



Independent Environmental Audit 2026

Port Kembla Coal Terminal

PREPARED FOR



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Independant Environmental Audit 2026

Port Kembla Coal Terminal

0807398



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EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Environmental Audit (IEA) of the Port Kembla Coal Terminal ('PKCT') on behalf of Port Kembla Coal Terminal Limited. The primary purpose of the audit was to satisfy the Department of Planning, Housing and Infrastructure (DPHI) Ministers' Conditions of Approval (CoA) Project Approval number PA 08_0009, which requires completion of an independent audit every three years from the date of the approval. The audit period assessed in this IEA is 2 August 2023 through 29 January 2026 (the date the site visit was completed as part of the audit).

The audit included a review of:

- DPHI, Ministers Conditions of Approval PA 08_0009 including the Driver's Code of Conduct (DCC);
- Environment Protection Licence (EPL) 1625; and
- Implementation of Management Plans developed as part of the Ministers' Conditions of Approval.

PKCT has established the control systems generally required for the stage of development i.e. operational. All staff interviewed demonstrated a high level of understanding of requirements and a commitment to the application of the requisite management systems and plans.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS 4360:2004 Risk management and HB 436:2004 Risk Management Guidelines Companion to AS/NZS 4360:2004 and as described in the Department of Planning & Environment publication "Post Approval Requirements – Independent Audit" issued May 2020. The number of non-conformances with the statutory conditions and implementation of the management plans is summarised in *Table E1* below.

TABLE E.1 SUMMARY OF AUDIT FINDINGS

Review	Non-Compliances (NC)
Statutory Instruments	Nil
Implementation of Plans	Nil

An action table addressing all findings of the audit has been developed by PKCT and will be issued separately to this report.

1. INTRODUCTION

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned to perform an Independent Environmental Audit (IEA) of the Port Kembla Coal Terminal (PKCT), on behalf of Port Kembla Coal Terminal Limited. The Site is located on the north side of Port Kembla Inner Harbour, south of Wollongong, New South Wales (NSW). The primary purpose of the audit was to satisfy the Department of Planning, Housing and Infrastructure (DPHI)¹ Ministers' Conditions of Approval (CoA) Project Approval number PA 08_0009), which requires completion of an independent audit every three years from the date of the approval. The audit period assessed in this IEA is 11 April 2017 through to 2 August 2023 through 29 January 2026 of Approval, the audit must:

- be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- include consultation with the relevant agencies;
- assess the environmental performance of the project and assess whether it is complying with the relevant requirements of this approval and any relevant mining lease or EPL (including any strategy, plan or program required under these approvals);
- review the adequacy of strategies, plans or programs required under these approvals; and, if appropriate; and
- recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.

The Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

1.1 OVERVIEW OF OPERATIONS AND APPROVALS

PKCT receives, stockpiles and loads coal from coalfields located in southern and western NSW for transport to internal and domestic markets. The Site is the major coal intermodal facility in southern NSW for the transfer of coal from road and rail to ship.

PKCT comprises of a single bulk handling facility. PKCT is leased from NSW Ports on a 20 year lease agreement, with a 20 year option. The lease commenced in 1990 and is due to expire in 2030. Six equal shareholders, namely Illawarra Services Proprietary Limited (GM³), Oakbridge Proprietary Limited (Glencore), Centennial Coal Company Limited, Simec Mining, Metropolitan Collieries Proprietary Limited (Peabody) and Wollongong Resources Pty Ltd (formerly Wollongong Coal), form the Board of PKCT. GM³, reporting to the PKCT Board, manages PKCT under a management contract.

The Site holds Environment Protection Licence (EPL) 1625 which was last varied during the audit period on 6 August 2025.

1.1.1 COAL TRANSPORT

The quantity of coal received by PKCT during the audit period was:

- 2023-2024 – 6.6 MT
- 2024-2025 – 6.9 MT

¹ Formerly the Department of Planning and Environment (DP&E).

The CoA limits the quantity of coal and bulk products received by public road at the site to not more than 7.5 million tonnes in any calendar year without the written approval of the Secretary.

The quantity of coal received by road during the financial years covered by the audit period were as follows:

- July 2023 – June 2024 – 2.3 MT
- July 2024 – June 2025 – 2.5 MT

1.1.2 MAINTENANCE ACTIVITIES

Routine maintenance of the stackers, reclaimers and ship loaders is conducted on-site by external contractors. The workshops located on-site are primarily used for storage of parts and equipment and for minor maintenance activities. The workshop contains oil, fuel and waste material in small quantities, stored in bunded IBCs.

1.1.3 WASTE MANAGEMENT

Wastes generated at the Site include:

- General waste;
- Waste oil;
- Septic waste;
- Cardboard;
- Oil filters;
- Controlled waste residues; and
- Metals.

All wastes are collected by Veolia for off-site disposal. During the audit, waste was noted to be well segregated.

1.1.4 WATER MANAGEMENT

Water management at PKCT is undertaken in accordance with the Water Management Plan. The main components of water-related infrastructure include:

- Perimeter road with kerb and drains to capture runoff;
- Satellite storage ponds capturing runoff from site sub catchments; and
- Settlement lagoon which removes solids before reuse on-site for dust suppression or discharge to Inner Harbour via licensed discharge point LDP16.

1.1.5 AIR QUALITY MANAGEMENT

Air quality is managed in accordance with the Air Quality Management Plan. Sources of emissions to air include coal stockpiles, coal receipt and ship loading, roads and unsealed areas. The main air quality controls include:

- Stockpile spray system installed around the stockyards, comprising manual and automatic spray systems;
- Road cleaning;
- Paving of roadways and around transfer points;

- Enclosed rail receival with water spray if required;
- Enclosed receival conveyors;
- Coal berth stockyard conveyors and machines with wind guards;
- All transfer points are enclosed;
- Conveyor belt washing station;
- Truck washers;
- Shiploader chutes discharge within ship's hatch;
- Variable height stackers minimise drop height to stockpile;
- Conveyor sprays at various locations on receival and ship loading flow paths;
- Weather forecast monitoring;
- Continuous air quality monitoring and dust monitoring network; and
- Truck driver rules and Code of Conduct.

1.2 AUDIT OBJECTIVES

The primary objectives of the audit included:

- assess the environmental performance of the project and whether it is complying with the requirements in the CoA, EPL or DCC (including any assessment, plan or program required under these approvals);
- review the adequacy of any approved strategy, plan, or program required under the abovementioned consents/approvals; and
- recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the abovementioned approvals.

1.3 AUDIT SCOPE

The scope of works in order to complete the audit included the following:

- the audit was carried out in accordance with DP&E's Guidelines for Independent Audits and AS/NZS ISO 19011:2018: Guidelines for auditing management systems;
- review of compliance against the documentation identified in CoA (as it relates to the current activities at the PKCT) which included;
 - document review of compliance against the CoA, statement of commitments, and any other relevant consents/approvals;
 - a site inspection to assess compliance against field implementation of the active CoA;
 - review of supporting plans developed as part of the CoA and assessment of their adequacy towards effective environmental performance;
- review of monitoring results and trends with comparison of monitoring results against regulatory limits and CoA limits (where applicable);
- confirmation of any additional monitoring required for identified trends;

- reviewing community complaints and assessing any trends and identifying the source of an established trend;
- review of any regulatory actions including any letters, penalty notices and prosecutions;
- review of previous IEA report to verify close-out of actions;
- consultation with the relevant agencies such as Department of Planning, Housing and Infrastructure (DPHI) (various divisions: planning and post approvals, compliance, water, resources, biodiversity and conservation), Environment Protection Authority (EPA) and PKCT Community Consultative Committee (CCC);
- draft report with results of compliance assessment to be issued for comment to PKCT; and
- final report to be issued for submission to the DPHI.
- The audit covers the period 2 August 2023 through 29 January 2026 and is limited to assessing the activities completed during the audit period.

1.4 AUDIT CRITERIA

The audit covered the following specifications and standards, with a particular focus on activities associated with the current stages of operation. The documents relevant to this audit included:

- Conditions of Approval PA 08_0009, including Driver's Code of Conduct;
- EPL 1625; and
- Implementation of approved Management Plans:
 - Air Quality Management Plan
 - Water Management Plan
 - Environmental Management Strategy
 - Greenhouse Gas and Energy Efficiency Management Plan
 - Landscape Management Plan
 - Green and Gold Bell Frog Management Plan
 - Waste Management Plan
 - Pollution Incident Response Management Plan
 - Noise Management Plan

1.5 LIMITATIONS OF THIS REPORT

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

This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, ERM relied on:

- a) client/third party information which was not verified by ERM except to the extent required by the scope of services, and ERM do not accept responsibility for omissions or inaccuracies in the client/third party information; and
- b) information taken at or under the particular times and conditions specified, and ERM do not accept responsibility for any subsequent changes.

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2. AUDIT METHODOLOGY

2.1 METHODOLOGY AND PROCESS

The audit comprised a site inspection during the dates 28 to 29 January 2026, interviews with key personnel, and review of records and other related documentation.

The audit process included the following primary components:

- development of a Terms of Reference, which included:
 - audit scope and objectives;
 - date and location of audit;
 - members of audit team;
 - list of people to be audited; and
 - list of reference documents and audit criteria;
- a project inception meeting was held on 5 January 2026 to confirm details of the Terms of Reference, site inspection logistics and request for documentation required prior to the site inspection component of the audit;
- an opening meeting was held on 28 January 2026 at site to confirm the audit objectives and scope for the site inspection. Attendees included:
 - Lucas Wilson – ERM Lead Auditor
 - Stephanie Yee – ERM Support Auditor
 - Michael Curley – HSER Lead
 - Luke Pascot – Environmental Specialist
 - Mark Beale – Planning and Logistics Lead
 - Darren Coleman – Operations Manager
 - Bruce Chapple – Asset Manager
 - David Zancolich – Process and Reliability Superintendent
 - David Richards – General Manager
- Site inspections were undertaken between 28 and 29 January 2026;
- A debrief/closeout meeting was held at the site on 29 January 2026 to discuss initial findings and recommendations.
- Preparation of the audit report (this report).

2.2 AGENCY AND COMMUNITY CONSULTATION

ERM consulted with the agencies and stakeholders as required including Department of Planning, Housing and Infrastructure (DPHI) (including its various departments such as Compliance, Post approvals), CCC, New South Wales Environment Protection Authority (NSW EPA). Emails were issued between 16 January 2026 and 22 January 2026. Responses are outlined in *Table 2.1*.

In each case, an email was sent to representatives of each agency requesting feedback on those issues considered most relevant by their Department at the time of the audit. The consultation outlining the terms of reference was provided prior to the site inspection to obtain feedback and draw attention to any key issues, within the agreed scope of the audit. The Departmental correspondence is provided in Appendix D.

TABLE 2.1 AGENCY AND STAKEHOLDER CONSULTATION SUMMARY

Agency/Stakeholder	Method	Consultation summary	Response	Location Addressed in Report
Department of Planning, Housing and Infrastructure (DPHI) – Compliance	Email on 16 January 2026	Provision of Audit Terms of Reference, introduction to team, outline date of audit and provide opportunity to comment.	<ul style="list-style-type: none"> ■ Air quality ■ Complaints Management 	Appendix A and Section 3.2 and 3.4.2
New South Wales Environment Protection Authority (NSW EPA)	Email on 16 January 2026	Provision of Audit Terms of Reference, introduction to team, outline date of audit and provide opportunity to comment.	<p>EPA advised it had no major areas of concern but requested focus on the following areas:</p> <ul style="list-style-type: none"> ■ Air quality impacts, management and monitoring of dust ■ Adequacy of site surface water controls and discharge 	Appendix B and Sections 3.4.2, 3.4.3 and 3.6
Community Consultation Committee (CCC)	Email on 16 January 2026	Provision of Audit Terms of Reference, introduction to team, outline date of audit and provide opportunity to comment.	No response	N/A
Wollongong City Council	Email on 22 January 2026	Provision of Audit Terms of Reference, introduction to team, outline date of audit and provide opportunity to comment.	No response	N/A

2.3 CLASSIFICATION OF AUDIT FINDINGS

Findings resulting from an assessment of audit evidence were divided into six categories as follows:

- **Compliant (C):** the intent and all elements of the audit criteria requirements have been complied with within the scope of the audit.
- **Non-compliant (NC):** Failure to meet the audit requirements, failure to achieve the field performance outcomes identified in documentation, or ineffective environmental management of the activity.
- **Not Triggered (NT):** A regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, and therefore a determination of compliance could not be made.
- **Note:** A statement or fact, where no assessment of compliance is required.
- **Obs:** Observations are recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance.

A qualitative risk assessment was also completed on the findings, consistent with AS/NZS 4360:2004 Risk management and HB 436:2004 Risk Management Guidelines Companion to AS/NZS 4360:2004 and as described in the DPHI publication "Post Approval Requirements – Independent Audit" issued May 2020.

The overall level of risk was estimated by combining the likelihood of harm occurring with the estimated level of harm associated with each finding. Risk levels have been assigned as follows:

- **High:** Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence;
- **Medium:** Non-compliance with:
 - potential for serious environmental consequences, but is unlikely to occur; or
 - potential for moderate environmental consequences, but is likely to occur;
- **Low:** Non-compliance with:
 - potential for moderate environmental consequences, but is unlikely to occur; or
 - potential for low environmental consequences, but is likely to occur.

3. AUDIT FINDINGS

3.1 PREVIOUS AUDIT FOLLOW UP

The last audit was conducted by ERM for the period 6 August 2020 to 1 August 2023. A summary of the 2023 audit findings and their status is summarised below in *Table 3.1*.

TABLE 3.1 SUMMARY OF 2023 AUDIT FINDINGS

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action	2026 Status
Minister's Conditions of Approval PA 08_0009					
Sch 4-5	<p>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 suitably 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.</p>	<p>Independent environmental audits were conducted by AECOM in 2011, 2014, 2017 and ERM in 2020. This audit was commissioned on 6 June 2023. Following the approved extension from DPE to the submittal due date of the 2020 IEA (due to Covid-19) to 31 September 2020, PKCT stated they planned the 2023 audit period to be 3 years following the delayed 2020 audit. The approval for the submission extension in 2020 however does not state any change to the ongoing requirements of this condition for the Proponent to commission and pay for the IEA by 31 March on an audit year. a) The lead auditor was approved by the Secretary and the audit team comprises suitably qualified experts in the fields of noise, air quality and traffic management; b) The IEA included consultation with DPE, EPA, and CCC; c) This report assesses the environmental performance of the project and compliance with relevant requirements in the approval and EPL; d) The adequacy of strategies, plans and/or programs required under the approval and EPL were reviewed as part of this audit; and e) Improvement recommendations have been provided (where applicable) as part of audit. ERM considers that the requirements of this Condition have been met, aside from the date of commissioning the 2023 IEA.</p>	<p>NC</p>	<p>ERM recommends PKCT revert to commissioning the IEAs by 31 March on an audit year and set up a reminder within PKCT scheduling systems.</p>	<p>Deemed compliant</p>
Driver's Code of Conduct					
<p>No non-compliances were identified.</p>					
Environmental Protection Licence 1625					
<p>No non-compliances were identified.</p>					

3.2 COMPLAINTS SUMMARY

Complaints registers for the auditing period were available online and on-site for review. Complaints over the reporting period include:

- One complaint received in May 2024 relating to a northern resident reported general coal dust concerns; and
- One complaint received by PKCT in June 2024; one related to dust on Springhill Road.

Evidence was provided that all complaints were investigated and actioned to the satisfaction of the EPA and the complainant.

3.3 INCIDENT SUMMARY

A review of incidents during the audit period was undertaken through examination of the PKCT incident register and supporting EMS records. This review did not identify any incidents that resulted in, or were likely to result in, material harm to the environment. No incidents requiring notification to the EPA or other regulators were recorded during the audit period. Based on the records reviewed, PKCT's incident management and reporting processes operated as intended, and no reportable environmental incidents occurred.

3.4 ENVIRONMENTAL MONITORING PERFORMANCE

3.4.1 NOISE

Condition M7.2 of the EPL provides for circumstances where noise monitoring may be ceased by PKCT. The noise monitoring program must be routinely reviewed and provided no exceedances of the stipulated criteria have occurred for 6 years and the EPA is satisfied with the program review, noise monitoring is not required to continue.

PKCT wrote to the NSW Department of Planning & Environment requesting permission to cease noise monitoring and received a response on 16 March 2017, confirming that noise monitoring is no longer required to be undertaken by PKCT given that noise levels were below the criteria in all noise surveys conducted since 2009.

According to an email received from NSW EPA by PKCT on 15th August 2017, the cessation of noise monitoring was acknowledged by the EPA and no formal change to the EPL was considered necessary.

While the noise limits remain applicable to the site, the requirement to undertake routine noise monitoring is no longer applicable. Given that operations have not materially changed since the cessation of monitoring and no noise-related complaints or non-compliances were recorded during the audit period, the existing arrangements remain appropriate.

3.4.2 AIR QUALITY

PKCT maintains an established air-quality management framework comprising a network of residential dust deposition gauges and on-site continuous particulate monitors to support proactive dust management and investigation of elevated results. No agreements are in place with landowners to permit exceedance of applicable air-quality criteria.

A review of AEMRs and EPL Annual Returns for the audit period indicates that annual average concentrations at the northern monitoring location remained below the applicable criteria for both TSP and PM₁₀. Residential dust deposition monitoring also demonstrated compliance with the annual average criterion of 4 g/m²/month at the residential gauges.

Short-term particulate behaviour was examined. During the 2023–2024 reporting period, one day recorded an elevated reading of 24-hour PM₁₀ at the northern monitor, with investigation attributing the result primarily to a regional dust event rather than site operations. During the 2024–2025 reporting period, several short-term PM₁₀ exceedances and consecutive days of elevated TSP were recorded; investigations concluded these were driven by regional haze and sea-mist conditions, with only a minor contribution from PKCT on the exceedance days assessed. Continuous monitoring data were used appropriately to track trends and trigger investigations rather than as a sole determinant of compliance.

One community complaint relating to dust on Springhill Road was received by the EPA in June 2024 and recorded in PKCT's EMS. Records reviewed indicate the matter was investigated, appropriate follow-up actions were undertaken, and the complaint was closed out.

AEMRs acknowledge a methodological limitation in the real-time particulate monitoring equipment used to assess compliance against NSW EPA Approved Methods. This limitation is transparently documented, with continuous data applied for trend analysis and investigation triggers. On balance, the monitoring results and investigations reviewed support the conclusion that air-quality impact assessment criteria at residences were achieved for the audit period.

PKCT demonstrates good practice through maintenance of a residential deposition network, continuous monitoring to inform operations, investigation of short-term exceedances, transparent reporting, and responsive complaint management.

A recommendation to address definitive compliance for real-time particulate monitoring has been made with further details of this provided separately in Table 3-2.

3.4.3 WATER MANAGEMENT

3.4.3.1 SURFACE WATER

Surface water management at the site comprises a series of satellite water storage ponds used to collect stormwater runoff, which is transferred to a settlement lagoon prior to discharge to the Inner Harbour in accordance with the EPL. Flocculant is added within the settlement lagoon to enhance the settlement of suspended solids. Discharges occur

via an overflow weir authorised under the EPL, and captured water is also reused on site for operational purposes, including dust suppression.

A review of surface water management during the audit period (2 August 2023 to 29 January 2026) was undertaken through assessment of AEMRs, Annual Returns, monitoring data and site inspection observations. One Total Suspended Solids (TSS) exceedance at the authorised discharge point occurred during the audit period; however, this discharge was permitted under the EPL due to rainfall exceeding the threshold specified in Condition L2.5 and did not result in regulatory non-compliance.

No other surface water incidents requiring notification to the EPA were reported during the audit period. Annual Returns and AEMRs did not record any unauthorised discharges, enforcement actions, or regulatory directions relating to surface water management. Site inspection observations confirmed that surface water infrastructure was maintained and operating as intended at the time of the audit.

Based on the information reviewed, surface water was managed in accordance with the EPL during the audit period.

3.5 MANAGEMENT PLAN ADEQUACY

The Management Plans for the site were reviewed and the adequacy in meeting the relevant approval requirements was assessed in view of current operations at the site. It was noted that management plans have been reviewed and updated in accordance with the Project Approval. The Driver's Code of Conduct was revised and submitted to DPHI on 15 September 2025 and approved by the DPHI on 15 August 2025.

In general, Management Plans were considered to be appropriate for the site's operations at the time of the site visit. The findings of the Management Plan review are outlined in *Table 3.2* and *Appendix A*.

3.6 ENVIRONMENTAL PROTECTION LICENCE

The site operates under Environment Protection Licence (EPL) 1625, issued to Port Kembla Coal Terminal Ltd. The EPL remained in force throughout the audit period and was varied during the audit period, with the most recent variation issued in August 2025. PKCT submitted Annual Returns to the EPA for the audit period in accordance with EPL requirements.

A review of the Annual Returns and AEMRs for the audit period did not identify any regulatory non-compliances. One minor air-monitoring interruption was recorded during the audit period, where heavy seas damaged a depositional dust gauge (P3), resulting in no data being collected for one monitoring round. PKCT reported the issue to the EPA and the dust gauge (P3) was subsequently requested to be removed from their EPL and Site. No surface water non-compliances, unauthorised discharges, or enforcement actions were reported during the audit period. Findings identified against the Site's EPL are outlined in *Table 3.2* and *Appendix B*.

3.7 DRIVER'S CODE OF CONDUCT

Traffic management at the Site is managed through the implementation of the Driver's Code of Conduct (DCC). The DCC was developed to ensure compliance with the Project Approval. The primary objectives of the DCC are:

- Minimise impacts on the community from road haulage activities;
- Encourage an environment for safe operations associated with PKCT road delivery operations; and
- Maximise public safety by adhering to Australian road rules and ensure all potential road safety issues are reported.

The DCC required coal transport drivers to follow designated road routes and specific requirements related to permitted times for receipt of coal at PKCT. Haulage companies are required to sign up to the DCC and implement the requirements.

Compliance with the DCC is subject to regular audits by PKCT, shippers and road transport providers. PKCT operates a '3-Strikes Policy' for non-compliance with the DCC.

DCC conditions and the summary of audit findings are provided in *Table 3.2* and *Appendix C*.

3.8 COMPLIANCE WITH REGULATORY INSTRUMENTS

A compliance check of the CoA and EPL conditions as well as management plan review has been completed and is provided in Appendix A and Appendix B respectively. Non-compliances and observations for each component are summarised in *Table 3.2*.

As discussed in *Section 2.3*, a qualitative risk assessment was also completed on the findings as follows:

- non-compliance assessed as 'high' have been colour coded red;
- non-compliance assessed as 'moderate' have been colour coded orange;
- non-compliance assessed as 'low' have been colour coded yellow; and
- administrative non-compliance have been colour coded blue.

It is noted that no 'high' or 'moderate' non-compliance were identified.

TABLE 3.2 SUMMARY OF 2026 AUDIT FINDINGS

Item No	Assessment Requirement	Comment	Audit Classification	Recommendation																							
Minister's Conditions of Approval PA 08_0009																											
Sch 3-7	<p>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.</p> <p><i>Table 3: Long term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>90 µg/m³</td> </tr> <tr> <td>Particulate matter <10 µm (PM10)</td> <td>Annual</td> <td>30 µg/m³</td> </tr> </tbody> </table> <p><i>Table 4: Short term impact assessment criteria for particulate matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter <10 µm (PM10)</td> <td>24 hour</td> <td>50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 5: Long term impact assessment criteria for deposited dust</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>2g/m²/month</td> <td>4g/m²/month</td> </tr> </tbody> </table> <p><i>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.</i></p> <p>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.</p>	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m ³	Particulate matter <10 µm (PM10)	Annual	30 µg/m ³	Pollutant	Averaging period	Criterion	Particulate matter <10 µm (PM10)	24 hour	50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	2g/m ² /month	4g/m ² /month	<p>There are no agreements in place with landowners to allow exceedance of the air quality limits. PKCT continues to operate a residential dust deposition network and onsite continuous particle monitors to support dust management and to inform investigations.</p> <p>A review of the recent Annual Environmental Monitoring Reports and EPL Annual Returns indicates that the annual average TSP and PM₁₀ concentrations at the northern monitoring site were reported to be below the applicable annual average criteria during the 2023 to 2025 reporting period:</p> <ul style="list-style-type: none"> The 2023–2024 AEMR reports annual averages at the northern site of 20.8 micrograms per cubic metre (µg/m³) for TSP and 14.6 µg/m³ for PM₁₀, both below the relevant criteria; and The 2024–2025 AEMR reports annual averages at the northern site of 23.9 µg/m³ for TSP and 16.9 micrograms per cubic metre for PM₁₀, which also remain below their respective criteria. <p>The residential dust deposition monitoring reported in the AEMRs indicates compliance with the annual average criterion of 4 grams per square metre per month (g/m²/month) at the residential gauges.</p> <p>Short-term particulate behaviour was also examined. In the April 2023 to March 2024 period there was one day where the northern monitor recorded a 24-hour PM₁₀ concentration above criterion of 50 µg/m³. The assessment of this exceedance attributed it primarily to a regional dust episode rather than PKCT operations.</p> <p>In the April 2024 to March 2025 period there were six days where the northern monitor recorded a 24-hour PM₁₀ exceedance and three consecutive days where 24-hour TSP concentrations exceeded the site trigger of 90 µg/m³, with the investigations concluding the exceedances were driven by regional haze and sea mists, and that the contribution from PKCT was expected to</p>	C(Obs)	<p>It is recommended that PKCT amend the existing air quality monitoring program to either:</p> <ul style="list-style-type: none"> Supplement the existing monitoring network (e.g. the northern monitoring location) with an Australian Standard (AS) sampling method listed in NSW EPA (2022b), e.g.: <ul style="list-style-type: none"> High volume air sampler (HVAS); Tapered element oscillating microbalance (TEOM); or Beta Attenuation Method (BAM) <p>Or:</p> <ul style="list-style-type: none"> Validate the performance of the existing monitoring network against an AS method with review of the acceptability of the correlation and implementation of a correction factor in the event that the accuracy of the Osiris instrumentation is acceptable. <p>Where implemented, the AS method should be conducted by a NATA-accredited body that has the applied method listed within its accreditation scope.</p>
Pollutant	Averaging period	Criterion																									
Total suspended particulate (TSP) matter	Annual	90 µg/m ³																									
Particulate matter <10 µm (PM10)	Annual	30 µg/m ³																									
Pollutant	Averaging period	Criterion																									
Particulate matter <10 µm (PM10)	24 hour	50 µg/m ³																									
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																								
Deposited dust	Annual	2g/m ² /month	4g/m ² /month																								

Item No	Assessment Requirement	Comment	Audit Classification	Recommendation
		<p>be small. The 2024–2025 AEMR further notes that on four exceedance days the estimated contribution of PKCT was minor, with the balance explained by regional dust and haze conditions.</p> <p>A review of the AEMR identified limitations in the monitoring method applied to evaluate compliance with this Condition. Section 3 of the AEMR states:</p> <p><i>"It should also be noted that the Osiris continuous dust monitoring equipment does not comply with the NSW EPA's Approved methods for the sampling and analysis of air pollutants in NSW (NSW EPA, 2022). Consequently, the data produced by these monitors cannot provide a definitive determination of whether dust levels comply with the standards"</i></p> <p>Both AEMRs acknowledge this limitation and use the continuous data to track relative trends and to trigger investigations rather than for definitive compliance determination. In addition, neither the approval conditions, nor the EPL define a required method for real-time particulate monitoring².</p> <p>On the basis of the AEMR and Annual Return data for the audit period, the annual average criteria for TSP and PM₁₀ at the northern site are expected to have been achieved and residential dust deposition criteria were not exceeded on an annual basis. Short term PM₁₀ exceedances were investigated and attributed largely to regional conditions with a low contribution from PKCT. Noting that on this basis, the project is assessed as Compliant with the air quality impact assessment criteria at residences for the audit period.</p>		
Sch 4-10	<p>The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <p>(a) be developed in consultation with DECC;</p> <p>(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</p> <p>(c) include:</p>	<p><i>See commentary for Sch 3-7 (immediately above)</i></p>	C(obs)	<p>It is recommended that the protocol for evaluation of exceedances should be amended to incorporate the following:</p> <ul style="list-style-type: none"> • Presentation of data for both onsite monitors and publicly available data from regional monitors including DCCEEEW Wollongong, Kembla Grange and Albion Park South (particularly relevant if concluding that an

² It is also noted that relative to the prior version, NSW EPA (2022) excludes ambient monitoring methods. Guidance for the selection of monitoring methods is provided in *Environment Protection Authority, Ambient Air Monitoring Guidance Note* (NSW EPA, 2022) [Ambient air monitoring guidance note](#).

Item No	Assessment Requirement	Comment	Audit Classification	Recommendation
	<ul style="list-style-type: none"> 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.			exceedance is part of a regional event). <ul style="list-style-type: none"> Presentation of a time series of reported particulate matter concentrations, wind speed and wind direction for the exceedance day/s. Qualification of limitations of the upwind/downwind analysis when high particulate concentrations are present during low wind conditions (e.g. <1 m/s) in which case wind patterns are expected to be non-uniform. Review of the wind vectors for which the monitor is assessed as downwind of either PKCT or Bluescope, noting that a 35° band has been used for Bluescope, whereas a 100° band would be considered more aligned with the site geometry. The band used for PKCT should also be reviewed to account for plume growth with distance downwind.

Environmental Protection Licence 1625

G1.1	A copy of this licence must be kept at the premises to which the licence applies.	ERM observed a copy of the licence kept at the premises. PKCT’s website also hosts a copy of the licence; however, the version displayed online showed an earlier licence version dated 12 July 2024, opposed to the current version dated 6 August 2025.	C(obs)	It is recommended to update the PKCT Website to include the latest version of the EPL.
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Drivers’ Code of Conduct

No non-compliances have been identified.

4. CONCLUSION

An audit of CoA and Environmental Protection Licence conditions has been completed as well as a check against commitments made in the management plans developed as part of CoA conditions for the site.

Overall, compliance was generally achieved with the audit documents that were reviewed. The number of non-compliances with the statutory conditions and implementation of the management plans is summarised in *Table 4.1* below.

TABLE 4.1 SUMMARY OF AUDIT FINDINGS

Review	Non-Compliances (NC)
Statutory Instruments	Nil
Implementation of Plans	Nil

An action response table has been developed by PKCT addressing all audit findings and will be submitted separately to this report.



APPENDIX A

CONDITIONS OF APPROVAL



No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
1.	The Proponent shall implement all practicable reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the project.	<ul style="list-style-type: none"> ▪ Note 	Compliance with this condition is as reported in the following report.	Note	N/A
Terms of Approval					
2.	<p>The Proponent shall carry out the project generally in accordance with the:</p> <ul style="list-style-type: none"> (a) EA; (b) Response to Submissions; (c) Statement of Commitments (see Appendix 2); and (d) Conditions of this approval. 	<ul style="list-style-type: none"> ▪ Note 	Compliance with this condition is as reported in the following report.	Note	N/A
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.	<ul style="list-style-type: none"> ▪ Note 	This condition has been applied to this audit.	Note	N/A
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.	<ul style="list-style-type: none"> ▪ Driver’s Code of Conduct 2025 and DPHI Approval 15 September 2025 ▪ Driver’s Code of Conduct (DCC) Implementation Plan 2025 and DPHI approval 15 September 2025 ▪ Greenhouse Gas and Energy Efficiency Management Plan 2025 and DPHI approval 15 September 2025 ▪ Environmental Management Strategy (EMS) Management Plan and DPHI approval 15 September 2025 ▪ Green and Golden Bellfrog (GGBF) Management Plan 2025 and DPHI approval 15 September 2025 	Site Management confirmed to the auditors that no requests for revisions of any strategies, plans or programs required under this consent have been received from the Department.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		<ul style="list-style-type: none"> ▪ Air Quality Management Plan (AQMP) 2025 and DPHI approval 15 September 2025 ▪ Landscape Management Plan (LMP) 2025 and DPHI approval 15 September 2025 ▪ Noise Management Plan (NMP) 2025 and DPHI approval 15 September 2025 ▪ Water Management Plan (WMP) 2025 and DPHI approval 15 September 2025 			
5.	<p>The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of:</p> <p>(a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with this approval; and</p> <p>(b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.</p>	<ul style="list-style-type: none"> ▪ AEMRs for 2023/2024, 2024/2025 ▪ Interviews with PKCT Environmental Specialist and HSER Lead 	<p>PKCT has obtained Director General approval for the current suite of management plans. Annual Environmental Management Reports have been submitted each year in accordance with the approval requirements and have been accepted by the Department of Planning, Housing and Innovation. The audit confirms that PKCT has implemented the actions and measures described in these approved documents, and that updates to management plans and associated procedures have been incorporated into site operations. Further confirmation of compliance with this condition is provided throughout this report.</p>	C	N/A
Limits On Approval					
6.	<p>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:</p> <p>(a) reviews the transport related impacts associated with the trucks being used to deliver coal and bulk products to the terminal;</p> <p>(b) demonstrates that these impacts are generally consistent with the predicted and/or approved impacts; and</p> <p>(c) examines whether there any other reasonable and feasible measures that could be implemented to minimise these impacts.</p>	<ul style="list-style-type: none"> ▪ AEMRs for 2023/2024, 2024/2025 ▪ Shipping reports FY25 ▪ Spreadsheet detailing monthly quantities of coal received by road and rail and ship-loading quantities, (PKCT tonnes and throughput.xls) ▪ (Summary conformance to Drives Code of Conduct.xls) ▪ Monthly DCC report FY2023-2026 	<p>In keeping with previous audits, ERM reviewed quantities of coal received for the following periods: July 2023 – June 2024, July 2024 – June 2025 and July 2025 – November 2025. According to the AEMRs, the following quantities were received by public road during the financial years covered by the audit period:</p> <ul style="list-style-type: none"> • July 2023 – June 2024: 2.3 Mt; and • July 2024 – June 2025: 2.5 Mt • July 2025-November 2025: 0.98 Mt <p>ERM reviewed a management spreadsheet documenting the quantities of coal received by financial year and confirmed</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	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.		the amounts recorded in the tracking spreadsheet were congruent with the AEMR reports. ERM reviewed example monthly supplier delivery dockets and confirmed that the amounts of coal delivered to the site were included on the dockets. For all years reviewed, the total quantity of coal and bulk products received at the site by road did not exceed 7.5 Mt, therefore the requirement to apply for written approval from the Director-General was not triggered.		
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.	<ul style="list-style-type: none"> Spreadsheet detailing monthly quantities of coal received by road and rail and ship-loading quantities, (PKCT tonnes and throughput.xls) Monthly supplier delivery dockets FY2023-2026 Driver's Code of Conduct (DCC) 2025 	Site management advised that NRE No 1 Colliery has remained in care and maintenance during the audit period and has not produced or dispatched coal to PKCT. On this basis, the operational trigger for this condition did not arise. The Drivers Code of Conduct sets out delivery time requirements consistent with this condition, demonstrating that PKCT has appropriate controls in place should receive from the colliery recommence. No evidence was identified during the audit to suggest any non compliant coal receipt activity.	C	N/A
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.	<ul style="list-style-type: none"> Environmental Supervisor and Management Interviews 	Notwithstanding the events detailed against Approval Items 6 and 7, above, coal and bulk products have been received at the Site by road delivery 24 hours per day, seven days per week.	C	N/A
Management Plans/Monitoring Programs					
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.	<ul style="list-style-type: none"> PKCT management plans DPHI correspondence and approvals Environmental Supervisor and Management Interviews 	This condition was not triggered during the audit period. The Proponent did not seek Director-General approval to submit management plans or monitoring programs on a progressive basis. All management plans continued to be reviewed, updated and submitted to DPHI through the standard approval process.	NT	N/A
Surrender of Consents					
10.	Within 12 months of the date of this approval, the Proponent shall surrender all existing development consents and existing	<ul style="list-style-type: none"> Project Approval 08_0009 (14 April 2009) 	As this condition was only triggered within a 12-month period from the date of this approval, the condition does not apply	NT	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	use rights associated with operations at the site in accordance with clause 97 of the EP&A Regulation.		to the current audit period. There is no ongoing obligation and the condition is therefore not triggered.		

Structural Adequacy

11.	<p>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.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	<ul style="list-style-type: none"> AEMRs for 2023/2024, 2024/2025 Environmental Supervisor and Management Interviews Historical aerial imagery review Occupation Certificate Historical aerial imagery review 	<p>The AEMRs for the audit period state that all building maintenance activities are undertaken in accordance with the Building Code of Australia. Interviews with PKCT management and observations during the site inspection confirmed that PKCT did not undertake any construction of new buildings or structures, nor any alterations or additions to existing buildings or structures, during the audit period.</p> <p>The auditors also reviewed historical aerial imagery covering the audit period and did not identify any evidence of construction activities or structural additions occurring onsite.</p> <p>As no new buildings or structural modifications were carried out, there was no requirement for PKCT to obtain construction or occupation certificates or to demonstrate compliance with the requirements of the BCA. On this basis, the Proponent has complied with this condition for the audit period.</p>	C	N/A
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Demolition

12.	<p>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.</p>	<ul style="list-style-type: none"> AEMRs 2023/2024 and 2024/2025 Interview: PKCT Environmental Specialist Site inspection observations Review of historical aerial imagery (audit period) 	<p>Interviews with PKCT management and observations during the site inspection confirmed that no demolition works were undertaken during the audit period. The AEMRs reviewed for the period did not report any demolition activities, and inspection of historical aerial imagery likewise showed no evidence of structures being removed or demolition activity occurring on the site.</p> <p>As no demolition works were conducted during the audit period, there were no activities that could give rise to non-compliance with AS 2601-2001. On this basis, PKCT has complied with this condition for the audit period.</p>	C	N/A
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Operation Of Plant And Equipment

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
13.	<p>The Proponent shall ensure that all plant and equipment used on site is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<ul style="list-style-type: none"> AEMRs 2023/2024 and 2024/2025 Spreadsheet summarising work orders (Environ_PM WO's_0126.xlsx) Example operator competency records (not exactly) Example Work Orders Example Competency Records Monitoring equipment calibration and service reports (2023-2025) Interview: PKCT Environmental Specialist and Asset Manager 	<p>(a) PKCT manages plant and equipment maintenance through the TechONE computerised maintenance management system. System-generated maintenance logs and a sample of Work Orders were reviewed, showing clear evidence of scheduled and corrective maintenance being raised, actioned and closed out across the audit period. Work Orders included condition notes, trades feedback and completion sign-off, demonstrating an established process for ensuring equipment remains in proper working order.</p> <p>Discussions with the Asset Manager confirmed that maintenance activities and equipment condition are routinely reviewed with trades personnel, with defects managed and escalated through TechONE in line with PKCT's maintenance framework.</p> <p>(b) Operator competency records were reviewed to confirm that equipment is being operated in a proper and efficient manner. The records sighted included Main Control Room (MCR) and Rail Receiving training assessments, reassessments and prerequisite training logs covering environmental controls, dust systems, emergency procedures, start-up/shut-down processes and safe equipment operation. All sampled assessments were signed off as competent. Examples included MCR competency assessments for 2023, 2025 and 2026, Rail Receiving reassessments for 2023 and 2025, and supporting documentation such as the Rail Receiving Competency Manual (ML.004).</p> <p>Based on evidence reviewed, PKCT are considered to be maintaining plant and equipment appropriately and that operators hold the necessary competencies to operate equipment efficiently and in accordance with site procedures.</p>	C	N/A
Dispute Resolution					
14.	<p>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</p>	<ul style="list-style-type: none"> AEMRs for 2023/2024, 2024/2025 Interview: Environmental Specialist 	<p>The AEMRs for the audit period did not identify any disputes with Council or other government agencies requiring referral to the Secretary for determination. Site management</p>	NT	N/A



No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	for resolution, whose determination of the disagreement shall be final and binding on the parties.		confirmed during interviews that no such disagreements occurred.		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
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SCHEDULE 3 – ENVIRONMENTAL CONDITIONS – MINING AREA

NOISE

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) L_{Aeq} (15 min)

Location	Time period	Noise Criteria L_{Aeq} (15 min) (dBA)
Cnr of Swan/Kembla Sts	Day	51
	Evening	50
	Night	49
Cnr of Swan/Corrimal Sts	Day	51
	Evening	50
	Night	49
Cnr of Keira/Fox Sts	Day	55
	Evening	49
	Night	45

Notes: a) To determine compliance with the L_{Aeq} (15 minute) 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:

o wind speeds of up to 3 m/s at 10 metres above ground level; or

- Email communication between PKCT Environmental Specialist and NSW EPA: PKCT EPL Noise Monitoring Requirements
- Screenshot of Complaints register 2024-2025
- AEMRs for 2023/2024, 2024/2025

While the site-specific noise limits remain applicable, the requirement for ongoing noise monitoring is no longer in effect. As Site operations have not changed significantly since the previous audit and no noise-related issues were identified during the current audit period, ERM considers PKCT to be compliant with this condition.

C N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>o temperature inversion conditions of up to 3°C/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.</p> <p>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.</p>				
Noise Monitoring Program					
2.	<p>The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <p>(a) be developed in consultation with DECC;</p> <p>(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</p> <p>(c) include a:</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> ▪ Noise Management Plan 2025 ▪ Complaints register ▪ Independent Environmental Audit 2023 	<p>According to previous audits, the Noise Management Plan (NMP) was approved by the Secretary (formerly the Director-General) on 5th April 2012 and the requirements of the plan were met, including consultation requirements.</p> <p>ERM reviewed the current NMP (August 2025) which indicates that routine biannual noise monitoring is no longer required. As such, noise monitoring will be undertaken on an event-based basis and will be conducted for a single nighttime period as per the letter from NSW Department of Planning & Environment, dated 16th March 2017. Refer to commentary against EPL condition M7.1 for further details.</p>	C	N/A
Continuous Improvement					
3.	<p>The Proponent shall:</p> <p>(a) continue to implement all reasonable and feasible best practice noise mitigation measures;</p> <p>(b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and</p> <p>(c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> ▪ Noise Management Plan 2025 ▪ AEMRs for 2023/2024, 2024/2025 	<p>a) According to the Noise Management Plan PKCT use external acoustical expertise, network with other coal terminals to keep up-to-date with best-practice methodologies and benchmark terminal noise performance.</p> <p>b) According to the AEMRs and auditor interviews with Site management, an example of continued investigation into reducing noise generated by the project included the trial installation of poly idlers on selected conveyors, undertaken during the 2023-2024 reporting period.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			c) Investigations of the trial as described in (b) are reported in the AEMR. Noise measurements taken before and after installation showed a reduction of approximately 25% with levels decreasing from 106 dB to 80 dB.		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
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TRANSPORT

Monitoring of Coal Transport

4.	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.	<ul style="list-style-type: none"> Same as Sch2. 6 Spreadsheet detailing monthly quantities of coal received by road and rail and ship loading quantities, (PKCT tonnes and throughput.xls) PKCT Monthly DCC Report 	<p>According to the AEMRs, the following quantities were received by road and rail during the financial years covered by the audit period:</p> <ul style="list-style-type: none"> July 2023 – June 2024: 3.74 Mt; July 2024 – June 2025: 4.59 Mt; and July 2025-November 2025: 0.98 Mt; <p>ERM reviewed a management spreadsheet documenting the quantities of coal received by financial year and confirmed the amounts recorded in the tracking spreadsheet were congruent with the AEMR reports. ERM reviewed example monthly supplier delivery dockets and confirmed that the amounts of coal delivered to the Site were included on the dockets.</p>	C	N/A
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Traffic Management

5.	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.	<ul style="list-style-type: none"> Driver's Code of Conduct 2025 PKCT, Implementation Program for Driver's Code of Conduct 2025 Example PKCT, Truck Drivers Code of Conduct, Observation Sheets Environmental Supervisor and Management Interviews Linfox Management Interview 	All drivers are required to complete the Driver's Code of Conduct (DCC) heavy-haulage induction prior to undertaking deliveries, which includes requirements applicable to the mine sites they service and the Port. Drivers and haulage contractors also sign an acknowledgement confirming compliance with the DCC, including the requirement not to park on roads other than Port Kembla Road.	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>PKCT undertakes regular traffic inspections of truck operating onsite and records internal surveillance findings through iAuditor. The auditor reviewed examples of DCC observation sheets and associated audit results, demonstrating PKCT's active compliance management for this condition. Management interview with Linfox confirmed that all trucks are equipped with GPS route-monitoring systems that issue alerts if a vehicle deviates from the approved route. No issues were reported during the audit period.</p>		
Driver's Code of Conduct					
6.	<p>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:</p> <p>(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;</p> <p>(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</p> <p>(c) include measures to ensure the Driver's Code of Conduct is enforced.</p>	<ul style="list-style-type: none"> ▪ PKCT, Implementation Program for Driver's Code of Conduct 2025 ▪ AEMRs for 2023/2024, 2024/2025 ▪ Heavy Haulage Training matrices ▪ Road Users Group meetings presentations ▪ Truck environmental task observations ▪ Incident report ▪ Example heavy haulage induction statement of completion ▪ PKCT Monthly DCC report ▪ Linfox Drivers Code of Conduct Audit 2025 ▪ Linfox National Heavy Vehicle Accreditation certificate 	<p>ERM reviewed the drivers' induction program which included speed limits, compression braking, truck washing, load covering and queuing on local roads. Routine audits of truck drivers are undertaken which include checking speed limits, compression braking, truck washing, load covering and queuing on local roads. ERM reviewed a sample of audits and no non-compliances were identified. Annual audits of trucking providers also includes checks to confirm the DCC is provided to drivers, drivers are familiar with the DCC and the DCC is up to date. PKCT implements a enforcement system that includes monthly compliance reporting, scheduled and risk-based behavioural observations and audits, mandatory driver induction, contractual compliance mechanisms, and a clearly defined 3-strikes disciplinary process that can result in driver exclusion from site.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
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AIR QUALITY

Impact Assessment Criteria

7.	<p>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.</p> <p><i>Table 3: Long term impact assessment criteria for particulate matter</i></p> <table border="1" data-bbox="261 688 1190 1031"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>Annual</td> <td>30 µg/m³</td> </tr> </tbody> </table> <p><i>Table 4: Short term impact assessment criteria for particulate matter</i></p> <table border="1" data-bbox="261 1104 1190 1293"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM10)</td> <td>24 hour</td> <td>50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 5: Long term impact assessment criteria for deposited dust</i></p> <table border="1" data-bbox="261 1367 1166 1640"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>2g/m²/month</td> <td>4g/m²/month</td> </tr> </tbody> </table> <p><i>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.</i></p> <p>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</p>	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m ³	Particulate matter < 10 µm (PM10)	Annual	30 µg/m ³	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM10)	24 hour	50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	2g/m ² /month	4g/m ² /month	<ul style="list-style-type: none"> PKCT, Air Quality Management Plan and Monitoring Program 2025 AEMRs for 2023/2024, 2024/2025 Observations of real time sampling and monitoring of dust and alert system 2026 Elevated Dust level Alerts 2024-2025 	<p>Consistent with the previous IEA (2023) commentary, there are no agreements in place with landowners to allow exceedance of the air quality limits. PKCT continues to operate a residential dust deposition network and onsite continuous particle monitors to support dust management and to inform investigations.</p> <p>A review of the recent Annual Environmental Monitoring Reports and EPL Annual Returns indicates that the annual average TSP and PM10 concentrations at the northern monitoring site were reported to be below the applicable annual average criteria during the 2023 to 2025 reporting period:</p> <p>The 2023–2024 AEMR reports annual averages at the northern site of 20.8 micrograms per cubic metre (µg/m³) for TSP and 14.6 µg/m³ for PM10, both below the relevant criteria; and</p> <p>The 2024–2025 AEMR reports annual averages at the northern site of 23.9 µg/m³ for TSP and 16.9 micrograms per cubic metre for PM10, which also remain below their respective criteria.</p> <p>The residential dust deposition monitoring reported in the AEMRs indicates compliance with the annual</p>	C(obs)	<p>It is recommended that PKCT amend the existing air quality monitoring program to either:</p> <ul style="list-style-type: none"> Supplement the existing monitoring network (e.g. the northern monitoring location) with an Australian Standard (AS) sampling method listed in NSW EPA (2022b), e.g.: <ul style="list-style-type: none"> High volume air sampler (HVAS); Tapered element oscillating microbalance (TEOM); or Beta Attenuation Method (BAM) <p>Or:</p> <ul style="list-style-type: none"> Validate the performance of the existing monitoring network against an AS method with review of the acceptability of the correlation and implementation of a correction factor in the event that the accuracy of the Osiris instrumentation is acceptable. <p>Where implemented, the AS method should be conducted by a NATA-accredited body that has the applied method</p>
Pollutant	Averaging period	Criterion																										
Total suspended particulate (TSP) matter	Annual	90 µg/m ³																										
Particulate matter < 10 µm (PM10)	Annual	30 µg/m ³																										
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Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																									
Deposited dust	Annual	2g/m ² /month	4g/m ² /month																									

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>may exceed the air limits in Table 3, 4 and/or 5 in accordance with the negotiated air quality agreement.</p>		<p>average criterion of 4 grams per square metre per month (g/m²/month) at the residential gauges.</p> <p>Short-term particulate behaviour was also examined. In the April 2023 to March 2024 period there was one day where the northern monitor recorded a 24-hour PM10 concentration above criterion of 50 µg/m³. The assessment of this exceedance attributed it primarily to a regional dust episode rather than PKCT operations.</p> <p>In the April 2024 to March 2025 period there were six days where the northern monitor recorded a 24-hour PM10 exceedance and three consecutive days where 24-hour TSP concentrations exceeded the site trigger of 90 µg/m³, with the investigations concluding the exceedances were driven by regional haze and sea mists, and that the contribution from PKCT was expected to be small. The 2024–2025 AEMR further notes that on four exceedance days the estimated contribution of PKCT was minor, with the balance explained by regional dust and haze conditions.</p> <p>A review of the AEMR identified limitations in the monitoring method applied to evaluate compliance with this condition. Section 3 of the AEMR states:</p> <p>“It should also be noted that the Osiris continuous dust monitoring</p>		<p>listed within its accreditation scope.</p>

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>equipment does not comply with the NSW EPA's Approved methods for the sampling and analysis of air pollutants in NSW (NSW EPA, 2022). Consequently, the data produced by these monitors cannot provide a definitive determination of whether dust levels comply with the standards"</p> <p>Both AEMRs acknowledge this limitation and use the continuous data to track relative trends and to trigger investigations rather than for definitive compliance determination. In addition, neither the approval conditions, nor the EPL define a required method for real-time particulate monitoring .</p> <p>On the basis of the AEMR and Annual Return data for the audit period, the annual average criteria for TSP and PM10 at the northern site are expected to have been achieved and residential dust deposition criteria were not exceeded on an annual basis. Short term PM10 exceedances were investigated and attributed largely to regional conditions with a low contribution from PKCT. Noting that on this basis, the project is assessed as Compliant with the air quality impact assessment criteria at residences for the audit period.</p>		
Operations					
8.	The Proponent shall:	<ul style="list-style-type: none"> PKCT, Air Quality Management Plan and 	a) PKCT report dust minimisation improvements in the AEMRs. PKCT	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>(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;</p> <p>(b) ensure that the real-time air quality monitoring and meteorological monitoring data is assessed regularly; and</p> <p>(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.</p>	<p>Monitoring Program 2025</p> <ul style="list-style-type: none"> ▪ AEMRs for 2023/2024, 2024/2025 ▪ Observations of real-time dust monitoring in the main control room ▪ Observations of the Event Management System (EMS) 	<p>maintain a belt scraper to minimise coal spillage, sealed access roads, spray gun network, sealed portion of the bulk products storage area, new stackers with advanced dust control systems, return scraper upgrades, windshields audit, Ship-loader 2 launder and washdown and additional hardstand re sealing.</p> <p>(b) PKCT provides 24/7 site operational control via the Main Control Room (MCR). ERM observed the real time monitoring system for air quality during the Site inspection. If dust is observed, action is taken through the operation of sprays or other available controls. The system also employs moisture monitoring of coal storages and will automatically activate the spray system when moisture levels drop below a predefined limit.</p> <p>(c) 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.</p> <p>PKCT also has an auditing process in place which includes site observations of dust, dust associated with truck movements and the assessment of associated controls. ERM reviewed example task observations which included regular assessment of dust generating capacity of different Site</p>		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>areas. Given the systems in place to monitor and manage air pollution, PKCT is considered to be compliant with the requirements of this condition.</p>		
9.	<p>During carrying out of the project, the Proponent shall ensure that:</p> <p>(a) all loaded trucks entering or leaving the site have their loads covered; and</p> <p>(b) trucks associated with the project pass through a truck wash before entering the public road network to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> ▪ Example driver observations and audits by PKCT and trucking companies ▪ AEMRs for 2023/2024, 2024/2025 ▪ Driver's Code of Conduct 2025 ▪ iAuditor Driver Audits ▪ Environmental Supervisor and Management Interviews 	<p>The Driver's Code of Conduct includes requirements to have loads covered and pass through the truck wash prior to entering public roads. ERM reviewed the induction program and confirmed that covering trucks and truck wash practices are included in the induction material. Routine task observations and audits were completed throughout the audit period, focusing on compliance against the Driver's Code of Conduct and PKCT's approval conditions. ERM reviewed a sample of driver audits and observed that load covering and truck wash practices are included in the audits. No examples of breaches were reported. Annual audits of the trucking providers by PKCT includes specific assessment on the induction requirements including load covering and truck wash practices. The AEMRs report EPL and regulatory breaches related to trucking based on Road Transport Provider observations, Trucksafe/National Heavy Vehicle Accreditation Scheme (NHVAS) and other audits. There were no EPL or regulatory breaches reported during the audit period. Site management confirmed that there were no incidents during the audit period and ERM observed the only way for trucks to leave site following unloading was through the truck wash. A visual inspection station is included for truck drivers to observe effectiveness of the wash and that the cover is in place.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
Air Quality Monitoring Program					
10.	<p>The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General. This program must:</p> <p>(a) be developed in consultation with DECC;</p> <p>(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</p> <p>(c) include:</p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> PKCT, Air Quality Management Plan and Monitoring Program 2025 AEMRs for 2023/2024, 2024/2025 Observations of real time sampling and monitoring of dust and alert system ALS Hydrographic Group PKCT Operation and Maintenance 2025 TBRG Calibration and Condition Report 2022-2025 	<p>PKCT operates under an Air Quality Management Plan and Monitoring Program (AQMPMP), which includes requirements for continuous dust monitoring, real-time sampling and alarm system and evaluation against the relevant screening criteria.</p> <p>Management strategies to ensure compliance with the approval criteria included in Section 5. ERM observed that continuous monitoring of dust occurs and that a real-time alarm system is in place to alert staff to potential dust issues in real-time. The coal stockpile spray system is automated and will spray the stockpiles once a moisture limit is triggered. As discussed against Approval condition 7, the only reported air quality exceedances occurred on days where PKCT contributed only a minor proportion of the dust measured and ERM considers PKCT to be implementing the AQMPMP appropriately.</p>	C	N/A
METEOROLOGICAL MONITORING					
11.	<p>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.</p>	<ul style="list-style-type: none"> Site observations of active monitoring station and up to date monitoring records TBRG Calibration and Condition Report, Dated September 2022-2025 AEMRs for 2023/2024, 2024/2025 	<p>PKCT maintains a dedicated on-site meteorological station that measures wind speed and direction, rainfall, temperature, humidity, and air pressure, consistent with the parameters outlined in the Approved Methods for Sampling of Air Pollutants in NSW. These monitoring results are reported in the AEMRs. Current and historical meteorological</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		<ul style="list-style-type: none"> Daily Rainfall data 	<p>data are displayed and actively used in the Main Control Room, as verified during the Site inspection. Calibration reports for the PKEA2101 rain gauge, confirm that the instrument to be functioning within acceptable tolerances.</p>		

SURFACE WATER

Discharge Limits

12.	<p>Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<ul style="list-style-type: none"> 'EPL Water Quality Data' 2025 AEMRs for 2023/2024, 2024/2025 Water Management Plan (WMP) 2025 and DPHI approval 15 September 2025 Annual Returns (2023-2025) 	<p>Section 120 of the the <i>Protection of the Environment Operations Act 1997</i> requires that no polluted or contaminated water can enter a waterway or stormwater system under any circumstances; causing or allowing pollution to occur is illegal. During the site walk ERM observed routine maintenance of the Central Pond. No ponds onsite were observed to be overflowing. The ponds are configured to capture, detain and settle contaminated runoff before transfer to the Settling Lagoon, with wet-weather overflows occurring only when rainfall exceeds system surge and pump capacity. Routine maintenance ensures sediment levels remain within the <20% design threshold. Which is all consistent with the containment, treatment and overflow arrangements defined in the Water Management Plan. During the audit period, PKCT reported no non-compliances relating to water discharges under</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>EPL 1625. All discharges at LDP16 were fully compliant with license limits, and all wet-weather satellite pond overflow events were assessed as permitted under the EPL due to rainfall volumes exceeding system capacity. No water pollution incidents were identified or reported through the EPL Annual Returns or AEMRs.</p> <p>On the basis of the above, auditors consider PKCT to comply with Section 120 of the Protection of the Environment Operations Act 1997.</p>		

Water Management Plan

13.	<p>The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director General.</p> <p>This Plan must:</p> <p>(a) be prepared in consultation with DECC;</p> <p>(b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and</p> <p>(c) include:</p> <ul style="list-style-type: none"> ▪ 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: <ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> ▪ AEMRs for 2023/2024, 2024/2025 ▪ Annual Returns (2023-2025) ▪ Water Management Plan (WMP) 2025 ▪ 'EPL Water Quality Data' 2025 ▪ PKCT Water Management Plan Approval Form 2025 	<p>a) PKCT operates under a currently approved Water Management Plan (WMP), originally prepared in 2009 and last updated in August 2025.</p> <p>b) PKCT received approval from DPHI for the updated Water Management Plan on 15 September 2025</p> <p>c) The WMP includes a site water balance as Attachment A. Water balance calibration has confirmed model was achieving similar statistical output to the recorded overflows. The WMP includes planning requirements to manage sediment during any construction activities at the Site and references the Wollongong Development Control Plan 2009, which</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			references the publication titled 'Managing Urban Stormwater: Soils and Construction' (Landcom 2004 or latest edition). The WMP describes the effluent discharge criteria, includes requirements to measure stormwater effluent during periods of discharge and outlines mitigation measures to ensure compliance with discharge criteria including system monitoring and automated alerts to Site staff.		

BIODIVERSITY

Green and Golden Bell Frog Management Plan

14.	<p>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:</p> <p>(a) be developed in consultation with DECC; and</p> <p>(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.</p>	<ul style="list-style-type: none"> Green and Golden Bell Frog Survey Reports 2023-2025 GGBF Site Familiarisation slides AEMRs for 2023/2024, 2024/2025 GGBF Management Plan, September 2025 	<p>PKCT operates under a currently approved Green and Golden Bell Frog (GGBF) Management Plan. PKCT is required to conduct a formal survey over the September – April period. According to the AEMRs, surveys were conducted by specialist consultants in accordance with the GGBFMP on 7 February 2024 and 23 January 2025.</p> <p>The surveys did not identify any Green and Golden Bell Frogs on site. PKCT stated that at toolbox talks refreshers are provided to Site personnel on identification and procedure if Green and Golden Bell Frogs are present on site.</p> <p>The 2026 Green and Golden Bell Frog (GGBF) survey has been</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			commissioned but had not yet been completed at the time of the audit. Evidence sighted included Purchase Order PO45126, issued to Niche on 14 January 2026, with the field survey undertaken on 19 January 2026.		
VISUAL AMENITY					
Lighting Emissions					
15.	<p>The Proponent shall:</p> <p>(a) ensure no external lights shine above the horizontal;</p> <p>(b) ensure that all external lighting associated with the project complies with <i>Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version, and</p> <p>(c) take all reasonable and feasible measures to mitigate off-site lighting impacts from the project to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> ERM 2023 Independent Environmental Audit, Port Kembla Coal Terminal AEMRs for 2023/2024, 2024/2025 	<p>ERM reviewed the community complaints register and confirmed that no lighting-related complaints were received during the audit period. Based on observations undertaken during the Site inspection and through interviews with PKCT management, it is understood that there have been no changes to the Site’s lighting plan during the audit period.</p>	C	N/A
Landscape Management Plan					
16.	<p>The Proponent shall prepare and implement a Landscape Management Plan to the satisfaction of the Director-General. This Plan must:</p> <p>(a) be submitted to the Director-General for approval within 12 months of this approval, or as otherwise agreed by the Director-General; and</p> <p>(b) include;</p> <ul style="list-style-type: none"> details of screening trees to be planted on the road receipt earth bund and along the northern site boundary; and an implementation program. 	<ul style="list-style-type: none"> Weed spraying notification forms Site observations AEMRs for 2023/2024, 2024/2025 PKCT Landscape Management Plan 2025 	<p>(a) The preparation of the Landscape Management Plan (LMP), including the timing of the submission and the satisfaction of the Secretary (formerly Director-General) was assessed as part of previous audits.</p> <p>(b) The LMP includes details of the screening trees planting program and an implementation program. The 2024 – 2025 AEMR reported PKCT continued the ongoing landscaping upgrades aimed at developing a visual screen for</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			residents to the west of the terminal, shielding truck tipping activities through the planting of 600 trees. The trees planted were a mix of native trees, shrubs and sedges and will take approximately 3-5 years to become established. In addition, PKCT held two staff tree planting days in 2025, revegetating two areas of the Site with over 300 trees and shrubs. During the Site inspection, vegetation along the road receival earth bund was observed to be well-established and considered consistent with the screening intent of the approved Landscape Management Plan.		

GREENHOUSE & ENERGY EFFICIENCY

Operating Conditions

17.	The Proponent shall implement all reasonable and feasible measures to minimise: (a) energy use on site; and (b) greenhouse gas emissions from the project to the satisfaction of the Director-General.	<ul style="list-style-type: none"> Greenhouse Gas and Energy Efficiency Management Plan 2025 PKCT Decarbonisation Opportunities Scope 1 and 2 PKCT Sustainability Performance Review 2025 AEMRs for 2023/2024, 2024/2025 PKCT Sustainability Strategy Framework PKCT SLR consulting Scope 1 and 2 	The Greenhouse Gas and Energy Efficiency Management Plan (GGEEMP) identifies processes to identify and implement reasonable and feasible measures to minimise energy (electricity) use and greenhouse gas (GHG) emissions. PKCT installed a 24 kW rooftop solar system on the Training Room building, which has been successfully commissioned and will be monitored for performance and reliability. In line with PKCT's ESG Plan, SLR Consulting was engaged in May 2025 as a specialist consultant to verify greenhouse gas emissions	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
		Decarbonisation Advice	data and identify opportunities to reduce or offset Scope 1 and Scope 2 emissions.		
Greenhouse and Energy Efficiency Plan					
18.	<p>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:</p> <ul style="list-style-type: none"> (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. 	<ul style="list-style-type: none"> ▪ Greenhouse Gas and Energy Efficiency Management Plan 2025 ▪ PKCT Decarbonisation Opportunities Scope 1 and 2 ▪ PKCT Sustainability Performance Review 2025 ▪ AEMRs for 2023/2024, 2024/2025 ▪ PKCT SLR consulting Scope 1 and 2 Decarbonisation Advice ▪ PKCT Sustainability Strategy Framework 	<p>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. 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). PKCT monitors greenhouse gas generated by the Site annually. At this stage, greenhouse gas emissions and reportable energy are below the legislated reporting thresholds. A summary of the actions undertaken for the reporting period related to Energy Efficiency is presented below.</p> <ul style="list-style-type: none"> ▪ PKCT continues to look for energy savings wherever possible. PKCT has revised the Greenhouse Gas and Energy Efficiency Management Plan. ▪ In line with PKCT's ESG Plan, a specialist consultant was engaged to verify greenhouse gas emissions data and identify opportunities to reduce or offset Scope 1 and Scope 2 emissions. 	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<ul style="list-style-type: none"> PKCT installed a 24 kW rooftop solar system on the Training Room building in August 2024. 		

WASTE

Operating Conditions

19.	<p>The Proponent shall:</p> <p>(a) monitor the amount of waste generated by the project;</p> <p>(b) investigate ways to minimise waste generated by the project;</p> <p>(c) implement reasonable and feasible measures to minimise waste generated by the project; and</p> <p>(d) report on waste management and minimisation in the AEMR to the satisfaction of the Director-General.</p>	<ul style="list-style-type: none"> Example monthly waste provider reports Example waste transport certificate Monthly Waste tracking spreadsheet From Veolia Elogic PKCT Toolbox Recycling Talks AEMRs for 2023/2024, 2024/2025 	<p>a) Waste quantities, waste streams and disposal methods are monitored and reported to PKCT on a monthly basis, with all waste streams tracked through a central database. PKCT maintains detailed records of each stream, including the amounts generated, reused on site, and those sent for recycling, recovery, or final disposal. ERM observed that waste is appropriately segregated across the Site. PKCT generates several waste types, including general waste, cardboard recyclables, oily rags, waste oil, pressure packs, batteries and scrap metal. Veolia manages all waste services except for oil and hydrocarbon waste, which is handled by City Coast Plumbing Services.</p> <p>b) PKCT implements the Waste Management Plan's requirements to continually review waste streams, consult staff, and assess opportunities to reduce waste generation. PKCT also undertakes annual WMP reviews, analyses waste trends, and uses contractor</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>reporting to identify further reduction opportunities</p> <p>c) During the audit period, PKCT implemented improvements to its waste management system, including the installation of new office recycling bins, fluorescent-light recycling and battery-recycling stations. In addition, a dedicated e-waste bin has been placed on site. These upgrades have been effective and remain in operation.</p> <p>d) Information on waste generation, investigations, and minimisation initiatives is detailed in Section 5.9 of the AEMRs where an annual summary of the waste generated at PKCT across the reporting period is shown.</p>		

HAZARDS

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 <i>Dangerous Goods Code</i> .	<ul style="list-style-type: none"> Site observations Environmental Supervisor and Management Interviews 	<p>Site management advised that dangerous goods are not stored on-site in significant quantities and that all hazardous materials (e.g., spray cans, paint tins) are kept within designated dangerous-goods cabinets. ERM inspected the on-site dangerous-goods cabinet and observed that it primarily contained paints, thinners, sealants, coatings, and aerosols.</p> <p>Site management also confirmed that no fuel is stored on-site and that no bulk quantities of dangerous goods have been stored,</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			transported, or handled during the audit period.		
Fire Control					
21.	During the project, the Proponent shall: (a) ensure that it maintains suitable equipment to respond to any fires on site; and (b) assist the fire and emergency services as much as possible if there is a fire on site.	<ul style="list-style-type: none"> PKCT, Fire Management Plan Servicing and compliance checks of fire-fighting systems Site observations of monitored fire panel system AEMRs for 2023/2024, 2024/2025 	According to the AEMRs and Site management, no fires occurred on site during the audit period. ERM reviewed a sample Work Order detailing maintenance and servicing of fire panels and fire-fighting equipment. Monthly testing and inspection of the deluge systems, along with five-yearly testing and servicing of the fire panels, is undertaken by an external contractor to maintain the Site's fire-fighting systems.	C	N/A
22.	The Proponent shall ensure that it maintains a Fire Management Plan for the site.	<ul style="list-style-type: none"> PKCT, Fire Management Plan 2025 	PKCT operates under a Fire Management Plan which was last updated in 2025.	C	N/A

SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

ENVIRONMENTAL MANAGEMENT

1.	<p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:</p> <p>(a) be submitted to the Director-General for approval within 12 months of this project approval or otherwise agreed by the Director-General;</p> <p>(b) provide for the strategic context for the environmental management of the project;</p> <p>(c) identify the statutory requirements that apply to the project;</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> ▪ 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; <p>(e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval;</p> <p>(f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and</p> <p>(g) describe the role, responsibility, authority and accountability of all the key personnel involved in the environmental management of the project.</p>	<ul style="list-style-type: none"> ▪ PKCT, Environmental Management Strategy 2025 ▪ AEMRs for 2023/2024, 2024/2025 ▪ Internal (WERC – WIP (Work In Progress) Event Risk Change – management system. Previously EMS - Event Management System 	<p>PKCT operates under an approved Environmental Management Strategy (EMS). 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 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</p>	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			regulator. 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 the audit period, with complaints recorded, tracked, investigated and closed out.		

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.	<ul style="list-style-type: none"> AEMRs for 2023/2024, 2024/2025 Environmental Supervisor and Management Interviews 	According to the AEMRs and Environmental Supervisor and Management Interviews, there were no incidents of 'material harm' during the audit period therefore this condition has not been triggered.	C	N/A
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: <ul style="list-style-type: none"> (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. 	<ul style="list-style-type: none"> AEMRs for 2023/2024, 2024/2025 Environmental Supervisor and Management Interviews 	There were no notifications of 'material harm' to DPE during the audit period therefore this condition has not been triggered.	NT	N/A

Annual Reporting

4.	Within 12 months of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-General and all relevant agencies. This report must: <ul style="list-style-type: none"> (a) identify the standards and performance measures that apply to project; (b) describe the works carried out in the last 12 months; 	<ul style="list-style-type: none"> AEMRs for 2023/2024, 2024/2025 	Annual environmental reports were submitted to the Secretary and relevant agencies. The reports addressed the requirements below as required by this condition: a) The	C	N/A
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No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
	<p>(c) describe the works planned to be carried out in the next 12 months;</p> <p>(d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;</p> <p>(e) include a summary of the monitoring results for the project during the past year;</p> <p>(f) include an analysis of these monitoring results against the relevant:</p> <ul style="list-style-type: none"> • impact assessment criteria/limits; • monitoring results from previous years; and • predictions in the EA or other documents listed in condition 2 of schedule 2; <p>(g) identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures;</p> <p>(h) identify any trends in the monitoring results over the life of the project;</p> <p>(i) identify any non-compliance during the previous year; and</p> <p>(j) describe what actions were, or are being, taken to ensure compliance.</p>		<p>standards and performance measures applicable to the project are included for noise, transport, air quality, meteorology, surface water, biodiversity, visual amenity, greenhouse and energy efficiency, waste, hazards and fire control in each relevant section of the AEMR.</p> <p>b) The works planned for noise, transport, air quality, surface water, biodiversity, visual amenity, greenhouse and energy efficiency, waste and fire control are included in each relevant section of the AEMR</p> <p>c) The works carried out for noise, transport, air quality, surface water, biodiversity, visual amenity, greenhouse and energy efficiency, waste and fire control are included in each relevant section of the AEMR</p> <p>d) Complaints are summarised in the Community section of each AEMR and a graph comparing number of complaints by type is also presented. e) Monitoring results compared to compliance criteria are provided for noise, transport, air quality, meteorology, surface water, biodiversity, visual amenity, greenhouse and energy efficiency, waste, hazards and fire control. f) Monitoring results are compared against the relevant impact assessment criteria/limits and historical results for noise, transport, air quality, meteorology, surface water, biodiversity, visual amenity, greenhouse and energy efficiency, waste, hazards (monitoring of performance standards only) and</p>		

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
			<p>fire control (monitoring of performance standards only) in each relevant section of the AEMR. g) Non-compliances (if any) are discussed in each of the relevant sections of the AEMR including actions undertaken to ensure compliance. h) Trends in monitoring results over the life of the project are presented in each relevant section of the AEMR for noise, transport, air quality, weather, surface water, biodiversity, visual amenity, energy efficiency and waste. i) The Statement of Compliance in Section 2.0 of each AEMR contains a summary of non-compliances during the previous year. Section 8.0 contains a summary of the actions which were taken or are being taken to ensure ongoing compliance.</p>		
INDEPENDENT ENVIRONMENTAL AUDIT					
5.	<p>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:</p> <p>(a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(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</p> <p>(d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate,</p> <p>(e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.</p>	<ul style="list-style-type: none"> ▪ Previous IEA Reports ▪ DPE letter dated 18 December 2025 approving audit team. 	ERM considers that the requirements of this Condition have been met.	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
<p><i>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.</i></p>					
6.	<p>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.</p>	<ul style="list-style-type: none"> Independent Environmental Audit 2023 (conducted by ERM) dated 8 September 2023 Receipt of IEA (2023) submission to DPE dated 11 September 2023. Port Kembla Coal Terminal August 2023 IEA Action Plan Receipt of Submission from DPE dated 11 September 2023 for the PKCT 2023 IEA Action Plan. 	<p>ERM considers that the requirements of this Condition have been met. The PKCT IEA Action Plan was submitted on the same date as the IEA.</p>	C	N/A
7.	<p>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.</p>	<ul style="list-style-type: none"> Receipt of Submission from DPE dated 11 September 2023 for the PKCT 2023 IEA Action Plan. AEMRs for 2023/2024, 2024/2025 PKCT 2023 IEA Action Plan 	<p>PKCT submitted the previous IEA Audit Report and Action Plan to the DPI&E on 11 September 2023. ERM considers that the requirements of this Condition have been met.</p>	C	N/A
<p>ACCESS TO INFORMATION</p>					
8.	<p>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:</p> <p>(a) provide a copy of the relevant document/s to the relevant agencies;</p> <p>(b) place a copy of the document/s on its website; and</p> <p>(c) remove superseded copies of strategies/plans/programs from its website.</p>	<ul style="list-style-type: none"> PKCT website Emails from PKCT to Planning NSW Management Plan approvals 	<p>ERM reviewed emails detailing the provision of updated plans and programs to the relevant agencies. ERM reviewed the PKCT website and confirmed that the management plans were up to date.</p>	C	N/A

No	Assessment Requirement	Reference/ Evidence	Comments	Compliance Status	Recommendations
9.	<p>During the project, the Proponent shall:</p> <p>(a) make a summary of monitoring results required under this approval publicly available on its website; and</p> <p>(b) update these results on a regular basis (at least every 6 months).</p>	<ul style="list-style-type: none"> ▪ PKCT Website ▪ AEMRs for 2023/2024, 2024/2025 	<p>AEMRs, including summaries of the monitoring results required under this approval, are publicly available on the PKCT website under the <i>Regulatory Documents section</i>. Previous IEAs note that PKCT received approval from the Department of Planning and Environment (DPE) to discontinue preparation of the Interim Environmental Monitoring Reports after 2016; therefore, only the annual AEMRs are produced and published. On this basis, the requirements of this condition are considered to have been met.</p>	C	N/A



APPENDIX B

CONDITIONS OF ENVIRONMENTAL
PROTECTION LICENCE

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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1 ADMINISTRATIVE CONDITIONS

A1 What the licence authorises and regulates

A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Coal works</td> <td>Coal works</td> <td>> 5,000,000 T annual handling capacity</td> </tr> <tr> <td>Shipping in bulk</td> <td>Shipping in bulk</td> <td>> 500,000 T of annual capacity to load and unload</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Coal works	Coal works	> 5,000,000 T annual handling capacity	Shipping in bulk	Shipping in bulk	> 500,000 T of annual capacity to load and unload	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 Spreadsheet detailing monthly quantities of coal received by road and rail and ship loading quantities, (PKCT tonnes and throughput.xls) 	<ul style="list-style-type: none"> AEMRs were reviewed during the audit which report the annual handling capacity of coal for road receipt (private and public road) and rail. The following quantities were received by road and rail during the financial years covered during the audit period: <ul style="list-style-type: none"> July 2023 – June 2024: 3.74 Mt; July 2024 – June 2025: 4.59 Mt; and July 2025 – November 2025: 0.98 Mt <p>During the audit, ERM reviewed tracking tools to determine the quantities of coal received during each reporting period and confirmed the amounts recorded in the tracking spreadsheet were congruent with the AEMR reports.</p>	C	N/A
Scheduled Activity	Fee Based Activity	Scale												
Coal works	Coal works	> 5,000,000 T annual handling capacity												
Shipping in bulk	Shipping in bulk	> 500,000 T of annual capacity to load and unload												

A2 Premises or plant to which this licence applies

A2.1	<p>The licence applies to the following premises:</p> <p>Premises Details PORT KEMBLA COAL TERMINAL LIMITED PORT KEMBLA ROAD WOLLONGONG NSW 2500 LOT 1 DP 1125445, LOT 3 DP 1125445, LOT 22 DP 1128396, LOT 8 DP 1154760</p>	N/A	N/A	N/A	N/A
A2.2	<p>The premises location is shown on the map below.</p>	N/A	N/A	N/A	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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A2.3	Note: In relation to Condition A2.1, the premises excludes pipelines, infrastructure and operations associated with the holder of Environment Protection Licence No. 654 issued under the Protection of the Environment Operations Act 1997.	N/A	N/A	N/A	N/A
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A3 Information supplied to the EPA

A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:	<ul style="list-style-type: none"> Environment Protection Licence 1625, version date 6-Aug-2025 	Based on the evidence reviewed as part of this audit, PKCT has carried out works and activities consistent with the activities authorised under	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>		<p>EPL 1625. The EPL authorises coal works and shipping-in-bulk operations at the premises, and no departures from the scope of licensed activities were identified. The operations observed on site and described in the AEMRs are consistent with the proposal contained in the licence application as referenced in Condition A3.1.</p>		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
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2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND

P1 Location of monitoring/discharge points and areas

P1.1 The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Air

EPA ID no.	Type of monitoring point	Type of discharge point	Location description
4	Dust deposition monitoring		P4 40m east of Coal Berth stockyard E307103 N6185818
5	Dust deposition monitoring		P5 Northern pond E306916 N6186282
6	Dust deposition monitoring		P6 40m west of Coal Berth stockyard E306908 N6185720

- Annual returns for 2023-2024, 2024-2025
- AEMRs for 2023-2024, 2024-2025
- Environment Protection Licence 1625 Monthly Reports for 2023-2025
- Site observations
- Dust monitoring calibration certificates 2023-2025
- s.58 Licence Variation 1651205 (6 August 2025)
- Air Quality Management Plan 2025

During the Site audit, ERM inspected a sample of dust deposition gauges and all ambient air monitoring locations. ERM confirms that the points identified reflected those listed within P1.1 of EPL 1625. In the 2025 Air Quality Management plan PKCT reported that access to depositional dust gauge P3 was lost after it was damaged during the April 2025 storm and asbestos was subsequently identified in the surrounding area. Following consultation with the EPA, the gauge location was removed from the licence in August 2025. Evidence of dust monitoring calibration certificates were provided indicating that the calibration of instrumentation is up to date. Dust deposition monitoring gauges appeared to be maintained in good condition and were free of potential inhibitors to the collection of dust.

C

N/A

Item	Assessment Requirement			Reference/ Evidence	Comments	Compliance	Recommendations
7	Dust deposition monitoring		P7 250m west of Coal Berth stockyard E306673 N6185865				
8	Dust deposition monitoring		P8 Northern truck wash E306744 N6186371				
9	Dust deposition monitoring		P9 Sydney Water recycled water plant E306936 N6186639				
12	Dust deposition monitoring		R1 157 Church Street Wollongong E306520 N6188025				
15	Dust deposition monitoring		P10 North of planning office E306859 N6185458				
17	Dust deposition monitoring		P11 Entry gate to Berth 109 E305867 N6185702				
18	Dust deposition monitoring		R3 Links Seaside Apartments, 1 Ross Street, Wollongong. E306872 N6187535				
19	Dust deposition monitoring		R2 Vikings Oval E306710 N6187446				
P1.1							

Item	Assessment Requirement			Reference/ Evidence	Comments	Compliance	Recommendations
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20	Ambient air monitoring		C1 Southern monitoring site Southern Pond E307102 N6184596
21	Ambient air monitoring		C2 Northern monitoring site Sydney Water recycled water plant E306874 N6186945

P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

Water and land

EPA ID no.	Type of monitoring point	Type of discharge point	Location description
16	Discharge to waters Water quality monitoring	Discharge to waters Water quality monitoring	DP16 Outlet of Settlement Lagoon E306674 N6185924
22	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP22 TS1 Pond E306732 N6186214
23	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP23 Central Pond E306912 N6185207
26	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP26 Workshop Pond E306816 N6185563
27	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP27 Berth 102 E306817 N6185181

- PKCT Annual Returns (2023–2024, 2024–2025)
- Monthly PKCT water-quality reports (audit period)
- Site inspection observations

ERM reviewed the Annual Returns submitted during the audit period and confirmed that the monitoring and discharge points listed in Condition P1.2 (DP16, DP22, DP23, DP26, DP27, DP28 and DP29) were included in PKCT’s routine monitoring and reporting.

Each discharge point was inspected during the site tour. The physical locations, structures and pond layouts corresponded with the descriptions in the EPL, including the Settlement Lagoon outlet, TS1 Pond, Central Pond, Workshop Pond, Berth 102, TS8 Sump and the South Eastern Pond.

ERM also examined PKCT’s monthly internal water-quality reports for the audit period. The monthly reports consolidate rainfall, pond performance, any discharge events and associated water-quality data, and include monitoring results for all EPL-listed discharge points. Monitoring listed in the monthly reports aligned with the requirements set out in Condition P1.2, and no gaps were identified in routine monitoring during the audit period.

C N/A

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	28	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP28 TS8 Sump (Pump 24) E306874 N8185099		Based on the evidence reviewed, PKCT implemented water-quality monitoring in accordance with the discharge points specified in Condition P1.2.		
	29	Wet weather discharge Discharge quality monitoring	Wet weather discharge Discharge quality monitoring	DP29 South Eastern Pond (Pump 25) E307101 N6185059				

L1 Pollution of Waters

L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 Water quality monitoring results (Annual Returns 2023/2024 and 2024/2025) Monthly internal water-quality compliance reports (audit period) Site inspection observations Management interviews 	Review of site documentation, EPL monitoring results, and observations made during the site inspection did not identify any evidence of water pollution or other indications of non-compliance with section 120 of the Protection of the Environment Operations Act 1997 during the audit period. Interviews with site management supported this conclusion. Assessment of discharge monitoring results is presented in the commentary for Conditions L2.1, L2.4 and L2.5, which also did not identify any pollution events outside the allowances of the EPL. Based on the evidence reviewed, PKCT complied with Condition L1.1 for the audit period.	C	N/A
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L2 Concentration Limits

L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 	As described in L2.4 and L2.5, the site is compliant with this condition on the	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																		
	applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	<ul style="list-style-type: none"> AEMRs for 2023-2024, 2024-2025 Management Interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Rainfall Data_Daily.xlsx 	basis that the exceeded concentrations of Total Suspended Solids (TSS) measured on one occasions during the audit period are permitted due to the discharges occurring solely as a result of rainfall at the premises. Further information of the rainfall events are described in L2.4.																				
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	N/A	N/A	N/A	N/A																		
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	N/A	Noted	Note	N/A																		
L2.4	Water and/or Land Concentration Limits Point 16	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 Management Interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Rainfall Data_Daily.xlsx 	<p>During the FY2024 monitoring period, one exceedance of the 50 mg/L Total Suspended Solids (TSS) limit was recorded:</p> <ul style="list-style-type: none"> 122 mg/L on 5 December 2024 <p>Rainfall records for the audit period confirmed multiple events where the 5-day cumulative rainfall depth exceeded 90 mm, including:</p> <ul style="list-style-type: none"> 154 mm from 21–25 February, and 109.8 mm from 23–27 March. <p>Under Condition L2.5, exceedances of the TSS limit at DP16 are permitted where discharges occur solely as a result of rainfall exceeding 90 mm in a consecutive 5-day period. Based on the rainfall and discharge information reviewed, the exceedance recorded at DP16 was attributable to wet-weather conditions consistent with L2.5.</p> <p>On this basis, compliance is demonstrated with Condition L2.4.</p>	C	N/A																		
	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Unit of measure</th> <th>50 percentile concentration on limit</th> <th>90 percentile concentration on limit</th> <th>3DGM concentration on limit</th> <th>100 percentile concentration on limit</th> </tr> </thead> <tbody> <tr> <td>Oil and grease</td> <td>Visible</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>Not visible</td> </tr> <tr> <td>Total suspended solids</td> <td>Milligrams per litre</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>50</td> </tr> </tbody> </table>	Pollutant	Unit of measure	50 percentile concentration on limit	90 percentile concentration on limit	3DGM concentration on limit	100 percentile concentration on limit	Oil and grease	Visible	N/A	N/A	N/A	Not visible	Total suspended solids	Milligrams per litre	N/A	N/A	N/A	50				
Pollutant	Unit of measure	50 percentile concentration on limit	90 percentile concentration on limit	3DGM concentration on limit	100 percentile concentration on limit																		
Oil and grease	Visible	N/A	N/A	N/A	Not visible																		
Total suspended solids	Milligrams per litre	N/A	N/A	N/A	50																		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
L2.5	Exceeding the limit specified in Condition L2.4 of this licence for Total Suspended Solids for discharges from Point 16 identified by Conditions P1.2 and P1.3 is only permitted when the discharge occurs solely as a result of rainfall measured at the premises. For discharge to be considered to occur solely as a result of rainfall, the rainfall must exceed a 5 day rainfall depth value of 90 mm over a consecutive 5 day period.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 Management Interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Rainfall Data_Daily.xlsx 	<p>One exceedance of the TSS limit occurred during the audit period.</p> <p>Condition L2.5 allows exceedances of the TSS limit at DP16 when the discharge occurs solely as a result of rainfall and rainfall at the premises exceeds 90 mm over a consecutive 5-day period. Rainfall data reviewed for the audit period confirms that this threshold was exceeded during the relevant timeframe.</p> <p>Accordingly, the exceedance identified under L2.4 is permitted under Condition L2.5.</p>	C	N/A
L2.6	The licensee must provide the EPA with a copy of the statistical correlation assessment methodology and results before using NTU in place of TSS.	<ul style="list-style-type: none"> Annual Returns 2023/2024 and 2024/2025 Monthly PKCT water-quality reports 	Results of concentration limits are stated in TSS units, not NTU, hence this condition is not triggered.	N/A	N/A
L2.7	The licensee must develop and implement a method to enable the ongoing verification of the relationship between NTU and TSS.	<ul style="list-style-type: none"> Annual Returns 2023/2024 and 2024/2025 Monthly PKCT water-quality reports 	Results of concentration limits are stated in TSS units, not NTU, hence this condition is not triggered.	N/A	N/A
L2.8	The licensee must provide the EPA with any amendments the licensee makes to the statistical correlation as a result of the ongoing verification required by Condition L4.2 before using the revised statistical correlation.	<ul style="list-style-type: none"> Annual Returns 2023/2024 and 2024/2025 Monthly PKCT water-quality reports 	Results of concentration limits are stated in TSS units, not NTU, hence this condition is not triggered.	N/A	N/A
L3 Noise Limits					
L3.1	<p>The proponent shall ensure that the noise generated by the project at any privately-owned residence does not exceed the limits specified in Table 1 for the location nearest to that residence.</p> <p>Table 1: Noise impact assessment criteria dB(A) LAeq(15 min)</p>	<ul style="list-style-type: none"> Letter from EPA to PKCT dated 15th August 2017 Letter from DPIE to PKCT dated 16th March 2017 	Condition M7.2 allows for the cessation of noise monitoring following 6 years of compliance with the criteria in Condition L4.1. In accordance with Condition M7.2, the DPIE approved a request from PKCT	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																								
	<table border="1"> <thead> <tr> <th>Location</th> <th>Time Period</th> <th>Limits (LAeq 15 min dB(A))</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Corner of Swan/Kembla Streets</td> <td>Day</td> <td>51</td> </tr> <tr> <td>Evening</td> <td>50</td> </tr> <tr> <td>Night</td> <td>49</td> </tr> <tr> <td rowspan="3">Corner of Swan/Corrimal Streets</td> <td>Day</td> <td>51</td> </tr> <tr> <td>Evening</td> <td>50</td> </tr> <tr> <td>Night</td> <td>49</td> </tr> <tr> <td rowspan="3">Corner of Keira/Fox Streets</td> <td>Day</td> <td>55</td> </tr> <tr> <td>Evening</td> <td>49</td> </tr> <tr> <td>Night</td> <td>45</td> </tr> </tbody> </table> <p>Note: a) To determine compliance with the LAeq(15minute) noise 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.</p> <p>b) The noise emission limits identified in the above table apply under meteorological conditions of:</p> <ul style="list-style-type: none"> - 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. <p>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 of Planning and DECC, then the proponent may exceed the noise limits in Table 1 in accordance with the negotiated noise agreement.</p>	Location	Time Period	Limits (LAeq 15 min dB(A))	Corner of Swan/Kembla Streets	Day	51	Evening	50	Night	49	Corner of Swan/Corrimal Streets	Day	51	Evening	50	Night	49	Corner of Keira/Fox Streets	Day	55	Evening	49	Night	45		<p>to cease routine noise monitoring on 16th March 2017, which is prior to the audit period. PKCT notified the EPA that noise monitoring was being ceased in accordance with Condition M7.2 on 15th August 2017 and received a response from EPA on 15th August 2017 stating that the EPL did not require amending to account for the cessation of noise monitoring. Therefore, noise monitoring has not occurred during the audit period.</p> <p>Based on the absence of complaints, the cessation approval under M7.2, and observations made during the site inspection, PKCT is considered compliant with Condition L3.1.</p>		
Location	Time Period	Limits (LAeq 15 min dB(A))																											
Corner of Swan/Kembla Streets	Day	51																											
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	Night	49																											
Corner of Keira/Fox Streets	Day	55																											
	Evening	49																											
	Night	45																											
L4 Potentially offensive odour																													
L4.1	<p>The licensee must not cause or permit the emission of offensive odour beyond the premises boundary.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the</p>	<ul style="list-style-type: none"> PKCT Event Management System Environmental and Community Events data Annual returns for 2023-2024, 2024-2025 	<p>No odour-related complaints were received during the audit period. Observations during the site inspection did not identify any sources of offensive odour or site conditions likely to cause odour impacts beyond the premises boundary. Material</p>	C	N/A																								

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	odour was emitted in accordance with the conditions of a licence directed at minimising odour.	<ul style="list-style-type: none"> Complaint Register Site inspection observations 	<p>handling areas, water management infrastructure and stockyard operations appeared to be operating in a manner consistent with odour control expectations for an open-air coal terminal.</p> <p>Based on the complaint history and site observations, PKCT is assessed as compliant with Condition L4.1 for the audit period.</p>		

4 Operating Conditions

O1	Activities must be carried out in a competent manner				
O1.1	<p>Licensed activities must be carried out in a competent manner</p> <p>This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<ul style="list-style-type: none"> PKCT Event Management System Environmental and Community Events data Annual returns for 2023-2024, 2024-2025 Site Management interviews Site observations 	<p>Coal remains the primary material handled under EPL 1625. Material flows observed and described in PKCT documents are consistent with the licensed activity: coal received by rail and road, unloaded at dedicated receipt points, conveyed to stockpiles via stackers, reclaimed, and loaded to vessels through the ship loader directly into holds to minimise wind-generated dust. Operations are supported by control measures that include CCTV at receipt points, routine housekeeping, and scheduled inspection and maintenance of conveyors, stackers and reclaimers. Dust suppression is integrated into stockyard operations via automated spray systems controlled in real time from the Main Control Room, with continuous particulate and weather monitoring enabling responsive adjustments to spray regimes and other operational settings. Stormwater infrastructure directs spillage to sumps for routine</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			<p>clean-out, with recovered coal returned to customers, and water levels/alarms are monitored and actioned through the control system.</p> <p>Review of site records for the audit period identified no complaints relating to licensed activities and no incidents indicating loss of operational control or unmitigated environmental harm. Compliance checks across related conditions did not identify systemic issues that would indicate activities were being conducted other than in a competent manner.</p> <p>Operations observed and described in reporting were consistent with the scope and conditions of EPL 1625 and with the Project Approval 08_0009 administrative and operating requirements that remain current for the site.</p> <p>Based on the documents reviewed (AEMRs, Annual Returns, internal monthly operational/environmental reports and procedures), interviews, and site observations, licensed activities at PKCT were carried out in a competent manner in accordance with O1.1 for the audit period.</p>		
O2	Maintenance of plant and equipment				
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	<ul style="list-style-type: none"> ▪ Annual Returns (2023-2025) ▪ Spreadsheet summarising work orders (Environ_PM WO's_0126.xlsx) ▪ Example operator competency records (not exactly) 	<p>(a) PKCT manages plant and equipment maintenance through the TechONE computerised maintenance management system.</p> <p>System-generated maintenance logs and a sample of Work Orders were reviewed, showing clear evidence of scheduled and corrective maintenance</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> ▪ Example Work Orders ▪ Example Competency Records ▪ Monitoring equipment calibration and service reports (2023-2025) ▪ Interview: PKCT Environmental Specialist and Asset Manager 	<p>being raised, actioned and closed out across the audit period. Work Orders included condition notes, trades feedback and completion sign-off, demonstrating an established process for ensuring equipment remains in proper working order.</p> <p>Discussions with the Asset Manager confirmed that maintenance activities and equipment condition are routinely reviewed with trades personnel, with defects managed and escalated through TechONE in line with PKCT's maintenance framework.</p> <p>(b) Operator competency records were reviewed to confirm that equipment is being operated in a proper and efficient manner. The records sighted included Main Control Room (MCR) and Rail Receiving training assessments, reassessments and prerequisite training logs covering environmental controls, dust systems, emergency procedures, start-up / shut-down processes and safe equipment operation. All sampled assessments were signed off as competent. Examples included MCR competency assessments for 2023, 2025 and 2026, Rail Receiving reassessments for 2023 and 2025, and supporting documentation such as the Rail Receiving Competency Manual (ML.004).</p> <p>Based on evidence reviewed, PKCT are considered to be maintaining plant and equipment appropriately and that operators hold the necessary competencies to operate equipment</p>		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			efficiently and in accordance with site procedures.		
O3	Dust				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> ▪ PKCT Event Management System ▪ Annual returns for 2023-2024, 2024-2025 ▪ AEMRs for 2023-2024, 2024-2025 ▪ PKCT Air quality management plan 2025 ▪ Dust Monitoring Report for Annual Return (2023-2025) by Katestone ▪ Site Management interviews with the Site's Environmental Specialist and Health, Safety, Environment and Risk Lead ▪ Site observations 	<p>During the audit period, PKCT implemented a range of operational and management controls to minimise the potential for dust emissions from the premises. Water carts were used to wet down trafficked areas and other dust-prone locations, and real-time weather monitoring informed operational planning and site preparation, including adjustments to dust suppression on coal stockpiles and material handling areas, as described further under Condition O1.1.</p> <p>A truck wash was operational at the road receipt exit throughout the audit period, and all trucks were required to pass through the truck wash prior to entering public roads. The truck wash comprises an automated spray system designed to remove residual dust from vehicles. Drivers visually check vehicle condition following the wash, and the site layout allows trucks to re-enter the wash if additional cleaning is required. ERM observed the truck wash during the site inspection and confirmed that the exit arrangement requires vehicles to pass through the wash prior to leaving the premises.</p> <p>Dust emissions were monitored during the audit period using on-site and off-site monitoring infrastructure, including depositional dust gauges and continuous particulate monitoring</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			<p>equipment. Monitoring data reviewed in the AEMRs and Annual Returns for the audit period did not identify dust impacts that would indicate the premises were not being maintained in a condition that minimises or prevents off-site dust emissions.</p> <p>A small number of community complaints relating to dust and/or water spray were recorded in the EMS during the audit period. EMS records reviewed by ERM indicate that these complaints were investigated, appropriate follow-up actions were undertaken, and all matters were closed out. No dust-related EPL non-compliances were reported in the AEMRs or Annual Returns for the audit period.</p> <p>Site inspection observations did not identify visible dust emissions or site conditions that would reasonably be expected to result in uncontrolled off-site dust impacts. Based on the controls in place, monitoring reviewed, complaint management processes observed, and site inspection findings, PKCT is considered to have maintained the premises in a condition that minimises or prevents the emission of dust, in accordance with Condition O3.1.</p> <p>Recommendations relating to dust monitoring practices are addressed separately under Condition 7 of Schedule 2 of the Project Approval. No further commentary is provided under this EPL condition.</p>		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
O3.2	All loaded trucks entering or leaving the premises must have their loads covered.	<ul style="list-style-type: none"> ▪ PKCT, Driver’s Code of Conduct, Version 14.0, 2025 ▪ Annual Returns (2023-2025) ▪ Example driver task observations and driver audit records (audit period) ▪ Complaints register ▪ Site inspection (truck-wash observation) ▪ Interviews with Site management and the haulage contractor’s management team (Linfox) 	<p>The Driver’s Code of Conduct includes requirements for loaded trucks to have covers in place and to pass through the truck wash prior to entering public roads. The latter reflects the Project Approval requirement for trucks to pass through a truck wash before accessing the public road network. ERM reviewed the induction program and confirmed that load-covering and truck-wash practices are included in the induction material provided to haulage contractors.</p> <p>Routine task observations and audits were completed throughout the audit period, focusing on compliance with the Driver’s Code of Conduct and PKCT’s approval and licence conditions. A sample of driver audits reviewed by ERM confirmed that load-covering and truck-wash checks are included in the audit scope. No examples of breaches were reported in the records reviewed. ERM also inspected the truck wash during the site visit and observed the egress arrangement, noting that the configured departure route requires trucks to pass through the truck wash before leaving the Site.</p> <p>Annual audits of trucking providers conducted by PKCT include assessment of induction requirements, including load covering and truck-wash practices. AEMRs and Annual Returns reviewed for the audit period did not record any EPL or regulatory breaches related to trucking or load-covering obligations.</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations								
			<p>Interviews were conducted with site management and the haulage contractor's management team (Linfox) regarding processes for auditing compliance with load covers, driver training and induction, and escalation of non-conformances. No incidents or complaints relating to uncovered loads or truck-wash non-use were identified for the audit period.</p> <p>Based on the evidence reviewed (induction content, task observations, driver audits, provider audits, AEMRs/Annual Returns, site inspection of the truck wash, and management interviews), PKCT is assessed as compliant with Condition O3.1.</p>										
O4	Processes and management Sedimentation ponds												
O4.1	<p>The following ponds referred to in the table below are identified in this licence for the purposes of identifying ponds in Condition O4.2.</p> <table border="1" data-bbox="299 1234 1305 1638"> <thead> <tr> <th data-bbox="299 1234 1305 1283">Sedimentation Pond</th> </tr> </thead> <tbody> <tr> <td data-bbox="299 1283 1305 1331">TS1 Pond</td> </tr> <tr> <td data-bbox="299 1331 1305 1379">Northern Pond</td> </tr> <tr> <td data-bbox="299 1379 1305 1428">Settlement Lagoon</td> </tr> <tr> <td data-bbox="299 1428 1305 1476">Workshop Pond</td> </tr> <tr> <td data-bbox="299 1476 1305 1524">Central Pond</td> </tr> <tr> <td data-bbox="299 1524 1305 1572">TS8 Sump</td> </tr> <tr> <td data-bbox="299 1572 1305 1621">South Eastern Pond</td> </tr> </tbody> </table>	Sedimentation Pond	TS1 Pond	Northern Pond	Settlement Lagoon	Workshop Pond	Central Pond	TS8 Sump	South Eastern Pond	N/A	N/A	N/A	N/A
Sedimentation Pond													
TS1 Pond													
Northern Pond													
Settlement Lagoon													
Workshop Pond													
Central Pond													
TS8 Sump													
South Eastern Pond													
O4.2	The ponds must be maintained to ensure that sedimentation does not reduce their capacity by more than 20% of the design capacity.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 	PKCT has established a range of operational controls to ensure sedimentation ponds are maintained and that sediment accumulation does not reduce pond capacity by more	C	N/A								

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> ▪ Work orders for routine pond inspections and preventative maintenance ▪ Site Observations ▪ Photos of Central Pond and Settling Lagoon Cleanouts which are triggered by routine checks ▪ Evidence of photographs provided by PKCT of pond de-watering and clean-out: <ul style="list-style-type: none"> ○ 30/06/2025 ○ 30/12/2024 ○ 04/10/2023 	<p>than 20% of design capacity. Controls include the use of visual depth markers installed on PVC standpipes to provide a quick reference for sediment build-up, weekly inspections of all ponds, and scheduled inbound and outbound inspections documented through routine work orders. Pond cleaning is undertaken periodically as part of PKCT's sediment management program, and flocculant blocks ("Floc Blocks") are deployed in key locations to enhance settlement performance within the pond network.</p> <p>Improvement measures have also been implemented, including upgrades to the Central Pond, where a knife-gate structure has been designed and installed to allow isolation of a portion of the pond to increase storage and sediment retention capacity. Draft updates to the Contaminated Water Collection & Treatment (CWCT) Plant Operations Manual further reflect the ongoing refinement of PKCT's approach to stormwater and sediment control.</p> <p>Work orders reviewed for the audit period included pond clean-outs, such as the Northern Pond in August 2025 and the Settlement Lagoon in July 2024, along with routine inspection records documenting sediment level observations across all ponds. No issues indicating a loss of capacity beyond the 20% threshold were identified in the records reviewed.</p> <p>During the Site inspection, all sedimentation ponds identified under Condition O4.1 were visually</p>		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			<p>assessed. No observations suggested capacity had been reduced by sedimentation beyond the allowable limit, and pond conditions appeared consistent with routine maintenance practices described in PKCT's management documentation.</p> <p>Based on the documentary evidence reviewed, work order records, internal monitoring, and Site inspection observations, PKCT is considered compliant with Condition O4.2.</p>		
5 Monitoring and Recording Conditions					
M1	Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	<ul style="list-style-type: none"> ▪ Annual returns for 2023-2024, 2024-2025 ▪ Environment Protection Licence 1625 Monthly Reports for 2023-2025 	ERM considers PKCT to be compliant with the requirements for recording and retaining monitoring results. Further detail is provided under Conditions M1.2-M1.3.	N/A	N/A
M1.2	<p>All records required to be kept by this licence must be:</p> <p>a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	<ul style="list-style-type: none"> ▪ Annual returns for 2023-2024, 2024-2025 ▪ Environment Protection Licence 1625 Monthly Reports for 2023-2025 ▪ Interviews with PKCT Environmental Specialist 	<p>ERM observed and confirm the following during the audit in relation to M1.2:</p> <p>(a) Monitoring records are maintained in a legible format.</p> <p>(b) Records are retained for longer than the minimum four-year requirement.</p> <p>(c) While the EPA has not requested monitoring data to date, PKCT provided evidence demonstrating that all required monitoring records can be produced in a legible format upon request by an authorised EPA officer.</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <p>a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.</p>	<ul style="list-style-type: none"> ▪ Site observations ▪ Annual returns for 2023-2024, 2024-2025 ▪ AEMRs for 2023-2024, 2024-2025 ▪ Monthly internal water-quality monitoring reports showing sampling metadata (date, time, discharge point). ▪ Discharge monitoring records for EPL points (DP16, DP22, DP23, DP26, DP27, DP28, DP29), including sample date/time, location and sampler details stored in PKCT's monitoring system. 	<p>ERM reviewed records for a sample of monitoring results, including EPL discharge points and monitoring points, which are contained within Annual Returns inclusion of date, time, location and sampler information. Specifically:</p> <ul style="list-style-type: none"> ▪ Discharge monitoring records for EPL points (DP16, DP22, DP23, DP26, DP27, DP28, DP29), including sample date/time, location and sampler details stored in PKCT's monitoring system. ▪ Water-quality laboratory reports reviewed, which list sampler name, sample collection date and sample point identification. ▪ Work orders and sampling task records used to track monitoring events and personnel assigned. ▪ Site inspection confirmation that sampling documentation was available and maintained in accordance with EPL M1.3 requirements. 	C	N/A
M2	Requirement to monitor concentration of pollutants discharged				
M2.1	<p>For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:</p>	<ul style="list-style-type: none"> ▪ Annual returns for 2023-2024, 2024-2025 ▪ AEMRs for 2023-2024, 2024-2025 ▪ Environment Protection Licence 1625 Monthly Reports for 2023-2025 ▪ Site Management interviews with the Site's Environmental Specialist and Health, 	<p>ERM confirms that the site monitors the concentration of each pollutant specified in M2.2 and M2.3. ERM directs the reader to the comments included within conditions M2.2 and M2.3.</p>	N/A	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																								
		Safety, Environment and Risk Lead <ul style="list-style-type: none"> Site observations 																											
M2.2	Air monitoring requirements Point 4,5,6,7,8,9,12,15,17,18,19 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>Particulates – deposited matter</td> <td>Grams per square metre per month</td> <td>Monthly</td> <td>AM-19</td> </tr> </tbody> </table> Point 20,21 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</td> </tr> <tr> <td>PM2.5</td> <td>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</td> </tr> <tr> <td>Total Solid Particle</td> <td>Micrograms per cubic metre</td> <td>Continuous</td> <td>Continuously</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling method	Particulates – deposited matter	Grams per square metre per month	Monthly	AM-19	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	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 Environment Protection License 1625 Monthly Reports for 2023-2025 Site Observations and management interviews Annual Dust Monitoring Equipment Audit 2023-2025 	ERM confirmed through site observations and review of monitoring records that air-quality monitoring during the audit period was undertaken in accordance with the requirements of Condition M2.2. Depositional dust monitoring was conducted at Points 4, 5, 6, 7, 8, 9, 12, 15, 17, 18 and 19 on a monthly basis for particulates (deposited matter), with results recorded in grams per square metre per month using the AM-19 sampling method. Continuous air-quality monitoring was undertaken at Points 20 and 21 for PM ₁₀ , PM _{2.5} and total solid particles, with results recorded in micrograms per cubic metre. Monitoring at these locations was operated on a continuous basis throughout the audit period, consistent with the licence requirements. Review of AEMRs, Annual Returns and supporting monitoring datasets confirmed that all air-quality monitoring points measured the pollutants relevant to their designated locations and that results were recorded using the correct units of measure, sampling frequencies and methods specified by the EPL.	C	N/A
Pollutant	Units of measure	Frequency	Sampling method																										
Particulates – deposited matter	Grams per square metre per month	Monthly	AM-19																										
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																										
M2.3	Water and/or Land Monitoring Requirements Point 16	<ul style="list-style-type: none"> Site observations Annual returns for 2023-2024, 2024-2025 	Auditors reviewed the Annual Returns for 2023–2024 and 2024–2025, which contain the required discharge	C	N/A																								

Item	Assessment Requirement				Reference/ Evidence	Comments	Compliance	Recommendations
	Pollutant	Units of measure	Frequency	Sampling method		<p>monitoring data for EPL Points 16, 22, 23, 26, 27, 28 and 29. The Annual Returns reported analytical results for pH and TSS, and visual assessment records for oil and grease, in the units and formats specified under Condition M2. Site observations taken during the inspection confirm the presence and accessibility of each discharge point listed in M2.3. The monitoring results presented in the Annual Returns were considered to be consistent with PKCT's internal records and with the discharge sampling protocols described during the site audit.</p> <p>No instances were identified in the Annual Returns where monitoring was not undertaken daily during discharge events for the points specified in this condition. Based on the monitoring data reviewed and site observations, ERM considers PKCT compliant with the monitoring requirements of Condition M2.3.</p>		
	Oil and Grease	Visible	Daily during any discharge	Visual inspection				
	pH	pH	Daily during any discharge	Grab sample				
	Total suspended solids	Milligrams per litre	Daily during any discharge	Grab sample				
	Point 22,23,24,25,26,27							
	Pollutant	Units of measure	Frequency	Sampling method				
	Oil and Grease	Visible	Daily during any discharge	Visual inspection				
	pH	pH	Daily during any discharge	Grab sample				
	Total suspended solids	Milligrams per litre	Daily during any discharge	Grab sample				
M3 Testing Methods – Concentration Limits								
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p>Note: The <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>				<ul style="list-style-type: none"> Environment Protection Licence 1625 Monthly Reports for 2023-2025 Site Observations of dust monitoring locations and management interviews Calibration records for continuous dust monitoring stations 2022-2025 	<p>ERM observed a sample of dust deposition gauges and both continuous dust monitoring stations. The siting for the monthly dust monitoring locations were observed to be compliant with the approved methods for the sampling and analysis of air pollutants in NSW, including the following:</p> <p>(a) A clear sky angle of 120° was available above sampling inlets;</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> ▪ PKCT, Air Quality Management Plan, 	<p>(b) airflow around the sample inlet was not restricted in any direction;</p> <p>(c) The locations were >10 metres from the drip line of buildings or trees;</p> <p>(d) Extraneous dust sources were generally not observed nearby; and</p> <p>(e) The monitoring locations were positioned >5 m from the source. The siting for the continuous monitoring locations were observed to be compliant with the approved methods for the sampling and analysis of air pollutants in NSW, including the following:</p> <p>(f) A clear sky angle of 120° was available above the sampling inlet;</p> <p>(g) Airflow was unrestricted for at least 270° around the sample inlet with no obstruction between the major dust source and the sample inlet;</p> <p>(h) The monitors were positioned >10 m from the nearest building or tree drip lines that are higher than 2 m below the height of the sample inlet;</p> <p>(i) Extraneous sources of dust were not present nearby; and</p> <p>(j) The dust monitors were positioned greater than 50 m from the nearest public road. The northern dust monitor is located within 50 m of internal Sydney Water property roads and the southern dust monitor was positioned within 50 m of internal PKCT roads, however traffic movement in the Sydney Water property is minimal and the area of the site</p>		

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			<p>adjacent to the southern dust monitor is seldom accessed.</p> <p>Collection of dust samples is undertaken by an external consultant and analysis of dust samples is completed by a NATA accredited laboratory, ALS. Methods of laboratory analysis were reported to be in accordance with AS3580.10.1 – 2003.</p> <p>ERM reviewed example calibration records for the continuous dust monitors, which stated that the stations were tested and calibrated in accordance with the World Meteorological Organisation AWS certification standard and procedures.</p> <p>Given the dust monitoring locations are generally located, sampled, calibrated and analysed in accordance with relevant standards and methods, PKCT is compliant with this condition.</p>		
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	<ul style="list-style-type: none"> ▪ Site observations of water sampling locations ▪ Example ALS laboratory reports (pond overflow and dust monitoring) 	<p>ERM observed the water sampling locations at each of the points identified in the EPL. Samples are collected using a clean stainless steel bucket to obtain a representative sample of water from the sample point at the point of discharge. Samples are stored on ice and transported to the laboratory under chain of custody with the details of the sample collection maintained in a register on-site, including sampler and date.</p> <p>Laboratory analyses were undertaken by a laboratory with NATA accreditation and the following methods were used:</p> <ul style="list-style-type: none"> ▪ Total suspended solids, APHA 2540D, which is generally consistent with the USEPA (1999) 	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
			<p>method 160.2 as required by the approved methods publication.</p> <ul style="list-style-type: none"> pH, in accordance with APHA as required by the approved methods publication. <p>The method for monitoring pollutants discharged to waters is considered to be compliant with the requirements of this condition.</p>		
M4 Environmental Monitoring					
M4.1	The licensee is required to install and maintain a rainfall depth measuring device.	<ul style="list-style-type: none"> Rainfall monitoring records spreadsheet (Rainfall Data_Daily.xlsx) Site observations and management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	Auditors confirmed during the site inspection that a rainfall depth measuring device is installed at the location of the continuous dust-monitoring unit C1, situated near the southern boundary of the premises. Site management advised that this device is routinely maintained and forms the basis of PKCT's daily rainfall recording program required this condition. The rainfall dataset reviewed during the audit is consistent with ongoing operation of this device.	C	N/A
M4.2	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	<ul style="list-style-type: none"> Rainfall monitoring records spreadsheet (Rainfall Data_Daily.xlsx) Site observations and management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	Auditors reviewed PKCT's rainfall data spreadsheet and confirmed that rainfall is recorded in millimetres on an hourly, daily and monthly basis. Hourly rainfall values were recorded at consistent times each day (on the hour), satisfying the requirement for measurements to occur at the same time each day. Daily rainfall totals were also present and aligned with EPL monitoring expectations.	C	N/A

M5 Recording of pollution complaints

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<ul style="list-style-type: none"> Site observations and management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	PKCT maintains an internal Event Management System (EMS) which records pollution-related complaints and associated details in a legible format. ERM reviewed the EMS during the audit and confirmed that it provides a mechanism for documenting and retaining complaints made to PKCT, its employees or its agents, and is considered consistent with the requirements of Condition M5.1. No pollution complaints were recorded during the audit period.	C	N/A
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	<ul style="list-style-type: none"> Extracts from the complaints register Annual Returns 2023-2025 PKCT Environmental Management Strategy – MP.024, Version 22.0, 15/08/2025 Site observations and management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	PKCT's Environmental Management Strategy – MP.024 (Version 22.0, authorised 15 Aug 2025) states that environmental events and hazards, including community complaints, are entered into the site's event management system with actions tracked to completion, and the EMS sets out the complaints and enquiries framework (hotline/email, logging, investigation, response and close-out). During the audit, ERM reviewed complaint record extracts and confirmed that entries capture the date and time of the complaint, the method of receipt, complainant details, the nature of the complaint, actions taken (including any follow-up contact), On this basis, it is considered that PKCT record complaints in a format that is consistent with condition M5.2 of the EPL.	C	N/A
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Extracts from the complaints register 	ERM reviewed complaint records stored within PKCT's Event Management System, as described in	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> Site observations and management interviews with the Site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	the Environmental Management Strategy, which specifies that environmental events, including complaints, are entered into the system and tracked to completion. Auditors were shown a sample of complaints during the audit included entries extending beyond the required four-year retention period,		
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	<ul style="list-style-type: none"> Management interviews with the Site's Environmental Specialist and Health, Safety, Environment and Risk Lead 	Management confirmed that complaint records have not been requested by any authorised officer of the EPA during the audit period, therefore this requirement has not been triggered.	NT	N/A
M6 Telephone complaints line					
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the license.	<ul style="list-style-type: none"> PKCT website Site observations 	A dedicated telephone complaints line is published on PKCT's website. Auditors tested the phone line during the audit and confirming it was active.	C	N/A
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	<ul style="list-style-type: none"> PKCT website Site observations 	A dedicated telephone complaints line is published on PKCT's website. Auditors tested the phone line during the audit and confirming it was active.	C	N/A
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	N/A	N/A	N/A	N/A
M7 Other noise monitoring and recording conditions					
Noise monitoring					
M7.1	Noise from the premises must be measured bi-annually (to measure summer and winter levels) via a combination of attended and unattended noise monitoring measures at the potentially affected premises identified in Condition L4.1 of this licence.	<ul style="list-style-type: none"> Letter from EPA to PKCT dated 15th August 2017 Letter from DPIE to PKCT dated 16th March 2017 	Condition M7.2 allows for the cessation of monitoring following 6 years of compliance with noise criteria. In accordance with Condition M7.2, the Department of Planning, Industry and Environment (DPIE; now	NT	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		<ul style="list-style-type: none"> ▪ 2023 Independent Environmental Audit ▪ Interviews with PKCT Environmental Specialist ▪ Complaints Register 	<p>referred to as DHPI) approved a request from PKCT to cease routine noise monitoring on 16th March 2017, which is prior to the audit period. PKCT notified the EPA that noise monitoring was being ceased in accordance with Condition M7.2 on 15th August 2017 and received a response from EPA on 15th August 2017 stating that the EPL did not require amending to account for the cessation of noise monitoring. Therefore, noise monitoring has not occurred during the audit period and the requirements of this Condition have not been triggered during the audit period. Based on interviews with the PKCT Environmental Specialist and as already outlined in the 2023 IEA Report, the requirement for ongoing noise monitoring has ceased. Review of PKCT's Complaints Register confirms that there have no noise related complaints raised from receptors or regulators. On this basis, PKCT are considered compliant with this condition</p>		
M7.2	The noise monitoring program must be reviewed by the licensee. If no exceedance of the criteria occurs for 6 years and the EPA is satisfied with the review, noise monitoring will not be required to continue.	<ul style="list-style-type: none"> ▪ Letter from EPA to PKCT dated 15th August 2017 ▪ Letter from DPIE to PKCT dated 16th March 2017 ▪ 2023 Independent Environmental Audit 	<p>The DPIE approved a request from PKCT to cease routine noise monitoring on 16th March 2017, which is prior to the audit period. PKCT notified the EPA that noise monitoring was being ceased in accordance with Condition M7.2 on 15th August 2017 and received a response from EPA on 15th August 2017 stating that the EPL did not require amending to account for the cessation of noise monitoring, therefore ERM considers PKCT to be compliant with this condition.</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
Availability of Continuous Monitoring Equipment required by this licence					
M7.3	All continuous monitoring equipment must be operated and maintained with the aim of achieving 100% availability in each licence year. Where a monitoring device does not achieve 95% availability, the licensee must report reasons and corrective actions to the EPA in the Annual Return.	<ul style="list-style-type: none"> Dust Monitoring Report for Annual Return (2023-2025) by Katestone Management Interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Annual returns for 2023-2024, 2024-2025 	<p>During the audit period, all continuous dust monitoring equipment was confirmed by site management to be operated and maintained to achieve monitoring availability above 95% each year. Within each Port Kembla Coal Terminal Dust Monitoring Reports prepared by Katestone submitted alongside the Annual Returns, the reported availability is provided for each month of the year. The data capture rates for the continuous dust monitors were reported to be:</p> <ul style="list-style-type: none"> 2023-2024: 99.5% (northern monitor) and 98.1% (southern monitor); and 2024-2025: 99.4% (northern monitor) and 99.8% (southern monitor). 	C	N/A

6 Reporting Conditions

R1 Annual return documents

R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> a Statement of Compliance, a Monitoring and Complaints Summary, a Statement of Compliance - Licence Conditions, a Statement of Compliance - Load based Fee, a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and a Statement of Compliance - Environmental Management Systems and Practices. <p>At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.</p>	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 	Annual Returns covering the audit period were reviewed. Each Annual Return was supplied to the EPA in the approved form and contained the required components: Statement of Compliance, Monitoring and Complaints Summary, Statements of Compliance for Licence Conditions, Load Based Fee, Pollution Incident Response Management Plan, Requirement to Publish Pollution Monitoring Data, and Environmental Management Systems and Practices.	C	N/A
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 EPA POEO Public Register Annual Return Administrative Fees 	<p>Annual Returns, reviewed by the auditors, were prepared for each reporting period within the audit scope and were completed after the end of the respective reporting period, consistent with the licence definition of "reporting period."</p>	C	N/A
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <p>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</p> <p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	<ul style="list-style-type: none"> Interviews with site management 	<p>Management confirmed there was no licence transfer during the audit period; consequently, the transfer-specific Annual Return obligations did not apply.</p>	N/A	N/A
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	<ul style="list-style-type: none"> Interviews with site management 	<p>Management confirmed the licence was neither surrendered nor revoked during the audit period; therefore, the surrender/revocation provisions did not apply.</p>	C	N/A
R1.5	<p>The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').</p>	<ul style="list-style-type: none"> Confirmation emails from eConnect EPA 	<p>Annual Return submission confirmations from eConnect EPA were reviewed. For the audit period, the Annual Returns were submitted within 60 days of the end of the reporting period (reporting period ends 31 March; due date 30 May). Submission dates sighted were:</p> <ul style="list-style-type: none"> 2023-2024: submitted 23 May 2024 2024-2025: submitted 28 May 2025 <p>All submissions therefore met the timing requirement of this condition.</p>	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 Site Observations 	PKCT retains copies of Annual Returns for longer than four years. Copies of returns dated more than four years prior to the audit date were sighted.	C	N/A
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 Site observations 	Statements of Compliance and the Monitoring and Complaints Summary within the Annual Returns were reviewed and confirmed as certified/signed by an authorised signatory in accordance with this condition.	C	N/A
R2 Notification of environmental harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 Interviews with site management Environmental Management Strategy Management Plan (MP.024, Version 22.0, approved 15 August 2025) 	Review of Annual Returns, EMS incident records and discussions with site management confirmed that no incidents occurred during the audit period that required notification to the EPA under Condition R2.1. PKCT maintains an Environmental Management System that includes incident identification, internal escalation, and statutory notification procedures aligned with Part 5.7 of the Protection of the Environment Operations Act 1997. As no notifiable incidents arose during the audit period, no notification to the Environment Line was required.	C	N/A
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 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.	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 Interviews with site management Environmental Management Strategy Management Plan (MP.024, Version 	Review of Annual Returns, EMS incident records and discussions with site management confirmed that no incidents occurred during the audit period that required written notification to the EPA under Condition R2.2. PKCT's EMS includes procedures for recording incidents, determinations of whether an incident	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
		22.0, approved 15 August 2025)	is notifiable and preparing written notifications to regulators where required. As no incidents triggering notification under Part 5.7 of the Protection of the Environment Operations Act 1997 occurred during the audit period, no written notification to the EPA was required.		
R3 Written Report					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	<ul style="list-style-type: none"> ▪ Management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead ▪ Extracts from the EMS complaints register 	ERM reviewed extracts from the EMS, including records of community complaints received during the audit period, as well as Annual Returns and AEMRs. While a small number of community complaints were recorded, discussions with site management confirmed that authorised officers of the EPA did not request a written report under Condition R3.1 during the audit period. As no request was made by the EPA, the condition was not triggered.	N/A	N/A
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<ul style="list-style-type: none"> ▪ Management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead ▪ Extracts from the EMS complaints register 	No written report was requested by the EPA during the audit period under Condition R3.1. As the prerequisite for this condition was not met, the requirement to make inquiries and provide a written report under Condition R3.2 did not arise.	N/A	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>	<ul style="list-style-type: none"> Management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Extracts of the EMS complaints register 	<p>No written report was requested by an authorised officer of the EPA during the audit period under Condition R3.1. As no report was requested or required, the provisions relating to the content of a written report specified in Condition R3.3 were not triggered.</p>	N/A	N/A
R3.4	<p>The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.</p>	<ul style="list-style-type: none"> Management interviews with the site's Environmental Specialist and Health, Safety, Environment and Risk Lead Extracts of the EMS complaints register 	<p>No written report was requested or submitted to the EPA during the audit period. As no report was provided, the EPA did not make any request for further information under Condition R3.4, and the condition was not triggered.</p>	N/A	N/A

R4 Other reporting conditions

Ambient Air Monitoring Report

R4.1	<p>The following must be submitted to the EPA with the Annual Return:</p> <p>A brief summary of the results for all Total Suspended Particulate (TSP) matter, Particulate Matter (PM10) and Particulate Matter (PM2.5) monitoring.</p> <p>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.</p> <p>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:</p>	<ul style="list-style-type: none"> Annual returns for 2023-2024, 2024-2025 AEMRs for 2023-2024, 2024-2025 Dust Monitoring Report for Annual Return (2023-2025) by Katestone 	<p>A review of the Annual Returns and Annual Environmental Monitoring Reports (AEMRs) submitted during the audit period confirmed that PKCT provided the EPA with a summary of results for Total Suspended Particulates (TSP), PM₁₀ and PM_{2.5} monitoring, in accordance with Condition R4.1. Tabulated air-quality results for continuous monitoring</p>	C	<p><i>It is noted recommendations have been made for Approval condition Sch 4-10 in relation to amendments to the protocol for to the evaluation of exceedances. Refer to Appendix A1 for further commentary on this.</i></p>
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Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
	<ul style="list-style-type: none"> ▪ 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. <p>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:</p> <ul style="list-style-type: none"> ▪ weather data; ▪ 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. <p>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.</p>		<p>locations (Points 20 and 21) were included, with average concentrations for TSP and PM₁₀ reported as required.</p> <p>Where elevated 24-hour concentrations of PM₁₀ and TSP were recorded at Point 21 during the audit period, PKCT undertook assessments consistent with the requirements of Condition R4.1. These assessments included consideration of prevailing meteorological conditions, comparison of results between monitoring locations, analysis of particle size fractions, and review of site operating conditions. The investigations documented in the AEMRs concluded that the elevated results were largely attributable to regional dust events, haze and sea-mist conditions, with a low contribution from PKCT operations.</p> <p>Ambient air-quality information used to inform the AEMRs for the relevant financial years was also used to support reporting under Condition R4.1, consistent with the provisions of the EPL. Information collected during the latter part of the reporting periods was appropriately incorporated into subsequent reporting where applicable.</p> <p>Based on the documentation reviewed, ERM confirms that PKCT complied with the reporting and assessment requirements of Condition R4.1 during the audit period.</p>		
Wet Weather Overflow Reporting					

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations
R4.2	<p>The following must be submitted to the EPA with the Annual Return: Details of any overflow from Point 22, Point 23, Point 26, Point 27, Point 28 and/or Point 29 specified by Conditions P1.2 and P1.3.</p> <p>The following information must be provided for each overflow:</p> <ul style="list-style-type: none"> ▪ 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 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; ▪ an estimate of sedimentation as a percentage of the design capacity of the relevant sedimentation pond identified in Condition O4.1; ▪ the location(s) of the discharge; and ▪ was the discharge permitted by the licence. 	<ul style="list-style-type: none"> ▪ Annual returns for 2023-2024, 2024-2025 ▪ Environmental Monitoring Reports for 2023, 2024, 2025 	ERM reviewed Annual Returns attachments and confirmed that details of any overflow from Point 22, Point 23, Point 26, Point 27 and Point 29 included the items required by this condition.8	C	N/A

7 General Conditions

G1	Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	<ul style="list-style-type: none"> ▪ Site Observations ▪ PKCT Website 	ERM observed a copy of the licence kept at the premises. PKCT's website also hosts a copy of the licence; however, the version displayed online showed an earlier licence version dated 12 July 2024, opposed to the current version dated 6 August 2025.	C(obs)	It is recommended to update the PKCT Website to include the latest version of the EPL.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	<ul style="list-style-type: none"> ▪ Management Interview 	It was advised by site management that an EPA officer has not requested to see the licence during the audit period.	NT	N/A
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<ul style="list-style-type: none"> ▪ Site Observations 	ERM confirms that the licence is available for inspection by an employee or agent of the licensee working at the premises.	C	N/A

Item	Assessment Requirement	Reference/ Evidence	Comments	Compliance	Recommendations																						
G2	Other general conditions																										
G2.1	Completed programs																										
	<table border="1"> <thead> <tr> <th data-bbox="284 510 655 573">Program</th> <th data-bbox="655 510 1012 573">Description</th> <th data-bbox="1012 510 1362 573">Completed date</th> </tr> </thead> <tbody> <tr> <td data-bbox="284 583 655 772">PRP 1- Installation of additional dust control for Difficult Coal Types</td> <td data-bbox="655 583 1012 772">Dust Control for Difficult Coal Types. Install additional controls and techniques to minimise dust resulting from handling difficult coal type products.</td> <td data-bbox="1012 583 1362 772">30-November-2004</td> </tr> <tr> <td data-bbox="284 783 655 1003">PRP 2 - Water Collection System Performance Upgrade</td> <td data-bbox="655 783 1012 1003">Water Collection System Performance Upgrade. Determine strategies to improve the performance of the water collection treatment and discharge system.</td> <td data-bbox="1012 783 1362 1003">31-January-2007</td> </tr> <tr> <td data-bbox="284 1014 655 1203">PRP 3 - Investigate further dust control technique for difficult coal types</td> <td data-bbox="655 1014 1012 1203">Investigate further dust control techniques for difficult coal types. Report the findings of the investigation and preferred dust control strategy.</td> <td data-bbox="1012 1014 1362 1203">30-June-2008</td> </tr> <tr> <td data-bbox="284 1213 655 1402">PRP 4 - Minimise Spillage of Coal from Maintenance Activities at Berth 102</td> <td data-bbox="655 1213 1012 1402">Report on the Spillage Reduction For Berth 102. Options to improve the spillage capture/minimisation performance of Berth 102.</td> <td data-bbox="1012 1213 1362 1402">02-April-2009</td> </tr> <tr> <td data-bbox="284 1413 655 1665">PRP 5 - Reuse of treated effluent from Coniston STP in dust control</td> <td data-bbox="655 1413 1012 1665">Reuse of treated effluent from Coniston STP in Dust Control. Implementation will save approx 1 Mega litre per day of potable water and reduce demand pressure on the Sydney drinking water dams.</td> <td data-bbox="1012 1413 1362 1665">30-June-2009</td> </tr> <tr> <td data-bbox="284 1675 655 1866">PRP 6 – Dust Management Improvement</td> <td data-bbox="655 1675 1012 1866">Dust Management Improvement. Identify ways of improving the effectiveness of dust management and minimising dust emissions.</td> <td data-bbox="1012 1675 1362 1866">30-June-2010</td> </tr> </tbody> </table>	Program	Description	Completed date	PRP 1- Installation of additional dust control for Difficult Coal Types	Dust Control for Difficult Coal Types. Install additional controls and techniques to minimise dust resulting from handling difficult coal type products.	30-November-2004	PRP 2 - Water Collection System Performance Upgrade	Water Collection System Performance Upgrade. Determine strategies to improve the performance of the water collection treatment and discharge system.	31-January-2007	PRP 3 - Investigate further dust control technique for difficult coal types	Investigate further dust control techniques for difficult coal types. Report the findings of the investigation and preferred dust control strategy.	30-June-2008	PRP 4 - Minimise Spillage of Coal from Maintenance Activities at Berth 102	Report on the Spillage Reduction For Berth 102. Options to improve the spillage capture/minimisation performance of Berth 102.	02-April-2009	PRP 5 - Reuse of treated effluent from Coniston STP in dust control	Reuse of treated effluent from Coniston STP in Dust Control. Implementation will save approx 1 Mega litre per day of potable water and reduce demand pressure on the Sydney drinking water dams.	30-June-2009	PRP 6 – Dust Management Improvement	Dust Management Improvement. Identify ways of improving the effectiveness of dust management and minimising dust emissions.	30-June-2010		N/A	Noted	Note	N/A
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Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
PRP 7 - Green and Golden Bell Management Plan		Green and Golden Bell Management Plan. Minimise the risk of harm or damage to the GGBF and its habitat from any actual or potential pollution from the premises.	30-June-2009			
PRP 8 - Identify options to improve the performance of the stormwater pollution control system		Identify options to improve the performance of the stormwater pollution control system. To improve the effectiveness of the stormwater pollution control system at the Port Kembla Coal Terminal.	31-August-2010			
PRP 9 - Performance upgrades to the stormwater control system		Performance upgrades to the stormwater control system to improve the system's ability to control suspended solids discharged into Port Kembla Harbour.	30-June-2012			
PRP10 - Environmental Improvement Program, Review Truck Wash Performance		Environmental Improvement Program, Review Truck Wash Performance	30-July-2011			
PRP11 - Environmental Improvement Program, Install Northern Truck Wash Upgrades		The effectiveness of the northern truck wash can be improved. This PRP is for the purpose of improving the effectiveness of the northern truck wash. The work involves civil and electrical refurbishments & installations together with new operating procedures to be followed by trucking companies using the facility.	06-February-2015			
PRP 12 - Implement upgrades to stormwater pollution control system		Implement recommendations from the Port Kembla Coal Terminal Pond Maintenance report or, if not reasonably practical, by alternate measures	09-December-2016			

Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
		at the Central, North and TS1 Ponds, and Coal Stockyard area.				
	PRP 13 - Algae control trial in Settlement Lagoon	The licensee submitted a proposal to trial the use of Eco-Tabs as a measure to prevent and treat algal growth in the Settlement Lagoon to EPA.	31-March-2014			
	Wagon Monitoring and Reporting Environmental Improvement Program	Implement a program of monitoring and reporting on the condition of loaded wagons received at the premises. All trains entering the dump-station will be assessed against criteria relating to likelihood that coal may have been spilt within the rail corridor during the trains most recent journey.	30-September-2016			
	EIP - Particulate Matter Control Best Practice Study	The licensee must conduct a Site-Specific Best Management Practice Study to identify the most practicable means to reduce particle emissions.	26-July-2017			
	EIP - Use of Real Time Particulate Monitoring Data for Operational Control	The licensee must review the effectiveness of the real time particulate monitoring system used at Port Kembla Coal Terminal and the associated management systems in place aimed at reducing dust emissions on site.	06-April-2017			
	EIP - Train Condition Exception Reporting	The licensee must complete visual train condition assessments for all trains arriving at the premises. The aim of this condition assessment is to identify wagons that are consistently loaded in a manner that clearly is likely to contribute to spillage of coal in the rail corridor.	30-November-2017			

Item	Assessment Requirement		Reference/ Evidence	Comments	Compliance	Recommendations
	Implement Stockyard Spray Optimisation	Implement improvements to existing stockyard spray system. Follow up actions from U2 - Particulate Matter Control Best Practice Study	29-June-2018			
	Develop Management Plan for Southern Pads/bulk products area	Develop Management Plan for Southern Pads/Bulk products area. Follow up actions from U2 - Particulate Matter Control Best Practice Study	21-May-2018			
	Review Inbound Moisture Meters	Review current inbound moisture meter. Follow up actions from U2 - Particulate Matter Control Best Practice Study	29-June-2018			
	Environmental Improvement Program (EIP) - Install Moisture Meters Road Receival	Purchase, install and commission an inbound moisture meter on road receival system (in line with meter of rail receival system). Complete the integration of the new inbound road and rail receival moisture meters for automatically report to PKCT's electronic monitoring system.	28-August-2020			



APPENDIX C DRIVER'S CODE OF CONDUCT

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
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Drivers Code of Conduct

4. HAULAGE ROUTES

All haulage trucks travelling to and from PKCT will do so by using major arterial roads as outlined in the sections below. Primarily, the major arterial roads associated with deliveries to PKCT are shown in Table 3 below. The haulage routes provide PKCT a concise understanding of PKCT's requirements relating to trucking operations when arriving to the site. It is provided in support of and shall be read in conjunction with the PKCT Site Induction and Heavy Vehicle Haulage Induction.

Table 3 Haulage Route Summary

Role	Responsibility
Appin Road	Appin Road is a combination of divided and undivided road with a speed limit of 90km/hr. Frequent overtaking lanes are found along this route.
Mt Ousley Road	Mt Ousley Road traverses through hilly country with steep grades and tight curves. The speed limit is 80Km/hr however the truck speed limit down Mt Ousley is 40km/hr, with trucks being restricted to the outer 2 lanes. Emergency stopping bays are provided in both directions. As Mt Ousley is close to residential receivers, drivers are requested to limit noise wherever possible. Transport for NSW (TfNSW) advise peak hour traffic is as follows: <ul style="list-style-type: none"> 6:00am to 8:00 am - Monday to Friday northbound 3:00pm to 7:00pm – Monday to Friday southbound. All breakdowns must be reported to the TfNSW Transport Management Centre (TMC) by calling 131700. The vehicle must be protected in accordance with the RMS Heavy Vehicle Drivers handbook.
Bellambi Lane	Receival of coal from Wollongong Coal at PKCT is only permitted from 7.30am onwards and until 10.30 pm Monday to Friday and from 8.30am to 6.30pm on weekends and public holidays. The speed limit on Bellambi Lane is 60km/hr. Bellambi Lane has a high number of commuter vehicles, drivers are required to be vigilant regarding separation distances. As Bellambi Lane is close to residential receivers, drivers are requested to limit noise wherever possible.
Northern Distributor	The Northern Distributor links Bellambi Lane with the Southern Freeway. The speed limit along the Northern Distributor varies between 80km/hr &

Driver's Code of Conduct Implementation Plans – signed and acknowledged.

- PKCT Driver's Code of Conduct 2025
- PKCT Driver's Code of Conduct Implementation Plan August 2025
- Linfox – Drivers Code of Conduct Compliance Audits
- Heavy Haulage Induction Question and Answers
- PKCT Heavy Haulage induction – onboarding
- Heavy Haulage Induction Extract A & B
- Example PKCT Environmental Task Observation Sheets
- PKCT Monthly Driver Code of Conduct Reports
- Interviews with Management from PKCT and Linfox (Haulage Contractor)

PKCT and Linfox undertake routine audits and Environmental Task Observations of trucking operations to verify compliance with the Driver's Code of Conduct (DCC), including adherence to the designated major arterial haulage routes specified in the DCC. ERM reviewed a sample of completed Environmental Task Observation records and audit sheets for the audit period, which included checks on route compliance, and confirmed that trucks were consistently utilising the approved arterial road network. In addition, interviews with Linfox management and PKCT management confirmed that haulage route compliance is monitored through a combination of GPS geofencing, routine audits, and exception reporting. Linfox advised that fleet vehicles are monitored in real time via GPS, enabling verification of vehicle movements and identification of any

C

N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>90Km/hr. Several traffic lighted intersections are found along this route.</p> <p>Transport for NSW (TfNSW) advise peak hour traffic is as follows:</p> <ul style="list-style-type: none"> • 6:00am to 9:00 am - Monday to Friday northbound • 3:00pm to 6:00pm – Monday to Friday southbound. <p>All breakdowns must be reported to the TfNSW Transport Management Centre (TMC) by calling 131700. The vehicle must be protected in accordance with the RMS Heavy Vehicle Drivers handbook.</p>		<p>deviations from approved haulage routes. Based on the documentation reviewed and interviews undertaken, the systems in place demonstrate alignment with the requirements of this condition</p>		
F6 Freeway	<p>The Southern Freeway forms part of the arterial link between Sydney and Wollongong. The speed limit varies from 80km/hr to 100km/hr on this route. Caution should be observed around merging lanes.</p> <p>Transport for NSW (TfNSW) advise peak hour traffic is as follows:</p> <ul style="list-style-type: none"> • 6:00am to 10:00 am - Monday to Friday northbound and southbound • 3:00pm to 6:00pm – Monday to Friday northbound and southbound. <p>All breakdowns must be reported to the TfNSW Transport Management Centre (TMC) by calling 131700. The vehicle must be protected in accordance with the RMS Heavy Vehicle Drivers handbook.</p>				
Masters Road	<p>Masters Road is a 1.3 km road with three lanes in either direction separated by a centre median island. The speed limit on Masters Road is 80Km/hr. Traffic lights are located in the left hand turning lane which allows vehicles to turn onto Springhill Road. Compression braking on this route should be avoided due to community disturbance. Interactions with other heavy vehicle users will be frequent in this area.</p> <p>The northbound exit to Figtree and Wollongong is located within 200 metres south of the 'The Avenue, Figtree' overpass of the location shown in the image below. The on-road ramp can experience morning peaks.</p>				
Springhill Road	<p>The section of Springhill Road between Masters Road and Port Kembla Road is 2.3 km in length, is 3 lanes wide and divided by a median strip. The speed limit is 80km/hr. Several traffic lights and intersections are found along this section of road and drivers are required to pay particular attention to other vehicles crossing the traffic flow. Due to the close proximity to residents, compression brakes are not to be used on the approach to the lights at Springhill and Port Kembla Road wherever possible. Interactions with other heavy vehicle users will be frequent in this area.</p>				
Port Kembla Road	<p>Port Kembla Road is a two lane undivided road. The speed limit on Port Kembla Road is 50km/hr. Port</p>				

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	Kembla Road is a public road and drivers should ensure that they remove any residual coal on their vehicles prior to entering the road from PKCT.				

5. NOISE MINIMISATION CONTROLS

	<p>This section designates the specific noise mitigation measures which must be adhered to. This includes rules on compression braking, tipping practices and speed limits for the approach to PKCT, when travelling on the site, tipping and leaving the site.</p> <p>Due to the relatively close proximity to residential areas, drivers are requested to limit the noise created in this area as much as possible.</p> <p>PKCT's Noise Monitoring Program is provided as part of the Noise Management Plan. The noise monitoring program has been prepared by Wilkinson Murray titled PKCT Noise Monitoring Program (Version D) (report reference: 07355-D).</p> <p>It is noted within the PKCT Noise Monitoring Program that the Conditions Approval require both attended and non-attended noise monitoring, however, the acoustic environment in the area is complex and given the fact the residential receivers are separated by roads and a park, unattended noise monitoring is unlikely to provide any useful information regarding the noise from PKCT.</p> <p>The Program shall be implemented in accordance with Section 9.2 of the Noise Management Plan. PKCT shall ensure suitably qualified external service providers and/or consultants are engaged to carry out the work. Service providers shall ensure that the equipment/instruments used are suitably calibrated in accordance with the relevant Australian Standards and manufacturer's specification.</p>	<ul style="list-style-type: none"> PKCT Driver's Code of Conduct 2025 PKCT Driver's Code of Conduct Implementation Plan August 2025 Implementation Plans & Induction protocols and acknowledgements PKCT Noise Management Plan 2025 Environmental Task Observation Truck Drivers Code of Conduct Summary Conformance to Drivers Code of Conduct xls 	<p>PKCT and Linfox undertake routine audits of trucking operations to verify compliance with the Drivers Code of Conduct (DCC). As part of the driver induction process, drivers are briefed on noise-related requirements, including measures to minimise noise impacts during transport activities.</p> <p>No complaints regarding road traffic noise were reported during the audit period.</p>	C	N/A
5.1	<p>Compression Breaking Noise</p> <p>Compression brakes can be extremely noisy and adversely impact on public amenity. Wherever possible, use of engine brakes near residences and in built up areas should be avoided. Compression brakes must not be used on the approach to Port Kembla Rd/ Springhill Rd lights when entering or exiting PKCT wherever possible.</p>	<ul style="list-style-type: none"> PKCT Driver's Code of Conduct 2025 PKCT Driver's Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements Interviews with PKCT and Linfox Management 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with the Driver's Code of Conduct (DCC), including restrictions on the use of compression braking near residential areas. As part of the driver induction and refresher training process, drivers are specifically briefed on requirements to avoid compression braking where practicable, including at the Port Kembla Road and</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			<p>Springhill Road intersection.</p> <p>Review of task observation records and interviews with PKCT and Linfox management confirmed that compression braking controls are monitored through on-site observations and haulage contractor oversight</p>		
5.2	<p>Tailgate noise</p> <p>Drivers must ensure that, following tipping, the tailgate is locked before leaving PKCT.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations of trucking operations to verify compliance with the Driver’s Code of Conduct (DCC), including controls to minimise tailgate noise following tipping.</p> <p>Drivers are briefed during induction on the requirement to ensure tailgates are securely locked prior to leaving the site.</p> <p>ERM observed that the truck wash facility provides drivers with access to video footage of their trailers, allowing visual confirmation that tailgates are secured before departure.</p> <p>Review of audit records and discussions with PKCT and Linfox management confirmed</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			this control is actively used to support compliance.		
5.3	<p>Speed hump noise</p> <p>When traversing the speed hump at the gate of PKCT, drivers are to approach slowly to ensure that excessive noise is not created.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with the Driver's Code of Conduct (DCC), including requirements to minimise noise when traversing speed humps at site access points. Drivers are briefed during induction on the need to approach speed humps slowly to reduce noise and ensure safe vehicle movements. ERM observed that the guard station is positioned adjacent to the speed hump and monitors vehicle movements, enforcing reduced speeds as required. Interviews with PKCT management confirmed this arrangement forms part of routine traffic and noise management controls.</p>	C	N/A
5.4	<p>Queuing</p> <p>Queuing at the truck receival area is permitted on Tom Thumb Road and Port Kembla Road. No trucks are permitted to queue on Springhill Road.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with the Driver's Code of Conduct (DCC), including queuing</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
		<ul style="list-style-type: none"> ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Interviews with Linfox and PKCT management 	<p>requirements. As part of the driver induction process, drivers are briefed on approved queuing locations and the prohibition on queuing on Springhill Road.</p> <p>Review of audit documentation and interviews with PKCT and Linfox management confirmed that queuing behaviour is monitored through on-site supervision and contractor oversight to minimise off-site impacts.</p>		
5.5	<p>Braking</p> <p>Brakes must be applied so as not to create excessive noise that could disturb local residents. Compression braking on Springhill and Masters Road should be avoided, and are not to be used at the intersection of Port Kembla Road and Springhill Road wherever possible.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Interviews with Linfox and PKCT management 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with the Driver's Code of Conduct (DCC), including requirements to apply brakes in a manner that minimises noise impacts on nearby residents. Drivers are briefed during induction on restrictions relating to compression braking on Springhill Road and Masters Road.</p> <p>ERM confirmed through review of task observation records and interviews with PKCT and Linfox management that drivers are</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			specifically instructed that compression braking is not permitted at the intersection of Port Kembla Road and Springhill Road, and that compliance is monitored through routine audits and operational oversight.		

6. SAFE DRIVING AT PKCT

	<p>The gates at the end of Port Kembla road denote the start of the PKCT Road Receiving Area. The speed limit is 40 km/hr in this area. A boom gate is installed at the crest of the hill to prevent unauthorised public vehicles entering the area. Drivers should slow down as they approach the gate to allow it to automatically open.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Site Observations ▪ Interviews with PKCT Management 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with the Driver’s Code of Conduct (DCC), including speed limits and safe driving behaviour at the PKCT Road Receiving Area. As part of the driver induction and refresher process, drivers are briefed on speed requirements, including the reduced speed limit when approaching and passing through the boom gate.</p> <p>ERM observed the guard station located adjacent to the boom gate during the site visit. Interviews with PKCT management confirmed that truck movements are actively monitored and reduced speeds are enforced to ensure safe and</p>	<p>C</p>	<p>N/A</p>
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No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			compliant entry to the facility.		
7. PKCT PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIREMENTS					
	<p>The minimum PPE requirements for truck drivers when outside of their trucks is as stipulated in the PKCT Induction include:</p> <p>Safety hard hat</p> <p>Safety glasses</p> <p>Long sleeve day-night hi-vis shirt (with sleeves rolled down) or a long sleeve shirt with a day-night hi-vis safety vest worn in accordance with manufacturers specifications</p> <p>Long pants/trousers</p> <p>Safety footwear.</p>	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits of trucking operations to verify compliance with the Drivers Code of Conduct (DCC). As part of the driver induction process, drivers are briefed on all relevant personal protective equipment (PPE) requirements to ensure safe and compliant access to the site.</p>	C	N/A
8. GENERAL PKCT HEALTH AND SAFETY REQUIREMENTS					
	<p>The following health and safety rules apply when working at PKCT:</p> <p>Drivers shall not to exit the truck cab at any time while the Road Receival circuit is active</p> <p>No queuing within area from amenities to bin top boom gate</p> <p>The dumping of rubbish of any form is prohibited</p> <p>Drivers are authorised to enter the site to carry out their allocated tasks. Access to other areas of the plant is prohibited</p> <p>Drivers shall take care to ensure product being delivered isn’t contaminated with rubbish or other foreign objects eg. timber, tarps. Contamination may be observed at the mine site during loading or during delivery and discharge at PKCT’s premises. If sighted in coal, the truck driver shall notify his/her supervisor, relevant mine personnel or PKCT Shift Supervisor, as appropriate, and arrange for such objects’ safe removal and offsite disposal</p> <p>Where necessary, liaise with PKCT personnel on site. Report any safety, environmental or other incidents</p> <p>Walk, don’t run; beware of slip, trip and fall hazards, especially when exiting a vehicle</p> <p>Standing between the trailer body and the tail gate with the hoist raised is not permitted</p> <p>Lowering Trays: take care to ensure trays are lowered after unloading</p> <p>If trucks/trailers are required to be inspected on the PKCT site, the truck shall be parked in a designated parking area. The vehicle shall be fundamentally stabled prior to inspection. Maxi brakes in addition to chocks shall be used to secure any vehicle that is to be stabled</p> <p>Standing or working under raised trailers is not permitted. Trailer bodies requiring inspection shall be appropriately propped before accessing the equipment</p> <p>Climbing or standing on trailers is not permitted</p>	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits of trucking operations to verify compliance with the Drivers Code of Conduct (DCC). As part of the induction process, drivers are briefed on all relevant health and safety requirements. Protocols are also in place for the identification and removal of foreign objects or waste within coal loads, with drivers required to notify the appropriate personnel to ensure safe and compliant handling.</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	Standing behind Tailgate Grain Doors is not permitted when the trailer contains material.				

9. SPEED LIMITS

	All drivers shall observe and comply with the speed limits posted at PKCT. Where conditions dictate, reduced speed limits shall be used.	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	PKCT conducts routine audits and Environmental Task Observations to verify compliance with posted speed limits across the site. Speed-related requirements are communicated during driver induction and reinforced through signage, on-site supervision and contractor oversight. Interviews with PKCT and Linfox management confirmed that speed compliance is monitored as part of routine operations and addressed through established compliance management processes.	C	N/A
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10. ROAD DELIVERY STANDARDS

	Road delivery standards, as specified by PKCT and legislation, which require attention when delivering to the PKCT road receiveal, are highlighted in this section.	Noted	Note	Noted	N/A
10.1	<p>Tipping</p> <p>Trucks shall be positioned over the tipping grates (Zones) before commencing tipping. Any spillage that occurs during tipping is to be reported to PKCT to enable efficient clean up. Tipping in other areas shall be done as directed by PKCT requirements and supervisors. The area used for tipping shall be risk assessed to determine whether tipping can proceed safely, with particular attention being paid to the cross slope and evenness of the area.</p>	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	PKCT conducts routine audits of trucking activities to verify compliance with the Drivers Code of Conduct (DCC). During induction, drivers are briefed on tipping requirements at PKCT. A stop-work and restricted-access process is implemented when spillage is	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			identified to allow clean-up before operations resume.		
10.2	<p>Load Covering</p> <p>All loaded trucks entering or leaving the premises must have their loads covered. The load cover may be removed upon arrival at the PKCT road receipt area. Manual trailer covers are not permitted for use on the PKCT site, eliminating the need for a truck driver to exit the truck cabin to remove or re-instate a trailer cover.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Interviews with PKCT Management ▪ Site Observations 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with load covering requirements under the DCC. Drivers are briefed during induction on load covering obligations prior to entering and leaving the site.</p> <p>ERM observed that drivers have access to video footage at the truck wash facility to visually confirm that load covers are correctly in place prior to departure. Interviews with PKCT and Linfox management confirmed this control is actively used to support compliance.</p>	C	N/A
10.3	<p>Truck Wash</p> <p>All trucks are to pass through a truck wash when leaving the client mine and also after tipping at PKCT, before leaving the site. To ensure effective washing, trucks must obey the truckwash traffic signals and signage at entry and proceed through the truckwash at an appropriate speed, no faster than 5km/h.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Site Observations 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with truck washing requirements under the DCC. Drivers are briefed during induction on the requirement to pass through the truck wash prior to leaving the site and on appropriate</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			<p>speeds through the wash.</p> <p>ERM observed the truck wash facility during the site visit. Interviews with PKCT management confirmed that truck wash performance is monitored and that additional wash-down facilities are available where required</p>		
10.4	<p>Equipment Performance</p> <p>It is the driver’s responsibility to report all vehicle faults and it is the owner’s responsibility to ensure that the vehicle is maintained to ensure safe vehicle operations.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits of trucking activities to verify compliance with the Drivers Code of Conduct (DCC). As part of the induction process, drivers are briefed on fault-reporting requirements. Haulage contractors are required to maintain all vehicles in safe operating condition under their contract and through their acknowledgement of the DCC.</p>	C	N/A

11. COAL BERTH ROAD RECEIVAL

11.1	<p>Truck Unloading</p> <p>Truck unloading procedures include:</p> <p>Remain in the truck at all times</p> <p>Ensure you are unloading in the correct zone</p> <p>Ensure your truck is aligned centrally on the road receival bin</p> <p>Find a location along the grid where there is sufficient room in the bin to accommodate the load</p> <p>Raise tray in a controlled fashion at a speed that ensures that coal is not deposited on the adjacent roadway or pedestrian access way</p> <p>Do not unload at a location where the bin is full</p> <p>Do not tip load directly onto the main cross beam in bins</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with coal berth road receival requirements under the DCC. Drivers are briefed during induction on unloading procedures, communication</p>	C	N/A
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No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<p>Do not reverse over reversing over unloaded material on the hopper grids with their trailers raised.</p> <p>Water sprays are installed on the western side of the roadway adjacent to the road receival bins. These sprays may be activated from time to time to control dust.</p>		<p>protocols and dust control measures at the road receival bins.</p> <p>ERM reviewed task observation records and confirmed that unloading practices are monitored during routine operations.</p>		

12. TRAFFIC LIGHTS AND BIN SENSORS

	<p>Road receival bins have a traffic light/ bin sensor system for guiding truck drivers on where best to tip. A red light provides an indication that the bin is full. Drivers should do a visual check to confirm. In advertent unloading when the bin is full will cause difficulties for trucks following and also result in increased coal deposits on adjacent roadways.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits of trucking activities to verify compliance with the Drivers Code of Conduct (DCC). As part of the induction process, drivers are briefed on the requirements for using the truck-unloading traffic lights and bin sensors at PKCT to ensure safe and compliant unloading operations.</p>	<p>C</p>	<p>N/A</p>
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13. LIGHT VEHICLE INTERACTIONS

	<p>If for any reason a light vehicle needs to access the bin top, communication with trucks in the area must be made via UHF Channel 10 silent is required.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Traffic Management Plan 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with requirements governing interactions between trucks and light vehicles. Drivers are briefed during induction on communication and access requirements when light vehicles are present in operational areas.</p>	<p>C</p>	<p>N/A</p>
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No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			ERM reviewed task observation records and confirmed that light vehicle interaction controls are addressed through routine supervision.		
14. CLEARWAYS					
	At various locations along the entry road and road receipt road, the road is marked by hatched lines. Do not park or stop across these areas as this will impede access to adjacent driveways and access ways.	<ul style="list-style-type: none"> PKCT Driver's Code of Conduct 2025 PKCT Driver's Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with clearway requirements under the DCC. Drivers are briefed during induction on the requirement to keep designated areas clear to maintain safe access and traffic flow.	C	N/A
15. DESIGNATED PARKING					
	There is a designated parking area for access to amenities is located adjacent to the amenities block. This area allows for no more than three (3) trucks to park at any one time. At the designated parking area, truck drivers must secure their vehicle (including the application of the park brake) prior to egressing the cab. All drivers are to egress the cab on the kerb side of the roadway.	<ul style="list-style-type: none"> PKCT Driver's Code of Conduct 2025 PKCT Driver's Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	PKCT conducts routine audits and Environmental Task Observations to verify compliance with designated parking requirements under the DCC. Drivers are briefed during induction on parking locations, vehicle securing requirements and safe egress from vehicles.	C	N/A
16. BOOM GATE					
	A boom gate is installed to control traffic and may be lowered by the Main Control to prevent access to the grids. This may be needed for clean-up or maintenance purposes. Wherever possible, consideration shall be given to truck arrivals to minimise impact on traffic flows.	<ul style="list-style-type: none"> PKCT Driver's Code of Conduct 2025 	PKCT undertakes routine audits and Environmental Task	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
		<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Site Observations 	<p>Observations to verify compliance with boom gate requirements under the DCC. Drivers are briefed during induction on boom gate operation and site access procedures. ERM observed boom gate operations during the Site visit and confirmed that access is actively managed by PKCT personnel.</p>		
17. MOBILE PLANT					
	<p>At times when PKCT is using the water cart or front end loader around the road receival grids, trucks must wait for PKCT direction to dump.</p> <p>The road receival area is often to unmanned by PKCT personnel. In case of an operational requirement, contact PKCT personnel in the vicinity or notify PKCT’s Main Control Tower on 4221 1807.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with requirements governing interactions between trucks and mobile plant. Drivers are briefed during induction on waiting procedures and communication protocols when mobile plant is operating.</p>		
18. TRUCK WASH					
	<p>Drivers must ensure that trucks pass through an operating truck wash after unloading and exiting site. If the truck wash is not operating, it must be reported immediately.</p> <p>To ensure effective truck washing, drivers are to assist by proceeding through the truck wash slowly and stopping if necessary if build up on tail gates and draw bars is particularly heavy or if the coal is sticky.</p> <p>The truck wash uses recycled water which is recirculated with recycled water top up. Recycled water is high quality. Visually, it is clear and doesn’t have any notable odour. Through recirculation, the water will have some suspended solids content. If water is dark, report to the Main Control Room immediately.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Site Observations 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with truck wash use and operating requirements. Drivers are briefed during induction on correct use of the truck wash and</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			reporting of any operational issues. ERM observed the truck wash facility and confirmed that procedures are in place to ensure effective cleaning prior to departure.		

19. MANUAL TRUCK WASH STATION

	<p>A manual truck wash station is available for cleaning of coal build-up from the truck’s dolly, drawbar and tailgate. The manual truck wash station is located downstream of the truck wash. At no stage shall a truck driver exit the truck cabin while on the active road receival circuit. The truck driver shall contact the Truck Wash Operator on UHF Channel 10 (silent) to commence visual inspection and manual wash.</p> <p>Once the Truck Wash Operator confirms that all coal build-up has been removed the truck, the truck driver may proceed to the eastern truck wash lane. If all coal build-up cannot be removed readily and requires extensive washing, the Truck Wash Operator will instruct the truck driver to proceed to an alternative wash down point.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with manual truck wash station procedures under the DCC. Drivers are briefed during induction on communication and safety requirements when manual wash-down is required. Review of task observation records confirmed that manual wash-down controls are implemented where necessary.</p>	C	N/A
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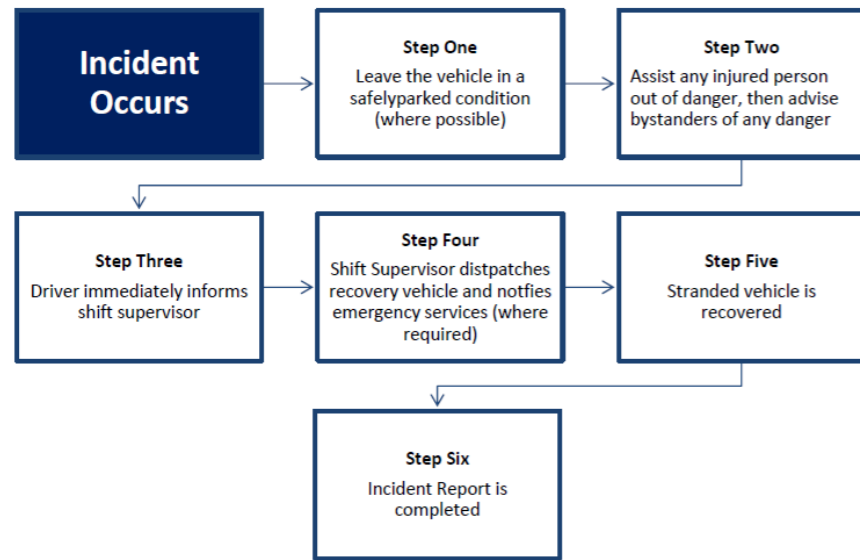
20. AREA HOUSEKEEPING AND MAINTENANCE

	<p>Where truck drivers identify a need for housekeeping (cleaning of coal build-up on the grids) or maintenance (blocked sprays on truck wash, etc) they are to notify PKCT personnel.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver’s Code of Conduct 2025 ▪ PKCT Driver’s Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Site Observation 	<p>PKCT conducts routine audits of trucking activities to verify compliance with the Drivers Code of Conduct (DCC). As part of the induction process, drivers are briefed on the requirement to notify PKCT personnel if they identify any</p>	C	N/A
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No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			housekeeping needs within the operational areas. No evidence of poor housekeeping was identified during the audit and PKCT are considered to have robust systems in place to allow for truck drivers to identify and log housekeeping or maintenance issues.		

21. INCIDENT MANAGEMENT AND REPORTING – NON-PKCT ROADS

The following flowchart shows the steps that must be followed to ensure that any incident is cleared as quickly as possible.



To ensure quick response, all incidents must be reported immediately to your shift supervisor. For incidents on the public road network contact emergency services and TfNSW as required and others if support is needed. For incidents at the mine site and PKCT, the site controller shall be contacted (i.e. mine site or PKCT as appropriate).

- PKCT Driver’s Code of Conduct 2025
- PKCT Driver’s Code of Conduct Implementation Plan August 2025
- PKCT - Drivers Code of Conduct Compliance Audits
- Implementation Plans & Induction protocols and acknowledgements
- Interviews with PKCT and Linfox Management

PKCT and Linfox conduct routine audits and Environmental Task Observations to verify compliance with incident management and reporting requirements for non-PKCT roads. Drivers are briefed during induction on incident response and notification procedures. Interviews with PKCT and Linfox management confirmed that incident reporting processes are understood and implemented by drivers.

C

N/A

22. CONTACT NUMBERS

Contact numbers are detailed in Table 4 below.

Noted

Note

Noted

N/A

Table 4 DCC Contact Numbers

Organization	Emergency Contact Number
Emergency Services	000
TfNSW Transport Management Centre	131 700

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	Port Kembla Coal Terminal Emergency Number	0242-211812			
	Shipper	The mine site's emergency number as advised			
	PKCT Supervisor	0418 238 817			
	PKCT Main Control Room	42 211 807			

23. MANAGEMENT OF NON-COMPLIANCES

<p>Trucking Companies shall ensure their drivers (including sub-contractors) are instructed on PKCT's requirements and provide the necessary supervision and corrective actions to ensure compliance. Where non compliances with these procedures are observed PKCT representatives will:</p> <p>(1) 1st Occasion: Where possible approach the driver involved, draw attention to the non-compliance and advise of the behaviour required. Take the registration number of the truck and the fleet number (large number displayed on rear of trailer) of the truck and advise that the incident will be recorded as a warning under this procedure in the PKCT Event Management System and that three warnings will result in the driver being precluded from entering PKCT. If unable to approach the driver, communication should be made with both the trucking company's supervisor on site and/or PKCT management to progress this issue in a timely manner. A PKCT event will be created by a PKCT Representative to record and track this issue. The relevant Shipper will be notified of the incident in writing and requested to do the following:</p> <p>a) Formally advise the person of the warning b) Counsel the person involved and advise of the consequences of further non compliances c) Reinstruct the person of PKCT's requirements d) Notify PKCT of the driver's name for PKCT's records.</p> <p>(2) 2nd Occasion: Where possible approach the driver involved, draw attention to the non-compliance and advise of the behaviour required. Take the registration number of the truck and the fleet number (large number displayed on rear of trailer) of the truck and advise that the incident will be recorded as a warning under this procedure in the PKCT Event Management System and that three warnings will result in the driver being precluded from entering PKCT. If unable to approach the driver, communication should be made with both the trucking company's supervisor on site and/or PKCT management to progress this issue in a timely manner. A PKCT event will be created by a PKCT Representative to record and track this issue.</p> <p>The relevant Shipper will be notified of the incident in writing and requested to do the following: repeat the steps (a) to (d) advise the driver that this is their second warning and that a third will result in the driver being precluded from entering PKCT of the second warning.</p> <p>(3) 3rd Occasion: If a PKCT employee observes a non – compliance and it is found that a driver has received two previous warnings, the trucking company shall do (a) and (d) and advise the driver he is banned from the site.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements ▪ Heavy Haulage Induction Script 	<p>PKCT and Linfox undertake routine audits and Environmental Task Observations to verify compliance with DCC requirements and to identify non-compliances. Non-compliances are recorded and managed through documented escalation and enforcement processes. ERM reviewed EMS records and task observation documentation and confirmed active management of driver behaviour, including corrective actions where required.</p>	<p>C</p>	<p>N/A</p>
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No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
24. TRUCK BREAKDOWN RESPONSE WHILE AT PKCT					
	<p>In the event that a truck driver needs to exit the cab at PKCT site for any reason (outside the designated parking area) the following process steps apply:</p> <ol style="list-style-type: none"> 1. The truck driver is to make their truck safe, secure as per the parking procedure and stay in the cab. 2. Truck driver to notify other drivers in the area. 3. Truck driver to notify the Road Supervisor and communicate the current situation. 4. The Road Supervisor is to notify immediately PKCT's Main Control Tower on 4221 1807 to dispatch the PKCT representative and isolate the circuit if required. 5. A PKCT representative will attend the site to ensure the area is made safe and make any necessary PKCT operational decisions. 6. Truck driver only to exit the cab at the direction of the Road Supervisor / PKCT representative and upon confirmation that the truck is secure. Chock vehicle as required. 7. For any services that the trucking companies organise to attend site in response to the break down, the following protocols should be complied with: <ol style="list-style-type: none"> a. The person attending site will need to be inducted to PKCT site (or be escorted on site by a PKCT representative). b. Prior to any work on our site an Authority to Work form will need to be generated and authorised by a PKCT representative, inclusive of a JSEA for that specific work on PKCT site. c. While on our site ensure all road signs and PKCT Truck driver rules are followed as per this procedure. <p>In the event that a truck breaks down outside of PKCT site boundary, but within the inner harbour terminal boundary, the same level of safety and environmental standard is recommended as that stated above. When not on PKCT site, i.e. Port Kembla Road or Seawall Road, trucking company employees will need to work with PKCT to mitigate any safety, environmental and operational implications in these areas.</p>	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with truck breakdown response procedures. Drivers are briefed during induction on breakdown protocols and communication requirements.</p>	<p>C</p>	<p>N/A</p>
25. SPILLS					
	<p>If there is a product spill while loading/unloading or en-route the driver must:</p> <ul style="list-style-type: none"> • Put out warning triangles where it is safe to do so • Immediately warn persons in the area who may be at risk. If there is flammable material, all people should be warned • Inform the Shift Supervisor immediately so that emergency services can be contacted, where applicable, and clean up can be initiated. All spills must be adequately cleaned up and waste disposed of in an acceptable environmental manner. The Road Transport Provider shall include PKCT and/or Shipper in notifications as part of the emergency response where support is needed or subsequently as part of incident reporting refer to the DCC Implementation Plan (DCCIP). 	<ul style="list-style-type: none"> ▪ PKCT Driver's Code of Conduct 2025 ▪ PKCT Driver's Code of Conduct Implementation Plan August 2025 ▪ PKCT - Drivers Code of Conduct Compliance Audits ▪ Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits of trucking activities to verify compliance with the Drivers Code of Conduct (DCC). As part of the induction process, drivers are briefed on the required procedures for responding to product spills, ensuring they understand the appropriate</p>	<p>C</p>	<p>N/A</p>

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
			spill-response protocols while operating on site.		
26. HAZARD REPORTING					
	Road conditions and traffic hazards can impact on road safety and increase noise impacting on residential area. Items such as potholes and poor sequencing of traffic lights shall be reported by drivers to shift supervisors. Road Transport Providers shall notify Shippers who shall investigate and action as appropriate.	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements 	<p>PKCT conducts routine audits and Environmental Task Observations to verify compliance with hazard reporting requirements. Drivers are briefed during induction on the need to report road conditions and traffic hazards.</p> <p>Review of audit documentation confirmed hazard reporting is addressed through established processes.</p>	C	N/A
27. IMPLEMENTATION, COMPLIANCE AND MONITORING REVIEW					
	<p>Under this DCC it is proposed that regular audits of the DCC will be carried out to monitor performance, particularly in relation to noise minimisation around PKCT.</p> <p>Audits will be completed regularly by PKCT, Shippers and Road Transport Providers checking compliance against the DCC including the following activities:</p> <ul style="list-style-type: none"> Speed of trucks Compression braking Truck washing and correct use of truckwash Load covering. <p>In addition to the above audits, formal observations will be made of compliance by the Road Transport Providers, Shippers and PKCT. Audits and observations will cover road transport in the following areas:</p> <ul style="list-style-type: none"> En-route from mine to PKCT At the PKCT site At the mine site. <p>The Driver’s Code of Conduct Implementation Program MP.BM.453 sets out the means by which the Code of Conduct is applied. This Implementation Program:</p> <ul style="list-style-type: none"> Incorporates the key elements of the DCC 	<ul style="list-style-type: none"> PKCT Driver’s Code of Conduct 2025 PKCT Driver’s Code of Conduct Implementation Plan August 2025 PKCT - Drivers Code of Conduct Compliance Audits Implementation Plans & Induction protocols and acknowledgements Linfox – Drivers Code of Conduct Compliance Audits Heavy Haulage Induction Script Heavy Haulage Induction Question and Answers iAuditor Records AEMRs for 2023-2024, 2024-2025 	<p>PKCT and Linfox conduct routine audits and Environmental Task Observations to verify ongoing implementation and effectiveness of the Driver’s Code of Conduct. ERM reviewed EMS, iAuditor and task observation records and confirmed active monitoring, review and reporting of DCC performance, including annual reporting through the AEMR.</p>	C	N/A

No	Assessment Requirement	Reference/Evidence	Comments	Compliance Status	Recommendations
	<ul style="list-style-type: none"> • Clarifies the process for management implementation of the DCC • Provides transparency for responsibilities by all stakeholders including PKCT, Shippers Road Transport Providers. <p>The key elements of the Implementation Program include:</p> <ul style="list-style-type: none"> • Commitment to DCC • Monthly Reports, Quarterly Meetings and Annual Review and Report • Key operational focus areas • Driver Induction Program • Audits and Enforcement. <p>Review of the DCC and its associated Implementation Program shall be undertaken in accordance with DPIE Project Approval 08_0009 and shall entail an annual review of DCC performance. Results shall be reported in the Annual Environment Management Report (AEMR).</p> <p>AEMR's are submitted to the DPIE and made available to other regulators and the community through PKCT's web site www.pkct.com.au. Reviews are also undertaken through the Independent External Audit (IEA) process, initially 2 years from the original DPI project approval date and 3 years thereafter.</p>	<ul style="list-style-type: none"> ▪ Interviews with Linfox and PKCT Management ▪ PKCT IEA 2023 			



APPENDIX D

PLANNING SECRETARY AUDITOR
APPROVAL

Department of Planning, Housing and Infrastructure

Reference: MP08_0009-PA-79

Mr Luke Pascot
Environmental Specialist
PORT KEMBLA COAL TERMINAL LIMITED
16/01/2026

Sent via the Major Projects Portal only

Subject: Port Kembla Coal Terminal - Independent Environmental Auditor 2026

Dear Mr Pascot

I refer to your request of 15 January 2026 seeking the agreement of the Planning Secretary of the NSW Department of Planning, Housing and Infrastructure (the Department) of the suitability of the auditors' qualifications, experience and independence to undertake the upcoming Independent Environmental Audit of Port Kembla Coal Terminal (the development), in accordance with Schedule 4, Condition 5 of SSD 08_0009 (the consent).

Having considered the qualifications and experience of the proposed audit team, I, as the nominee of the Planning Secretary, endorse the appointment of:

- Mr Lucas Wilson, Lead Auditor;
- Ms, Stephanie Yee, Support Auditor;
- Ms Jeny Luk, Technical Review and Approver; and
- Mr James Grieve, Air Quality Specialist,

to undertake the audit in accordance with Schedule 4, Condition 5 of the approval. This approval is conditional on the audit team being independent of the development and maintaining certification as lead or principal auditors with a relevant industry body. The Department reserves the right to request an alternate auditor or audit team for future audits.

Please note, the Lead Auditor must attend the site inspection/s.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the Independent Audit Guideline dated May 2020. A copy of this guideline can be located at <https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>. The audit team may also wish to have regard to the AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

The audit report is to include the following:

- consultation with the relevant agencies;

Department of Planning, Housing and Infrastructure

- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term “partial compliance”;
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

Within six weeks of completing this audit, you are to submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Planning Secretary, it is recommended that you review the report to ensure it complies with the relevant consent conditions.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary



APPENDIX E

DECLARATION OF INDEPENDENCE

Declaration of Independence Form

Declaration of Independence - Auditor


Project Name	Port Kembla Coal Terminal ('PKCT')
Consent Number	08_0009
Description of Development	Coal exporting facility for coking and thermal coal.
Project Address	Port Kembla Road, Wollongong, NSW 2500 LOT 1 DP 1125445, LOT 3 DP 1125445, LOT 81 DP 1250940, LOT 222 DP 1250943
Proponent	Port Kembla Coal Terminal Limited
Date	18 August 2025

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Lucas Wilson
Signature	
Qualification	BEng (Mechanical)
Company	Environmental Resources Management Australia Pty Ltd (ERM)

Declaration of Independence Form

Declaration of Independence - Auditor


Project Name	Port Kembla Coal Terminal ('PKCT')
Consent Number	08_0009
Description of Development	Coal exporting facility for coking and thermal coal.
Project Address	Port Kembla Road, Wollongong, NSW 2500 LOT 1 DP 1125445, LOT 3 DP 1125445, LOT 81 DP 1250940, LOT 222 DP 1250943
Proponent	Port Kembla Coal Terminal Limited
Date	03 December 2025

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Stephanie Yee
Signature	
Qualification	Bachelor of Environmental Science and Bachelor of Economics - UTS
Company	Environmental Resources Management Australia Pty Ltd (ERM)

Declaration of Independence Form

Declaration of Independence - Auditor


Project Name	Port Kembla Coal Terminal ('PKCT')
Consent Number	08_0009
Description of Development	Coal exporting facility for coking and thermal coal.
Project Address	Port Kembla Road, Wollongong, NSW 2500 LOT 1 DP 1125445, LOT 3 DP 1125445, LOT 81 DP 1250940, LOT 222 DP 1250943
Proponent	Port Kembla Coal Terminal Limited
Date	15 January 2026

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	James Grieve
Signature	
Qualification	Bachelor of Engineering (Mech, Hons)
Company	Environmental Resources Management Australia Pty Ltd (ERM)

Declaration of Independence Form

Declaration of Independence - Auditor

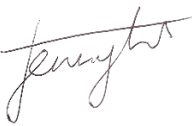
Project Name	Port Kembla Coal Terminal ('PKCT')
Consent Number	08_0009
Description of Development	Coal exporting facility for coking and thermal coal.
Project Address	Port Kembla Road, Wollongong, NSW 2500 LOT 1 DP 1125445, LOT 3 DP 1125445, LOT 81 DP 1250940, LOT 222 DP 1250943
Proponent	Port Kembla Coal Terminal Limited
Date	14 January 2026

I declare that:

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	Jenny Luk
Signature	
Qualification	Exemplar Global Lead Auditor (ISO14001:2015)
Company	Environmental Resources Management Australia Pty Ltd (ERM)



APPENDIX F

STAKEHOLDER CORRESPONDENCE

Lucas Wilson

From: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>
Sent: Thursday, 22 January 2026 10:57 AM
To: Stephanie Yee
Cc: Lucas Wilson; Luke Pascot; Katrina O'Reilly
Subject: RE: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL MESSAGE

Hi Stephanie,

Thank you for consulting the NSW Department of Planning, Housing and Infrastructure on the upcoming IEA for PKCT. In addition to the consent requirements, please review the management of air quality and complaints management.

Please ensure all relevant stakeholders, as identified in the consent are consulted during the course of the audit.

Thank you kindly,
Georgia

From: Stephanie Yee <stephanie.yee@erm.com>
Sent: Friday, 16 January 2026 3:08 PM
To: Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>
Cc: Lucas Wilson <Lucas.Wilson@erm.com>; Luke Pascot <luke.pascot@pkct.com.au>
Subject: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request

Dear Georgia,

We are currently completing the Independent Environmental Audit (IEA) on the Conditions of Approval issued to PKCT, PA 08_0009.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed over the period 28-29 January 2026, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised ahead of the date of the visit.

I can be contacted at the details outlined below to discuss further should you wish to discuss anything.

Kind regards,



Sustainability is our business

Stephanie Yee
Consulting Associate

Sydney
+6185868755

erm.com

A dark blue banner with white and teal text. On the left, it says "RATE THE RATERS 2025" in teal, followed by "ESG ratings in evolution" in large white font, and "Corporate survey results" in smaller white font below it. On the right, there is a small white sunburst icon above the text "ERM SUSTAINABILITY INSTITUTE". At the bottom right, there is a teal rounded rectangle with the white text "LEARN MORE".

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Lucas Wilson

From: Fergus Cowan <Fergus.Cowan@epa.nsw.gov.au>
Sent: Monday, 19 January 2026 11:32 AM
To: Stephanie Yee
Cc: Lucas Wilson; Luke Pascot
Subject: RE: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL MESSAGE

Hi Stephanie

Thank you for the consultation. The main suggested areas of focus from the EPA are:

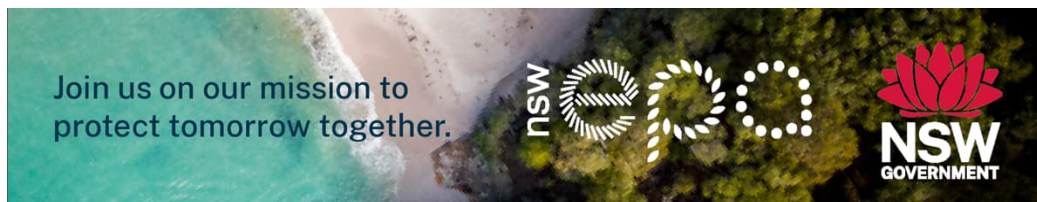
- Stormwater management
- Drag-out on roadways
- Dust management

Regards,

Fergus Cowan

Operations Officer
Regulatory Operations
NSW Environment Protection Authority
T 02 4224 4132 | M 0472 847 542 | www.epa.nsw.gov.au

Working days: Monday to Friday



The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

I work on Dharawal Country.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Stephanie Yee <stephanie.yee@erm.com>
Sent: Friday, 16 January 2026 3:07 PM
To: Fergus Cowan <Fergus.Cowan@epa.nsw.gov.au>
Cc: Lucas Wilson <Lucas.Wilson@erm.com>; Luke Pascot <luke.pascot@pkct.com.au>
Subject: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request

Dear Fergus,

We are currently completing the Independent Environmental Audit (IEA) on the Conditions of Approval issued to PKCT, PA 08_0009.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed over the period 28-29 January 2026, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised ahead of the date of the visit.

I can be contacted at the details outlined below to discuss further should you wish to discuss anything.

Kind regards,



Stephanie Yee
Consulting Associate

Sydney
+6185868755

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If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Lucas Wilson

From: Stephanie Yee
Sent: Friday, 16 January 2026 3:08 PM
To: 'brendanleo@hotmail.com'
Cc: Lucas Wilson; Luke Pascot
Subject: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request
Attachments: ERM Audit Terms of Reference - PKCT.pdf

Dear Brendan,

We are currently completing the Independent Environmental Audit (IEA) on the Conditions of Approval issued to PKCT, PA 08_0009.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed over the period 28-29 January 2026, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised ahead of the date of the visit.

I can be contacted at the details outlined below to discuss further should you wish to discuss anything.

Kind regards,



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Stephanie Yee
Consulting Associate

Sydney
+6185868755

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ERM SUSTAINABILITY INSTITUTE

Lucas Wilson

From: Stephanie Yee
Sent: Thursday, 22 January 2026 11:37 AM
To: council@wollongong.nsw.gov.au
Cc: Lucas Wilson; Luke Pascot
Subject: Port Kembla Coal Terminal Environmental Audit 2026 Consultation Request
Attachments: ERM Audit Terms of Reference - PKCT.pdf

To the Council,

We are currently completing the Independent Environmental Audit (IEA) on the Conditions of Approval issued to PKCT, PA 08_0009.

One of the requirements of the audit is that it is to be undertaken in consultation with relevant agencies. To that end, this email invites you to raise any questions or concerns regarding this project from an environmental management aspect.

The attached Terms of Reference outlines the audit process. The site inspection will be completed over the period 28-29 January 2026, therefore it would be appreciated if there are any concerns, areas of focus etc., they are raised ahead of the date of the visit.

I can be contacted at the details outlined below to discuss further should you wish to discuss anything.

Kind regards,



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Stephanie Yee
Consulting Associate

Sydney
+6185868755

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ERM SUSTAINABILITY INSTITUTE

Lucas Wilson

From: Wollongong City Council <council_customerservice@wollongong.nsw.gov.au>
Sent: Monday, 2 February 2026 11:37 AM
To: Stephanie Yee
Subject: Request CR0397399 completed

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

EXTERNAL MESSAGE

Hello ERM- Stephanie Yee,

Thanks for logging CR0397399 relating to General Enquiry/Contact Customer at Port Kembla Road WOLLONGONG NSW 2500 on 22 January 2026 with us. This request has been reviewed and closed.

Outcome: Spoke to Stephanie 2/2/26 regarding the audit. Confirmed that it did go ahead on the 28-29/1 and it appears compliant.

Apologised as to lack of response as there was glitch in the system and it was allocated to me while on leave.

To view the details of this request, you can follow this link : [Tracking Link](#)

We value your feedback, so please take a few minutes to let us know about [your experience](#).

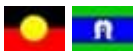
Regards,



Wollongong City Council
Website wollongong.nsw.gov.au
Email council@wollongong.nsw.gov.au
Phone +61 2 4227 111



We acknowledge the Traditional Custodians of the land on which our city is built, the Aboriginal people of Dharawal Country. We recognise and appreciate their deep connection to this land, waters and the greater community.





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Environmental Resources
Management

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