PKCT
ANNUAL ENVIRONMENTAL MANAGEMENT REPORT

1 JULY 2023 – 30 JUNE 2024

PKCT 2023-2024 AEMR

TABLE OF FIGURES

1. TITLE BLOCK

Name of Operation	Port Kembla Coal Terminal Project
Name of Operator	Port Kembla Coal Terminal Ltd
Development consent / project approval #	08_0009
Name of holder of development consent / project approval	Port Kembla Coal Terminal Ltd
Land #	Lot 222 DP 1250953 and, Lots 1 and 3 in DP1125445
Name of holder of land lease	NSW Ports (rented from)
Environment Protection Licence #	EPL 1625
Planning Approval start date	12th June 2009
AEMR start date	1st July 2023
AEMR end date	30th June 2024

I, Luke Pascot, certify that this audit report is a true and accurate record of the compliance status of Port Kembla Coal Terminal Ltd for the period 1st July 2023 to 30th June 2024 and that I am authorised to make this statement on behalf of Port Kembla Coal Terminal Ltd.

Note.

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

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

Name of authorised reporting officer	Luke Pascot
Title of authorised reporting officer	Environmental Specialist
Signature of authorised reporting officer	Luke Pascot
Date	30/07/2024

2. STATEMENT OF COMPLIANCE

Development Approval / Licence	Compliant?
Development Approval 08_0009	No
EPL 1625	No

Figure 1: Statement of compliance

Licence / Development Approval (DA)	Condition #	Condition description (Summary)	Compliance status	Comment	Where addressed in Annual Review
EPL 1625 / DA 08_0009	L1.1 / Schedule 3, Condition 12	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	Non-compliant	See detail in AEMR	8.1

Figure 2: Non-compliances

3. INTRODUCTION

3.1. Purpose

The purpose of this Annual Environment Management Report (AEMR) is to provide the Department of Planning, Industry and Environment (DPI&E), formally Department Planning and Environment, and other stakeholders a report of Port Kembla Coal Terminal's (PKCT's) environmental performance together with actions taken in relation to environmental control and regulatory compliance across the July 2023 to June 2024 reporting period.

3.2. Scope

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

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

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

3.3. Background

PKCT is located on Lot 1 DP1125445, Lot 3 DP1125445, Lot 222 in DP 1250943 and Lot 81 DP 1250940 on the northern side of the Inner Harbour of Port Kembla, Wollongong.

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

In October 2020, NSW Ports, PKCT and Australian Industrial Energy (AIE) agreed to a surrender of the southernmost portion of the PKCT to AIE for construction and operation of a Liquid Natural Gas (LNG) Terminal. The surrender became active on 18 April 2021. As a result of the reduced site boundary, PKCT reviewed and resubmitted for approval all Management Plans required under Approval 09_0009 and EPL 1625. Subsequently, the EPA and DPI&E approved the revised plans and Licence.

Six equal shareholders, namely Illawarra Services Pty Ltd, Oakbridge Pty Ltd, Centennial Coal Company Pty Limited, Tahmoor Coal Pty Ltd, Metropolitan Collieries Pty Ltd and Wollongong Resources Pty Ltd (formerly Wollongong Coal), form the Board of PKCT. South32, reporting to the PKCT Board, manages PKCT under a management contract. PKCT is the major coal intermodal facility in southern NSW for the transfer of coal from rail and road to ship.

PKCT is responsible for receiving, assembling and loading coal from the southern and western NSW coalfields and for transport by ship to international and domestic markets, see Figure 4. Following the surrender of Berth 101 and the southern portion of the terminal land to AIE on 18th April 2021, PKCT now has a single bulk handling facility being; a high capacity Coal Berth (Berth 102) that handles the loading of coal. See Figure 3.

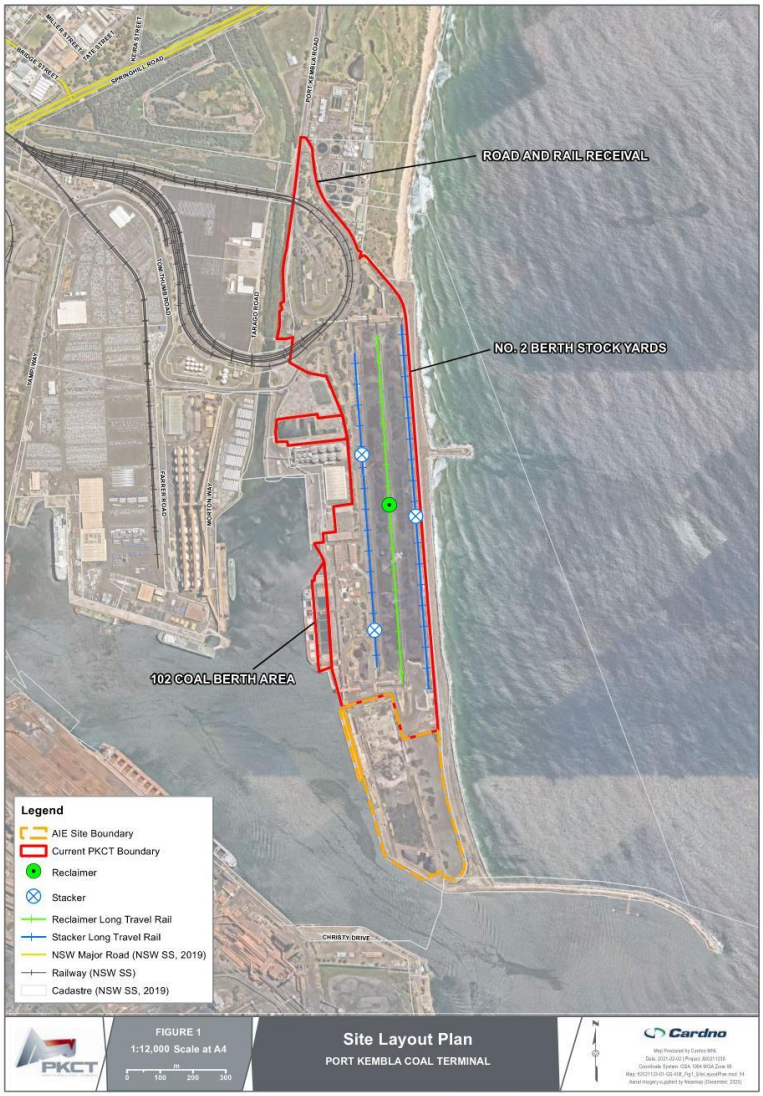


Figure 3: PKCT site boundary and surrounding land use

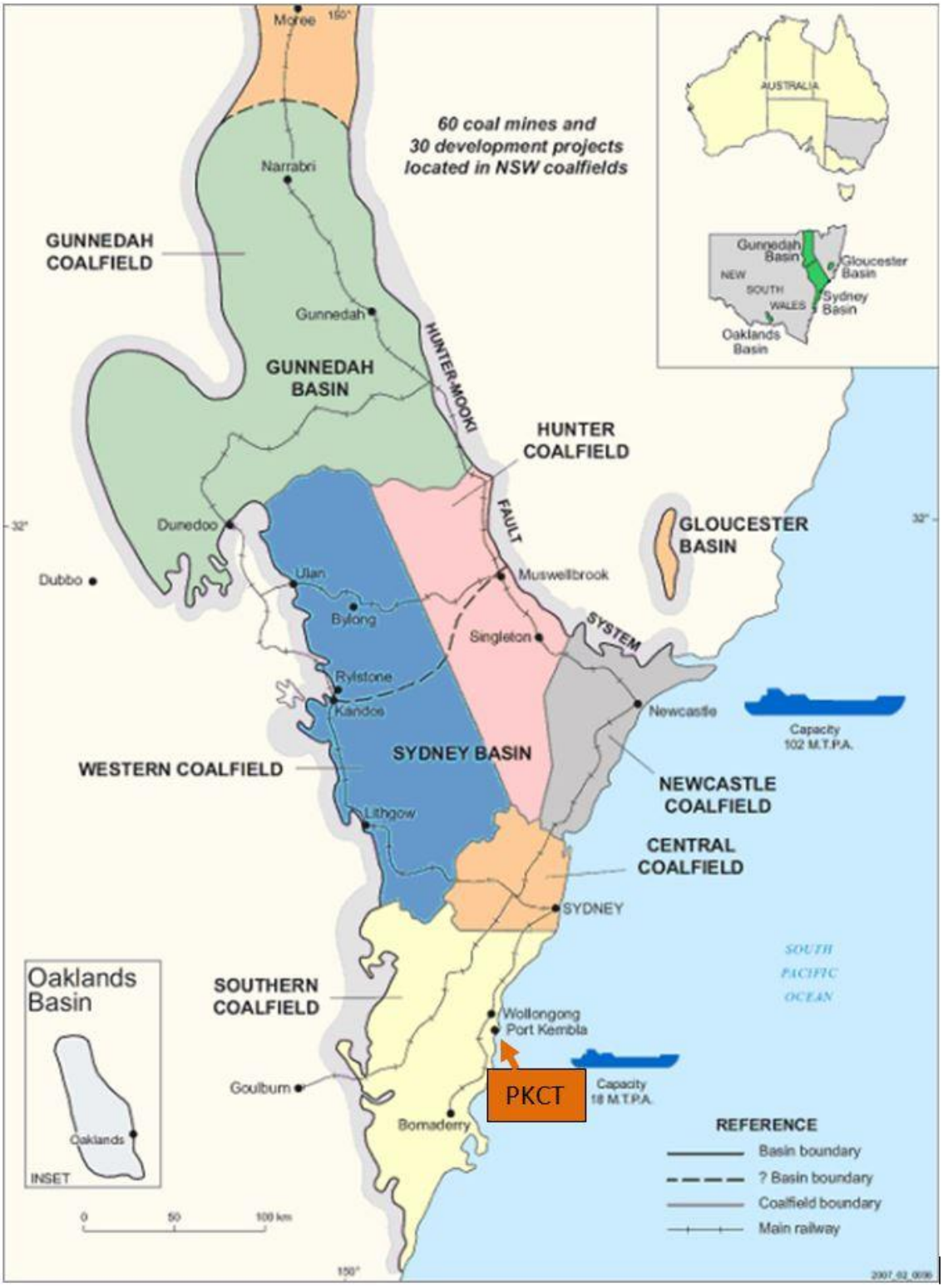


Figure 4: PKCT regional context (source; NSW Department of Planning and Environment Resources and Energy website 2017)

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

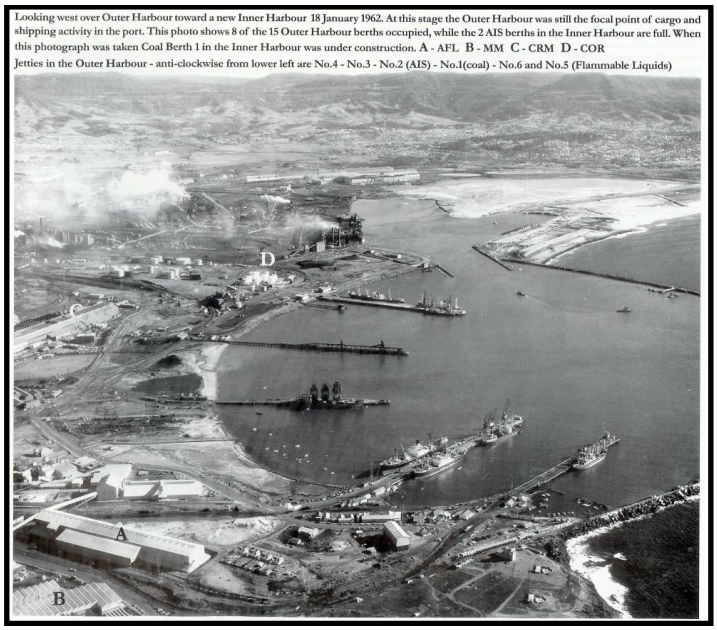


Figure 5: Early image of Port Kembla Inner Harbour. Image referenced from "Roadstead to World Class Port", Port Centenary Committee 1999.

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

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

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

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

3.4. Objectives

The objective of this AEMR is to provide a report that outlines the environmental monitoring, mitigation, assessments and management actions undertaken by PKCT over the July 2023 to June 2024 reporting period.

3.5. Environment Management

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

- Sustainable Development Policy PO.BM.291
- Environment Policy PO.HS.85

- Quality Policy PO.004
- Environment Management Strategy MP.HS.464
- Noise Management Plan MP.HS.387
- Air Quality Management Plan MP.HS.386
- Driver Code of Conduct Implementation Plan MP.BM.453
- Water Management Plan MP.HS.462
- Green and Golden Bell Frog Management Plan MP.HS.109
- Landscape Management Plan MP.HS.470
- Greenhouse Gas and Energy Efficiency Management Plan MP.HS.461
- Waste Management Plan MP.HS.460
- Fire Management Plan MP.HS.459

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

3.6. Terminal Contact

Figure 6 below identifies relevant contacts at PKCT.

PKCT Employee & Position	Contact Details
David Richards General Manager	(02) 4228 0288 David.Richards@pkct.com.au
Darren Coleman Operations Manager	(02) 4228 0288 Darren.Coleman@pkct.com.au
Mark Beale Planning and Logistics Lead	(02) 4228 0288 Mark.Beale@pkct.com.au
Luke Pascot Environmental Specialist	(02) 4228 0288 Luke.Pascot@pkct.com.au
Michael Curley HSER Superintendent	(02) 4228 0288 Michael.Curley@pkct.com.au
Community Hotline	1800 111 448 communitylinks@pkct.com.au

Figure 6: PKCT contacts

3.7. Actions Arising From Previous AEMR Review

The 2022/2023 AEMR was submitted to the DPI&E as required in July 2023.

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

Action Required from Previous AEMR	Requested by	Action taken by PKCT	Where discussed in AEMR
No actions required from the 2022/2023 Review	n/a	n/a	n/a

Figure 7: Actions required from the previous AEMR

4. ADMINISTRATIVE CONDITIONS

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

Administrative Condition	AEMR Section
Obligation to Minimise Harm to the Environment	4.1
Terms of Approval	4.2
Limits on Approval	4.3
Management Plans / Monitoring Programs	4.4
Surrender of Consents	4.5
Structural Adequacy	4.6
Demolition	4.7
Operation of Plant and Equipment	4.8
Dispute Resolution	4.9

Figure 8: Administrative conditions

4.1. Obligation to minimise harm to the Environment

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

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

PKCT has in place an Environmental Aspects and Impacts Register. This document provides a framework whereby PKCT identifies, records, risk-ranks and provides controls for activities associated with the operation that have the potential to cause harm to the environment. The register is reviewed at least annually. The register was last reviewed in January 2024.

4.2. Terms of Approval

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

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

4.3. Limits on Approval

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

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

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

PKCT did not receive more than 7.5 million tonnes of coal and bulk products by public road during the 2023 calendar year.

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

4.4. Management Plans / Monitoring Programs

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

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

4.5. Surrender of Consents

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

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

4.6. Structural Adequacy

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

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

4.7. Demolition

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

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

4.8. Operation of Plant & Equipment

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

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

4.9. Dispute Resolution

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

PKCT accepts the dispute resolution process. This condition is referenced in the PKCT Environment Management Strategy.
There were no disputes during the reporting period.

5. SPECIFIC ENVIRONMENTAL CONDITIONS

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

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

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

Figure 9: Specific environmental condition overview

5.1. Noise

5.1.1. Noise Standards and Performance Measures

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

Impact Assessment Criteria

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

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

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

Notes:

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

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

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

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

in accordance with the NSW Industrial Noise Policy.

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

Noise Monitoring Program

2. The Proponent shall prepare and implement a Noise Monitoring Program for the project to the satisfaction of the Director-General. This program must:
   (a) be developed in consultation with DECC;
   (b) be submitted to the Director-General for approval within 6 months from the date of this approval, or as otherwise agreed by the Director-General; and
   (c) include a:
      - combination of attended and unattended noise monitoring measures;
      - noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval; and
      - reasonable and feasible best practice noise mitigation measures to ensure project specific noise criteria are met.

Continuous Improvement

3. The Proponent shall:
   (a) continue to implement all reasonable and feasible best practice noise mitigation measures;
   (b) continue to investigate ways to reduce the noise generated by the project, including maximum noise levels which may result in sleep disturbance; and
   (c) report on these investigations and the implementation and effectiveness of these measures in the AEMR to the satisfaction of the Director-General.

5.1.2. Noise Monitoring

5.1.2.1. Noise Monitoring Methodology

Biannual noise monitoring began at PKCT in September 2009. Since this time, monitoring results have been compliant with the noise monitoring criteria set out in PKCT's EPL 1625 and Major Project Approval 08_0009.
As outlined in Section 8.2.3.1 of PKCT's approved Noise Management Plan, if no exceedance of the criteria occurs for 6 years, noise monitoring will not be required to continue.

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

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

5.1.2.2. Noise Monitoring Results and Compliance 2023/2024

Notwithstanding there is no longer a requirement to undertake routine noise monitoring, on 26th November 2020, PKCT engaged a consultant to undertake a noise survey to re-confirm that noise levels, following installation of the new yard machines, remained within the required limits outlined in our Planning Approval 08_0009. The results of the survey confirmed that levels remained below the threshold limits. PKCT continues to maintain and utilise the DPIE approved Noise Management Plan MP.HS.387. The plan is publicly available on PKCT's website.

5.1.3. Trends in Noise Emissions

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

5.1.4. Noise –Activities undertaken during 2023/2024 Reporting Period

A summary of the actions undertaken for the 2023/2024 reporting period relating to noise is presented below.

- PKCT continues to look for opportunities to improve noise levels across its operations.
- PKCT's Noise Management Plan remains a live document and is formally reviewed annually and within the Triennial Independent Audit program.
- PKCT undertook a trial of poly idlers on some conveyors. Measurements before and after installation of the poly idlers showed a 25% reduction in noise (106dB before compared to 80dB after).

5.1.5. Noise - Activities Planned for 2024/2025 Reporting Period

A summary of actions proposed to be undertaken in the 2024/2025 reporting period is presented below.

- PKCT will continue to undertake noise surveys if noise complaints or issues are raised.
- Continuation of the poly idler trial in key locations around site.

5.2. Transport

5.2.1. Transport Standards and Performance Measures

Monitoring of Coal Transport

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

Traffic Management

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

Driver's Code of Conduct

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

5.2.2. Transport Monitoring

5.2.2.1. Transport Monitoring Methodology

Shippers to PKCT are signatories to the PKCT Drivers Code of Conduct (DCC). This document was developed in consultation with the PKCT road receival customers, and their associated road transport providers, Roads and Traffic Authority (now Roads and Maritime Services), EPA, and the PKCT Community Consultative Committee (CCC). The document outlines specific measures focusing on opportunities to minimise, mitigate and manage traffic volume, traffic safety and acoustic impacts. Among others, it specifically covers items such as haulage routes, compression breaking, road delivery standards, truck washing, queuing on Springhill Road, load covering and incident management and reporting.

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

PKCT monitors compliance against the DCC via an audit program. The monitoring of road transport operations is undertaken by PKCT personnel and by the shippers and their associated road transport providers. Audits are undertaken at the mine site, on route and at PKCT. Monthly compliance reports are supplied to PKCT. Road transport providers also undertake driver observations within their own businesses.

5.2.2.2. Transport Monitoring Results and Compliance 2023/2024

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

Shiploading July 2023 to June 2024	Coal		Total (tonnes)
	Coking	Steaming	
Berth 102: Coal Berth (Tonnes)	5,566,369	1,140,351	6,706,720

Receivals July 2023 to June 2024	Private Road	Public Road	Total
Road Receival (Tonnes)	1,397,371	2,345,424	3,742,795
Rail Receival (Tonnes)			2,939,589
		Total Tonnes	6,682,384

Figure 10: Summary of PKCT throughput 2023/2024

Across the reporting period, truck companies undertook 2197 driver observations and 409 audits were completed by PKCT personnel.

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

As part of the monitoring regime, PKCT records and responds to complaints and incidents associated with coal transport to and from PKCT where required. PKCT received no road transport related complaints across the reporting period and one complaint associated with road haulage was made directly to PKCT's Road Transport Provider.

5.2.3. Trends in Transport

Road receival at PKCT was below long-term average levels during the reporting period with 3.74Mt of combined private and public road receivals to end June 2024, Figure 11.

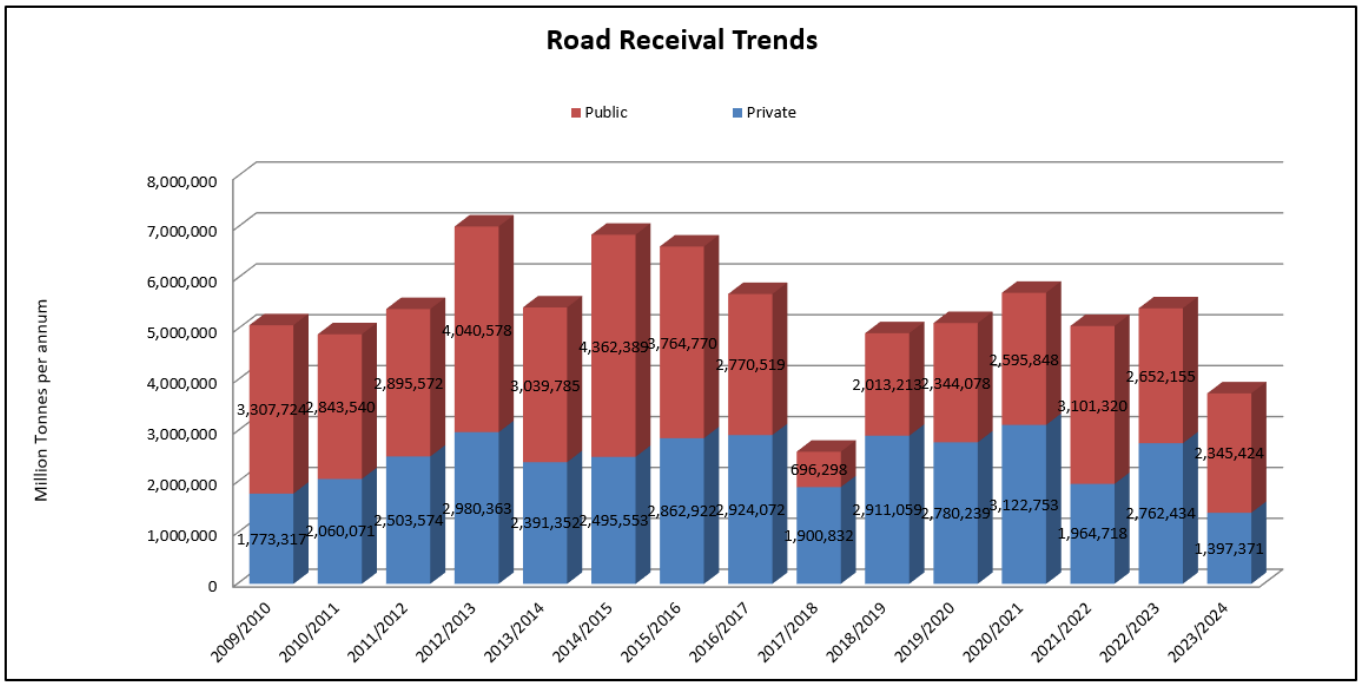


Figure 11: Road receival trends

5.2.4. Traffic –Activities Undertaken During 2023/2024 Reporting Period

A summary of the actions undertaken for the 2023/2024 reporting period related to traffic is presented below.

- Routine task observations and audits have continued, focussing on compliance against dust drag-out, the Driver's Code of Conduct and PKCT's approval conditions.
- Following successful trials of a high-pressure jet road-washing truck in 2020/21 reporting period, the use of this unit has been adopted on an ad-hoc basis to complement the existing road sweeper and water carts with the deep cleaning of the outbound roadways and other areas across site.
- Trial of a small trailer-mounted pressure wash unit was undertaken. The unit was successful in cleaning of roadways however, further engineering is required to ensure that the unit is robust and safe for continued use.
- Drivers' code of conduct was reviewed with no changes required.

5.2.5. Traffic - Activities Planned for 2024/2025 Reporting Period

A summary of the planned actions for the 2024/2025 reporting period related to Traffic is presented below.

- Continue to undertake additional routine Driver's Code of Conduct auditing.
- Focus on cleaning and auditing of outbound road.

5.3. Air Quality

5.3.1. Air Quality Standards and Performance Measures

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

Impact Assessment Criteria

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

Table 3: Long term impact assessment criteria for particulate matter

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

Table 4: Short term impact assessment criteria for particulate matter

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

Table 5: Long term impact assessment criteria for deposited dust

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

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

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

Operations

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

   to the satisfaction of the Director-General.

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

   to the satisfaction of the Director-General.

Air Quality Monitoring Program

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

- reasonable and feasible best practice emissions mitigation measures to ensure project specific assessment criteria are met.

5.3.2. Air Quality Monitoring and Compliance

5.3.2.1. Air Quality Monitoring Methodology

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

- The AQMP, developed in consultation with the EPA, was submitted to DPI&E by the due date of 9th December 2009. The DPI&E approved the AQMP by letter of 25th March 2010.
- The EPA assisted in developing the AQMP though did not add any new air quality criteria to EPL 1625. In the 2014 EPL review, the EPA included new obligations on PKCT to report on continuous dust against the DPI&E Impact Assessment Criteria and this commenced in the 2014/15 EPL Annual Return.
- PKCT's AQMP contains dust monitoring, assessment, reporting and mitigation and management provisions to ensure necessary actions are undertaken and that dust from PKCT's premises does not exceed the criteria in the Impact Assessment Criteria outlined above.
- PKCT provides 24/7 site operational control via the Main Control Room (MCR). MCR operators monitor site conditions and weather forecasts. If dust is observed, action is taken through the operation of sprays or other available controls. Dust events observed which emanate beyond the immediate source with a potential to have off site impacts are entered into PKCT's event management system, requiring investigation and corrective action. PKCT also has an auditing process in place that includes site observations of dust, dust associated with truck movements and the assessment of associated controls.
- Following surrender of the southern portion of the Terminal to the AIE LNG Project in April 2021, rationalisation of the number and location of the existing depositional and continuous dust monitoring equipment was undertaken. PKCT removed two of the 14 depositional gauges and moved the location of the southern continuous dust monitor to within the new PKCT lease area. PKCT now has a total of 12 depositional dust gauges (9 Industrial and 3 residential) located on site and on adjacent port and residential areas, and two continuous dust monitors located to the north and south of the site, see Figure 12 below. These locations included in the revised EPL and Project Approval 08_0009. Dust Samples from each dust deposition gauge are collected on a monthly basis by an environmental contractor and sample analysis is performed at a NATA accredited laboratory. Results from the residential depositional gauges are analysed on a monthly basis and compared to the EPA amenity criteria of 4 grams/m²/month. The results are reported on the PKCT website.

Figure 12: PKCT air quality monitoring sites

5.3.2.2. Air Quality Monitoring Results and Compliance 2023/2024

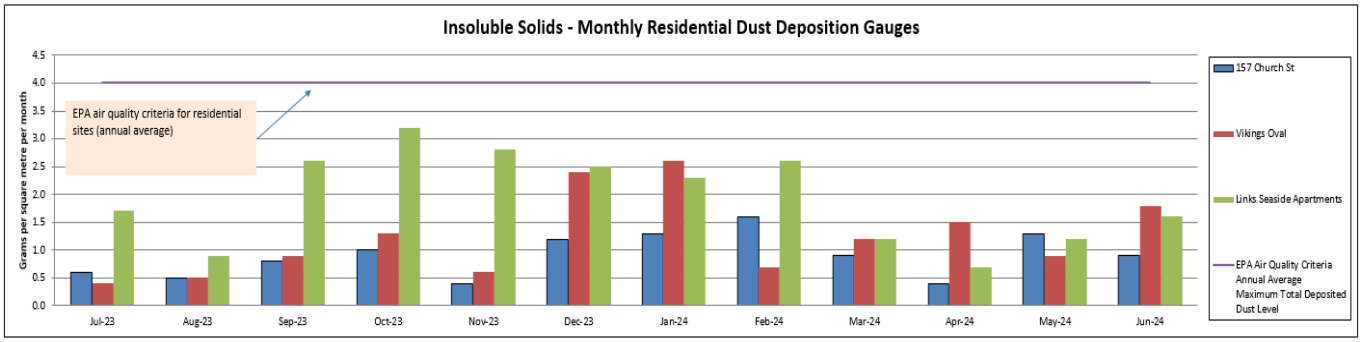
PKCT collects monthly depositional dust records at three residential sites and 9 industrial sites located on or near the PKCT premises.

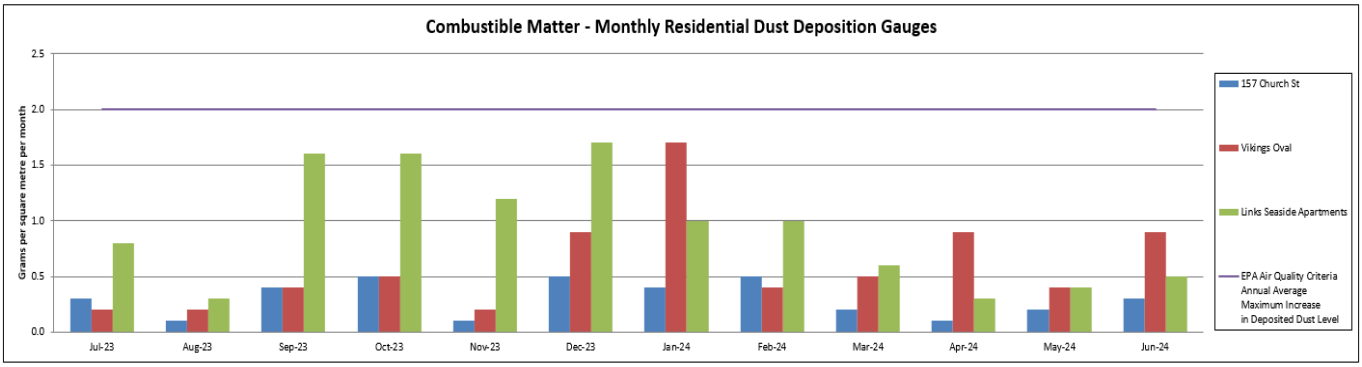
PKCT engages air quality specialists to analyse a range of data obtained from gauges and instruments across the site and neighbouring areas.

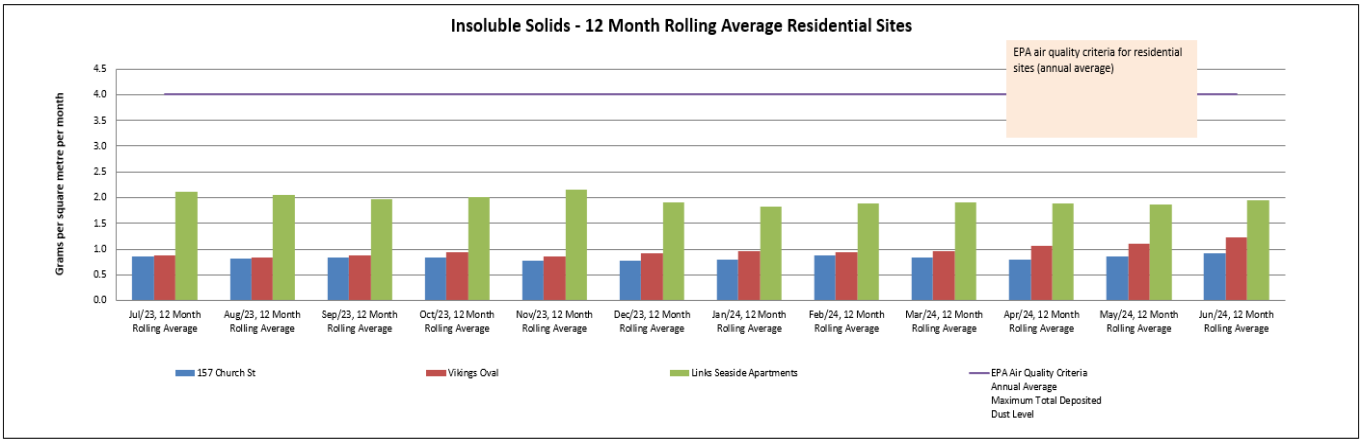
The following conclusions have been made by the consultants from the measurements of dust deposition at the network of residential dust deposition gauges during the July 2023 to June 2024 period.

- The monthly average and annual average insoluble solids did not exceed the 4 g/m²/month trigger level at the Church Street, Vikings Oval and Links Seaside Apartment sites for the July 2023 to June 2024 period.
- The monthly average combustible matter did not exceed the 2 g/m²/month trigger level at the Church Street Vikings Oval and Links Seaside Apartment sites for the July 2023 to June 2024 period.
- Petrographic analysis to determine the insoluble solid components was not required due to no samples exceeding the 2 g/m²/month trigger level for combustible matter.

Individual monthly and 12-month rolling average dust deposition results for the three residential dust gauges are presented in Figure 13 below.







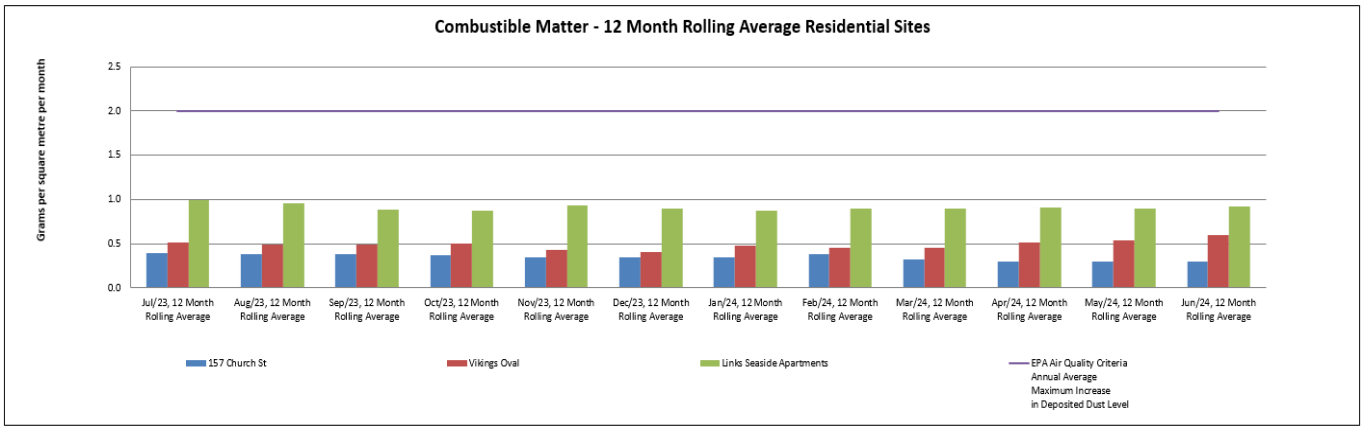


Figure 13: PKCT residential depositional dust gauges data

PKCT utilises nine Industrial Deposition Gauges around site to assist with managing dust. The results are not used for compliance purposes, however operational criteria are used to monitor and track deposition trends.

Combustible Matter is typically an indicator of coal and organic deposits in a sample, and generally has the most relevance for internal monitoring within the site. During the reporting period all nine gauges recorded 12 month rolling average results for Combustible Matter well below the internal assessment criteria across each of the locations.

A summary of the twelve month rolling averages for both insoluble solids and combustible matter at these industrial deposition gauges is presented below in Figure 14 and Figure 15. The 12 month rolling average for site “P3” was temporarily elevated for four months during July to October as a result of strong westerly winds causing an abnormally high “dirt” content measured in the samples during June and July. The measured “dirt” was a product of a nearby construction site excavating during those months. All sites remained below the assessment criteria for the remainder of the reporting period.

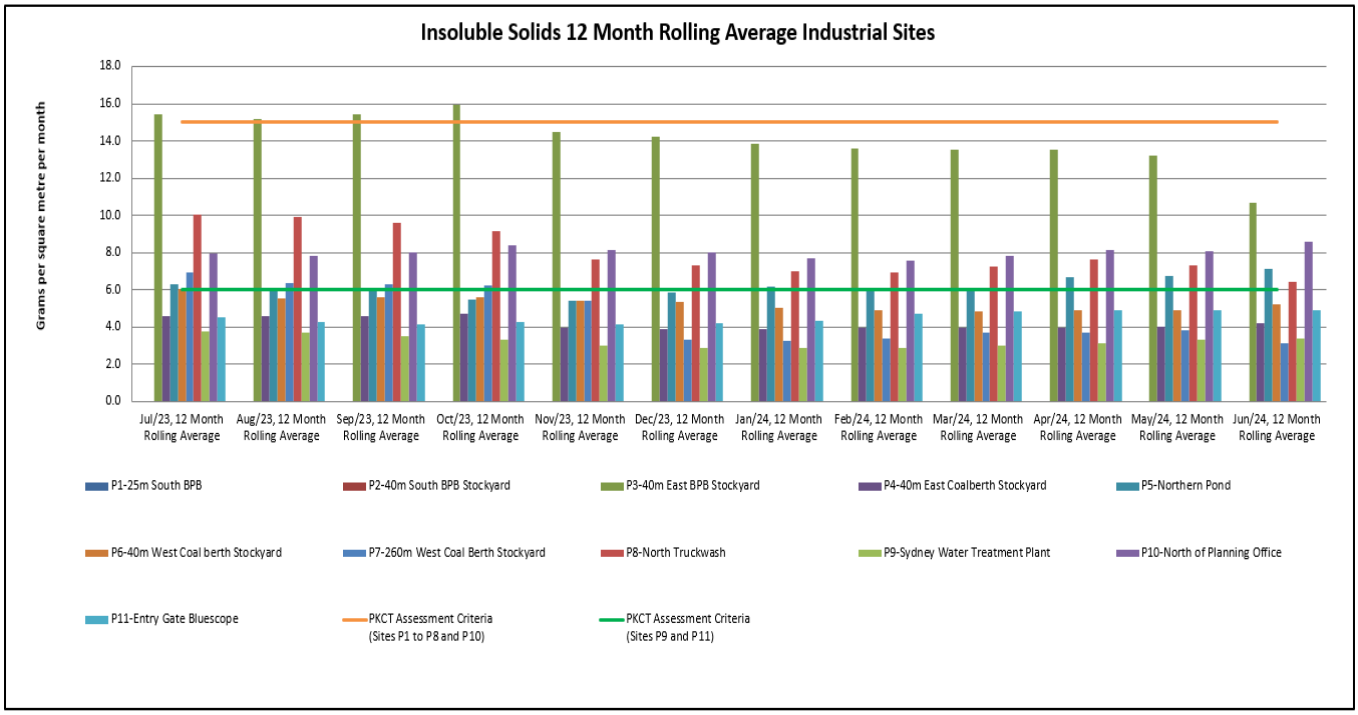


Figure 14: PKCT industrial dust deposition gauges insoluble solids 12 month rolling average

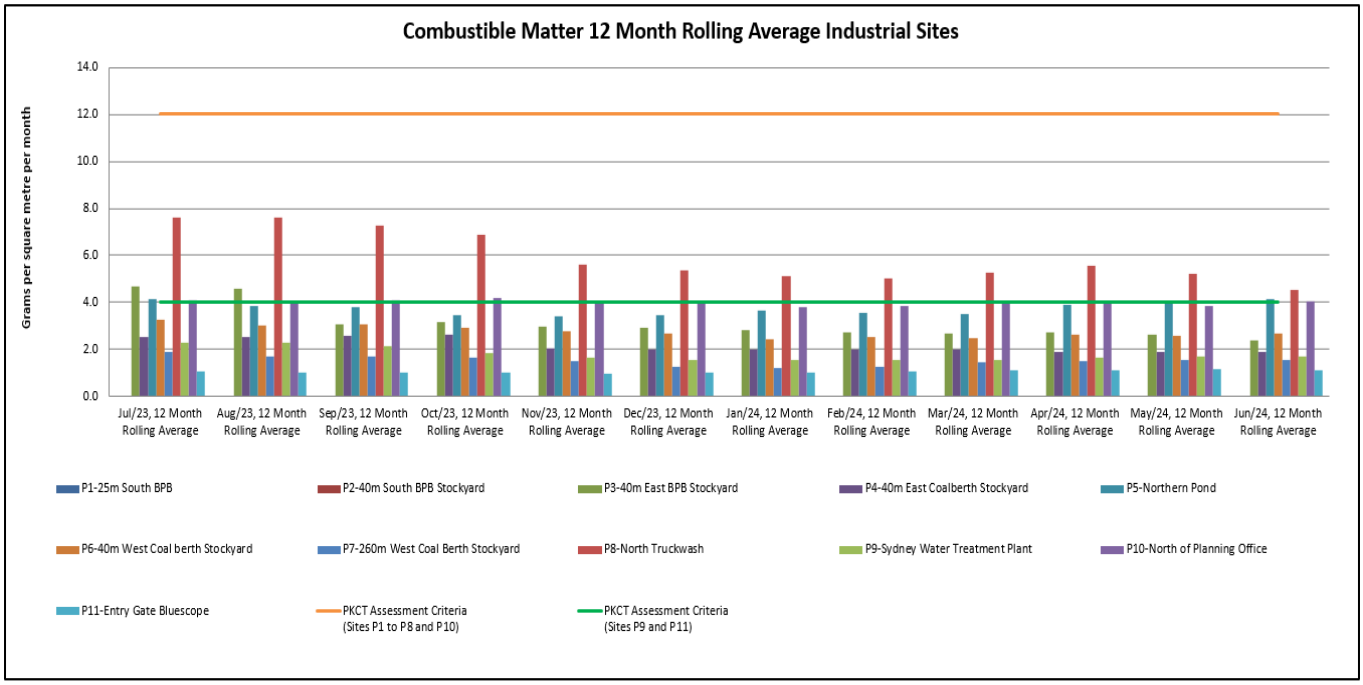


Figure 15: PKCT industrial dust deposition gauges combustible matter 12 month rolling average

In addition to the dust deposition gauges which are analysed monthly, PKCT has in place two continuous dust monitors used to monitor ambient dust conditions. One monitor is located at the southern end of PKCT's premises. The other monitor is located north of PKCT's premises, midway to the residential boundary. Data from these monitors is captured and analysed by specialist air quality consultants engaged by PKCT. Data and exceedances related to the northern monitor are presented with wind data in
Appendix B: Consultant Dust Data Summary and in Figure 16. A summary of the air quality data at the northern dust monitor from PKCT's Air Quality consultant is provided below.

- The data capture rates for dust parameters at the PKCT northern and southern dust monitoring sites were 99.2% and 98.8%, respectively.
- The annual average TSP concentration of 20.8 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 90 µg/m³.
- The annual average PM_{10} concentration of 14.6 µg/m³ at the PKCT northern monitoring site was below the air quality criterion of 30 µg/m³.
- The 24-hour average TSP trigger level of 90 µg/m³ and the 24-hour average PM_{10} air quality standard of 50 µg/m³ were both exceeded at the northern monitoring site on 5 February 2024 when 24-hour average concentrations of 97.9 µg/m³ (TSP) and 74.2 µg/m³ (PM_{10}) were recorded at the site. Analysis has demonstrated that PKCT contributed very little to this exceedance event, which was primarily a result of a regional dust event.
- During the exceedance day at the PKCT northern monitoring site on 5 February 2024, the 24-hour average PM_{10} concentration at the DPE sites were:
    - 50.1 µg/m³ at the Kembla Grange site, also exceeding the PM_{10} air quality standard.
    - 49.7 µg/m³ at the Wollongong site, just below the PM_{10} air quality standard.
    - 30.8 µg/m³ at the Albion Park South site, below the PM_{10} air quality standard.

  The coinciding elevated concentrations indicate that regional particulate levels were elevated during the exceedance period; however, higher concentrations at the PKCT northern monitoring site than at the DPE sites indicate an additional contribution from a local source. The exceedance analysis indicates that PKCT was very infrequently upwind of the monitor on 5 February 2024 and made a negligible contribution, which suggests that local sources other than PKCT also contributed to the exceedance event in addition to the contribution of regional particulate levels.

- There were no other exceedances of the TSP trigger level of 90 µg/m³ or the 24-hour average PM_{10} air quality standard of 50 µg/m³ at the northern monitoring site during the reporting period

PKCT Contribution Rating	Number of TSP Exceedance Days	Number of PM_{10} Exceedance Days
None	1	1
Minimal (0% to 10%)	0	0
Minor (10% to 30%)	0	0
Moderate (30% to 70%)	0	0
Major (70% to 100%)	0	0
Unclassified (missing data)	0	0
Total Exceedance Days	1	1

Figure 16: PKCT contribution ratings for exceedance days during July 2023 to June 2024

5.3.3. Trends in Air Quality

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

Combustible Matter is typically an indicator of coal and organic deposits in a sample. In this reporting period, there were no readings at any of the residential deposition gauges where combustible matter was outside of PKCT's criteria. PKCT's dust management systems were and continue to be operational and the business will monitor and react as necessary to manage dust. The 12 month rolling average values at all residential deposition gauges was well within the reporting criteria.

Residential Air Quality Criteria Number of Exceedances - Insoluble Solids													
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Links Seaside Apartments	Criteria 4 g/m²/month	0	0	1	0	0	0	0	0	1	0	5	1	0
Vikings Oval	Criteria 4 g/m²/month	0	2	0	0	1	1	0	0	1	0	0	0	0
157 Church Street	Criteria 4 g/m²/month	0	0	0	0	1	0	0	0	1	0	0	0	0

Residential Air Quality Criteria Number of Exceedances - Combustible Matter													
		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Links Seaside Apartments	Criteria 2 g/m²/month	0	0	0	0	1	0	0	0	0	0	6 (a)	2	0
Vikings Oval	Criteria 2 g/m²/month	0	2	0	0	2	1	0	0	1	0	0	0	0
157 Church Street	Criteria 2 g/m²/month	0	0	0	0	1	0	0	0	0	0	0	0	0

Figure 17: Annual residential depositional dust gauge trends

A summary of the 2023/2024 depositional and continuous dust gauge data compared to historical records is presented below in Figure 18.

		FY 2011	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Location	Standard	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average	Annual Average
Residential Depositional Gauges												
Total Insoluble Solids												
Vikings Oval (d)	4 g/m² month	1.4	1.1	2.6	1.6	1.0	1.1	1.9	1.1	1.3	0.9	1.2
Church Street (d)	4 g/m² month	3.5	1.1	1.8	1.2	1.0	1.0	1.6	0.6	0.7	0.8	0.9
Ross Street (d)	4 g/m² month	-	1.1	1.4	1.6	1.0	1.3	1.5	1.4	1.8 (b)	2.1	1.9
Combustible Matter												
Vikings Oval (d)	2 g/m² month	0.8	0.8	1.7	0.8	0.5	0.4	0.8	0.6	0.7	0.5	0.6
Church Street (d)	2 g/m² month	0.8	0.6	1.2	0.6	0.4	0.4	0.4	0.2	0.3	0.4	0.3
Ross Street (d)	2 g/m² month	-	0.6	0.8	0.8	0.3	0.5	0.4	0.5	0.8 (b)	1.0	0.9
Continuous Dust Monitor												
TSP												
Northern (c)	90 ug/m³	32.2	45.8	48.3	40.8	34.6	31.1	26.7	28.2	18.3	17.6	20.8
PM10												
Northern (c)	30 ug/m³	25.8	30.8	31.6	28.1	24.4	22.0	19.2	20.9	12.6	12.0	14.6

(b) Data for FY22 reflects a 7 month average. Five months data excluded (Sep; Oct; Feb; Mar; May). The results were well outside of normal values for this location and inconsistent with adjacent sampling locations (refer details in text). Petrographic analysis confirmed that the main constituents were vegetation and extraneous matter not related to PKCT operations.

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

PKCT's Environmental Assessment on Air Quality undertaken in 2008 predicted that impacts to air quality from PKCT would be well below relevant DECC criteria based on existing PKCT operations and the proposal to receive coal by road over a 24/7 period up to a maximum of 10mtpa. Annual average results for the three residential depositional dust gauges show that for both total insoluble solids and for combustible matter, levels are well within the DECC guidelines by the end of the 12 month reporting period. This aligns with the predictions in the Environmental Assessment.

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

5.3.4. Air Quality –Activities Undertaken During 2023/2024 Reporting Period

A summary of the actions undertaken for the 2023/2024 reporting period related to Air Quality is presented below.

- PKCT built and trialled a concept trailer mounted IBC/pressure washer specifically to clean our road network. The unit was successfully used to clean our front road, but unfortunately broke soon after. The concept was successful and will be further developed in the coming year. See Figure 19 below.
- PKCT undertook a project to trial the use of a wetting agent to improve water retention and reduce dust lift-off in some areas across the site. The project utilised a small trailer mounted water tank and "Kapture" dust suppression blocks. The trial proved successful and will be continued when deemed necessary. See Figure 19 below.

Figure 19: Concept trailer mounted road pressure washer and "Kapture" wetting agent trial water cart.

- PKCT has undertaken significant work in recent years at the road receival area including improved washing processes, increasing the areas of hardstand around the facility and planting of ~1200 trees on the western berm wall, adding a wash-down attendant on the outbound side of the wash and additional road cleaning processes. These improvements continue to assist in reducing dust generation from the area in this and future years.

5.3.5. Air Quality - Activities Planned for 2024/2025 Reporting Period

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

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

5.4. Meteorological

5.4.1. Meteorological Monitoring Standards and Performance Measures

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

5.4.2. Meteorological Monitoring

5.4.2.1. Meteorological Monitoring Methodology

PKCT primarily utilises an on-site weather station to measure, monitor and record weather variables. The station measures wind speed and direction, rainfall, air pressure, temperature and humidity continuously at the site. Additionally, PKCT operates two continuous dust monitors that measure PM10, PM2.5, TSP, wind speed and wind direction, see Figure 20 below.

Figure 20: PKCT northern continuous dust monitor

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

5.4.2.2. Meteorological Monitoring Results and Compliance 2023/2024

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

Year/Month	Rainfall (mm)
Jul-23	7
Aug-23	74
Sep-23	29
Oct-23	33
Nov-23	180
Dec-23	168
Jan-24	28
Feb-24	65
Mar-24	51
Apr-24	179
May-24	304
Jun-24	190

Figure 21: PKCT weather station monthly monitoring data 2023/2024

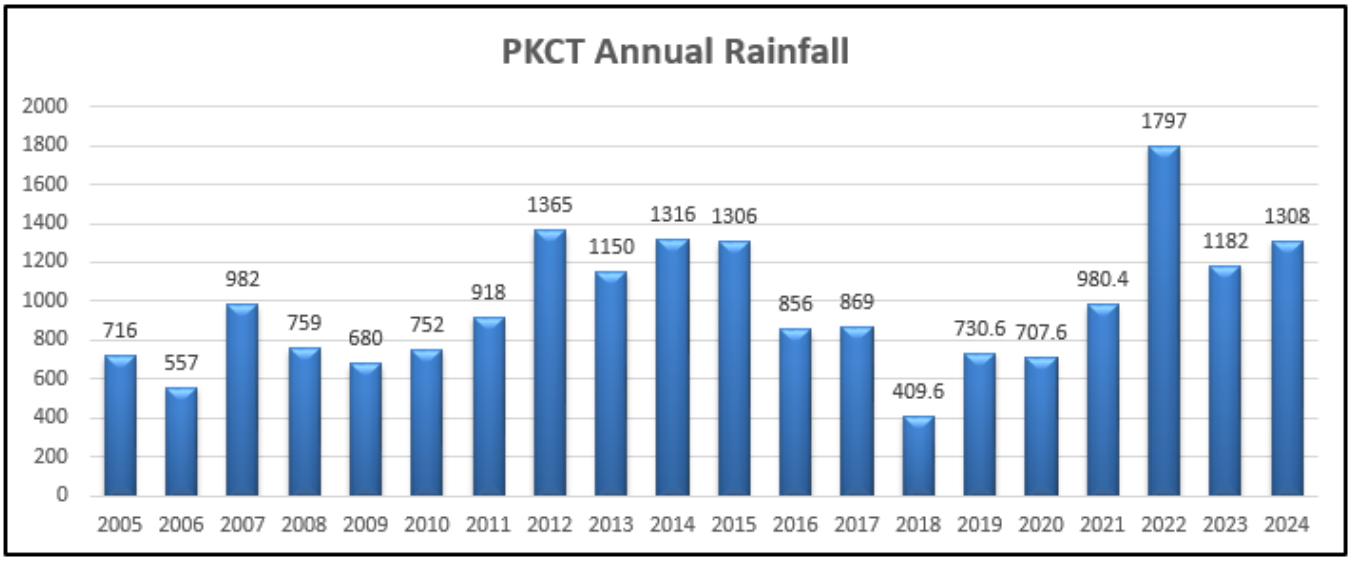


Figure 22: PKCT annual rainfall (financial year)

5.4.3. Trends in Weather

As is shown in Figure 22 above, the 2023/2024 reporting period was above the long term average for PKCT (2024 - 1308mm, LTA - 967mm), and similar compared to last year (2024 – 1308mm, 2023 – 1182mm). At the time of writing, the Bureau of Meteorology were predicting weather conditions would move to generally wetter conditions with a high likelihood of another *La Nina* event developing in the coming months.

5.5. Surface Water

5.5.1. Surface Water Standards and Performance Measures

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

Discharge Limits

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

Water Management Plan

13. The Proponent shall prepare and implement a Water Management Plan to the satisfaction of the Director- General. This Plan must:
    (a) be prepared in consultation with DECC;
    (b) be submitted to the Director-General for approval within 12 months of this approval or as otherwise agreed by the Director-General; and
    (c) include:
        - a site water balance, which includes details of sources of water supply, on-site water use and management and off-site water discharges and investigates and describes measures to minimise water use by the project;
        - a sediment control plan for surface works on the site that is consistent with the requirements of the *Managing Urban Stormwater: Soils and Construction Manual* (Landcom 2004, or its latest version);
        - a surface water monitoring program that includes:
            - stormwater effluent discharge criteria;
            - a monitoring protocol for evaluating compliance with the stormwater effluent discharge criteria; and
            - reasonable and feasible mitigation measures to ensure the stormwater effluent discharge criteria are met.

5.5.2. Surface Water Monitoring

5.5.2.1. Surface Water Monitoring Methodology

PKCT has a Water Management Plan MP.HS.462 (WMP) which is in operation and DPI&E approved. This plan was submitted to the DPI&E within 12 months of Project Approval 08_0009.

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

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

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

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

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

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

5.5.2.2. Surface Water Monitoring Results 2023/2024

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

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

(a) Exceeding the TSS limit is permitted when the discharge occurs solely as a result of high rainfall at the site, exceeding a 5 day rainfall depth value of 90mm over a consecutive 5 day period

Figure 23: EPL 1625 water quality parameter limits and compliance

Across the reporting period, PKCT recorded a total of 282 discharges from LDP16. Of these discharges, 100% were compliant for TSS and 100% were compliant for Oil and Grease. pH was monitored as required, see Figure 24 below. A summary of all LDP16 discharge monitoring data is presented in
Appendix D: LDP16 Discharge Data Summary.

Monitoring Parameter	Number of Overflows	Maximum recorded value	Minimum recorded value	Mean recorded value	Compliant Samples (%)
pH	282	9.18	6.74	7.9	n/a
TSS (mg/l)	282	122*	<5	9.04	100%
Oil and Grease (mg/l)	282	8	<5	<5	100%

*Note: 122mg/L TSS was recorded following significant rainfall event where >90mm of rainfall fell across a 5 day period leading up to the overflow. This reading was allowable within the PKCT EPL due to excessive rainfall.

Figure 24: Water quality monitoring summary for LDP16 discharges

PKCT Monthly Water Usage

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

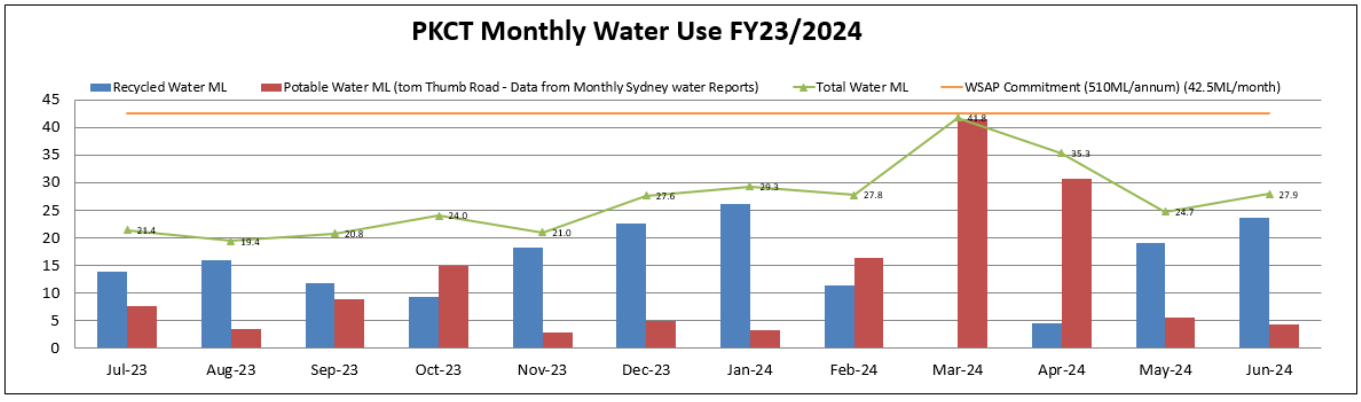


Figure 25: PKCT monthly water use for 2023/2024 reporting period

5.5.2.3. Surface Water Monitoring Compliance

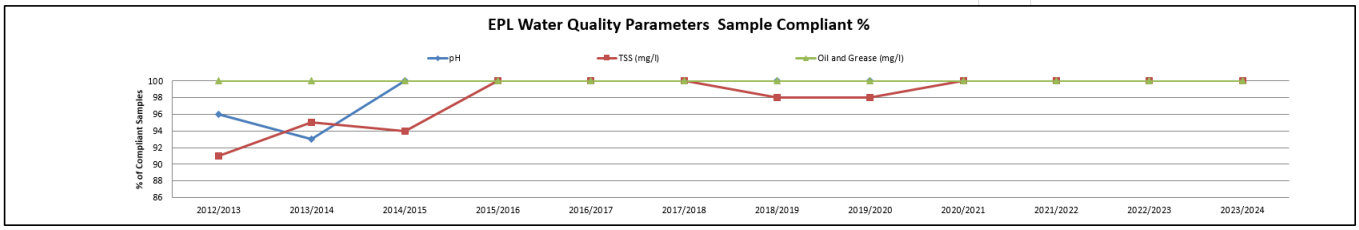
Of the 282 discharges from LDP16 recorded during the Reporting Period, PKCT was compliant with its EPL Licence Conditions for 282 (100%) Oil and Grease samples and 282 (100%) TSS samples, and pH was monitored on all 282 overflow occasions as required.

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

5.5.3. Trends in Surface Water Monitoring

Figure 26Figure 26 below highlights the trends in compliance measured at LDP16 for EPL 1625 water quality parameters of pH, TSS and Oil and Grease. As is shown in Figure 26, compliance remains high and above historical levels in this reporting period. The large amount of overflows recorded at LDP16 reflect the large number of heavy rainfall events throughout the 2023/2024 reporting period, and some progressive changes to the satellite pond dewatering levels. In one instance discharges during a heavy rain fall event exceeded the TSS concentration limit of 50mg/L (122mg/L, 12/5/24) however since the rainfall exceeded the 5 day rainfall depth of 90mm, the discharge was permitted and compliant under PKCT's Licence Conditions.

Monitoring Parameter	2014/2015		2015/2016		2016/2017		2017/2018		2018/2019		2019/2020		2020/2021		2021/2022		2022/2023		2023/2024	
	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %	Number of Overflows	Compliant Samples %
pH		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only		Reporting only
TSS (mg/l)	143	94	72	100	54	100	17	100	86	98	84	98	128	100	212	100	191	100	282	100
Oil and Grease (mg/l)		100		100		100		100		100		100		100		100		100		100



(a) One sample in the 2023/2024 Reporting Period exceeded the EPL concentration limit of 50mgL TSS. The discharge was permitted under the Licence as the 5 day rainfall depth exceeded the 90mm requirement in each instance. No non-compliances were recorded.

Figure 26: Trends in EPL water quality data at LDP16

Trends in Potable and Recycled Usage

Total water (recycled + potable) used this reporting period remained historically low. During the 2023/2024 reporting period, there was a slight increase in the total water used which is attributable to an underground mains leak in March. Potable water usage as a percentage of total water used also increase this reporting period as a result of recycled water supply from Sydney water (2022/2023 period 58.6ML compared to 2023/2024 period 144.5ML), see Figure 27 below.

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

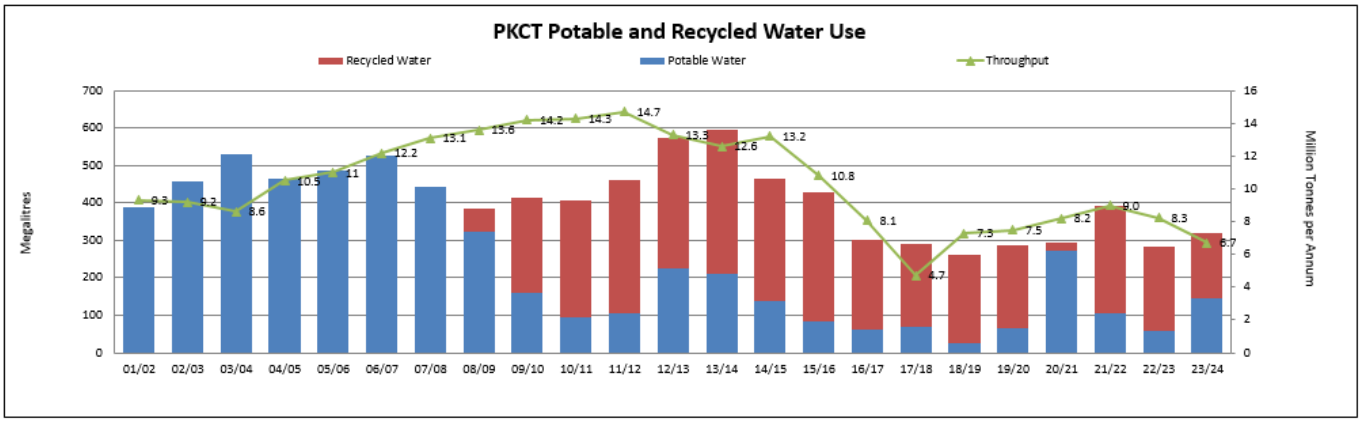


Figure 27: Trends in potable and recycled water use at PKCT

5.5.4. Surface Water –Activities Undertaken During 2023/2024 Reporting Period

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

- PKCT continues to manage water across the site in line with EPL and Approval 08_0009 requirements. General and ongoing improvements to the system have been made such as;
    - Improved sediment control processes across the site (review of process and procedures)
    - Upgrading of chemical dosing system components at the north and central ponds
    - Pond sediment removal in line with EPL requirements at the Northern, Central and TS1 ponds.
    - Continued use of "*Biostim*" to manage algal blooms in catchment ponds

5.5.5. Surface Water - Activities Planned for 2024/2025 Reporting Period

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

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

5.6. Biodiversity

5.6.1. Biodiversity Standards and Performance Measures

Green and Golden Bell Frog Management Plan

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

5.6.2. Biodiversity Monitoring

5.6.2.1. Biodiversity Monitoring, Results and Compliance

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

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

5.6.3. Trends in Biodiversity

PKCT undertakes GGBF surveys and records all sightings in a register. PKCT personnel have not identified any GGBF during normal operations or as a result of focused surveys since 2011. Figure 28 below shows the trend in GGBF sightings at PKCT back to the 2007/2008 financial year.

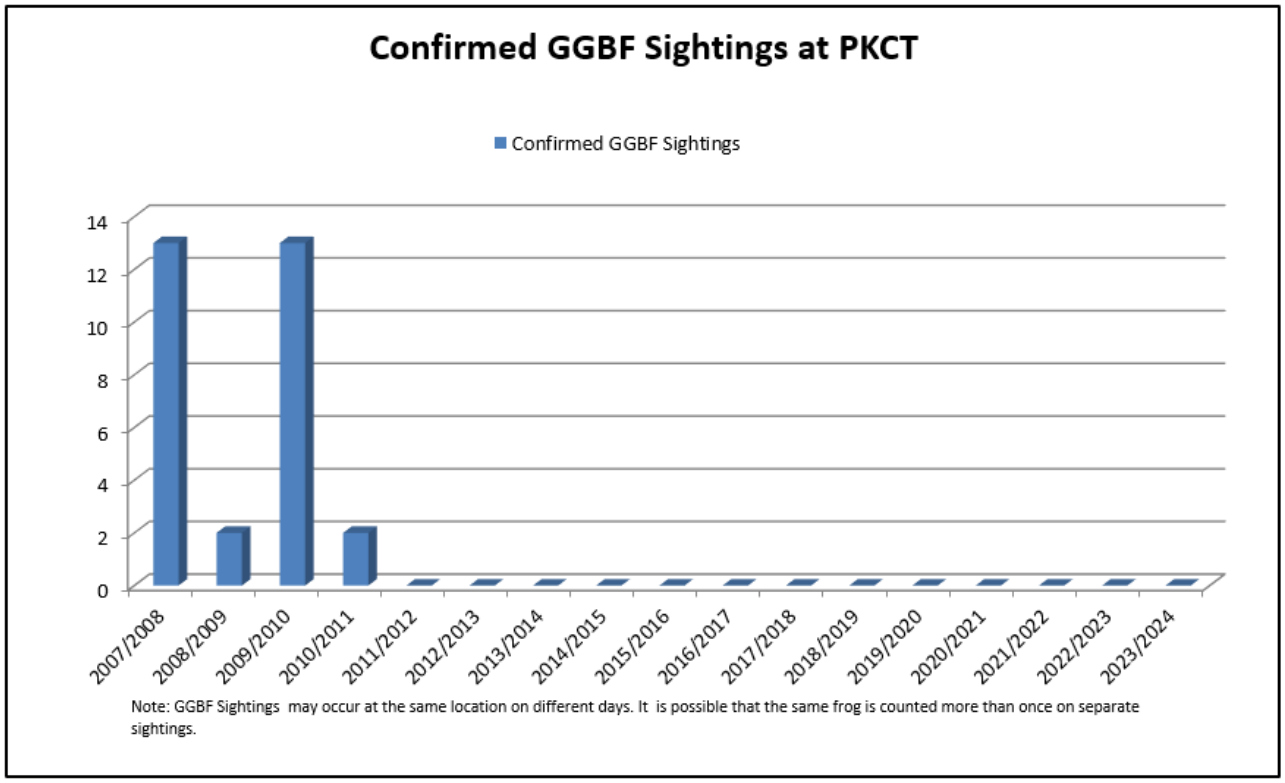


Figure 28: GGBF sightings at PKCT

5.6.4. Biodiversity –Activities Undertaken During 2023/2024 Reporting Period

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

- PKCT undertook a GGBF survey on the 7th February 2024. The survey was supervised by an expert consultant, with assistance provided by the PKCT Environmental Specialist. The survey confirmed that GGBFs are not currently present on site. The Peron's Tree Frog, Striped Marsh Frog and Spotted Marsh Frog were the only species of frog found or heard on site during the survey.
- Workers at PKCT are instructed to report and record any GGBF (or other frog) sightings throughout the year. Any frog sightings are recorded in a site database. No GGBFs were identified by the PKCT site personnel in the reporting period.

5.6.5. Biodiversity - Activities Planned for 2024/2025 Reporting Period

PKCT will continue to ensure that the biodiversity standards and performance measures are considered during any planning for future restoration and improvement works. A summary of the planned actions for the 2024/2025 reporting period related to biodiversity is presented below;

- Continued monitoring for GGBF populations at PKCT during site operations
- Undertake further surveys annually or when deemed necessary.

5.7. Visual Amenity

5.7.1. Visual Amenity Standards and Performance Measures

Lighting Emissions

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

    to the satisfaction of the Director-General.

Landscape Management Plan

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

5.7.2. Visual Amenity Monitoring

5.7.2.1. Visual Amenity Monitoring, Results and Compliance

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

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

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

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

PKCT utilises a landscaping contractor to maintain lawns and gardens and control weeds on site. Landscape contractor staff are trained in chemical application and use non-residual herbicides. All weed spraying undertaken considers prevailing weather conditions and locations, and PKCT is provided with a Weed Spraying Notification Form (WSNF) each time an herbicide is used on site. See Appendix E: Weed Spraying Notification Form for an example of a WSNF.

5.7.3. Trends in Visual Amenity

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

5.7.4. Visual Amenity –Activities Undertaken During 2023/2024 Reporting Period

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

- PKCT's long-term road receival landscaping project began in January and February 2019. This major landscaping project aimed at developing a visual screen for residents to the west of the terminal, shielding truck tipping activities through the planting of 600 trees and approximately 200 sedges on the adjacent berm. The trees planted were a mix of native trees, shrubs and sedges and will take around 3-5 years to become established. In July 2023 PKCT completed planting of a further 550 native trees and shrubs in the area. The trees and shrubs, once established will further enhance the biodiversity of at the terminal and provide additional safe habitat for birds and other species. See Figure 29 and Figure 30 below for an update on the growth of the trees and new plantings. In addition to the screening, as they grow, the trees will assist with dust reduction in the area.

Figure 29: Tree Planting - Northern Road Receival Berm 2019

Figure 30: Tree Plantings – Northern Road Receival Berm July 2024

- PKCT continued to manage the tree planting undertaken in June 2019 as part of the Administration Building Upgrade Project. Refer to Figure 31 below for an update on the growth of the garden.

Figure 31: **Main Administration Building landscaped gardens, June 2019, June 2020, June 2023 and June 2024**

- Ongoing maintenance of the landscaped area near the northern transfer station. The garden is now well established in this area, see Figure 32 below.

Figure 32: Landscaped area near Northern Transfer Station, July 2024

- All new lighting complies with AS4282 and is maintained to ensure minimise off-site impacts. There were no community complaints relating to lighting across the 2023/2024 reporting period.

5.7.5. Visual Amenity - Activities Planned for 2024/2025 Reporting Period

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

- Funding was approved to further vegetate approximately 500m² of the Road Receival Berm area across two periods in July 2023 and August 2024. Native trees and shrubs will continue to be planted along the berm to further enhance the visual amenity of the area and provide increased habitat for local fauna.

5.8. Greenhouse and Energy Efficiency

5.8.1. Greenhouse and Energy Efficiency Standards and Performance Measures

Operating Conditions

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

Greenhouse and Energy Efficiency Plan

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

5.8.2. Greenhouse and Energy Efficiency Monitoring

5.8.2.1. Greenhouse and Energy Efficiency Monitoring Methodology

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

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

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

A consultant was engaged to advise on applicable site activities and energy aspects and to develop a monitoring format. The format developed has been implemented. Though not reporting at this stage, PKCT is recording data and monitoring energy use and greenhouse gas generation. Figure 33 below outlines the volumes of reportable emissions from PKCT operations across the reporting period.

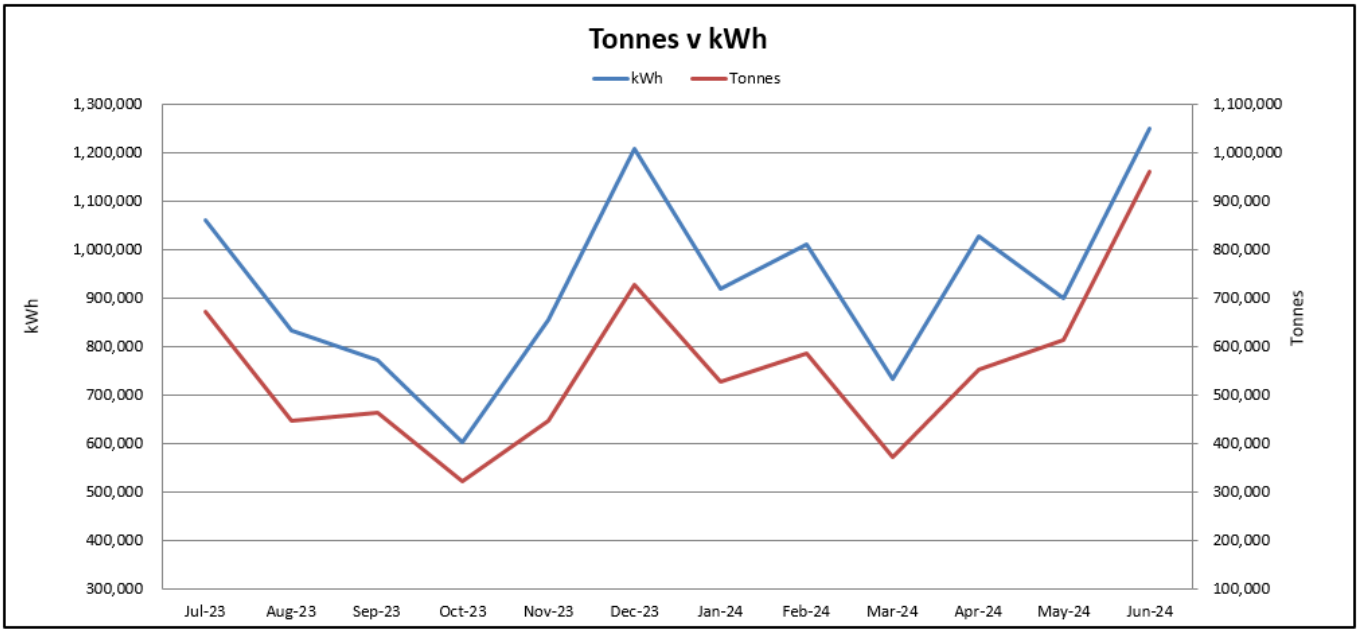
2023/2024 FY (July-June)		A	B	C	D Gigajoules	E tonnes
	Reporting unit	Amount consumed (reporting unit)	Energy content (GJ per reporting unit)	Emissions factor (kg CO2-e per GJ)	Reportable energy (GJ)	Reportable emissions (tonnes CO2-e)
Scope 1 – direct emissions						
Diesel oil(transport)	kL	28	38.60	69.90	1099	77
Diesel oil (stationary energy)	kL	0	38.60	69.50	0	0
Biodiesel B20 (Transport)	kL	0	30.88	69.51	0	0
Petrol (transport)	kL	9	34.20	69.60	303	21
Petroleum based oils	kL	0.82	38.80	27.90	32	1
Petroleum based greases	kL	0.77	38.80	27.90	30	1
Acetylene	m3 *	3	0.0393	51.33	0	0
Scope 2 – indirect emissions						
	Reporting unit		Energy content (GJ per kWh)	Emissions factor (kg CO2-e per kWh)		
Electricity	kWh	11,189,743	0.0036	0.68	40283	7609
Total					41747	7709
Threshold (as per 2022/2023)					100,000	25,000

http://www.cleanenergyregulator.gov.au/NGER/Reporting-cycle/Assess-your-obligations/Reporting-thresholds
https://cer.gov.au/schemes/national-greenhouse-and-energy-reporting-scheme/report-emissions-and-energy/nger-calculators

Figure 33: Greenhouse gas report 2023/2024

5.8.2.2. Greenhouse and Energy Efficiency Monitoring, Results and Compliance

Energy use is measured at PKCT on a monthly basis. Energy use generally follows the same trend as throughput at the site, i.e. when there is an increase in throughput, energy use also increases. Figure 34 below provides monthly energy consumption and tonnes (throughput) for the 2023/2024 reporting period, with month-to-month variation largely continuing to follow this expected correlation.



Month	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24
kWh	1,061,942	835,600	774,146	604,483	856,346	1,209,132	921,804	1,011,248	733,135	1,029,612	900,734	1,251,561
Tonnes	674,134	447,626	466,101	323,168	448,614	729,693	529,080	586,428	372,357	553,792	614,823	960,904

Figure 34: PKCT tonnes v kWh

5.8.3. Trends in Energy Efficiency

PKCT measures energy efficiency against its baseline energy efficiency target of 1.655 kWh/tonne. This figure is calculated by dividing the energy used at the premises (kWh) by throughput (tonnes). The 2023/2024 reporting period saw ten months where monthly kWh/tonne exceeded the baseline energy efficiency target, see Figure 35 below. These records correspond with low throughput during those particular months. Overall, the site operated at an average monthly energy efficiency level of 1.71 kWh/tonnes for the 2023/2024 reporting period which is marginally above the baseline energy efficiency target of 1.655kWh/tonne. PKCT will be at its most efficient when throughput is high.

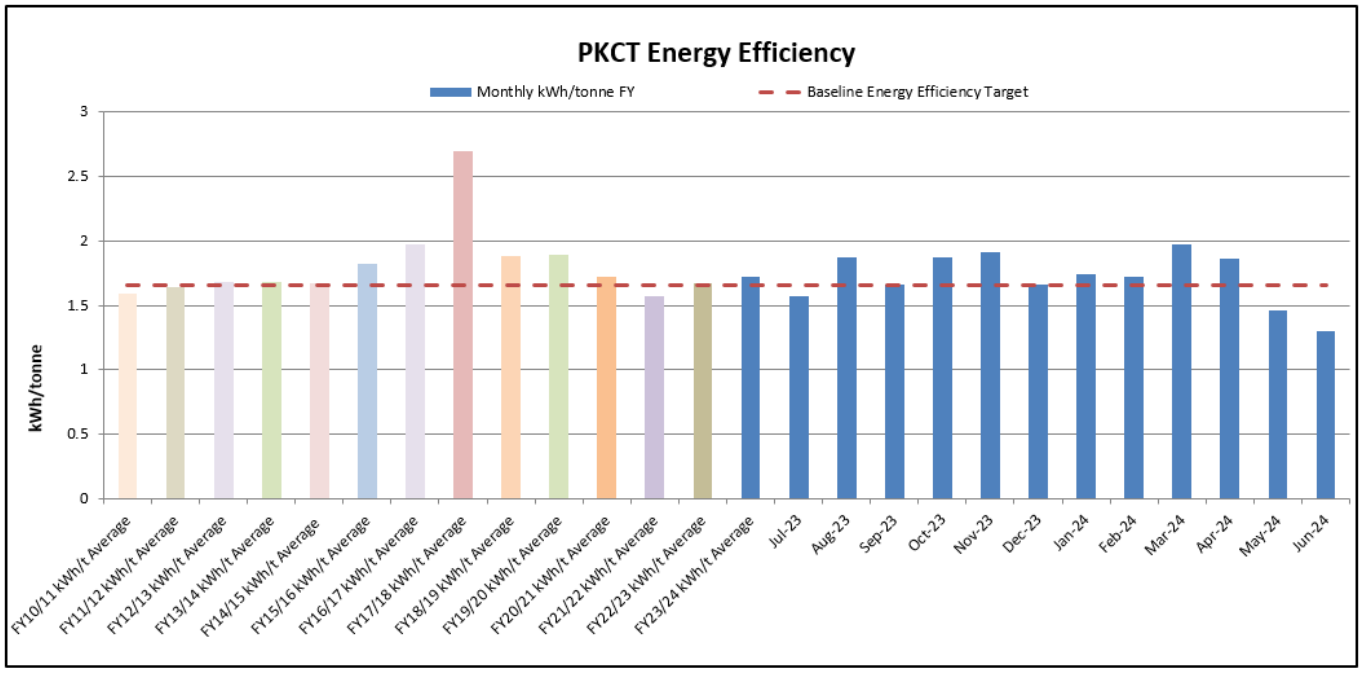
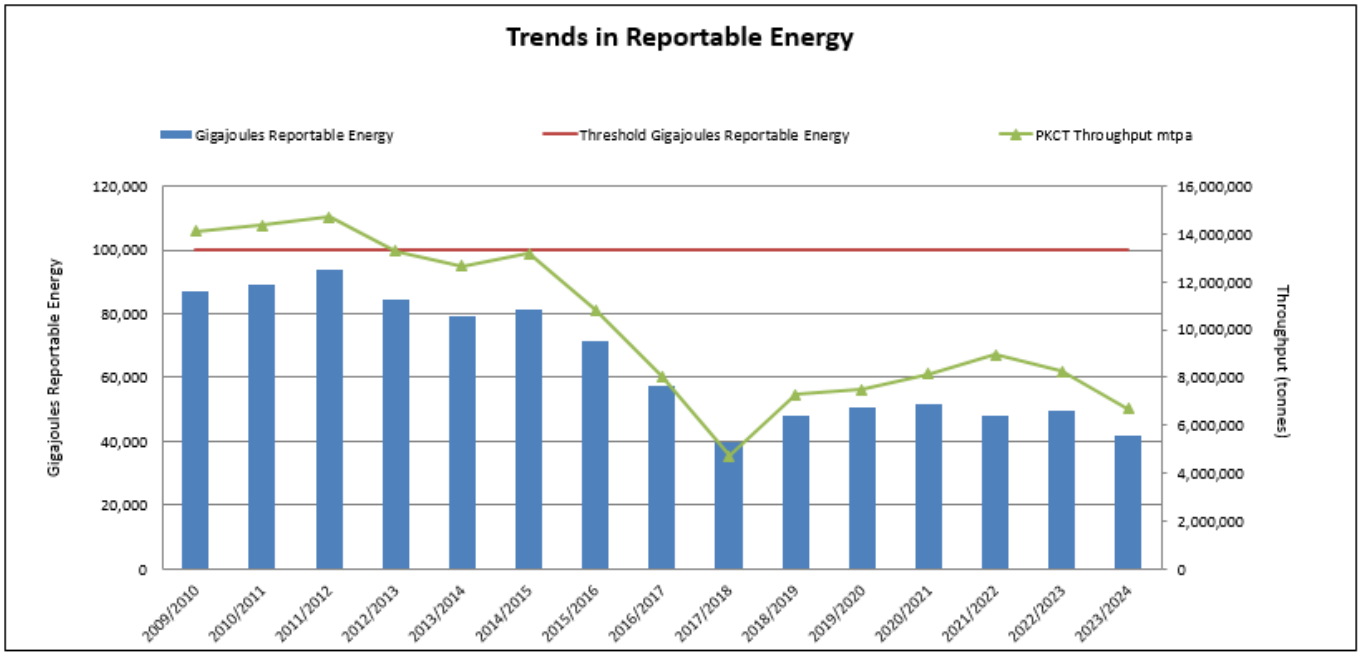


Figure 35: PKCT energy efficiency trends

PKCT monitors greenhouse gas generated by the site annually. At this stage, greenhouse gas emissions and reportable energy are below the legislated reporting thresholds, see Figure 33.
Reportable energy consumption and greenhouse emissions remain relatively low and well below reporting thresholds for this reporting period. PKCT will continue to monitor this positive result. Figure 36 below shows these trends.



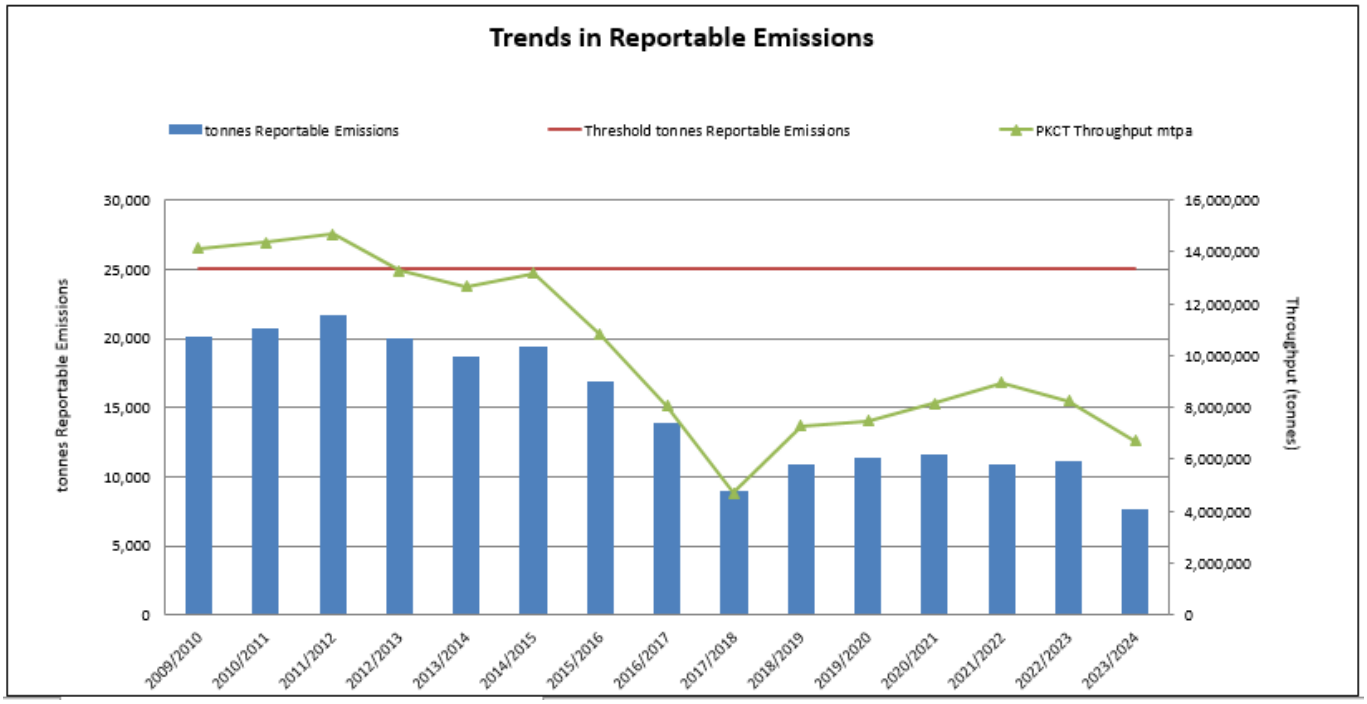


Figure 36: Trends in reportable energy and greenhouse gas emissions

5.8.4. Energy Efficiency –Activities Undertaken During 2023/2024 Reporting Period

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

- PKCT continues to look for energy savings wherever possible. PKCT has revised the Greenhouse Gas and Energy Efficiency Management Plan.
- PKCT undertook an initial investigation into the feasibility of installing solar panels on some of our buildings to assist with reducing energy consumption.

5.8.5. Energy Efficiency - Activities Planned for 2024/2025 Reporting Period

A summary of these actions planned for the 2024/2025 reporting period is presented below.

- Based on the feasibility investigation, PKCT has budgeted to install a 24.36kW solar system on one of our buildings this coming financial year.
- PKCT will continue to ensure that energy efficiency is considered during any planning for future restoration works.

5.9. Waste

5.9.1. Waste Standards and Performance Measures

Operating Conditions

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

5.9.2. Waste Monitoring

5.9.2.1. Waste Monitoring Methodology

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

The objectives of the WSMP are to:

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

5.9.2.2. Waste Monitoring Results and Compliance 2023/2024

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

General site waste is managed by a waste contractor on behalf of PKCT. An annual summary of the waste generated at PKCT across the reporting period is presented below in Figure 37.

	Cardboard (t)	Comingle (t)	General - Bioreactors (t)	General - Landfill (t)	Hazardous Solid Landfill (t)	Waste Oil (t)	Scrap Steel (t)	Total Mass (t)	J120 (L)
Jul-23	0.38		2.64	4.74			4.82	12.58	7,000
Aug-23	0.38		5.28	1.32		1	0.93	8.91	
Sep-23	0.58		5.28				5.76	11.62	
Oct-23	0.38		3.96	2.78			7.11	14.23	
Nov-23	0.38	0.08	5.28	1.44			3.8	10.98	
Dec-23	0.38	0.18	5.28	1.7			0.56	8.1	
Jan-24	0.38	0.11	2.64	6.04			4.2	13.37	
Feb-24	0.38	0.11	5.28	0.11			2.53	8.41	5,000
Mar-24	0.38	0.14	5.6	0.05	2		0	8.17	
Apr-24	0.38	0.21	5.54	0.21			0	6.34	
May-24	0.38	0.14	4.28	4.31			1.09	10.2	7,800
Jun-24	0.38	0.14	4.28	1.43			19.3	25.53	
Total Mass (t)	4.76	1.11	55.34	24.13	2	1	50.1	138.44	19,800

Figure 37: Waste Summary 2023/2024

5.9.3. Trends in Waste

Figure 38 below shows trends in three different waste streams generated at PKCT; steel, general waste and cardboard. The 2023/2024 reporting period saw waste streams remaining low and relatively stable.

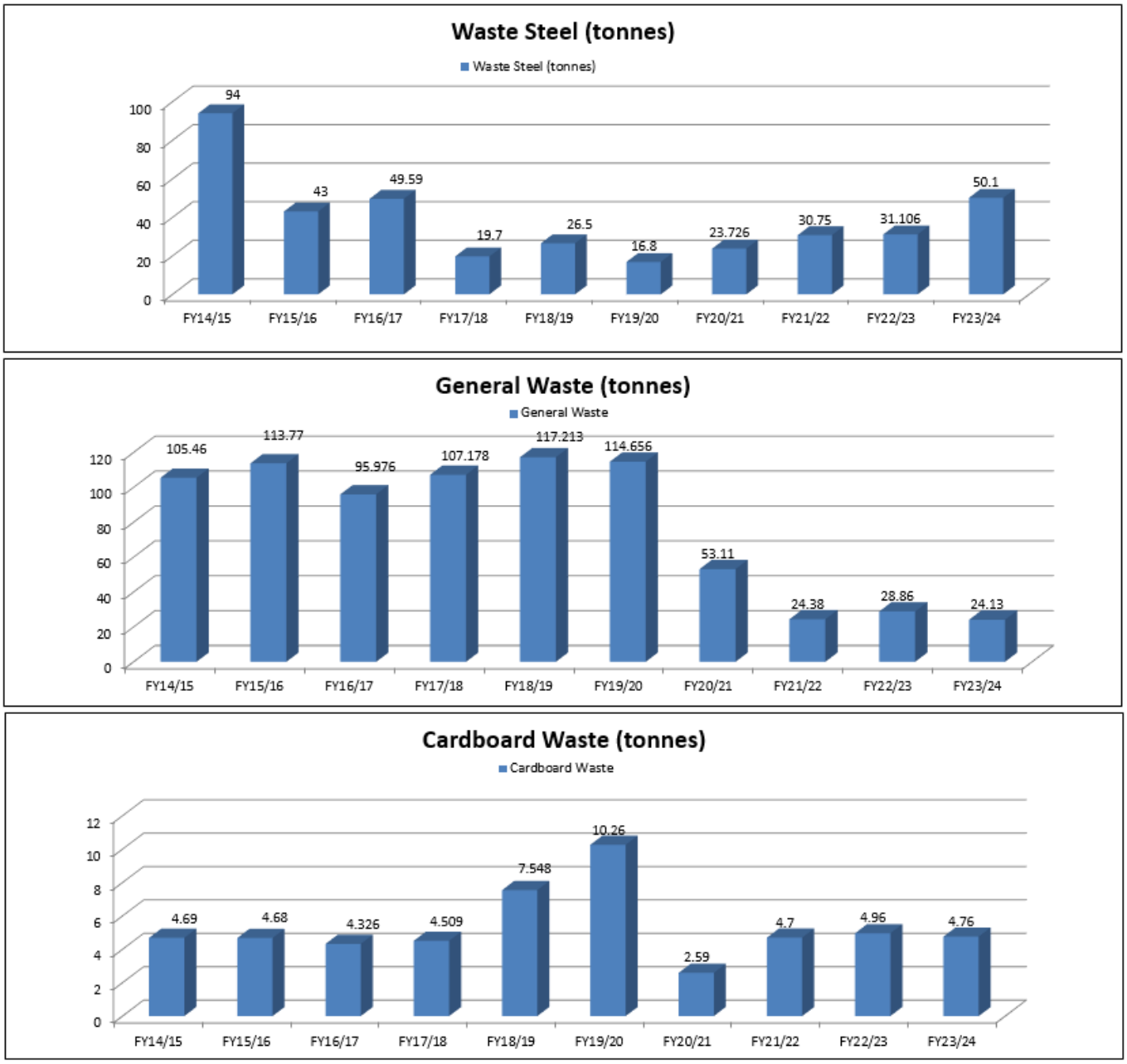


Figure 38: Waste Trends at PKCT

5.9.4. Waste –Activities Undertaken During 2023/2024 Reporting Period

A summary of the actions undertaken for the 2023/2024 reporting period related to waste is presented below.

- In December 2023, PKCT implemented office based comingle recycling bins across all main office blocks. Whilst having larger comingle recycle bins outside for many years, our office areas did not - meaning that workers needed to head outside to recycle. The addition of the office based bins allows all office workers a simpler method to manage waste, see Figure 39.
- In May 2024, workers at PKCT implemented dedicated fluorescent tube recycling containers and a battery recycling bin, see Figure 39.

Figure 39: New office comingle recycling bins, battery and fluorescent lighting tube recycling areas

5.9.5. Waste - Activities Planned for 2024/2025 Reporting Period

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

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

5.10. Hazards

5.10.1. Hazards Standards and Performance Measures

Dangerous Goods

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

5.10.2. Hazards Monitoring

5.10.2.1. Hazards Monitoring, Results and Compliance.

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

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

Regular environmental auditing is undertaken at PKCT to ensure compliance with relevant standards.
PKCT continues to utilise a mobile refuelling system for its plant machinery and does not store any fuel on site. In February 2014, PKCT decommissioned the underground fuel storage tanks and completed remediation of the site. During the reporting period, PKCT rolled out and embedded a new Event Management System (WERC). PKCT and key contract partners are now utilising the new system to store and manage any hazards that are identified across the site.

5.11. Fire Control

5.11.1. Fire Control Standards and Performance Measures

Fire Control

21. During the project, the Proponent shall:

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

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

5.11.2. Hazards Monitoring

5.11.2.1. Fire Control Monitoring, Results and Compliance.

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

5.11.3. Fire Control – Activities Undertaken During 2023/2024 Reporting Period

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

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

- Maintenance of PKCT fire protection systems to AS1851
- Annual Fire Safety Statements Submitted to Wollongong City Council
- Installation of additional deluge systems for TS2 Transfer Station
- Commenced installation of gaseous fire suppression for RC3 Hydraulic Equipment Room

5.11.4. Fire Control - Activities Planned for 2024/2025 Reporting Period

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

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

5.12. Community

5.12.1. Community Engagement Activities

PKCT continues to utilise its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from/to local residents. A summary of the information presented to the PKCT CCC during the reporting period is presented below in Figure 40.

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

Meeting Date	Presented Information
17th April 2024	Information covering PKCT operational update, environmental compliance for air and water quality, recent environmental improvements, general business.

Figure 40: PKCT CCC Meetings

During the reporting period, PKCT rolled out our Environment and Social Governance (ESG) Framework, which included a number of community initiatives and community support activities.

The activities undertaken this period are summarised below.

- 60 PKCT personnel participated in "Clean-up Australia day" initiatives. PKCT spent 4 days cleaning and removing rubbish from public areas surrounding our site. During the clean-up sessions, over 7 ute-loads of rubbish were removed from the environment including shopping trolley, car tyres, cigarette butts, and fishing line. See Figure 41.

Figure 41: Participation in Clean Up Australia Day

- PKCT staff volunteered to assist Wollongong Council and their Bushcare volunteers to undertake dune rehabilitation works along city beach. The works over two session included planting over 1000 trees and shrubs with other community members in the dunes. PKCT will continue to work with and support Wollongong Council with this initiative. See Figure 42.

Figure 42: Participation in dune restoration works on City Beach

- Development of an "Employee Sponsorship Procedure" whereby PKCT employees engaged in charitable endeavours are able to apply for PKCT sponsorship in support of their charity.

5.12.2. Community Contributions

With the development of PKCT's ESG strategy, PKCT has implemented a number of community donations and support initiatives during the reporting period.
PKCT continues to support the Port Kembla Branch of the Mission to Seafarers. In the 2023/2024 reporting period, PKCT made a $5,000 annual donation to this community organisation.

5.12.3. Community Complaints

PKCT continues to operate a website including a community hotline and contact email. Typically, any community complaints are received through our hotline.

PKCT received two community complaints across the reporting period. A summary of each of the complaints is shown below.

- 18th May 2024 - A resident to the north of PKCT lodged a compliant via our "*community links*" email system. The resident was concerned about coal dust in general. PKCT contacted the resident and offered to provide further information, and/or a site visit to highlight the tools used to control dust however this was declined. PKCT undertook a review of the site activity, weather conditions on the day of the compliant and monitoring data. Dust control equipment was being used as required and real time monitoring data did not show any elevated levels above PKCT's criteria.
- 18th June 2024 – PKCT received a compliant via the EPA's Environment Line. The compliant from a resident indicated concern with coal dust on Springhill Road at the intersection of Tom Thumb Road. PKCT recalled our street sweeper and combined with our water cart completed an additional 4 hour clean of the area on the day of the compliant. Permission has since been requested to undertake a full jet clean of Springhill Road from Transport NSW. Pending approval, PKCT will complete the jet clean during July.

PKCT's Shippers monitor and report their compliance to PKCT's Driver's Code of Conduct (DCC). A component of the DCC is to monitor and report any DCC related complaints through to PKCT. In the reporting period, one complaint was reported to PKCT from our Shippers.

- July 2023 – A resident following a coal truck contacted the truck company complaining of “black liquid” on the back of a truck travelling south on Appin Road. PKCT shipper contacted person to discuss and no further action was required.

Any complaints received by PKCT are captured within PKCT’s Event Management System for action tracking.
A summary of community complaints by type as received over the past 14 years is presented below in Figure 43.

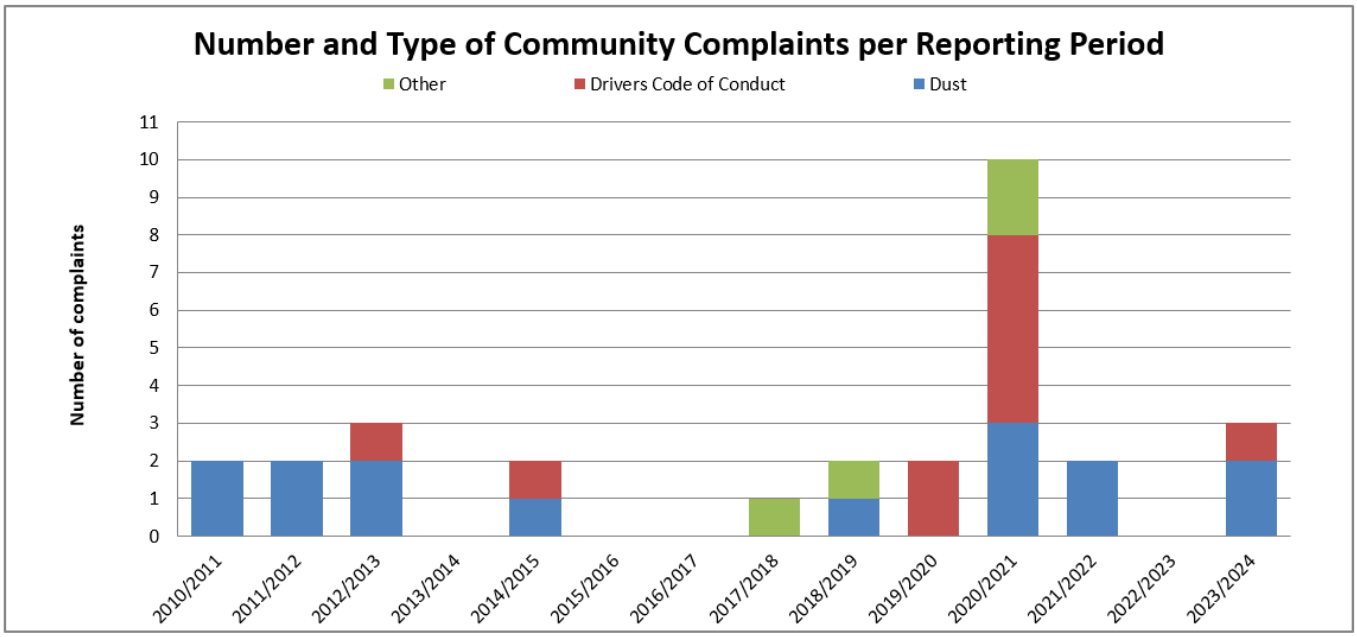


Figure 43: Community Complaints Summary

6. ENVIRONMENTAL MANAGEMENT, MONITORING, AUDITING AND REPORTING

6.1. Environmental Management Performance Measures and Compliance

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

Figure 44: EMS compliance in the AEMR

PKCT has in place an approved Environmental Management Strategy (EMS). The EMS was submitted with the 2009/2010 AEMR to the DPI&E. The EMS details how PKCT complies which each line item of Schedule 4, Condition 1, Environmental Management of Project Approval 08_0009. Figure 44 above references the specific EMS Sections that PKCT utilises for compliance with Schedule 4, Condition 1.

6.2. Reporting - Incident Reporting

Incident Reporting

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

Requirements associated with Schedule 4, Conditions 2 and 3 are referenced in PKCT's EMS and Event Management Procedure. There were no reportable incidents of "material harm" across the 2023/2024 reporting period. PKCT's Pollution Incident Response Management Plan was not activated during the period.

6.3. Reporting - Annual Reporting

Annual Reporting

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

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

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

Each of these additional components remain included within this AEMR.
There were no further requests from the DPI&E to change the formatting of the 2016/2017 report and this currently remains the standard for subsequent reports.

6.4. Independent Environmental Audit

Independent Environmental Audit

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

a) Be conducted by a suitable qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;
b) Include consultation with the relevant agencies;
c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL (Including any strategy, plan or program required under these approvals); and
d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate
e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.

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

6. Within 6 weeks of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit report.
7. Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director-General.

The Triennial Independent Audit was last conducted in August 2023. A single non-compliance was identified during the audit with no other findings or recommendations identified. As per the requirements of the Audit, PKCT prepared an actions plan which was subsequently submitted, along with the audit report to DPIE. PKCT's Action Plan, including a summary of the non-compliance is presented in Appendix F: Triennial Independent Audit Findings and Action Plan

During the reporting period, PKCT underwent an external audit on its ISO14001 accreditation, with no non-compliances identified. Minor improvement opportunities were agreed and will be progressed through PKCTs internal review processes.

It should be noted that as a measure of the maturity and application of PKCT's Environmental Management Systems, the external auditors recommended that the frequency of surveillance audits be extended out from the 6 monthly audits to an annual schedule for ISO14001 accreditation. The annual audit schedule has now been implemented.

6.5. Access to Information

Access to Information

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

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

As required PKCT reviewed all Management Plans associated with the Project during the reporting period. All Plans are approved by the DPI&E and are available publicly at www.pkct.com.au.

As required under Condition 9, PKCT makes a summary of its monitoring results publicly available on its website. Monthly monitoring results along with historical PKCT AEMR's can be found on www.pkct.com.au.
Via letter dated 16th March 2017, the Department granted PKCT permission to cease continuation of the Interim EMR as it was deemed that that adequate environmental monitoring data was being made available via other reporting mechanisms (i.e. Annual Return and AEMR).

7. STATEMENT OF COMMITMENTS

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

PKCT's compliance with these commitments across the 2023/2024 reporting period is outlined in the following sections.

7.1. Statement of Commitments -Traffic and Transportation

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

A summary of actions undertaken across the 2023/2024 reporting period specific to this Statement of Commitments is presented below. Further details related to the Traffic and Transportation Statement of Commitments can be found under Section 5.2 of the AEMR.

- Coal throughput at PKCT and therefore road related transport was lower than long-term average levels this reporting period. Lower road deliveries this period were due to closure of a mine and operating conditions at other mines. Public road receivals for the reporting period were 2,345,424 tonnes.
- An AEMR is published on the PKCT website every 12 months, making throughput records publicly available.
- PKCT and its associated road transport providers utilise an auditing program to ensure compliance with the PKCT DCC. This includes monitoring of trucks adherence to the specified travel routes.
- PKCT receives monthly DCC compliance reports from its transport providers who provide coal haulage for Wollongong Coal when operating. Wollongong Coal must ensure that coal is dispatched within the designated dispatch hours. The reports highlight any breaches to the designated dispatch hours. No breaches were reported to PKCT as a result, or observed in the 2023/2024 reporting period.

7.2. Statement of Commitments -Air Quality

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

A summary of actions undertaken across the 2023/2024 reporting period specific to this Statement of Commitments is presented below. Further details related to the Air Quality Statement of Commitments are found under Section 5.34.4, Air Quality –Activities Undertaken During 2023/2024 Reporting Period.

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

7.3. Statement of Commitments -Water Management

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

A summary of actions undertaken across the 2023/2024 reporting period specific to this Statement of Commitments is presented below. Further details related to the Water Management Statement of Commitments are found under Section 5.5.4 of the AEMR.

- Recycled water use has continued at PKCT across the reporting period where possible. Supply issues from Sydney Water have continued to across this reporting period with intermittent supply during some months. When available, the use of TTE has continued at PKCT for dust suppression on stockpiles, fire protection, truck wash facilities, gardens and wash down equipment. A summary of volumes of potable and recycled water consumed are presented in Section 5.5.3 Trends in Surface Water Monitoring.

7.4. Statement of Commitments -Noise Management

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

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

- Notwithstanding there is no longer a requirement to undertake routine noise monitoring, on 26th November 2020, PKCT engaged a consultant to undertake a noise survey to re-confirm that noise levels, following

installation of the new yard machines, remained within the required limits outlined in our Planning Approval 08_0009. The results of the survey confirmed that levels remained below the threshold limits.

- PKCT continues to maintain and utilise Noise Management Plan MP.HS.387. The plan was reviewed during the reporting period as a result of the AIE lease transaction and subsequently approved by the Department. The plan is publicly available on PKCT's website.
- There were no noise complaints received during the 2023/2024 reporting period.

7.5. Statement of Commitments -Community Relations

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

A summary of actions undertaken across the 2023/2024 reporting period specific to this Statement of Commitments is presented below.

- PKCT utilises its Community Consultative Committee (CCC) as a forum for updating the community on its operations and receiving and providing feedback from local residents. PKCT held one face-to-face meeting within the reporting period on the 17th April 2024. Minutes and presentations from the meetings are published to PKCT's webpage (www.pkct.com.au).
- PKCT received two community complaints associated with the operation during the reporting period. Details of these complaints are outlined under Section 5.12.3 Community Complaints.

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

7.6. Statement of Commitments – Environmental monitoring

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

PKCT has in place Environmental Monitoring Strategy MP.HS.464. The Strategy outlines the various monitoring requirements together with references to applicable management plans. General descriptions of PKCT monitoring and monitoring methodology are found throughout the AEMR. Figure 45 below outlines the sections of the AEMR describing Environmental Monitoring.

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

Figure 45: Environmental monitoring area and reference in AEMR

7.7. Statement of Commitments – Environmental Management System

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

A summary of actions undertaken across the 2023/2024 reporting period specific to this Statement of Commitments is presented below.

- PKCT has maintained its external surveillance audit schedule (now 12-monthly) with no environmental non-compliances identified during the audit in November 2023. PKCT's ISO certification is included in Appendix G: ISO 14001 and 9001 Certificate.
- PKCT completed its triennial independent audit in August 2023. An action plan has developed for the findings, this plan has been shared with the DPIE.

7.8. Statement of Commitments – Greenhouse Gases

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

PKCT undertook a greenhouse gas emission and energy use assessment of the Terminal following the Major Project Approval. The report found that PKCT's use of electricity for powering coal handling infrastructure is by far the largest energy user. As a result, 96% of PKCT GHG emissions are Scope 2 emissions associated with electricity generated by power stations.

Opportunities for energy reduction are pursued when purchasing new equipment and considered when developing improvements. PKCT has budgeted for installation of a roof mounted 24.36kW solar system in the coming financial year.

Further details related to the Greenhouse Gas and Energy Efficiency Statement of Commitments can be found under Section 5.8.

7.9. Statement of Commitments – Landscaping

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

With reference to the Landscape Management Plan MP.HS.460 (LMP), PKCT has developed a Landscape Concept Plan along the northern boundary. During this reporting period, maintenance of Stage 2 has continued and the area is now well established, see Figure 30.

The nature and timing of further landscaping works requires consideration of major remedial works in development and PKCT's strategic planning to ensure their compatibility. PKCT has continued to maintain the landscaped areas along the truck wash berm that were planted 2018/2019 reporting period. Additional planting has been completed in July 2023 with further planting to progress in August 2024. Refer to Figure 29 and Figure 30 for growth progress of these plantings.

7.10. Statement of Commitments – Flora and Fauna

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

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

A GGBF survey was undertaken by specialist consultants in February 2024. No GGBF's were found on site.

Further details related to the Flora and Fauna Statement of Commitments can be found under Section 5.6.4, Biodiversity –Activities Undertaken During 2023/2024 Reporting Period.

7.11. Statement of Commitments – Waste

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

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

Further details related to the Waste Statement of Commitments are found under Section 5.9.4, Waste –Activities Undertaken During 2023/2024 Reporting Period.

8. ENVIRONMENTAL PROTECTION LICENCE 1625

PKCT holds EPL 1625 under the Protection of the Environment Operations Act 1997. This stipulates the emission criteria that PKCT must not exceed. Criteria are outlined for water, noise and dust. Pollution Reduction Programs (PRPs) are attached to the EPL to identify aspects which may require improvement.

PKCT is required to submit an Annual Return to the EPA reporting performance against licence requirements. The 2023/2024 Annual Return was submitted to the EPA via the online EPA "eConnect" system on the 23rd May 2024. As the specific criteria for water, noise and dust are common to both the EPL and Project Approval 08_0009, all data and discussion associated with these criteria are outlined in other sections of the AEMR.

Figure 46 below provides a summary of the EPL conditions, Project Approval 08_0009 requirements and the section of the AEMR that discusses the criteria.

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

Figure 46: Common Requirements of Project Approval 08_0009 and EPL1625

8.1. Other EPL Matters in the 2023/2024 Reporting Period

- PKCT completed testing and training on our Pollution Incident Response Management Plan in November 2023.
- As required in our EPL 1625, PKCT has continued to update its website with monthly monitoring data summaries throughout the reporting period, see www.pkct.com.au.
- The EPA commenced a scheduled five-yearly review of PKCT's EPL in June 2024, completing the review in July 2024. No major changes to the EPL were made.
- PKCT self-reported a find of illegally dumped asbestos on our site in January 2024. While not deemed a non-compliance, PKCT notified the EPA of the find and our actions to clean up the asbestos. The asbestos (found in a small hessian-type bag) was found beneath some topsoil during excavation works. PKCT utilised a licenced contractor to manage the safe removal of the asbestos.
- In October 2023 whilst grouting a pile on Berth 102, a small volume of water containing drilling fines entered the harbour resulting in a localised plume of turbid water. The event was of short duration and the turbid water did not cause any substances that would likely cause any environmental harm. The plume dissipated quickly and no sediment was observed following the event. The non-compliant event was not considered Material, and no harm to flora or fauna was noted.
- In May 2024[1] whilst loading a vessel during a wet weather period, PKCT's Shift Supervisor noticed some spillage off the Shiploader boom. The spillage had fallen onto the berth below, with some spillage on the edge of the berth hob likely entering the harbour. Very localised discolouration was observed in the harbour below the berth which dissipated quickly. Loading ceased immediately. The non-compliant event was not considered Material, no harm to flora or fauna was noted.

[1] Non-conformance will be included in next year's EPL Annual Return i.e. reporting period 1st April 2024 to 31st March 2025

9. RESULTS COMPARED TO THE ENVIRONMENTAL ASSESSMENT 2008

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

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

Monitoring results obtained over the 2023/2024 reporting period align with predictions made in the EA. Traffic and noise studies undertaken associated with PKCT's application to the DPE for 7.5 MTPA to 10 MTPA approval also aligned.

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

10. COMPLAINTS

Schedule 4, Condition 4d requires PKCT to include a summary of the complaints received during the past year and compare this to complaints received in previous years. Figure 47 shown below, provides a summary of complaints recorded at PKCT and reported to PKCT by road transport providers.

PKCT received 3 community complaints associated with the operation during the reporting period.

As can be seen in Figure 47, total complaints made to PKCT have remained relatively consistent at a low level since FY15/16. PKCT continues to record all complaints in its Event Management System and responds appropriately when a complaint is received. PKCT continues to work with its shippers and road transport providers to ensure complaints are recorded and handled appropriately.

	Number of Complaints recorded by PKCT							
Complaints	FY16/17	FY17/18	FY18/19	FY19/20	FY20/21	FY21/22	FY22/23	FY23/24
General (PKCT)	0	1	2	0	5	2	0	2
Drivers Code of Conduct related	0	0	0	2	5	0	0	1
Total	0	1	2	2	10	2	0	3

Figure 47: PKCT and DCC complaints.

11. CONCLUSION

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

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

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

11.1. Appendix A: Drivers Code of Conduct Summary

Monthly Reports Summary FY 23/24	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	FY23/24 Total	Comment
Tonnes - Public Road	252,380	205,247	97,088	85,186	147,131	254,592	203,356	236,079	193,599	233,816	252,115	184,835	2,345,424	
Tonnes - Private Road	255,662	106,652	14,048	16,354	99,996	95,873	78,458	110,547	135,220	171,332	185,584	127,645	1,397,371	
Total road tonnes	508,042	311,899	111,136	101,540	247,127	350,465	281,814	346,626	328,819	405,148	437,699	312,480	3,742,795	
Spillage - Public Road	0	0	0	0	0	0	1	0	0	0	0	0	1	One spill in was reported by road transport providers in January 2024. The spill on Springhill road was cleaned
Incident - Other	0	0	1	0	0	3	0	1	0	3	1	1	10	A number of self reported overloading events and minor short term minor speed exceedances reported.
Impact with other vehicle	0	0	0	0	0	0	0	0	0	0	0	0	0	
Incidents Reported to RTA	0	0	0	0	0	0	0	0	0	0	0	0	0	
Complaints	1	0	0	0	0	0	0	0	0	0	0	0	1	behind a Linfox truck travelling South on Appin Road. Car was covered with black liquid. Contact made with driver. No further follow up requested.
EPL/ regulatory breaches	0	0	0	0	0	0	0	0	0	0	0	0	0	
Inductions (%)	100	100	100	100	100	100	100	100	100	100	100	100	100	
Hours restrictions breach	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Road Transport Providers (RTP): Observations	193	91	73	69	177	166	254	208	216	253	287	210	2,197	
CTO / Audits at mine sites, at PKCT and on route to PKCT (Shippers & PKCT)	56	81	40	26	28	31	21	30	15	23	28	30	409	Includes data from Shippers and PKCT (via PKCT IAuditor)
RTP system audits	1	0	0	0	0	0	0	0	0	0	0	0	0	road this FY. Audit undertaken in July 2023

11.2. Appendix B: Consultant Dust Data Summary

Table 6 24-hour average TSP concentrations at the northern and southern PKCT monitoring sites, by month during the reporting period (trigger level of 90 µg/m³)

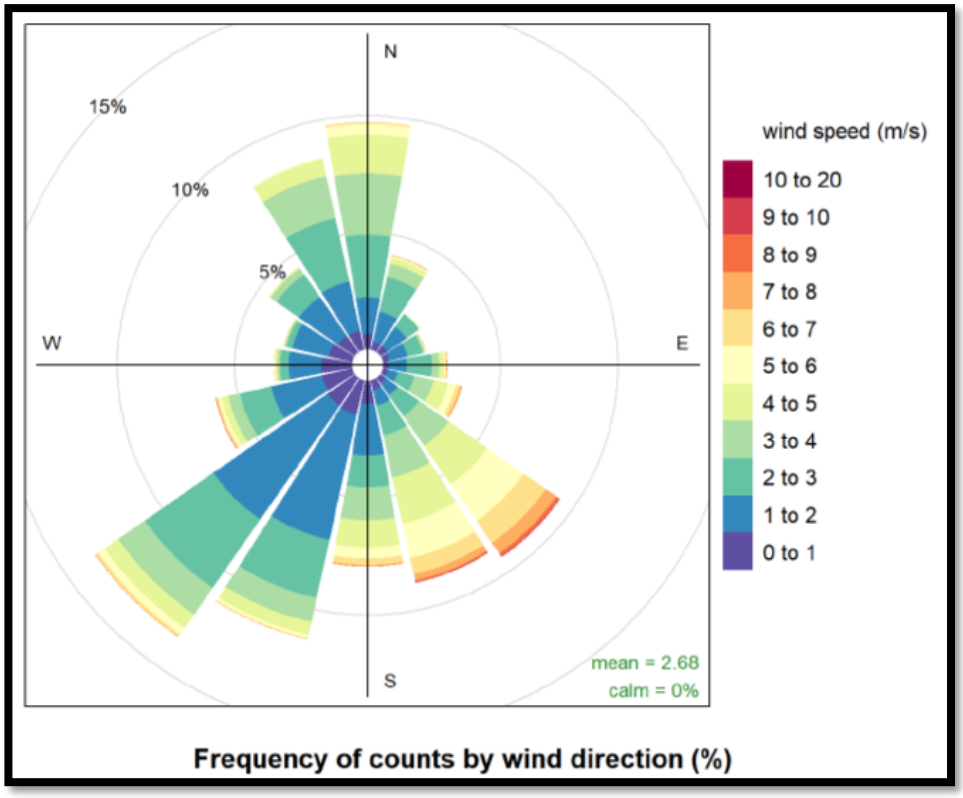
Monitoring period	Maximum concentration (µg/m³)		90th percentile concentration (µg/m³)		Mean concentration (µg/m³)		Number of exceedances
	Northern	Southern	Northern	Southern	Northern	Southern	Northern
July 2023	20.6	95.3	17.6	43.8	11.4	32.4	0
August 2023	23.2	55.0	19.8	33.4	12.4	25.6	0
September 2023	43.0	70.4	28.1	54.6	19.1	37.2	0
October 2023	43.0	101.6	34.5	77.3	22.3	45.9	0
November 2023	52.2	76.2	40.6	54.8	25.4	33.7	0
December 2023	66.8	101.4	44.4	61.8	29.1	39.9	0
January 2024	52.1	126.9	41.7	73.9	30.5	48.5	0
February 2024	97.9	102.6	43.6	67.1	32.1	45.4	1
March 2024	48.1	60.0	35.4	57.6	24.3	37.4	0
April 2024	51.8	114.7	26.5	55.4	20.3	40.4	0
May 2024	22.4	42.3	18.7	36.6	13.8	27.6	0
June 2024	18.0	49.3	14.7	31.9	9.9	21.6	0
July 2023 to June 2024	97.9	126.9	37.1	59.5	20.8	36.1	1

Table 7 24-hour average PM_{10} concentrations at the northern and southern PKCT monitoring sites, by month during the reporting period (air quality standard of 50 µg/m³)

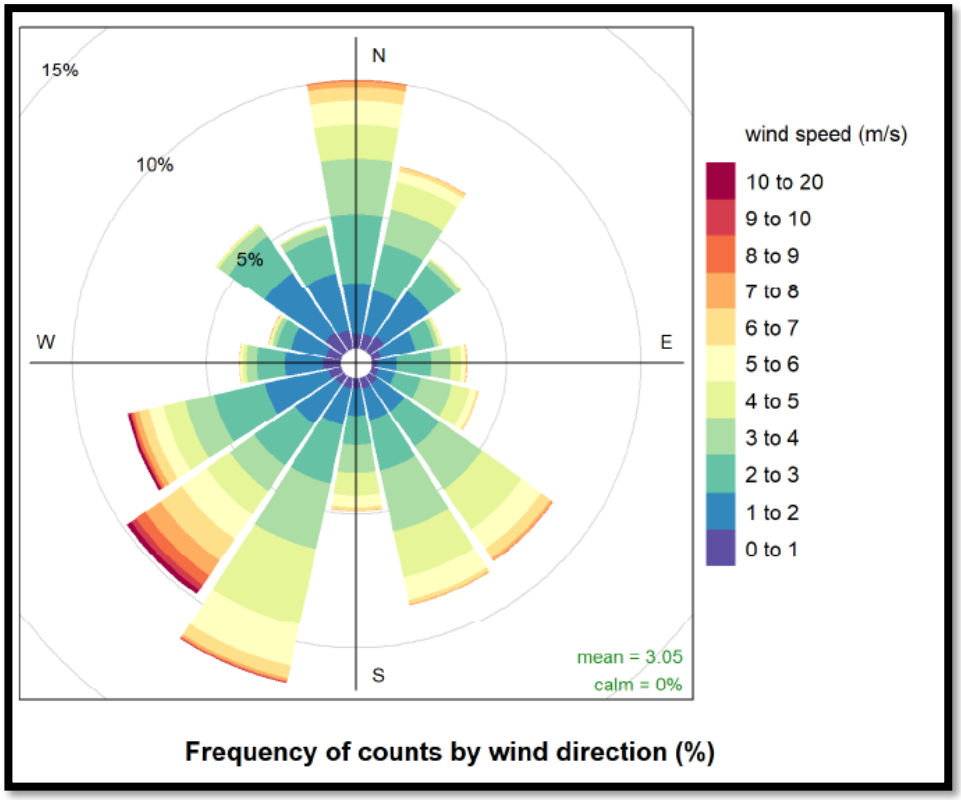
Monitoring period	Maximum concentration (µg/m³)		90th percentile concentration (µg/m³)		Mean concentration (µg/m³)		Number of exceedances
	Northern	Southern	Northern	Southern	Northern	Southern	Northern
July 2023	14.2	54.7	12.0	26.3	7.5	19.4	0
August 2023	17.7	32.4	14.3	22.5	8.4	16.0	0
September 2023	29.9	49.6	18.8	35.7	12.8	23.1	0
October 2023	32.7	71.7	25.6	58.4	15.8	31.0	0
November 2023	39.0	55.0	30.0	39.5	18.5	24.2	0
December 2023	48.7	74.6	32.0	44.6	20.8	28.3	0
January 2024	37.3	100.1	31.0	51.4	22.3	35.2	0
February 2024	74.2	78.5	33.9	48.1	23.2	32.0	1
March 2024	35.5	44.5	25.0	39.4	17.3	25.9	0
April 2024	40.0	85.6	19.0	41.3	14.1	26.5	0
May 2024	15.2	26.9	13.0	24.3	9.3	18.3	0
June 2024	14.2	26.8	9.6	18.8	6.5	13.0	0
July 2023 to June 2024	74.2	100.1	26.9	41.1	14.6	24.3	1

11.3. Appendix C: PKCT Annual Wind Summary

Northern Monitor



Southern Monitor



11.4. Appendix D: LDP16 Discharge Data Summary

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
4/07/2023	7.64	15	Not visible
5/07/2023	8.18	16	Not visible
7/07/2023	7.68	10	Not visible
9/07/2023	8.26	7	Not visible
14/07/2023	8.24	15	Not visible
17/07/2023	7.95	22	Not visible
18/07/2023	8.14	18	Not visible
20/07/2023	7.83	12	Not visible
21/07/2023	8.45	13	Not visible
24/07/2023	8.33	12	Not visible
25/07/2023	8.1	11	Not visible
26/07/2023	8.57	16	Not visible
28/07/2023	8.99	15	Not visible
29/07/2023	7.28	8	Not visible
2/08/2023	7.73	15	Not visible
3/08/2023	7.94	8	Not visible
4/08/2023	8.84	8	Not visible
5/08/2023	9.06	10	Not visible
6/08/2023	8.72	14	Not visible
7/08/2023	8.76	6	Not visible
8/08/2023	8.67	9	Not visible
9/08/2023	7.94	<5	Not visible
10/08/2023	8.07	9	Not visible
11/08/2023	8.74	9	Not visible
14/08/2023	8.5	10	Not visible
15/08/2023	7.31	6	Not visible
16/08/2023	7.54	10	Not visible
17/08/2023	7.16	8	Not visible
18/08/2023	7.04	<5	Not visible
19/08/2023	7.54	<5	Not visible
20/08/2023	7.86	<5	Not visible
21/08/2023	7.44	5	Not visible
22/08/2023	7.61	<5	Not visible
23/08/2023	7.47	<5	Not visible
24/08/2023	8.05	<5	Not visible
25/08/2023	8.17	6	Not visible
26/08/2023	8.4	<5	Not visible
27/08/2023	8.97	<5	Not visible
28/08/2023	9.32	<5	Not visible
29/08/2023	9.07	8	Not visible
30/08/2023	9.48	16	Not visible
31/08/2023	9.62	9	Not visible
1/09/2023	8.79	17	Not visible
2/09/2023	9.03	14	Not visible
3/09/2023	9.56	17	Not visible
4/09/2023	9.45	16	Not visible
5/09/2023	9.81	20	Not visible
6/09/2023	9.5	20	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
7/09/2023	9.72	17	Not visible
8/09/2023	9.97	20	Not visible
9/09/2023	9.59	24	Not visible
10/09/2023	9.73	26	Not visible
11/09/2023	10.3	32	Not visible
12/09/2023	9.51	32	Not visible
13/09/2023	9.45	26	Not visible
14/09/2023	9.65	28	Not visible
19/09/2023	9.94	10	Not visible
20/09/2023	9.5	20	Not visible
21/09/2023	9.44	13	Not visible
22/09/2023	9.04	7	Not visible
23/09/2023	8.36	<5	Not visible
24/09/2023	7.95	9	Not visible
28/09/2023	8.41	14	Not visible
29/09/2023	8.62	8	Not visible
30/09/2023	8.25	10	Not visible
5/10/2023	7.94	18	Not visible
6/10/2023	8.51	<5	Not visible
18/10/2023	7.44	<5	Not visible
19/10/2023	8	<5	Not visible
20/10/2023	8.26	6	Not visible
28/10/2023	7.57	6	Not visible
29/10/2023	7.73	<5	Not visible
4/11/2023	7.59	16	Not visible
5/11/2023	7.6	<5	Not visible
6/11/2023	7.48	<5	Not visible
7/11/2023	7.33	<5	Not visible
8/11/2023	7.61	<5	Not visible
9/11/2023	6.54	<5	Not visible
10/11/2023	6.65	<5	Not visible
11/11/2023	7.51	<5	Not visible
14/11/2023	7.62	6	Not visible
15/11/2023	8.62	<5	Not visible
24/11/2023	7.73	<5	Not visible
25/11/2023	7.53	<5	Not visible
26/11/2023	7.94	22	Not visible
27/11/2023	8.31	<5	Not visible
29/11/2023	8.08	6	Not visible
30/11/2023	7.39	<5	Not visible
1/12/2023	7.26	8	Not visible
2/12/2023	7.63	<5	Not visible
4/12/2023	7.37	<5	Not visible
5/12/2023	7.26	<5	Not visible
6/12/2023	8.65	8	Not visible
7/12/2023	7.66	24	Not visible
8/12/2023	8.66	6	Not visible
9/12/2023	8.88	5	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
10/12/2023	8.65	10	Not visible
11/12/2023	8.44	<5	Not visible
12/12/2023	7.85	<5	Not visible
13/12/2023	8.42	7	Not visible
14/12/2023	8.47	<5	Not visible
15/12/2023	8.16	<5	Not visible
16/12/2023	8.13	<5	Not visible
17/12/2023	7.86	<5	Not visible
18/12/2023	7.59	<5	Not visible
19/12/2023	7.95	<5	Not visible
20/12/2023	7.87	12	Not visible
21/12/2023	7.81	<5	Not visible
22/12/2023	7.85	<5	Not visible
23/12/2023	8.08	<5	Not visible
24/12/2023	8.15	6	Not visible
25/12/2023	7.1	10	Not visible
26/12/2023	7.81	<5	Not visible
27/12/2023	7.62	6	Not visible
28/12/2023	7.9	5	Not visible
29/12/2023	8.21	<5	Not visible
30/12/2023	8.16	<5	Not visible
31/12/2023	8.27	<5	Not visible
1/01/2024	8.22	<5	Not visible
2/01/2024	8.31	<5	Not visible
3/01/2024	7.97	<5	Not visible
4/01/2024	8.27	<5	Not visible
5/01/2024	8.38	<5	Not visible
6/01/2024	8.49	<5	Not visible
11/01/2024	9	7	Not visible
12/01/2024	8.93	<5	Not visible
15/01/2024	9.2	8	Not visible
16/01/2024	9.04	5	Not visible
17/01/2024	8.78	<5	Not visible
18/01/2024	9.2	<5	Not visible
19/01/2024	8.79	<5	Not visible
20/01/2024	9	11	Not visible
21/01/2024	9.35	7	Not visible
22/01/2024	9.57	12	Not visible
25/01/2024	9	11	Not visible
26/01/2024	9.1	7	Not visible
27/01/2024	9.08	<5	Not visible
28/01/2024	8.98	5	Not visible
29/01/2024	8.56	<5	Not visible
30/01/2024	8.61	<5	Not visible
1/02/2024	8.6	<5	Not visible
1/02/2024	8.69	<5	Not visible
2/02/2024	8.82	<5	Not visible
3/02/2024	8.95	<5	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
6/02/2024	9.3	<5	Not visible
7/02/2024	8.86	8	Not visible
8/02/2024	8.62	<5	Not visible
9/02/2024	8.96	<5	Not visible
10/02/2024	8.69	<5	Not visible
11/02/2024	8.76	<5	Not visible
12/02/2024	8.84	8	Not visible
13/02/2024	8.63	7	Not visible
14/02/2024	8.84	<5	Not visible
15/02/2024	8.74	8	Not visible
16/02/2024	8.42	<5	Not visible
20/02/2024	8.49	<5	Not visible
21/02/2024	8.54	<5	Not visible
23/02/2024	8.89	<5	Not visible
24/02/2024	8.18	<5	Not visible
25/02/2024	8.18	<5	Not visible
26/02/2024	8.24	<5	Not visible
27/02/2024	8.28	7	Not visible
28/02/2024	8.35	10	Not visible
29/02/2024	8.59	<5	Not visible
1/03/2024	8.54	<5	Not visible
2/03/2024	8.55	<5	Not visible
4/03/2024	8	10	Not visible
5/03/2024	8.45	8	Not visible
6/03/2024	7.96	11	Not visible
7/03/2024	7.98	6	Not visible
8/03/2024	8.42	6	Not visible
11/03/2024	7.3	9	Not visible
12/03/2024	8.37	39	Not visible
13/03/2024	8.65	11	Not visible
14/03/2024	8.66	6	Not visible
15/03/2024	8.22	<5	Not visible
16/03/2024	8.24	5	Not visible
17/03/2024	8.05	<5	Not visible
18/03/2024	7.97	<5	Not visible
19/03/2024	7.92	14	Not visible
20/03/2024	8.14	<5	Not visible
21/03/2024	7.99	<5	Not visible
22/03/2024	7.75	<5	Not visible
23/03/2024	6.99	<5	Not visible
24/03/2024	7.56	<5	Not visible
25/03/2024	7.24	<5	Not visible
26/03/2024	8.42	<5	Not visible
27/03/2024	7.5	<5	Not visible
28/03/2024	7.96	<5	Not visible
29/03/2024	7.87	<5	Not visible
30/03/2024	8.44	<5	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
31/03/2024	8.32	<5	Not visible
1/04/2024	8.54	<5	Not visible
2/04/2024	8.56	<5	Not visible
3/04/2024	8.04	<5	Not visible
4/04/2024	8.67	5	Not visible
5/04/2024	6.46	<5	Not visible
6/04/2024	7.22	14	Not visible
7/04/2024	7.95	<5	Not visible
8/04/2024	8.26	<5	Not visible
9/04/2024	8.43	<5	Not visible
10/04/2024	8.04	<5	Not visible
11/04/2024	7.63	<5	Not visible
12/04/2024	8.12	<5	Not visible
13/04/2024	8.16	<5	Not visible
14/04/2024	8.21	<5	Not visible
15/04/2024	8.26	<5	Not visible
16/04/2024	8.39	<5	Not visible
17/04/2024	8.29	<5	Not visible
18/04/2024	8.3	<5	Not visible
19/04/2024	7.95	<5	Not visible
20/04/2024	8.26	<5	Not visible
21/04/2024	8.3	<5	Not visible
22/04/2024	8.29	<5	Not visible
23/04/2024	8.42	<5	Not visible
24/04/2024	8.51	<5	Not visible
25/04/2024	8.47	<5	Not visible
26/04/2024	8.52	<5	Not visible
27/04/2024	8.25	<5	Not visible
28/04/2024	8.54	<5	Not visible
29/04/2024	8.4	<5	Not visible
30/04/2024	8.49	<5	Not visible
1/05/2024	8.41	5	Not visible
2/05/2024	8.48	<5	Not visible
3/05/2024	8.43	<5	Not visible
4/05/2024	8.04	21	Not visible
5/05/2024	7.16	19	Not visible
6/05/2024	6.84	35	Not visible
7/05/2024	7	11	Not visible
8/05/2024	7.27	7	Not visible
9/05/2024	8	27	Not visible
10/05/2024	7.19	6	Not visible
11/05/2024	7.52	23	Not visible
12/05/2024	7.23	122	Not visible
13/05/2024	7.66	9	Not visible
14/05/2024	7.79	7	Not visible
15/05/2024	7.62	<5	Not visible
16/05/2024	7.92	<5	Not visible

Date	pH (pH units)	TSS (mg/litre)	Oil and Grease (mg/litre)
17/05/2024	7.96	<5	Not visible
18/05/2024	7.77	9	Not visible
19/05/2024	7.71	5	Not visible
20/05/2024	8	<5	Not visible
21/05/2024	8.08	6	Not visible
22/05/2024	8	<5	Not visible
23/05/2024	7.98	<5	Not visible
24/05/2024	7.94	<5	Not visible
25/05/2024	8.01	<5	Not visible
26/05/2024	8.13	<5	Not visible
27/05/2024	8.02	<5	Not visible
28/05/2024	8.18	<5	Not visible
29/05/2024	8.08	7	Not visible
30/05/2024	8.21	<5	Not visible
31/05/2024	8.18	<5	Not visible
1/06/2024	8.27	<5	Not visible
2/06/2024	8.14	<5	Not visible
3/06/2024	8.1	<5	Not visible
5/06/2024	8.23	<5	Not visible
6/06/2024	7.7	8	Not visible
7/06/2024	7.58	28	Not visible
8/06/2024	7.64	18	Not visible
9/06/2024	8.05	<5	Not visible
10/06/2024	8.12	<5	Not visible
11/06/2024	7.93	<5	Not visible
12/06/2024	7.97	<5	Not visible
13/06/2024	8.38	<5	Not visible
14/06/2024	8.17	<5	Not visible
15/06/2024	8.12	<5	Not visible
16/06/2024	8.36	<5	Not visible
17/06/2024	8.42	<5	Not visible
18/06/2024	8.42	<5	Not visible
19/06/2024	8.36	<5	Not visible
20/06/2024	8.05	<5	Not visible
21/06/2024	8.19	<5	Not visible
22/06/2024	8.25	<5	Not visible
23/06/2024	8.28	<5	Not visible
24/06/2024	8.32	<5	Not visible
25/06/2024	7.86	<5	Not visible
26/06/2024	8.07	<5	Not visible
27/06/2024	8.12	<5	Not visible
28/06/2024	8.11	<5	Not visible
29/06/2024	8.00	<5	Not visible
30/06/2024	8.23	<5	Not visible

*Note: 122mg/L TSS was recorded following significant rainfall event where >90mm of rainfall fell across a 5 day period leading up to the overflow. This reading was allowable within the PKCT EPL due to excessive rainfall.

11.5. Appendix E: Weed Spraying Notification Form

Notification of Weed Spraying

Section		Details
1	Date	24/6/24
2	Responsible Person	J. Delfino
3	Area Sprayed	NC8 & Pond/Pump South PKCT
4	Start time	7:30
5	Finish time	2:20
6	Weather	Fine Sunny
7	Frog sightings?	No
8	Total amount sprayed	380 L
9	Product used:	Glyphosate

Name	J. Delfino
Signature	
Date	24/6/24

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11.6. Appendix F: Triennial Independent Audit Findings and Action Plan

Port Kembla Coal Terminal (PKCT) Approval 08_0009

Department of Planning Industry and Environment (DPI&E) – Independent External Audit 2nd and 3rd August 2023

On 2nd and 3rd August 2023, Environmental Resources Management Australia Pty Ltd (ERM) undertook a Triennial Independent Environmental Audit at Port Kembla Coal Terminal as per the requirements of Project Approval 08_0009.

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

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

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

Summary of Audit Findings

Review	Non-compliances (NC)	Observations (Obs NC)	Observations (Obs C)
Statutory Instruments	1	Nil	Nil
Implementation of Plans	Nil	Nil	Nil

Item No	Assessment Requirement	Comment	Audit Classification	Response/Action	PKCT Response/Action
Minister's Conditions of Approval PA 08_0009					
Sch. 4-5	By 31 March 2011, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be conducted by a 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.*	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.	NC	ERM recommends PKCT revert to commissioning the IEAs by 31 March on an audit year and set up a reminder within PKCT scheduling systems.	Finding accepted. PKCT has created Action "A372" within the WERC Event Management System to flag the required audit date to occur on or before 31st March 2026.
Driver's Code of Conduct					
		No non-compliances have been identified.			n/a
Environmental Protection Licence 1625					
		No non-compliances have been identified.			n/a

11.7. Appendix G: ISO 14001 and 9001 Certificate

LRQA

Current issue date: 1 March 2022
Expiry date: 28 February 2025
Certificate identity number: 10415638

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

Certificate of Approval

This is to certify that the Management System of:

Port Kembla Coal Terminal Limited

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

has been approved by LRQA to the following standards:

ISO 14001:2015, ISO 9001:2015

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

The scope of this approval is applicable to:

Receiving, stockpiling and loading of coal, coke and other dry bulk materials for shipment.

Luis Cunha

Area Operations Manager - SAMEA

Issued by: Lloyd's Register Quality Assurance Limited

JAS-ANZ

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