0	<5	Not Visible

18/12/2020	7.9	<5	Not Visible
21/12/2020	7.1	5	Not Visible
22/12/2020	7.2	<5	Not Visible
27/12/2020	7.3	<5	Not Visible
28/12/2020	7.4	<5	Not Visible
29/12/2020	7.5	6	Not Visible
30/12/2020	7.5	<5	Not Visible
31/12/2020	7.4	6	Not Visible
2/01/2021	6.8	<5	Not Visible
3/01/2021	7.0	14	Not Visible
4/01/2021	7.0	10	Not Visible
5/01/2021	6.7	<5	Not Visible
4/01/2021	7.0	<5	Not Visible
6/01/2021	6.2	9	Not Visible
7/01/2021	6.1	<5	Not Visible
8/01/2021	6.7	<5	Not Visible
28/01/2021	6.6	6	Not Visible
29/01/2021	6.7	9	Not Visible
1/02/2021	7.2	8	Not Visible
3/02/2021	7.4	22	Not Visible
5/02/2021	6.3	<5	Not Visible
6/02/2021	6.7	6	Not Visible
9/02/2021	7.3	<5	Not Visible
13/02/2021	6.6	<5	Not Visible
14/02/2021	6.2	<5	Not Visible
15/02/2021	6.6	<5	Not Visible
16/02/2021	7.2	13	Not Visible
17/02/2021	7.3	<5	Not Visible
18/02/2021	6.7	<5	Not Visible
19/02/2021	6.3	<5	Not Visible
20/02/2021	6.2	6	Not Visible
24/02/2021	7.4	13	Not Visible
25/02/2021	7.6	<5	Not Visible
1/03/2021	8.1	15	Not Visible
5/03/2021	7.1	6	Not Visible
14/03/2021	6.9	<5	Not Visible
15/03/2021	7.3	<5	Not Visible
17/03/2021	7.3	7	Not Visible
18/03/2021	7.4	<5	Not Visible
19/03/2021	7.8	8	Not Visible
20/03/2021	7.6	12	Not Visible
21/03/2021	7.4	11	Not Visible
22/03/2021	7.3	27	Not Visible
23/03/2021	7.6	19	Not Visible
24/03/2021	6.7	18	Not Visible
25/03/2021	7.0	<5	Not Visible
31/03/2021	7.5	<5	Not Visible
1/04/2021	7.0	<5	Not Visible
7/04/2021	7.6	<5	Not Visible
8/04/2021	7.4	<5	Not Visible

17/04/2021	6.5	5	Not Visible
5/05/2021	6.7	<5	Not Visible
6/05/2021	6.4	8	Not Visible
7/05/2021	7.0	23	Not Visible
11/05/2021	6.3	<5	Not Visible
12/05/2021	6.5	<5	Not Visible
13/05/2021	6.0	<5	Not Visible
14/05/2021	7.6	<5	Not Visible
20/05/2021	6.3	<5	Not Visible
21/05/2021	5.7	<5	Not Visible
24/05/2021	7.2	<5	Not Visible
25/05/2021	8.2	<5	Not Visible
27/05/2021	8.1	<5	Not Visible
3/06/2021	7.5	<5	Not Visible
4/06/2021	7.0	<5	Not Visible
5/06/2021	7.4	28	Not Visible
9/06/2021	6.1	11	Not Visible
10/06/2021	6.9	12	Not Visible
11/06/2021	7.5	8	Not Visible
14/06/2021	7.7	<5	Not Visible
15/06/2021	8.0	6	Not Visible
17/06/2021	7.8	5	Not Visible
18/06/2021	6.5	6	Not Visible
19/06/2021	6.8	7	Not Visible
21/06/2021	7.5	<5	Not Visible
23/06/2021	8.3	10	Not Visible
24/06/2021	7.0	<5	Not Visible
25/06/2021	7.9	<5	Not Visible
25/06/2021	7.8	5	Not Visible
27/06/2021	7.9	5	Not Visible
28/06/2021	7.3	<5	Not Visible
29/06/2021	7.8	8	Not Visible
30/06/2021	7.7	8	Not Visible

11.5 Appendix E: Weed Spraying Notification Form



Notification of Weed spraying

CBC

Section		Details
1	Date	13/8/20
2	Responsible Person	B Purcell
3	Area Sprayed	Main Roddel
4	Start time	800
5	Finish time	215
6	Weather	Fine no wind
7	Frog sightings?	No
8	Total amount sprayed	1350
9	Product used:	Glyphosate

Name	B Purcell
Signature	
Date	13/8/20

11.6 Appendix F: Triennial Independent Audit Findings and Action Plan

Port Kembla Coal Terminal (PKCT) Approval 08_0009 - Action Plan

Department of Planning Industry and Environment (DPI&E) – Independent External Audit 5th August 2020

On 4th and 5th August 2020, Environmental Resources Management Australia Pty Ltd (ERM) undertook a Triennial Independent Environmental Audit at Port Kembla Coal Terminal as per the requirements of Project Approval 08_0009. By letter dated 26th March 2020, PKCT requested of the DPI&E that the Audit Report submission date be extended to the 30th September 2020 due to escalation of the COVID-19 Pandemic, associated border closures and social distancing directives. This request was approved by DPI&E by letter dated 21st April 2020.

As per Schedule 4, Condition 6, of Approval 08_0009 the tables below represent PKCT's formal response (Action Plan) to the recommendations outlined in the submitted Audit Report.

The tables below are presented in the same format to those contained in the Audit Report with PKCT's Response to each finding outlined within the last column to the right of the table.

Each of the findings below will be given a unique identification number managed through PKCT's Event Management System.

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
Minister's Conditions of Approval PA 08_0009					
2.9	With the approval of the Director-General, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	Evidence was sighted that management plans are routinely reviewed, updated and submitted to the Department for approval, however the Department has not responded to the submitted management plans or provided approval for the updates. PKCT has been operating under the updated management plans despite the plans not receiving approval from the Department.	NC	Confirm the status of previously submitted management plans with DPIE.	Finding accepted **NC-2020_001** – PKCT will formally contact DPI&E and confirm status of previously submitted Management Plans. PKCT will assume that the Dept. accepts the plans until such time as formal notification is received from the Dept. Completion by;

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
					31st October 2020 **Status as of June 2021** Action Complete
3.3	The Proponent shall: (a) continue to implement all reasonable and feasible best practice noise mitigation measures; (b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and (c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.	In 2017, PKCT committed to investigating the hanging metal tubes in the northern truck-wash to assess whether noise levels may be problematic and adding checks for operating vehicles to the internal audit worksheet to minimise noise. The outcome of this investigation and confirmation of the changes to the audit worksheet were not included in subsequent AEMRs. Site management reported that the hanging metal tubes were not investigated during the audit period due to	NC	PKCT to report on the outcome of the hanging metal tubes investigation and internal worksheet updates in the AEMRs.	Finding accepted **NC-2020_002** – PKCT had intended to implement a project where the metal tubes would be removed. This project has been placed on hold. PKCT has not received any noise complaints

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		alternative monitoring systems being considered which would include removal of the hanging metal tubes. An alternative monitoring mechanism was not in place at the time of the audit.			associated with the Project as a whole, nor with the hanging metal tubes. Based on this finding, PKCT will engage a noise consultant to review potential noise associated with the hanging metal tubes and recommend actions. Completion by; 10th March 2021 **Status as of June 2021**

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
					Action Complete
3.7	The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 3 to 5 at any residence. *Table 3: Long term impact assessment criteria for particulate matter* Pollutant / Averaging period / [d] Criterion Total suspended particulate (TSP) matter / Annual / [a] 90 µg/m3 Particulate matter < 10 µm (PM10) / Annual / [a] 30 µg/m3 *Table 4: Short term impact assessment criteria for particulate matter* Pollutant / Averaging period / [d] Criterion Particulate matter < 10 µm (PM10) / 24 hour / [a] 50 µg/m3	PKCT monitors residential dust at three locations, with 11 additional monitoring points throughout the site to assist with dust management practices. According to the AEMRs, there were no instances of exceedances of the criteria at any of the residential locations. The AEMRs for the audit period reported one month where the criteria were exceeded at one of the 11 industrial gauges, in March 2017. However, there was no associated exceedance reported at any of the residential gauges. Exceedances of the short term criteria were reported on 115 occasions during the audit period (43 in 2016/2017,	C(Obs)	The Air Quality Management Plan and Monitoring Program is currently version 3 (according to the version history table) dated 20th July 2020 while the document header states the version as 12.0 and the footer states the document authorisation date as 9th October 2017. The document requires updating to correctly state	Finding accepted **Obs-2020_001** – PKCT will update the document to correctly state the current version. **Status as of June 2021** Action Complete

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	Table 5: Long term impact assessment criteria for deposited dust Pollutant: Deposited dust; Averaging period: Annual; Maximum increase in deposited dust level: [b] 2g/m²/month; Maximum total deposited dust level: [a] 4g/m²/month *Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS 3580.10.1-1991: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.* However, if the Proponent has a written negotiated air quality agreement with any landowner to exceed the air quality limits in Table 3, 4 and/or 5, and a copy of this agreement has been forwarded to the Department and DECC, then the Proponent may exceed the air limits in Table 3, 4 and/or 5 in accordance with the negotiated air quality agreement.	44 in 2017/2018 and 28 in 2018/2019). Of these exceedances, PKCT was assessed as having made either no, minimal or minor contributions to the results (i.e. <30%) for 107 events. Of the remaining 8 events, PKCT was assessed as having contributed a moderate amount (30% to 70%) on four occasions and the remaining four were unable to be assessed. PKCT was not assessed as being a major contributor (70% - 100%) to the results for any exceedance event. On average, PKCT was estimated to have contributed between 2% and 10% on days where exceedances were reported. Given that the only reported exceedances occurred on days where PKCT contributed		the current version.	

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		only a minor proportion of the dust measured, ERM considers PKCT to be compliant with this condition.			
3.12	Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the *Protection of the Environment Operations Act 1997*.	PKCT has been operating generally in compliance with Section 120 of the *Protection of the Environment Operations Act 1997* with the exception of events identified within this audit, including reported water quality exceedances during discharge events. ERM have therefore assessed PKCT as non-compliant with this condition. Specific instances of non-compliance are addressed throughout this report.	NC	Refer to specific conditions.	Finding accepted. **NC-2020_003** – PKCT accepts the findings of non-compliance associated with this finding occurred as a result of specific events that occurred during the reporting period. For each of the events, PKCT has implemented remedial measures to

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
					limit the potential of future occurrences. PKCT continues to operate in line with its approved Policies, Procedures and Management Plans. PKCT continues to maintain accreditation to ISO14001 and ISO9001. The events and associated actions have been reported to, and closed off by the EPA. PKCT does not

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
					propose any further actions associated with this non-compliance. **Status as of June 2021** Action Complete
3.15	The Proponent shall: (a) ensure no external lights shine above the horizontal; (b) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version, and (c) take all reasonable and feasible measures to mitigate off-site lighting impacts from the project to the satisfaction of the Director-General.	Previous IEAs have reported that an external consultant reviewed site lighting in 2011 and reported that PKCT was compliant with AS 4282. The 2018 - 2019 AEMR reported that a major restoration project had been completed including ensuring all new lighting complies with AS 4282 and using LED lighting and ensure lighting emissions are either local to access and stairway areas or elevated and directed towards the ground or stockpiles.	NC	Upgrade the lighting in the Bulk Products Area to Type C or D as recommended by the 2020 External Lighting Audit.	Finding accepted. **NC-2020_004** – Lights in the Bulk Products area are changed out on failure rather than on a defined schedule. PKCT will adjust the angle of the lights in the area on a

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		ERM reviewed an audit report titled Port Kembla Coal Terminal External Lighting Audit, AS/NZS 4282 Control of the Obtrusive Effects of Outdoor Lighting dated 16th March 2020. The audit concluded any report detailing that lighting is in accordance with AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting with the exception of the Bulk Products Area, which should be upgraded as part of the next scheduled maintenance for those lights. ERM reviewed the community complaints register which confirmed that there were no complaints related to lighting during the audit period.			progressive basis to ensure compliance with the AS. PKCT's maintenance schedule will be updated to include this requirement. Completion by; 31st December 2020. **Status as of June 2021** Action Complete
4.1	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:	PKCT operates under the PKCT Environmental Management Strategy (EMS), Version 13.0, last updated on	C(Obs)	Note: ERM recommends removing Protection of the	Finding accepted. **Obs-2020_002**

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	(a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General; (b) provide for the strategic context for the environmental management of the project; (c) identify the statutory requirements that apply to the project; (d) describe the procedures that would be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • manage cumulative impacts; and • respond to emergencies; (e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval; (f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and	10th July 2020. a) The development application was approved in 2009 and the EMS is now in Version 13.0. It is unclear whether the EMS was first submitted within 12 months of approval, however given the 12 month submittal period falls outside the audit period it has not been raised as a finding. b) The strategic context is presented in Section 5.0 c) Statutory requirements are presented in Section 6.0 d) Systems to keep the local community and relevant agencies informed are presented in Section 11. Procedures to respond to non-compliance and manage cumulative impacts are presented in Section 7.0 and emergency response procedures are presented in Section 8.1. e) The environmental monitoring program includes monitoring requirements from this approval (traffic, received		Environment Operations (Underground Petroleum Storage Systems) Regulation 2008 from the Section 6.3 list of Acts and Regulations as there are no longer underground petroleum storage systems present at the site. Note: ERM recommends removing reference to EIP U3 as this program has been terminated.	- PKCT has updated the Environmental Management Strategy to Version 15. Changes have been made as per audit suggestions. Reference to EIP U3 has been removed as well as removing reference to Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008 from Section 6.3.

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	(g) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.	quantities, noise, dust, meteorology, surface water, biodiversity, greenhouse gas emissions and waste) and is presented in Section 9.0. f) A comprehensive reporting framework is presented in Section 9.0. **g)** Key personnel roles and responsibilities are described in Section 4.0. **Implementation** PKCT maintains regular correspondence with the local community via the community consultative committee and relevant agencies via routine reporting through AEMRs, Annual Returns and Management Plan submissions and on an as needed basis by self-reporting environmental incidents to the regulator. ERM received a response from one Community Consultative Committee member, Barry,			**Status as of June 2021** Action Complete

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		who reported that he had no concerns at the time of writing and is happy with his interaction with PKCT. ERM reviewed correspondence between the regulator and PKCT following actual and potential environmental breaches of the PKCT EPL. In general, correspondence between PKCT and the EPA was positive and the pro-active steps taken by PKCT during these events was noted by EPA. ERM observed a daily pre-start meeting between site management which included a component focused on discussing potential environmental issues concerned with the day's activities. PKCT has received minimal community complaints during			

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		the audit period, with complaints recorded, tracked, investigated and closed out.			
Driver's Code of Conduct					
	No non-compliances have been identified.				
Environmental Protection Licence 1625					
L2.4	Water and/or Land Concentration Limits **Point 16** **Pollutant** / **Unit of measure** / **50 percentile concentration limit** / **90 percentile concentration limit** / **3DGM concentration limit** / **100 percentile concentration limit** Oil and grease / Visible / - / - / - / Not visible Total suspended solids / Milligrams per litre / - / - / - / 50	All samples from the audit period were compliant with this condition with the exception of the following samples which exceeded the total suspended solids limit of 50 mg/L: ■ 15th March 2019 (84 mg/L); ■ 5th June 2019 (97 mg/L); ■ 30th August 2019 (96 mg/L); and ■ 17th January 2020 (62 mg/L). The NSW EPA issued a formal warning in April 2019 due to the March TSS exceedance with no further formal action proposed.	NC	Consider engaging with the EPA with a view to amending Condition L2.5 to include discharges resulting from high intensity, short duration rainfall events.	Finding accepted. **NC-2020_005** – PKCT accepts the findings of non-compliance associated with this finding occurred as a result of specific events that occurred during the reporting period. For each of the events, PKCT

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		Following the June exceedance event, PKCT installed an additional coagulant dosing system, automated the existing system and further progressed capital projects to increase site capabilities to manage stormwater. The August exceedance was caused by a coding error that caused the polymer dosing system to under-dose when backup mode was initiated. The coding error was rectified, additional alarms and system checks implemented, water quality monitoring increased and a strategic review undertaken to prevent recurrence. Following the January exceedance, PKCT installed a new automated coagulant treatment plant at the Northern Pond to assist with			has implemented remedial measures to limit the potential of future occurrences. PKCT continues to operate in line with its approved Policies, Procedures and Management Plans. PKCT continues to maintain accreditation to ISO14001 and ISO9001. The events and associated actions have

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		clay removal following pond cleaning. Due to the TSS exceedances noted above, PKCT has breached this EPL requirement. Condition L2.5 provides for circumstances where the 50 mg/L limit can be exceeded during discharge. The circumstances are limited to a 5 day rainfall depth value of 90 mm over a consecutive 5 day period. For the four exceedance events noted from the audit period, rainfalls immediately preceding the exceedances were high intensity, short duration events, therefore condition L2.5 was not triggered. In the April 2019 formal warning letter, the EPA acknowledged that a high			been reported to, and closed off by the EPA. PKCT does not propose any further actions associated with this non-compliance. **Status as of June 2021** Action Complete

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		intensity, short duration rainfall contributed to the March exceedance and stated that there is merit in discussing the requirements of L2.5.			
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	PKCT utilises a water cart to wet down areas of the site which may potentially emit dust from the premises. Real-time weather monitoring is used to guide PKCT's planning and site preparations to minimise dust emissions, such as applying additional water to coal stockpiles. A truck wash is present at the road receival exit and it is mandatory for all trucks to pass through the truck wash to minimise emissions of dust from road transport vehicles accessing PKCT. PKCT monitors residential dust at three locations, with	C (Obs)	The Air Quality Management Plan and Monitoring Program is currently version 3 (according to the version history table) dated 20th July 2020 while the document header states the version as 12.0 and the footer states the document authorisation date as 9th October 2017.	Finding accepted **Obs-2020_003** - PKCT has reviewed and updated the Air Quality Management Plan to adjust the headers, footers and document version. **Status as of June 2021** Action Complete

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		11 additional monitoring points throughout the site to assist with dust management practices. According to the AEMRs, there were no instances of exceedances of the criteria at any of the residential locations. The AEMRs for the audit period reported one month where the criteria were exceeded at one of the 11 industrial gauges, in March 2017. However, there was no associated exceedance reported at any of the residential gauges.		The document requires updating to correctly state the current version. (Duplicate observation – See CoA Sch 3 Cl 7)	
M2.2	Air monitoring requirements **Point 1,2,3,4,5,6,7,8,9,12,15,17,18,19** **Pollutant** | **Units of measure** | **Frequency** | **Sampling method** Particulates – deposited matter | Grams per square metre per month | Monthly | AM-19	The annual returns contained monthly results for Particulates – deposited matter - for all points listed in Condition M2.2 with the exception of P6, which did not have a result for November	NC	Historic NC. No further action.	Finding accepted. **NC-2020_006** – PKCT proposes no further action on this non-

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	Point 20,21 **Pollutant** / **Units of measure** / **Frequency** / **Sampling method** PM10 / Micrograms per cubic metre / Continuous / Continuously PM2.5 / Micrograms per cubic metre / Continuous / Continuously Total Solid Particle / Micrograms per cubic metre / Continuous / Continuously	2018 due to a broken sample bottle which had been blown over due to strong winds. The Contractor in charge of collecting PKCT dust gauges undertook a full review following this event and repaired any gauges likely to fail. ERM reviewed the real time continuous dust monitoring system and reviewed a spreadsheet containing continuous dust monitoring results from the locations identified in Condition M2.2. ERM did not observe the sampling of dust gauges and is unable to confirm the method complies with AM-19.			conformance. **Status as of June 2021** Action Complete
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. Note: The licensee or its employees must notify all relevant authorities of incidents causing or	ERM reviewed the following emails relating to notified incidents: ■ Notification of TSS exceedances during discharge on 30th August	C (Obs)	PKCT should confirm laboratory turnaround times to ensure notification of	Finding accepted. **Obs-2020_004** – With reference to

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	2019, dated 6th September 2019; ■ Notification of dust emanating from stockpiles on 2nd March 2020, dated 9th March 2020; ■ Notification of Dirty Water Discharging from the Iron Chieftain from PKCT to Port Authority of NSW (forwarded to EPA on the same day) on 13th March 2018, dated 13th March 2018; ■ Notification of dust emanating from stockpiles on 23rd November 2018, dated 30th November 2018; and ■ Notification of TSS exceedances during discharge on 15th March 2019, dated 27th March 2019. ERM understands that PKCT notified the EPA of the exceedance on 27th March 2019 following receipt of laboratory analysis on 25th March 2019 confirming the exceedance		exceedances are made as close to the incident as possible.	the observation, PKCT will engage with our lab to strengthen reporting timeframes to minimise the likelihood of a future issue. Completion by; 31st October 2020 **Status as of June 2021** Action Complete
R4.1	The following must be submitted to the EPA with the Annual Return: A brief summary of the results for all Total	ERM reviewed annual returns attachments and confirmed that:	NC	ERM recommends conducting assessments for	Finding accepted. **NC-2020_007**

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	Suspended Particulate (TSP) matter, Particulate Matter (PM10) and Particulate Matter (PM2.5) monitoring. Tabular presentation of all TSP, PM10 and PM2.5 levels for monitoring/discharge point 20 and 21. The average result for TSP and PM10 must be detailed within the table. Where the 24-hour concentration of TSP exceeds 90 µg/m3 at point 21, the licensee must undertake an assessment to determine the likely reason for the elevated level, including: ■ weather data; ■ a comparison of TSP levels at monitoring/discharge point 20 and 21; ■ the proportion of TSP that is PM10, PM2.5 and PM1; ■ the contribution of operating conditions; and ■ other relevant factors. Where the 24-hour concentration of PM10 exceeds 50 µg/m3 at point 21, the licensee must undertake an assessment to determine the likely reason for the elevated level, including: ■ weather data;	■ A brief summary of the results for all TSP, PM10 and PM2.5 monitoring is presented in Section 2.0; ■ Tabular presentation of all TSP, PM10 and PM2.5 levels for monitoring/discharge points 20 and 21 including the average result for TSP and PM10 is included in Attachment B in the 2017/2018 and 2018/2019 annual returns and Attachment C in the 2019/2020 annual return; ■ PKCT has included excerpts from assessments for events where the 24-hour concentration of TSP exceeded 90 µg/m^3 at point 21, however, this is only undertaken when analysis shows that PKCT is likely to have		all exceedances of TSP and PM10 thresholds at point 21 or engaging with the EPA to align this condition with the PKCT Dust Monitoring Program to require investigations only where PKCT is likely to have contributed more than 30% to the exceeding concentration.	– PKCT has discussed with our dust consultant and will include assessments for all exceedances of TSP and PM10 thresholds at Point 21 in future Annual Returns. Completion by; 1st June 2021 (submission of next Annual Return) **Status as of June 2021** Action Complete

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
	■ a comparison of PM10 levels at monitoring/discharge point 20 and 21; ■ the proportion of PM10 that is PM2.5 and PM1; ■ the contribution of operating conditions; and ■ other relevant factors. Ambient air quality information used to inform the licensee's Annual Environmental Monitoring Report for the financial year preceding 30 June in the reporting period and information used to inform the licensee's Interim Annual Environmental Monitoring Report for the six-month period from 1 July to 31 December in the reporting period may be used to satisfy Condition R4.1. Information collected from 1 January to 31 March in the reporting period may be submitted to the EPA with the next Annual Return.	contributed more than 30% to the exceeding concentration of TSP, which is in accordance with the PKCT Dust Monitoring Program. According to the annual returns summary tables, exceedances of the 24-hour concentration of TSP at the point 21 occurred 17 times in 2017/2018 and 2018/2019 and 10 times in 2019/2020, however the annual returns attachments only included investigations for two events in 2017/2018, zero events in 2018/2019 and three events in 2019/2020. Therefore, there are instances where the reporting required by this condition has not been included in the annual returns and this condition has not been			

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		met; and ■ PKCT has included excerpts from assessments for events where the 24-hour concentration of PM10 exceeded 50 µg/m^3 at point 21, however, this is only undertaken when analysis shows that PKCT is likely to have contributed more than 30% to the exceeding concentration of PM_{10}, which is in accordance with the PKCT Dust Monitoring Program. According to the annual returns summary tables, exceedances of the 24-hour concentration of PM10 at point 21 occurred 41 times in 2017/2018, 31 times in 2018/2019 and 23 times in 2019/2020, however the annual returns attachments only			

Item No	Assessment Requirement	Comment	Audit Class.	Response/Action	PKCT Response/Action
		included investigations for one event in 2017/2018, zero events in 2018/2019 and seven events in 2019/2020. Therefore, there are instances where the reporting required by this condition has not been included in the annual returns and this condition has not been met.			
R4.2	The following must be submitted to the EPA with the Annual Return: Details of any overflow from Point 22, Point 23, Point 24, Point 25 and/or Point 26 specified by Conditions P1.2 and P1.3. The following information must be provided for each overflow: ■ a tabular presentation of the concentration of each pollutant specified in Condition M2.3; ■ date and time of the commencement of each overflow; ■ an estimate of the volume of each stormwater overflow and over what time period the overflow	ERM reviewed annual returns attachments and confirmed that details of any overflow from Point 22, 23, 24, 25 or 26 included the items required by this condition.	C (Obs)	P1.3 includes Point 27, however Point 27 is not referenced in this condition. ERM recommends clarifying with EPA if details of overflows from Point 27 require submitting with the annual	Finding accepted **Obs-2020_005** – PKCT agrees that details of any overflows from Point 27 should be included with the annual returns. PKCT will consult with the EPA and request to

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	occurred; ■ the weather conditions at the time of each overflow, specifying the amount of rainfall on a daily basis that had fallen a) on the day(s) of the overflow and b) for each day of the 7 day period prior to the overflow; ■ an explanation as to why the overflow occurred			returns.	have the licence updated to reflect this recommendation. Completion by; 10th March 2021 **Status as of June 2021** Action Complete
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	ERM confirmed the presence of a copy of the EPL at the premises. The PKCT website also links to a copy of the EPL, however when ERM tested this, the link connected to the incorrect version of the EPL on the EPA website.	C (Obs)	ERM recommends updating the PKCT website to link to the correct version of the EPL.	Finding accepted **Obs-2020_006** – PKCT has rectified the website link to the correct version of the

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					EPL. The link now takes the user to the EPA website. **Status as of June 2021** Action Complete

11.7 Appendix G: ISO 14001 and 9001 Certificate

Lloyd's Register

Certificate of Approval

This is to certify that the Management System of:

Port Kembla Coal Terminal Limited

Port Kembla Road, (off Springhill Road), Wollongong, 2520, Australia

has been approved by LRQA to the following standards:

ISO 14001:2015 | ISO 9001:2015

Basem Obaid - Global Head of Training and Improvement Services

Issued by: Lloyd's Register Quality Assurance Limited

Current issue date: 4 February 2019
Expiry date: 28 February 2022
Certificate identity number: 10170166

Original approval(s):
ISO 14001 – 2 February 1994
ISO 9001 – 2 February 1994

Approval number(s): ISO 14001 – 0048094 / ISO 9001 – 0048095

The scope of this approval is applicable to:
Receiving, stockpiling and loading of coal, coke and other dry bulk materials for shipment.

JAS-ANZ

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