

8 May 2024

Mr. Bradley James
Principal Case Manager
Office of the Independent Planning Commission
Suite 15.02, Level 15
135 Kind Street
SYDNEY, NSW, 2000

Via email: bradley.james@ipcn.nsw.gov.au

Dear Brad

Lidsdale Siding MOD 5 and Clarence Colliery MOD 10 – Response to Questions on Notice

We refer to the modification applications for the Lidsdale Siding State Significant Development (**SSD**) 08_0223 Modification 5 (**MOD5**) and Clarence Colliery Development Consent DA504-00 Modification 10 (**MOD10**), currently before the Independent Planning Commission (**Commission**) for determination. We also refer to further questions from the Commission regarding MOD10 and MOD5 following our meeting held on 2nd May 2024 and the Commission's letter dated 3rd May 2024. Each question from the letter is set out below in bold, and our response is provided thereafter.

1. Can you provide further information regarding the flexibility of transporting coal via truck to Mount Piper Power Station (MPPS) as an alternative to rail?

The dispatch of coal via trucks provides enhanced flexibility for both the producer (ie Clarence) and the recipient. The ability to organise and dispatch trucks is more flexible as compared to organising and dispatching trains, and therefore deliveries can be tailored to demand. Additionally, the ability to truck coal product allows for the continuation of delivery at times when there are issues with:

- rail services such as landslips,
- derailments
- pauses in production at Springvale and/or Airly (ie. Geological/geotechnical issues, longwall moves, etc)

In addition, loading and unloading trucks requires less double handling of the coal material compared to rail. The Clarence coal product has a relatively high proportion of fine coal and the more the coal product is handled and double handled, the more it pulverises. Loading a truck consists of a front end loader loading coal into the truck. Unloading the coal consists of tipping the product out of the truck directly on the stockpile at Lidsdale Siding. In comparison, loading a train requires more moving parts and logistics including:

- working the coal stockpile with a dozer,
- loading the coal into the reclaim via underground chutes,
- conveying the coal to the coal bin,

- dumping the coal into the coal bin,
- loading the coal to the train wagons from the elevated coal bin via a covered chute.

The rail loading process exacerbates the volume of fine coal product compared to truck loading. Clarence has found that loading the same proportion of fine coal product into a train (as that loaded into trucks) results in the coal product not discharging effectively out of the wagon at the unloading point.

Other advantages of trucking Clarence's coal product include:

- flexibility due to smaller volumes delivered at a rate which can be handled and more effectively managed on the smaller stockpile footprint at Lidsdale Siding,
- flexibility as truck movements can be adjusted daily to suit the ebbs and flows of supply and demand whereas trains require up to 2 weeks or prior planning to secure paths and arrange trains,
- trucks can be loaded blended to our specifications and again on blended at the Lidsdale Siding to ensure the end customer quality is maintained as per our contract conditions,
- trucks are able to discharge higher ratios of finer coal product which cannot not be unloaded from train wagons due to the inherent nature of the bomber door unloading configuration of rail wagons,
- enables the option to run and dispatch directly into the Mt Piper Power Station truck unloading terminal if the Lidsdale Facility is closed due to unforeseen circumstances or at full capacity, and
- haulage is generally conducted by local operators manned by local people adding to our local economy who have an understanding of our local issues and understand the importance of maintaining compliance, as they live local.

To this end, dispatching coal by truck provides additional flexibility in terms of product mix, logistics and timing and by virtue of the simple loading and unloading procedure, protects the coal product from additional pulverisation as compared to train load out and delivery.

2. You have advised that there are a number of complexities involved in transporting coal to MPPS via rail. Can you provide further information on this matter?

We note that we are able to dispatch coal from Clarence via train to the west and we have carried out campaign events at different times over the last 12 months. Pathings can be arranged with the Network rail service provider.

Complexity in dispatching coal via train to the west from Clarence, comes from the rail service provider as they are subject to logistical challenges such as:

- raiing west can conflict with yard issues at Lithgow referred to as "possessions". Under these circumstances, no trains can go west from Clarence,
- increasing light vehicle and pedestrian interactions at level crossings such as behind the Lithgow information centre on Barton Street,
- unloading trains at Lidsdale Siding are limited to the amount the unloading facility terminal can receive daily due to consent conditions (SSD 08_0223, Schedule2, condition 7: limits the number of trains through the Lidsdale Siding per day and coal train loading operations

are not to be undertaken on the same day as coal train unloading operations), and the limited footprint of the stockpile,

- the rail service providers have limited units and are subject to personnel constraints (ie limited human resources) to service all our and their other customer requirements. Limited human resourcing is commonly the case across the mining and energy industry particularly in Lithgow,
- the logistics of crewing for Western paths is difficult due to crews being deployed from Sydney which limits further their pathing options when they are travelling from the east and this is compounded with the restrictions associated with the Lidsdale Siding consent associated with curfews on unloading times, and
- trains are already being delivered from Airly at, or close to, the maximum rate that can be unloaded at the Lidsdale facility within curfew hours.

We also note the physical complexities associated with loading the Clarence coal product into trains as set out in Question 1.

3. What is the small incremental increase of particulate emissions referenced on page 26 of the Modification Report, dated 13 November 2023? How far within the air quality criteria is it? Can you please provide quantitative data in your response.

As discussed at our meeting on 2nd May 2024, Clarence has previously transported coal product by truck to Lidsdale Siding throughout the 2023 calendar year. Air quality monitoring over 2023 confirmed that with the additional activities of dispatching coal from Clarence, unloading coal at Lidsdale Siding and forward dispatch to the Mt Piper Power Station, both operations were able to maintain compliance with their air quality criteria as stipulated under each consent. The air quality monitoring results from both Lidsdale Siding and Clarence from 2023 are presented herein.

Lidsdale Siding

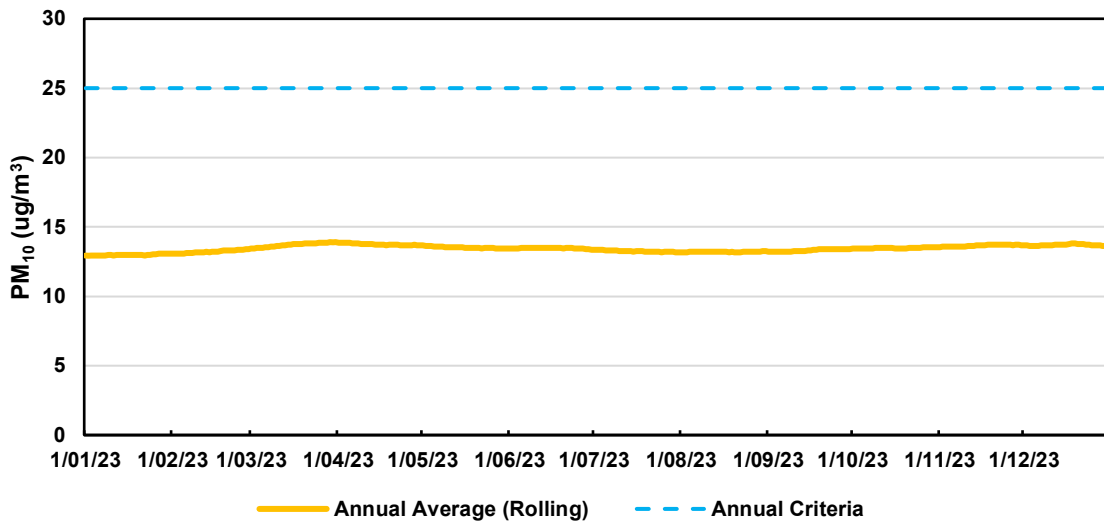
The air quality assessment criteria at Lidsdale Siding is stipulated within Schedule 3, condition 8 of SSD 08_0223 and is summarised below:

- Long Term criteria:
 - Total suspended particulate (TSP) matter Annual Average - 90 $\mu\text{g}/\text{m}^3$
 - Particulate matter < 10 μm (PM₁₀) Annual Average - 25 $\mu\text{g}/\text{m}^3$ (see **Graph 1**)
 - Deposited dust Annual Average 4 $\text{g}/\text{m}^2/\text{month}$ or incremental increase of 2 $\text{g}/\text{m}^2/\text{month}$ (see **Graph 2**)
- Short term criteria:
 - Particulate matter < 10 μm (PM₁₀) 24 hour Average - 50 $\mu\text{g}/\text{m}^3$ (see **Graph 3**)

TSP is calculated from the PM₁₀ results. The recorded Annual Average for 2023 was 33.4 $\mu\text{g}/\text{m}^3$ which is less than the criteria of 90 $\mu\text{g}/\text{m}^3$.

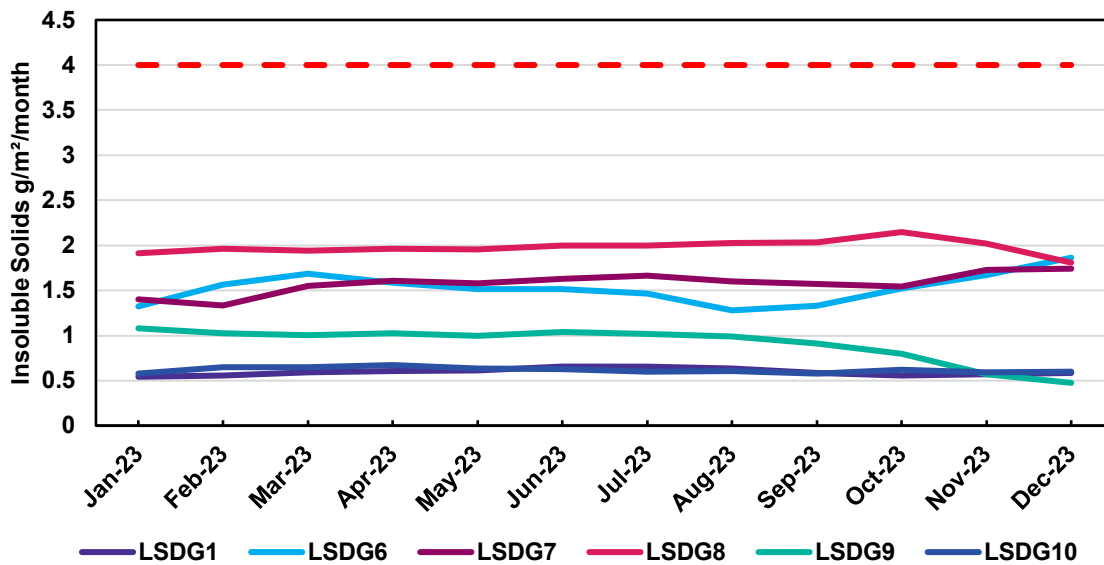
The rolling Annual Average results from the PM₁₀ monitoring over 2023 is presented in **Graph 1**, which shows the monitoring results were less than the criteria. The Annual Average for 2023 was 13.9 $\mu\text{g}/\text{m}^3$, which is less than the criteria of 25 $\mu\text{g}/\text{m}^3$.

Graph 1. Lidsdale Siding 2023 Annual Average PM₁₀



Lidsdale Siding has six dust deposition gauges surrounding the Lidsdale Siding facility. The rolling Annual Average results from the dust deposition monitoring over 2023 is presented in **Graph 2**, which shows the monitoring results were less than that the criteria. All dust gauges recorded Annual Average dust deposition rates less than 2.1 g/m²/month which is less than the criteria of 4 g/m²/month.

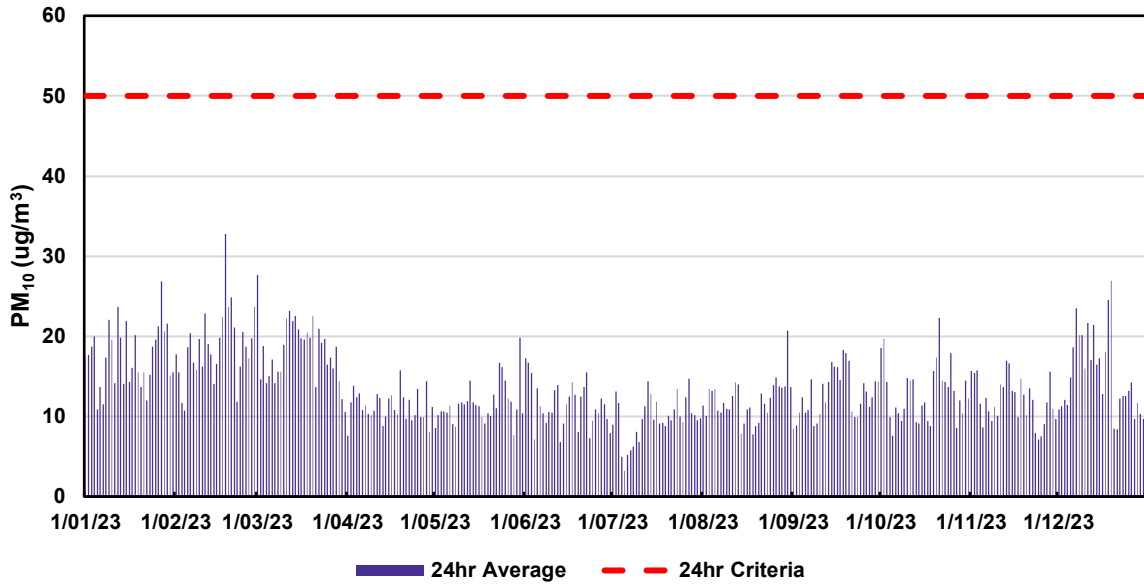
Graph 2. Lidsdale Siding Depositional Dust 12-month rolling average



Note: the criteria is shown by the red dashed line

The 24 hour Average results from the PM₁₀ monitoring over 2023 is presented in **Graph 3**, which shows the monitoring results were less than that the criteria. All 24 hour Average PM₁₀ results were less than 33 µg/m³ which is less than the criteria of 50 µg/m³.

Graph 3. Lidsdale Siding 2023 24hr Average PM₁₀



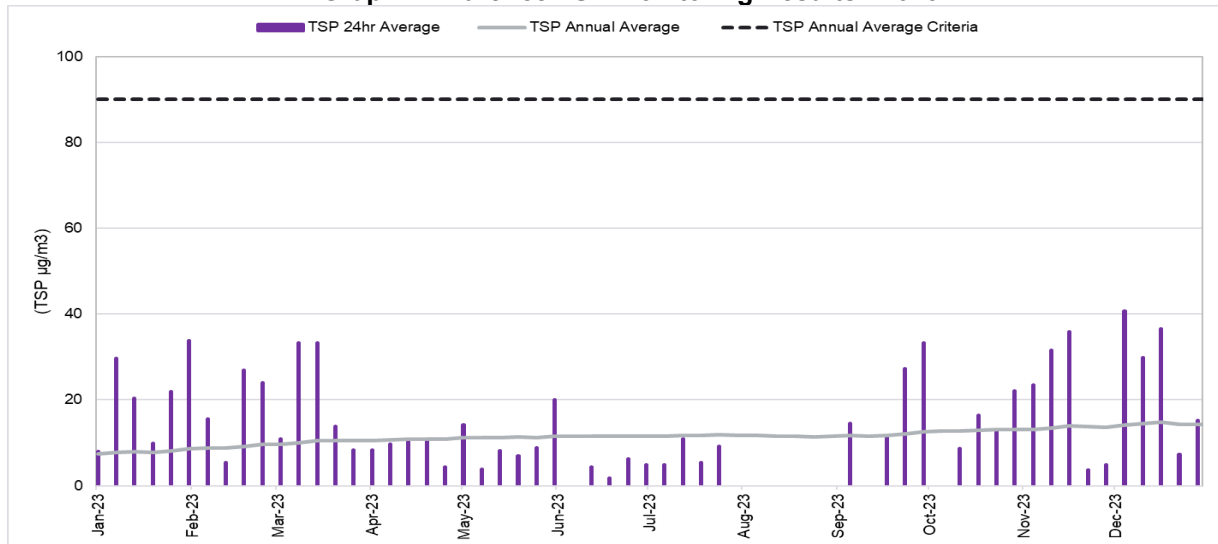
Clarence

The air quality assessment criteria at Clarence is stipulated within Schedule 3, condition 13 of development consent DA504-00 and is summarised below:

- Long Term criteria:
 - Total suspended particulate (TSP) matter Annual Average - 90 µg/m³ (**Graph 4**)
 - Particulate matter < 10µm (PM₁₀) Annual Average - 25 µg/m³ (**Graph 5**)
 - Deposited dust Annual Average 4 g/m²/month or incremental increase of 2 g/m²/month (**Graph 6**)
- Short term criteria:
 - Particulate matter < 10µm (PM₁₀) 24 hour Average - 50 µg/m³ (**Graph 7**)

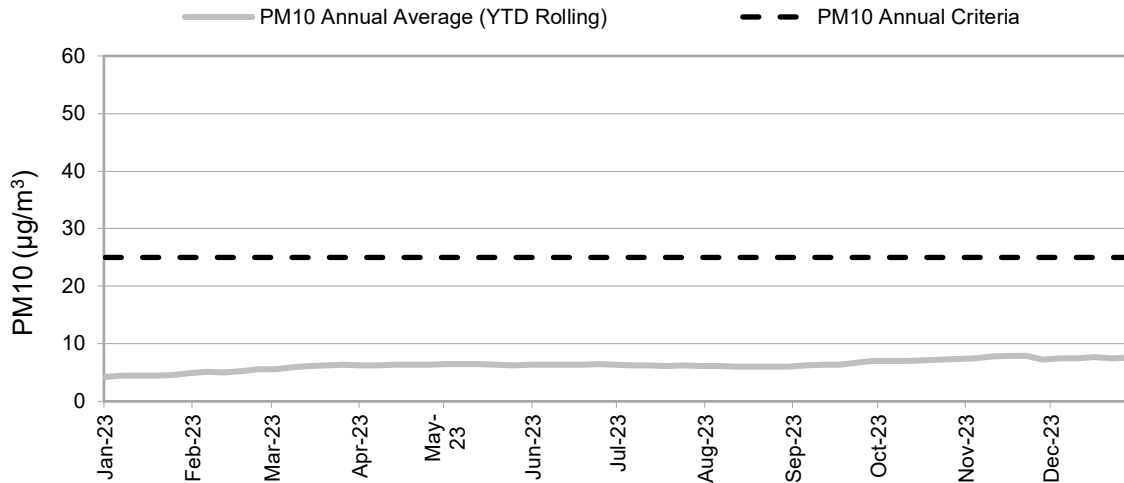
The recorded Annual Average TSP for 2023 was 11.4 µg/m³ which is less than the criteria of 90 µg/m³. Results from the TSP monitoring, including the rolling annual average TSP results are presented in **Graph 4**.

Graph 4. Clarence TSP Monitoring Results - 2023



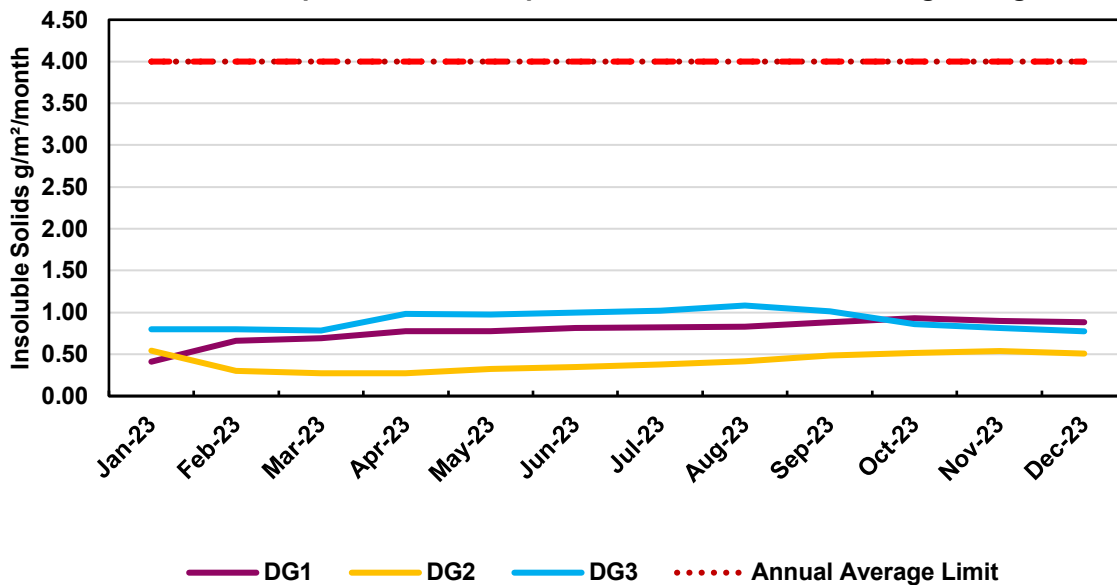
The rolling Annual Average results from the PM₁₀ monitoring at Clarence over 2023 is presented in **Graph 5**, which shows the monitoring results were less than the criteria. The Annual Average PM₁₀ result for 2023 was 6.2 µg/m³, which is less than the criteria of 25 µg/m³.

Graph 5. Clarence Annual Average PM10



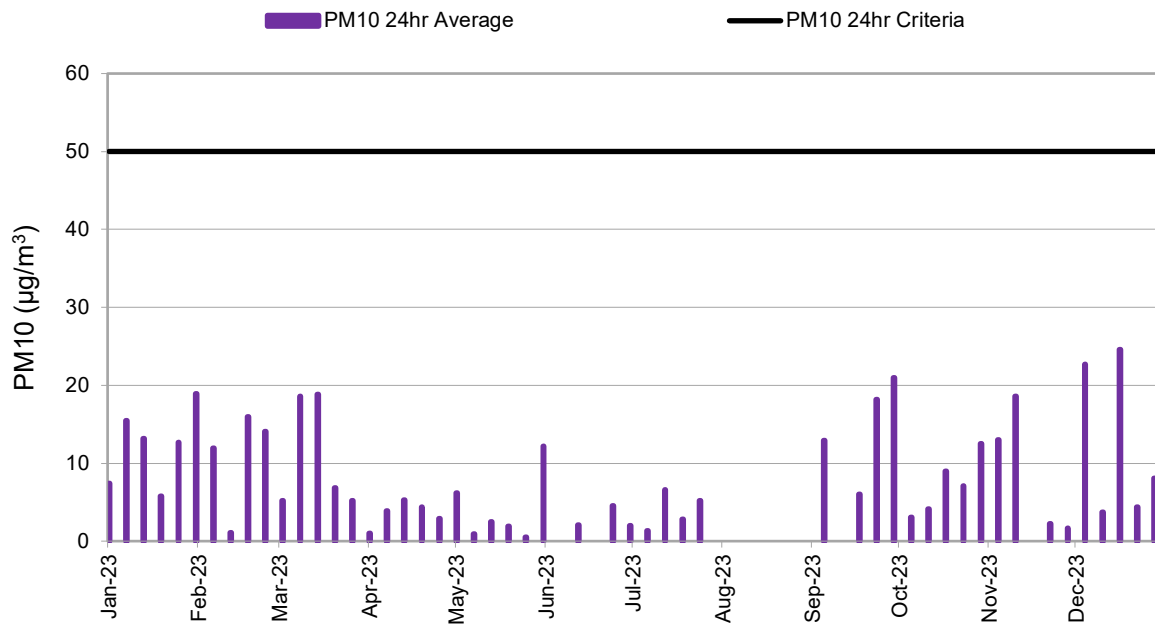
Clarence has three dust deposition gauges located around the Clarence pit top. The rolling Annual Average results from the dust deposition monitoring over 2023 is presented in **Graph 6**, which shows the monitoring results were less than the criteria. All dust gauges recorded a rolling Annual Average of less than 1.1 g/m²/month which is less than the criteria of 4 g/m²/month.

Graph 6. Clarence Depositional Dust 12-month rolling average



The 24 hour Average results from the PM₁₀ monitoring over 2023 is presented in **Graph 7**, which shows the monitoring results were less than that the criteria. All 24 hour Average PM₁₀ results were less than 25 µg/m³ which is less than the criteria of 50 µg/m³.

Graph 7. Clarence 24hr Average PM10



4. What is the stockpile capacity at Lidsdale, Western Coal Services and MPPS?

The stockpile capacity at Lidsdale Siding is 30,000 tonnes. The stockpile capacity at Western Coal Services is 400,000 tonnes. We do not have access to details relating to the operational capacity of the stockpile at Mt Piper Power Station. It is noted that EnergyAustralia may restrict stored volumes for any number of reasons potentially including (amongst others):

- fire risk,
- development consent requirements,
- safety issues, and/or
- financial reasons.

The following paragraphs consider hypothetical scenarios of storing a train delivery of Clarence’s coal at Western Coal Services or Lidsdale Siding and highlights the constrains of such scenarios. Unloading coal from a train at Lidsdale Siding and delivering that coal to Western Coal Services for storage uses the same conveyor as that which delivers coal to the Mt Piper Power Station so we can only do one delivery destination at a time. Delivering coal product to the Western Coal Services removes the ability to deliver coal product directly to the Mt Piper Power Station, so unless there is an urgent set of circumstances, it is logistically and economically more favourable to dispatch coal from Lidsdale Siding, directly to the Power Station.

Coal delivered to the Lidsdale Siding by train, needs to be unloaded and then sent to the Lidsdale Siding Stockpile. To then load the coal onto the conveyor to the Mt Piper Power Station, coal dozers are required to push the coal out and then back in again to direct coal to the conveyor feeders. This double handling is not only costly, it further pulverizes the coal creating more fines which retains moisture on the stockpile, increasing the potential for blockages in the conveying system. Too much fine coal product can also impact our contract compliance. Coal delivered out of specifications can lead to product rejection. Conversely, coal product delivered by trucks can be delivered directly to the stockpile for blending and loading out to the Power Station.

From a safety perspective, it is not best practice to manage our stockpiles at or close to capacity. We often find, as our stockpiles get larger we have more occurrences of the dozer getting bogged on the stockpile. Managing our stockpiles at close to capacity (amongst other things) can also result in unforeseen bridging over the coal valves, which if not managed very carefully, can result in slumping and in a worst case scenario, engulfment. Therefore, managing volumes of coal on the stockpile via maintaining throughput (as opposed to term storage), is a safety practice that is maintained at the Lidsdale Siding and Western Coal Services where possible. It is actually preferable to keep the stockpiles as low as possible as it tends to be the safest means of operating.

5. Would covering the train cars resolve the sticky coal issue? Has this been considered as an option in providing coal to MPPS?

Covering the train cars will not resolve the sticky fine coal issue because the fine coal material is inherently sticky. We have not considered this as an option because it would not provide any improvement to the unloading effectiveness of wagons with higher contents of fine coal.

Importantly, for the short time the fine coal material stands in the wagons affected by rain events from the time of loading from the train load out bin to the unloading at the discharge facility at Lidsdale Siding, would make little difference to the hang up issues experienced. Clarence has quite a lot of experience from loading fairly damp to reasonably dry fine coal material and the issues always experienced, comes down to poor unloading due to the design configuration of the train wagons, being bottom dumpers, and hang up of the fine coal. Clarence has trialled various treatments of the train wagons to facilitate better slip, however, these have proven to be not successful.

Further Correspondence

We note your email dated 7th May 2024, whereby the Commission requested a copy of the presentation from our meeting last week. The presentation is provided with this letter.

Should you have any further questions, please do not hesitate to contact me at Edwina.white@centennialcoal.com.au

Yours sincerely

Edwina White

Edwina White
Group Manager Approvals
Centennial Coal

Encl.

CENTENNIAL

Clarence Colliery DA 504-00 MOD10 Lidsdale Siding SSD 08_0223 MOD5

Meeting with IPC Thursday 2 May 2024

OUR WAY IN ENERGY

1

Clarence Colliery

- Clarence Colliery (Clarence) is an underground coal mine within the Western Coalfields of NSW, approximately 10kms east of Lithgow.
- Clarence commenced operations in the 1980s and currently operates under three separate development consents including:
 - IRM.GE.76 issued in 1976 by the Baxland Shire Council (now Lithgow City Council)
 - Development consent DA 174/93, issued in 1994 by the Lithgow City Council
 - Development Consent **DA 504-00**, issued in 2005 by the then NSW Department of Infrastructure, planning and Natural Resources
- MOD 10, relates to DA504-00 which authorises the extraction of up to 3 Million tonnes per annum (Mtpa) of coal, employing partial extraction mining methods, until the end of 2026.
- Clarence produces high quality, low ash thermal coal from the Katoomba Seam for both domestic and export customers.
- DA 504-00 permits the dispatch of coal via rail and allows limited dispatch of coal in trucks via public roads - 200,000 tonnes per annum (tpa) of coal products from Clarence by road, including:
 - Up 200,000 tpa to the east; or
 - Up to 100,000 tpa to the west via the Darling Causeway and Great Western Highway route (Western Haulage Route).

OUR WAY IN ENERGY

2

Lidsdale Siding

- Lidsdale Siding is an existing rail loading and coal blending facility that has been in operation since 1974 and it automates the transfer and dispatch of coal to and from Centennial's Western Coal Services (WCS) Project.
- The facility is approximately 500 metres (m) north of Wallerawang and approximately 9 km north-west of Lithgow.
- Lidsdale Siding operates under SSD 08_0223, which was approved under Part 3A of the EP&A Act in May 2013.
- SSD 08_0223 is held by Ivanhoe Coal Pty Ltd, a wholly owned subsidiary of Centennial Coal Company Pty Limited.
- SSD 08_0223 allows for Coal handling and train loading/unloading operations on the site until 31 December 2042. Receipt of coal by truck expired in December 2023:
 - Coal receipt and transport By conveyor, by rail and by truck until 31 December 2023
 - Until 31 December 2023, receive up to 25 laden coal trucks per day between hours of 7 am to 10 pm Monday to Saturday and 8 am to 10 pm on Sundays and public holidays.



OUR WAY IN ENERGY

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3

Clarence Colliery MOD 10 and Lidsdale Siding MOD 5

- Centennial is seeking to modify Clarence Colliery development consent DA 504-00 and Lidsdale Siding development Consent SSD 08_0223, pursuant to Section 4.55(1A) of the NSW Environmental Planning and Assessment Act 1979, to:
 - Clarence Colliery DA 504-00**
 - allow for the dispatch of up to 300,000 tpa of coal product from Clarence by truck until the lapse of DA 504-00
 - the ability to transport up to 200,000 tpa of product coal from Clarence by truck to the west to either MPPS and/or to the Lidsdale Siding via public roads (as previously approved - Western haulage Routes), until the lapse of DA 504-00
 - Lidsdale Siding SSD 08_0222**
 - allow for the acceptance of up to 200,000 tpa of coal by truck into Lidsdale Siding via the Castlereagh Highway
- The proposed modification has been designed to avoid and minimise adverse impacts through the implementation of appropriate management measures to mitigate any residual impacts from the proposed modification.
- Key assessments undertaken conclude there will be minimal impacts and they are considered acceptable
- The combined modification was submitted to DPHI in November 2023 and was on public exhibition from 24 November 2023 until 7 December 2023

OUR WAY IN ENERGY

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Clarence Colliery MOD 10 and Lidsdale Siding MOD 5

- Project Justification: Energy Security
 - EnergyAustralia (EA) has highlighted the criticality of Centennial maintaining its ability to deliver a secure energy source to meet the ongoing forward electricity demand on the Eastern Seaboard of Australia
 - The proposed modification will authorise an alternate coal supply source to secure electricity demand
 - The proposed modification will enable the blending of coal products to ensure supply meets the required specifications for efficient power generation
 - By utilising trucks, Clarence can flexibly and quickly deliver coal to MPPS responding to fluctuations in demand as and when required
 - The environmental assessment findings and proposed mitigation and management measures to be implemented have not identified any material additional environmental impacts
 - Benefits to NSW – the provision of an immediate and cost effective additional coal supply to assist EA in securing reliable and affordable electricity supply
- Project Justification: Alternatives Considered
 - Rail the coal product – restricts flexibility and introduces inefficiencies
 - Supply from other Centennial operations: Airly (community objection), Springvale, Clarence
 - Coal from other suppliers outside of Lithgow LGA – longer dispatch and associated effects

7 December 2023

Anna Houston
Project Officer
Energy, Resources and Industry Assessments
Department of Planning and Environment
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Manlyvale NSW 1515
anna.houston@pep.nsw.gov.au

Dear Sirs,

EnergyAustralia supports the Modification Application(s) and Report(s) for the Clarence Coal and Lidsdale Coal Loader Modification (DA54-00-Mod-10 and MPO_0223-Mod-5) and is pleased to provide comments.

EnergyAustralia is one of Australia's largest energy companies, providing gas and electricity to 3.5 million households and business, across Queensland, NSW, Victoria, Queensland, South Australia and the Australian Capital Territory. EnergyAustralia owns and operates a portfolio of energy generation assets across Australia, including coal, gas and wind assets with control of over 4,500MW of generation in the National Electricity Market (NEM). We operate approximately 1.2 million retail customer accounts in total and operate the coal-fired Mt Piper Power Station near Lithgow and the Talavera gas-fired power station near Wodonga.

Mt Piper is the newest, most efficient and the better environmentally performing coal-fired power station in NSW. Mt Piper is amongst the best performing power plants in Australia, generating clean electricity and with some of the lowest emissions of air pollutants and greenhouse gases.

Mt Piper Power Station has limited access to approved coal reserves in the central catchment area. In recent years the Mt Piper Power Station has had to reduce its generation in the period of increasing the available coal reserves in the catchment to guarantee availability over the peak demand periods (Summer and Winter). More than 50% of coal supplied to Mt Piper Power Station is sourced from a single supplier, Springvale Coal Mine. The remaining coal volume is sourced from Clarence Colliery, Springvale, and other smaller coal operations including Clarence United. Hence to have additional coal supplied to Mt Piper Power Station's limited ability to provide a reliable generation to the National Energy Market.

EnergyAustralia supports the Modification as proposed. Please contact me if you have any questions relating to this email.

Anna Houston
Anna Houston
Head of Mt Piper Power Station

EnergyAustralia
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OUR WAY IN ENERGY

Proposed changes to conditions of consent

Proposed changes to DA 504-00 Schedule 2, Condition 7AA:

Until 31st December 2023-2026, the Applicant may transport up to 300,000 tonnes of coal by road per calendar year in total, including up to 200,000 tonnes of coal by road per calendar year to the Mount Piper Power Station or to the Lidsdale Siding, and up to 200,000 tonnes of coal by road per calendar year to locations north of Sydney or Eastern NSW, using the haulage routes shown in Figure 1 of Appendix 5.

Proposed changes to SSD 08_0223 Schedule 2, Condition 7A:

Until 31st December 2023-2026, the Proponent may receive up to 25 laden trucks per day to deliver coal to the site between 7 am to 10 pm Monday to Saturday and 8 am to 10 pm on Sundays and public holidays.

OUR WAY IN ENERGY

Questions and discussion points

Can you provide more information regarding the decision to not use rail as an alternative for the transport of coal?

Centennial has previously considered the transport of coal to west by train, however has been determined to be not a feasible alternative. The coal proposed to be transported from Clarence pit top to MPPS typically contains a higher fine coal content which is sensitive to rainfall and moisture.

Finer coal is more sensitive to rainfall and natural moisture contents – easily absorbing moisture. When the fine coal product absorbs any rainfall the product becomes “sticky” to handle, ultimately resulting in difficulties during the unloading procedures. The potentially “sticky” nature of the fine coal component will cause blockages and may result in the material “hanging up” in the wagon.

Centennial has identified that it is more feasible to manage the transport of coal to MPPS using covered trucks from a logistics point of view. The dispatch of coal via truck offers far superior flexibility compared to trains. It allows Centennial to respond to demand at short notice, respond to the prevailing weather conditions and protect the coal within a covered vessel.

Clarence has previously dispatched coal via truck at the levels proposed in MOD 10 between November 2022 and December 2023 utilising the successful controls set out in the Mod Report, without incident or complaints or non compliances.

7

Can you provide more context around the decision to not use private roads for the transport of coal?

The private haul roads are owned by third parties. Previously, Centennial held access agreements with these third parties, which allowed use of these private haul roads.

These access agreements have since expired. Despite efforts to do so, Centennial has not been able to re-establish access to the Wallerawang Haul Road or Mt Piper Haul road since 2020, due to changes in land ownership and delayed and protracted negotiations.



The proposed haulage route was assessed as part of this modification, the TIA concluded that the Modification would result in minor impacts on traffic and transport related matters. Centennial will continue to implement internal standards and procedures, including the Clarence Haulage Management Standard which addresses the code of conduct, fatigue management and other measures for truck drivers hauling coal along the proposed route.

OUR WAY IN ENERGY

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Page 26 of the Mod report states: “there would be a small increment on particulate emissions from the additional trucks being loaded at the Clarence pit top and uploaded at Lidsdale Siding or MPPS, however this is unlikely to result in an exceedance of air quality criteria”. What is the small incremental increase and how far within the air quality criteria is it?

Loading and unloading of coal into trucks as well as transport would result in some level of dust emissions as a single activity – very minor when compared to other approved activities at Clarence, Lidsdale Siding and MPPS.

This point is an acknowledgement that activities will be crossing bare ground and loading/unloading materials, but these activities will result in a negligible change.

Clarence already utilises successful controls for coal loading, unloading and dispatch:

- Covered loads;
- Truck washdown;
- Coal product to be loaded retains inherent moisture;
- Dust suppression on internal haul roads;

These were successfully implemented throughout the November 2022-December 2023 period with no exceedances of air quality criteria when the same activities as those proposed were carried out.

Can you talk us through the measures to manage dust impacts while the coal is being transported by road.

Dust management measures include:

- All haulage trucks entering and leaving the sites have their loads covered.
- Prior to leaving the Clarence pit top and the Lidsdale Siding site, all haulage trucks are to pass through the truck wash to ensure they are in a clean state prior to accessing the public road network (ie. Sides, undercarriage, draw bars, etc).
- Use of low sulfur diesel in coal haulage trucks.
- Dust suppression on internal Haul roads and stockpiles as required.
- Coal products – inherent moisture of coal product material usually ranges between 8%-28%.

As per the draft conditions for DA 504-00 provided by DPHI on 8 April 2024, if approved Centennial will prepare a combined Transport Management Plan (TMP), in consultation with TfNSW. The TMP will manage the haulage of coal product between the Clarence Colliery and Lidsdale Siding.

Clarence Colliery and Lidsdale Siding have a number of existing endorsed, site specific standards and procedures to manage internal traffic and surface transportation at each site.

Site	Document
Clarence Colliery and Lidsdale Siding	Centennials Air Quality and Greenhouse Gas Management Plan Western Region 2021
Clarence Colliery	CL-29 Surface Transport Management Plan 2022 CL-29-01 Operation of Surface Transport Standard 2019 CL-29-02 Haulage Management Standard 2022 Colliery Environmental Management Strategy 2021
Lidsdale Siding	SCSO-TA-1216 Coal Truck Delivery Induction 2022 SCSO-MS-004 Roads and Other Vehicle Operating Areas Management Environmental Management Strategy Springvale Coal Services Operations 2021

