

INTEGRA UNDERGROUND

GLENCORE



Environmental Management Strategy

Number: INTUG-793190785-45

Owner: Environment and Community Manager

Status: Approved

Version: 4.0

Effective: 24/02/2021

Review: 24/02/2024

Uncontrolled unless viewed on the intranet

Table of Contents

1.	Introduction.....	4
1.1	Background	4
1.2	Purpose.....	4
1.3	Scope and Structure	5
1.4	Consultation regarding the EMS	6
2.	Environmental Policy	9
3.	Planning.....	10
3.1	Environmental Aspects & Impacts	10
3.2	Environmental Objectives and Targets.....	11
3.3	Annual Planning Process.....	11
3.4	Baseline Environmental Studies.....	11
3.5	Statutory Requirements	12
3.6	Environmental Management Plans	15
4.	Implementation.....	16
4.1	Roles and Responsibilities	16
4.2	Documentation and Document Control	17
4.3	Environmental Training and Awareness.....	17
4.4	Operational Controls	18
	4.4.1 Environmental Operating Procedures.....	18
	4.4.2 Emergency Preparedness and Response.....	18
	4.4.3 Change Management.....	19
4.5	Communication.....	19
	4.5.1 Internal Communication	19
	4.5.2 External Communication.....	19
	4.5.3 Community Complaints Management	20
	4.5.4 Dispute Resolution	20
4.6	Managing Cumulative Impacts.....	20
5.	Environmental Reporting	21
5.1	Internal Reporting	21
5.2	External Reporting.....	21
6.	Review and Improvement	23
6.1	Environmental Monitoring	23
6.2	Environmental Inspections	23
6.3	Environmental Audits.....	25
6.4	Social Performance.....	26
6.5	Human Rights.....	26
6.6	Assurance.....	26

6.7	Incidents and Corrective Action	26
6.8	Adaptive Management	29
7.	DA Compliance Table.....	30
8.	Document Information	34
8.1	Related Documents	34
8.2	Reference Information	34
8.3	Change Information	35
	Appendix A - EMS Approval	36

1. Introduction

1.1 Background

This Environmental Management Strategy (EMS) is one of a series of Environmental Management Plans that together form the Environmental Management System for the Glencore Integra Underground Mine, herein referred to as Integra Underground.

The Integra Underground is approximately 12 km north-west of Singleton, in the Singleton Local Government Area (see **Figure 1**). Underground mining operations are approved at a maximum extraction rate of 4.5 million tonnes per annum (Mtpa) of run-of-mine (ROM) coal until 31 December 2035 under Project Approval PA 08_0101 (as modified). This approval allows longwall mining of the Hebden, Barrett and Middle Liddell seams to produce high quality, semi-hard coking coal for export.

The Integra Underground was formerly a part of the larger Integra Mine Complex. This complex comprised both underground and open cut operations and operated under a single project approval instrument which combined the project approvals for the Integra Underground (PA 08_0101) and Integra Open Cut (PA 08_0102). In late 2015, HV Coking Coal Pty Ltd (HVCC) (a 100% Glencore-owned company) acquired all assets associated with the Integra Underground, which had been placed in care and maintenance in May 2014. Bloomfield Collieries Pty Limited (Bloomfield) purchased the open cut and surface facilities (subsequently re-named the Rix's Creek North Mine).

Following the separate sale of the underground and open cut, the combined project approval was modified to separate the approvals. Following the separation of the approvals Integra Underground operated under PA 08_0101 as modified.

HVCC recommenced underground operations in 2017, with development resuming in February 2017 and longwall extraction resuming in May 2017 in accordance with the Extraction Plan as required under Condition 20 of Schedule 3 of PA 08_0101. An application for a further modification to PA 08_0101 (MOD 7) and accompanying Environmental Assessment (EA) was lodged with the Department of Planning and Environment (now Department of Planning, Industry and Environment, DPIE) in June 2017. Subsequently, approval was granted by DPE on 15 September 2017. The modification application was made to facilitate the construction of a water pipeline from Integra Underground to the adjacent Mt Owen Glendell Operations and the subsequent use of the pipeline to transfer mine water. The modification enables surplus mine water collected at Integra Underground to be managed at Mt Owen Glendell Operations and within Glencore's Greater Ravensworth Area Water Sharing Scheme (GRAWSS).

An application for Modification 8 (MOD 8) to PA 08_0101 and accompanying EA was lodged with the DPE in November 2017. Approval was granted by DPIE on 16 April 2018. MOD 8 allows continuation of longwall mining of the Middle Liddell Seam further to the north of the currently approved longwall panels, along with the construction and operation of ancillary surface infrastructure required to support the mining activities.

1.2 Purpose

This Environmental Management Strategy (EMS) outlines how Integra Underground manages environmental and community aspects, impacts and performance. It provides a framework for the standards, plans and procedures to be implemented so that operations are managed in accordance with Glencore Coal Assets Australia (GCAA) business principles, Health, Safety, Environment and Community (HSEC) Policy and Standards and all relevant licences and approvals held by the mine.

Condition 1 of Schedule 5 of PA 08_0101 entails the preparation of an EMS for the site, if the Secretary requires. Implementation of the EMS will assist in minimising the environmental impacts of Integra Underground by facilitating continual improvement in environmental performance. The EMS promotes proactive environmental management, which will facilitate ongoing compliance with environmental commitments and legislative requirements.

Accordingly, this EMS:

- Provides the strategic context for the environmental management of operations at Integra Underground;
- Outlines the framework for environmental management at the site utilising the principles of AS/NZS ISO14001:2015 – Environmental Management Systems;
- Identifies the requirements of PA 08_0101 and other statutory approvals that apply to Integra Underground;
- Describes the role, responsibility, authority and accountability of all key personnel involved in the environmental management of Integra Underground;
- Describe the procedures that will be implemented to:
 - keep the local community and relevant agencies informed about the operation and environmental performance of the mine;
 - receive, handle, respond to, and record complaints;
 - respond to any non-compliance; and
 - respond to emergencies;
- Describes the framework to achieve compliance with PA 08_0101 and other relevant licences and approvals;
- Provides Integra Underground employees and contractors with a clear and concise description of their responsibilities for environmental management at the site; and
- Outlines HVCC's commitment to proactive community and environmental management and demonstrates HVCC's commitment to minimising environmental and community impacts.

1.3 Scope and Structure

This EMS relates to the Integra Underground, and forms an integral part of the Integra Underground Environmental Management System. It applies to all activities undertaken within the project approval area (see **Figure 2**) for the mine, to which PA 08_0101 applies.

This EMS has been prepared generally in accordance with the five principles of AS/NZS ISO 14001- Environmental Management Systems:

- Environmental policy and commitment;
- Planning;
- Implementation and operation;
- Measurement and evaluation; and
- Review and improvement.

The structure of the EMS therefore follows the 'Plan-Do-Check-Act' process as per AS/NZS ISO 14001:2015. A description of this process and how it relates to the Integra Underground EMS is provided in **Table 1-1**.

Table 1-1 – Structure of the Integra Underground Environmental Management Strategy

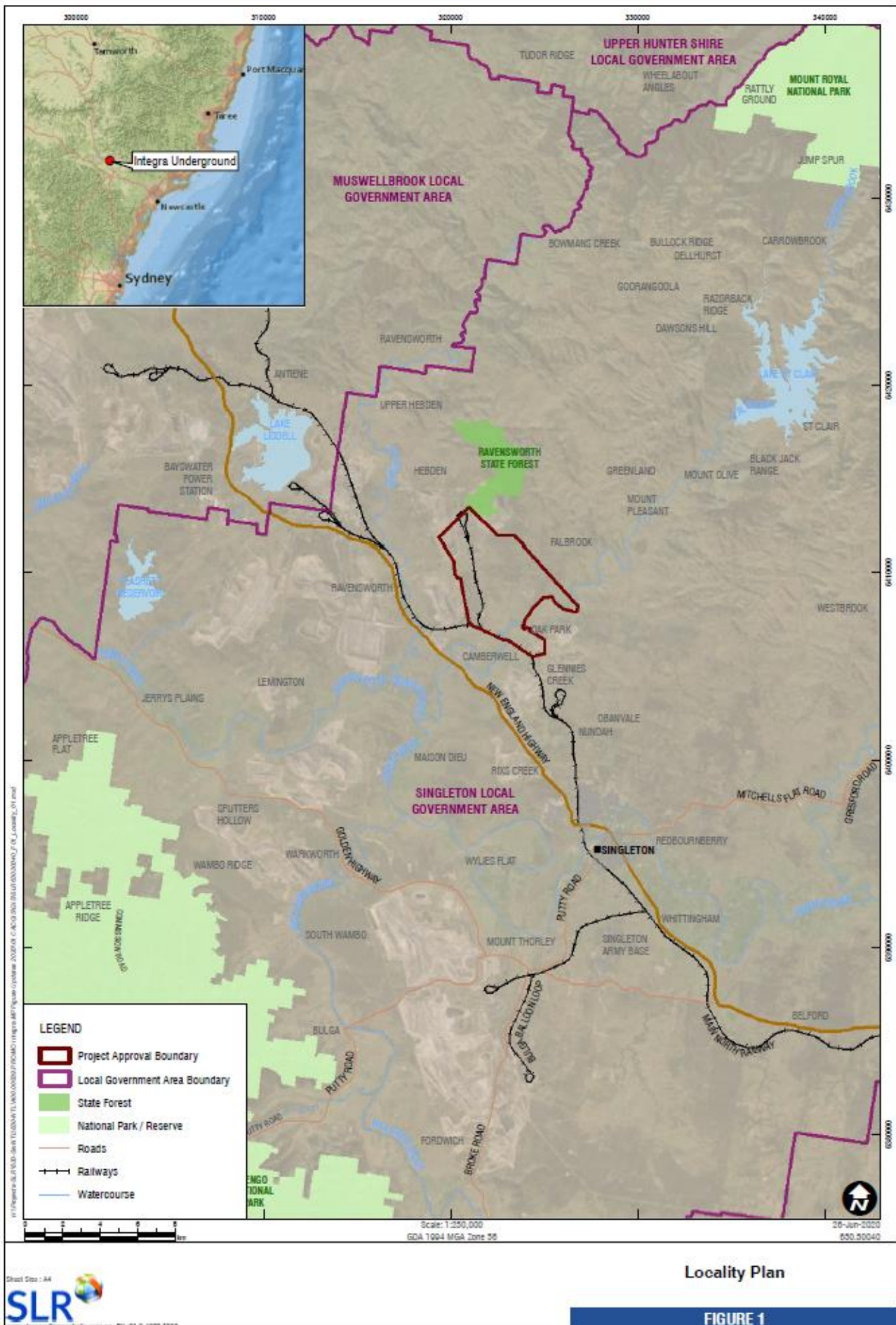
Task	Requirements	EMS section reference
Plan	– Maintain register of legal and other requirements. – Maintain register of environmental aspects and impacts. – Set environmental objectives and targets. – Develop environmental programs and management plans.	Section 3
Do	– Responsibilities for environmental management. – Provision of environmental awareness training and assessment of competence. – Internal communications and document control. – External communications with regulators, members of the public and other stakeholders. – Management of complaints. – Operating procedures. – Incident management. – Emergency preparedness and response.	Section 4
Check	– Annual review of compliance with environmental statutory requirements during preparation of the annual environmental management report. – Environmental monitoring and inspections. – Internal and external audits.	Sections 5 and 6
Act	– Periodic review and revision of the EMS by senior management. – Non-compliance and corrective/preventive action.	Section 6
Report	– Internal and external reporting	Section 5

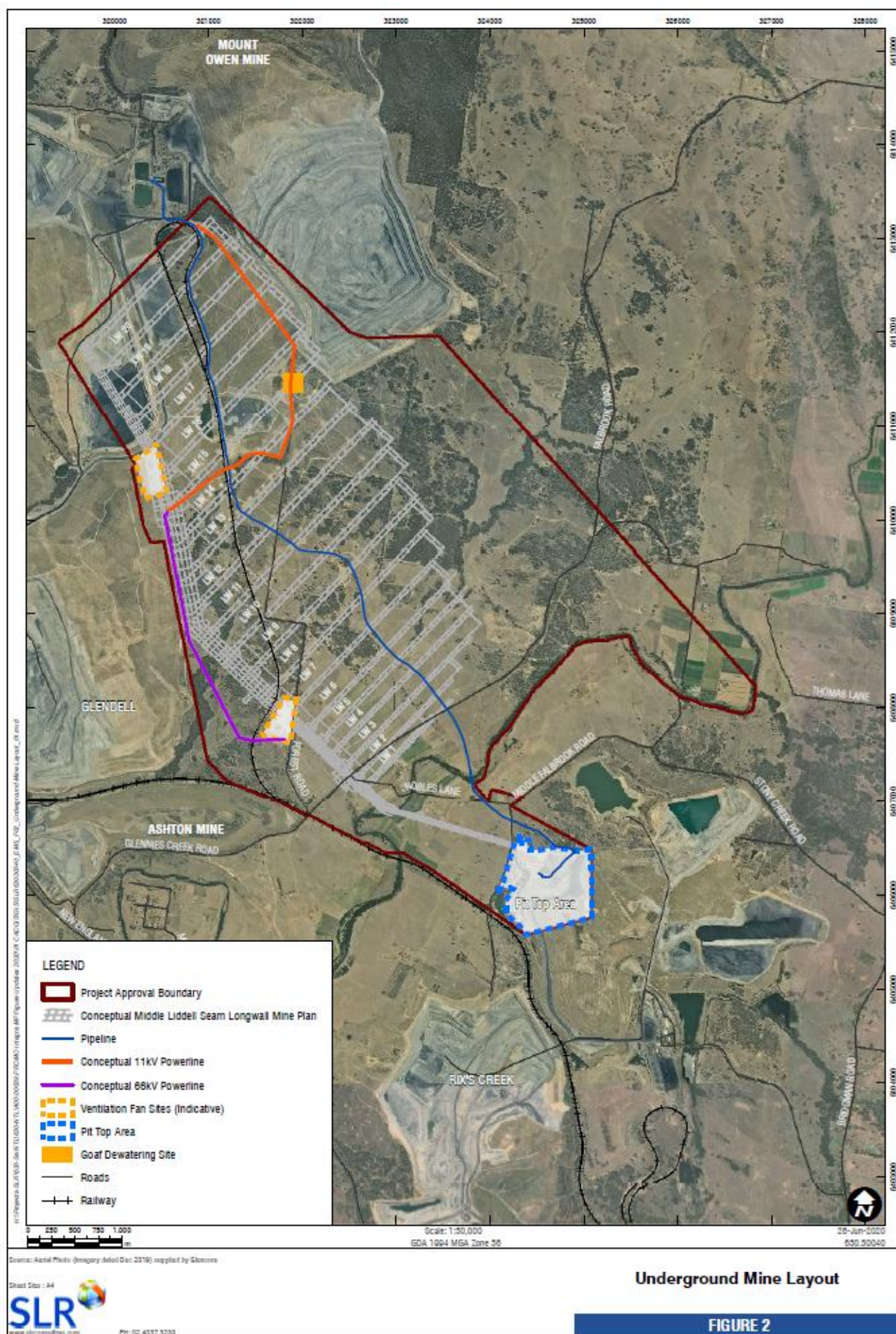
1.4 Consultation regarding the EMS

As per PA 08_0101, the EMS and all associated management plans have been submitted to the Secretary of Department of Planning and Environment (DPE) for approval. Specific management plans have additional consultation requirements, and these are addressed in the relevant plan, including copies of the correspondence. A copy of the approved EMS is also available to members of the community via the Integra Underground website: www.glencore.com.au/IntegraUnderground

This EMS was reviewed and updated following approval of MOD 8 (see **Section 1**). The *Longwall Extension Modification Environmental Assessment* (Hanson Bailey 2017b) contains details of the consultation undertaken in relation to MOD 8.

Correspondence with the DPE in relation to the approval of this document is included in **Appendix A**.





2. Environmental Policy

Integra Underground will operate in accordance with the Glencore *Environmental Policy* (G HSEC POL 0004), which applies to all Glencore operations. The intent of the policy, and the verifiable outcomes from its implementation, are:

- Senior and line management are accountable for environmental performance.
- Operations, assets and projects comply with applicable environmental regulations and monitor relevant regulations for changes.
- Compliance, risk based management approaches, and resource efficiency determine priorities, capability requirements, capital expenditure, and controls.
- Improvement plans and target setting at each level of the organisation take the group's focus areas into account, namely:
 1. Integrity of Glencore facilities for preventing pollution (e.g. spills, emissions, effluents);
 2. Efficient use of resources (e.g. energy, water, land, raw materials, waste);
 3. Protected areas and biodiversity;
 4. Closure planning and rehabilitation.
- All environmental incidents are reported and investigated to prevent repeat incidents.

3. Planning

3.1 Environmental Aspects & Impacts

Integra Underground personnel will continuously seek to identify and assess environmental risks associated with the mine so they are appropriately managed and minimised. Environmental and community aspects and their impacts are identified in consideration of the activities undertaken at the site as well as legislative requirements, project approval conditions and other licences and approvals. This process aims to appropriately manage environmental and community aspects and minimise the potential environmental and community impacts of the operation.

The key environmental risks for the operation and their management strategies are identified through an Environment and Community Risk Assessment. This Risk Assessment will be reviewed annually.

The Life of Mine (LOM) Risk Assessment considers changes over the rest of the operational life of the mine at a strategic level.

Once significant environmental and community aspects and impacts are identified in the Risk Assessment, their management controls are considered. This leads to either modifications to existing processes or creation of new plans; the requirements for which are then captured in the development of the site's annual plans and budgets.

The environmental aspects that are considered during the Risk Assessment review process include:

- Surface water and groundwater;
- Air quality;
- Waste minimisation and management;
- Community interaction;
- Subsidence;
- Cultural heritage;
- Biodiversity;
- Noise;
- Visual amenity; and
- Energy and greenhouse gases.

The following items are considered during the annual Environment and Community Risk Assessment at Integra Underground:

- Baseline environmental studies;
- Review of environmental performance data;
- Review of any existing or proposed changes to the operation;
- Review of relevant legislation, standards, codes and additional external requirements;
- Industry experience;
- The needs and interests of relevant stakeholders; and
- Climate related risk and opportunities related to assessing water related risks, climate variability within the catchment area and the impact on shared water resources, water quality, supply, and operational requirements.

3.2 Environmental Objectives and Targets

Environmental objectives and targets will be set annually to meet the commitments contained within the Glencore *Environmental Policy*. These targets will also be developed in consideration of the requirements of PA 08_0101, the Environment Protection Licence (EPL) 3390, previous environmental performance, and other company and regulatory requirements.

The annual planning process for setting these objectives and targets is described below.

3.3 Annual Planning Process

Integra Underground undertakes an annual management review of environment and community issues and performance. This review provides a detailed understanding of key environmental aspects and impacts prior to participating in an Environment and Community Risk Assessment (see **Section 3.1**). The annual management review meeting considers the following factors:

- Environmental monitoring and inspections;
- Internal and external environmental inspections, assessments and audit reports addressing operational, functional, management system, legal compliance and stakeholder requirements, or other external commitments;
- Environment and community incident reports and investigation findings;
- Performance data, trends and reports including the extent to which targets and objectives have been met;
- Inputs and views of external stakeholders, including complaints;
- Status of corrective and preventative actions;
- Outcomes from previous management reviews; and
- Government policies and regulation, socio-economic or political developments and new scientific findings and technological developments.

Following the annual management review, HSEC strategies, plans, processes, objectives and targets are updated where required as part of this annual planning process.

3.4 Baseline Environmental Studies

PA 08_0101 for the Integra Underground was granted in 2010. Extensive baseline environmental studies were conducted as part of preparation of the Environmental Assessment (EA) that accompanied the development application.

Where additional minor surface disturbance is required (for activities such as exploration and gas drainage works that are still generally in accordance with PA 08_0101), due diligence surveys will be undertaken to ensure environmental constraints are identified and effectively managed to prevent harm. If significant changes to the operations lead to works not being generally in accordance with PA 08_0101, then new assessments will be undertaken to support modifications to licences and approvals. The environmental data collected during these due diligence surveys and modifications adds to the existing baseline data set from the original EA.

These baseline studies together with the conditions of licences form the core of the Integra Underground environmental compliance management which is addressed in **Sections 4, 5 and 6**.

3.5 Statutory Requirements

A register of all legislative requirements relevant to the operations at Integra Underground is maintained on site. This register is maintained through a software program used across GCAA operations.

Environmental risks associated with applicable regulatory and non-regulatory requirements are considered within the risk register in accordance with the Glencore Risk Framework (refer to **Section 5.1**).

Integra Underground maintains awareness of ongoing changes to legislation, standards, codes and other external requirements through the receipt of regular updates from legal advisers, participation in industry groups such as the NSW Minerals Council and Hunter Coal Environment Group, notification from the GCAA General Manager Environment and Community and through access to legislation via the internet.

The legal register will be reviewed and updated at least annually by the Integra Underground Environment and Community Manager. Any significant changes to legal or other requirements identified are reported to the Integra Underground management team as soon as possible. Where significant changes to legislation, standards, codes and other external requirements are identified as impacting upon processes or procedures at Integra Underground, the relevant management plan or procedure will be updated in accordance with document control, risk and change management protocols. Such changes will be communicated where necessary in environmental training or through email notification to senior management and relevant personnel.

A list of legislative requirements relevant to Integra Underground, including leases, licences, consents, authorisations, and other approvals is presented in **Table 3-1** below.

Table 3-1 Register of licences/leases/approvals

Type of lease/licence/approval	Date of Issue/Registration	Renewal/Expiry Date	Comments
Approvals			
PA 08_0101	26.11.2010	31.12.2035	Original approval
	18.03.2012		Modification 1 – Extend the open cut dump and increase emplacement heights
	01.02.2013		Modification 2 – Amendments to consent wording
	05.10.2012		Modification 3 – Extend timeframes for conditions
	24.02.2016		Modification 4 – Modify biodiversity offset areas
	23.08.2016		Modification 5 – Separate into two project approvals for open cut and underground
	21.12.2016		Modification 6 – Approved to correct an administrative error
	15.09.2017		Modification 7 – Construct a water pipeline from Integra Underground to the Mt Owen Complex (now Mt Owen Glendell Operations)
	16.04.2018		Modification 8 – Longwall extension and additional surface infrastructure
	17.05.2023		Modification 9 – Removal of requirement to have DRG approve Mining Operations Plan
Leases			
Coal Lease (CL) 382	12.11.1991	11.11.2033	Varying surface exemptions. Part transfer between HV Coking Coal Pty Ltd and Mt Owen completed in 2016. Part transfer between HV Coking Coal and Bloomfield completed in 2016 to transfer the area of CL382 covering the Open Cut North Pit and the Glennies Creek Pit Water Dam (also known as Possum Skin Dam)
Mining Lease (ML) 1437	28.04.1999	27.03.2032	Part transfer from CL357
ML 1525 (Shaft)	18.11.2002	17.11.2044	Forest Road Ventilation Shaft Area (from 20m to 5m from surface)
ML 1676	05.06.2013	04.01.2026	Sub-Lease MPL 343 was under agreement with Glendell Tenements Pty Ltd. Overlies ML 1525(-5m to surface)
ML 1518	14.06.2004	27.03.2032	Part transfer from CL 357
ML 1551	10.01.2006	27.03.2032	Part transfer from CL 357
ML 1786	24.06.2019	31.12.2031	Varying surface exemptions. Part 243.84 metres, remainder 213.36 metres.
ML 1740	06.04.2020	29.12.2045	Surface exception Partial transfer of CCL 708
ML 1742	06.04.2020	22.10.2034	Surface exception Partial transfer of ML 1694

Type of lease/licence/approval	Date of Issue/Registration	Renewal/Expiry Date	Comments
Licences			
Environment Protection Licence 3390	27.07.2000	In force - anniversary date 31 August	Variation application approved 15 November 2017 to revise an overlapping boundary with the Mt Owen Glendell Operations
WAL 961	01.07.2004	In Perpetuity	150 Units (High Security)
WAL 960	01.07.2004	In Perpetuity	50 Units (High Security)
WAL 484	01.07.2004	In Perpetuity	3 Units (High Security)
WAL 485	01.07.2004	In Perpetuity	99 Units (General Security)
WAL 1172	01.07.2004	In Perpetuity	3 Units (High Security)
WAL 1173	01.07.2004	In Perpetuity	303 Units (High Security)
WAL 1242	01.07.2004	In Perpetuity	13 Units (Supplementary)
20BL167917	15.08.2000	In Perpetuity	Monitoring Bore
20BL169571	07.03.2005	In Perpetuity	Monitoring Bore
20BL169573	07.03.2005	In Perpetuity	Monitoring Bore
20BL169574	07.03.2005	In Perpetuity	Monitoring Bore
20BL169631	17.03.2005	In Perpetuity	Monitoring Bore
WAL 41562 (Previously 20BL169862 & 20BL169864)	04.08.2015	25.09.2020	Bore – groundwater extraction for dewatering purposes
WAL 41563 (Previously 20BL172505 & 20BL172506)	20.05.2011	19.05.2021	Bore – groundwater extraction for dewatering purposes
20BL171707	17.08.2007	In Perpetuity	Monitoring Bore
20BL171708	17.08.2007	In Perpetuity	Monitoring Bore
20BL171710	17.08.2007	In Perpetuity	Monitoring Bore
20BL171813	03.04.2008	In Perpetuity	Monitoring Bore
20BL171870	15.05.2008	In Perpetuity	Monitoring Bore
20BL172277	15.09.2009	In Perpetuity	Monitoring Bore
20BL172278	15.09.2009	In Perpetuity	Monitoring Bore
20BL172279	15.09.2000	In Perpetuity	Monitoring Bore
OSSM Approval Number 3969/2008	25.01.2012	30.06.2020	Extension of Approval to operate on-site sewage management system

3.6 Environmental Management Plans

Environmental management plans provide an overview of a specific environmental aspect or activity and the controls which are implemented to effectively manage the aspect or activity. PA 08_0101 requires the following management plans to be prepared to the satisfaction of the Secretary of DPE:

- Noise Management Plan (Schedule 3, Condition 9);
- Air Quality and Greenhouse Gas Management Plan (Schedule 3, Condition 15);
- Water Management Plan (Schedule 3, Condition 31);;
- Biodiversity Management Plan (Schedule 3, Condition 32);
- Heritage Management Plan (Aboriginal and Heritage) (Schedule 3, Condition 33);
- Rehabilitation Management Plan (Schedule 3, Condition 40) (the requirements of which are contained in the Integra Underground Mining Operations Plan);
- Exploration Activities and Surface Infrastructure Management Plan (Schedule 3, Condition 41); and
- Extraction Plan (Schedule 3, Condition 20).

The implementation of these management plans will assist HVCC in ensuring effective environmental performance of the operations at Integra Underground.

4. Implementation

4.1 Roles and Responsibilities

Environment and community management is part of the responsibilities of all employees and contractors at Integra Underground.

Key personnel and their relevant environment and community management roles and responsibilities are outlined in **Table 4-**. More specific roles and responsibilities are outlined in the environmental management plans, procedures and standards referred to in this EMS.

Table 4-1 Roles and Responsibilities for Environmental Management

Role	Responsibilities
Operations Manager	• Maintain a working knowledge of this EMS and be aware of all environmental legislative requirements associated with their respective operation; • Provide adequate resources for environmental management including: qualified personnel, adequate financial resources and training as required for all employees; • Provide the necessary legislative approval for any proposed works associated with the operation that may have an impact on the environment or the community, prior to the commencement of works.
Environment and Community Manager or delegate	• Implement and maintain the EMS; • Liaise with government and community stakeholders regarding environment and community matters associated with Integra Underground; • Maintain a working knowledge of this EMS and be aware of all environmental legislative requirements associated with the operation; • Liaise with senior management personnel to promote awareness and delegate tasks associated with the management of environmental issues/commitments; • Prepare internal reports associated with the HSEC Management System; • Facilitate the annual environmental risk assessment and develop management protocols for proposed works associated with existing operations and any new or altered works; • Provide environmental assistance and advice on legislative and approval requirements for any proposed works; • Implement corrective actions arising from environmental incidents and audits. • Develop and deliver necessary environmental management/awareness training to all personnel; • Coordinate the activities of specialist sub-consultants and project personnel for environmental assessment/monitoring/auditing responsibilities; • Prepare statutory environmental reports.

Role	Responsibilities
All Managers	• Maintain a working knowledge of this EMS; • Be aware of the environmental legislative requirements and community responsibilities; • Facilitate that operations under his/her control are undertaken in accordance with this EMS and in particular, in accordance with relevant environmental management plans, procedures and standards; • Provide resources for appropriate training to site employees regarding their environmental and community roles and functions; • Implement corrective actions arising from environmental incidents and audits; • Allow adequate provision in the annual capital budget for undertaking required environmental capital works; • Involve the Environment and Community Manager in the assessment of any proposed works associated with the operation that may have an impact on the environment; • Maintain a high level of environmental performance at the site; • Report any pollution control incidents and/or community complaints to the Environment and Community Manager as soon as practicable.
All employees and contractors	• Have a general awareness of this EMS; • Conduct their work activities in accordance with this EMS; • Report all environmental incidents to the Environmental personnel or their immediate supervisor; • Participate in relevant environmental training.

4.2 Documentation and Document Control

The document control process at Integra Underground is outlined in the HSEC Management System. This process has been established for controlling all environmental documents to ensure that:

- They can be located;
- All documents are appropriately labelled and filed;
- They are periodically reviewed, revised as necessary and approved for adequacy by authorised personnel or government agencies where required;
- The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the EMS are performed;
- Obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use;
- Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified; and
- Environmental correspondence documentation and environmental records are effectively maintained for a minimum of four years in accordance with relevant statutory requirements.

4.3 Environmental Training and Awareness

Integra Underground aims to provide the necessary tools and training for its employees and contractors to enable the effective implementation of the EMS. As a minimum, all personnel working

on site are required to undergo Environmental Awareness Training as part of the induction process. The level of training and induction required depends on the type of work and site access the person working/visiting the site requires. As a minimum the training programs are to include the following:

- The importance of conformance with environmental legislation, approvals and licences and the EMS;
- The potential environmental and community impacts and associated controls for their work activities;
- Their roles and responsibilities in achieving conformance with environmental legislation, approvals and licences, and the EMS;
- The potential consequences of non-compliance with environmental legislation, approvals and licences, and the EMS;
- Environmental incident and community complaint reporting requirements; and
- Emergency contact details.

Following changes to the operation or changes to the sites risk profile (refer to **Section 3.1**), appropriate training is to be given to affected employees and contractors.

4.4 Operational Controls

4.4.1 Environmental Operating Procedures

Operational controls are required where activities are identified as potentially having environmental impacts to ensure the environmental objectives and targets are met. Therefore, a key management tool of the EMS is the establishment, documentation and maintenance of various environmental procedures.

These procedures will be used to manage key environmental aspects and impacts as described in **Section 3.1**. Procedures will be developed as required to provide specific guidance where legislation or management plans require more detailed explanation or guidance. The effectiveness of operating procedures will be reviewed on a regular basis and revised as appropriate, with new procedures developed on an as-needs basis.

Procedures will be communicated to the workforce via training programs and site familiarisations as detailed in **Section 4.3**.

4.4.2 Emergency Preparedness and Response

All personnel receive emergency preparedness and response training during their site familiarisation and induction. Integra Underground maintains a dedicated emergency response team who undergo regular training and operational drills. A *Pollution Incident Response Management Plan* (PIRMP) has been developed to manage preparation, emergency response and reporting requirements under the *Protection of the Environment Operations Act 1997* (NSW).

The PIRMP details response procedures to be initiated in the event of an environmental emergency, along with the responsibilities of key personnel in the event of an environmental emergency as well as the contact details for the appropriate emergency services.

A copy of the PIMRP is available on the Integra Underground website: www.glencore.com.au/integra-underground.

4.4.3 Change Management

Change management will be undertaken in accordance with the Integra Underground HSEC Management System, which provides a process for managing the risks associated with change. All changes to construction activities and plant and equipment are required to be assessed in accordance with the change management process.

When change is considered to have an impact on the objectives of the EMS, the process below must be followed:

- Identify the change;
- Assess the potential risks associated with the change and develop a risk management plan;
- Approve the change subject to the risk management plan;
- Communicate and implement the change and risk management actions;
- Monitor and evaluate the change and risk management plan; and
- Document the change management process.

4.5 Communication

Communication between all levels of mine management, employees, contractors and stakeholders is important for the effective implementation and maintenance of the EMS.

4.5.1 Internal Communication

Integra Underground encourages a constructive and consultative approach to environmental management and active participation by all personnel in the environmental management of the operation. Internal communication strategies include:

- Shift Changeover Meetings: A shift meeting where all HSEC hazards and incidents, as well as production information for the previous shift are raised and discussed. These meetings also communicate toolbox talks to raise environmental awareness and provide an opportunity for employees to discuss any environmental concerns.
- Notice Boards: Notice boards are used to display relevant environmental and OH&S information, alerts and statistics.

4.5.2 External Communication

Integra Underground has an ongoing consultation program which allows for consideration of all stakeholder views and timely feedback to any concerns raised. This program encourages a constructive and consultative approach to environmental management and active participation by all personnel in the environmental management of the operation.

Relevant stakeholders include:

- Government departments;
- Singleton Shire Council (SSC);
- Community Consultative Committee (CCC);
- Local Indigenous groups;
- Local communities;

- Neighbouring mining operations; and
- Regional environmental groups.

Communication and consultation tools employed include:

- Integra Underground Community Hotline; and
- Integra Underground website (includes links to the Integra Underground EMS and regular reporting on environmental performance, see **Section 5.2** External Reporting).

A combined CCC is run for the Integra Underground and Mt Owen Glendell Operations. This CCC is operated in general accordance with the DPE's *Community Consultative Committee Guidelines State Significant Projects* (November 2016, or its latest version) as required by Schedule 5 Condition 8 of PA 08_0101. Minutes from CCC meetings are available on the Integra Underground public website.

4.5.3 Community Complaints Management

In accordance with Condition M5 of EPL 3390, Integra Underground has a 24-hour Community Hotline (1300 573 352) for members of the public to lodge complaints, concerns or to raise issues associated with the operation. This service aims to promptly and effectively address community concerns and environmental matters. All complaints, via letter, in person, by fax or via the Community Hotline are recorded and investigated and appropriate actions taken as soon as practicable (such as location specific monitoring). Initial response to the complainant will be made within 24 hours where possible.

All complaints received are recorded and lodged in the complaint register. Information recorded includes the following, as required by Condition M4 of EPL 3390:

- Date and time the complaint was lodged;
- Personal details provided by the complainant;
- Nature of the complaint;
- Action taken or if no action was taken, the reason why; and
- Follow up contact with the complainant.

A summary of all complaints will be reported in the Annual Review.

4.5.4 Dispute Resolution

In the event of a disagreement between Integra Underground and a member of the community, Integra Underground will liaise and communicate with the community member to seek to understand the concern and reach a resolution.

Where relevant, dispute resolution and/or negotiations will be initiated and managed in accordance with PA 08_0101. Specifically, Condition 4 of Schedule 4 details the Independent Review process and Condition 5 of Schedule 4 details the land acquisition process.

4.6 Managing Cumulative Impacts

Integra Underground is in close proximity to a number of mines including the Mt Owen Glendell Operations to the north, west and east (another GCAA operation), Ashton to the west, and Rix's Creek to the south.

The potential cumulative impacts of the operation were considered in the EA for Integra Underground (ERM 2009) and included:

- Surface water;
- Groundwater;
- Air quality;
- Noise; and
- Traffic and transport.

Hansen Bailey (2017b) also assessed the cumulative impacts of MOD 8 relating to groundwater.

Cumulative impacts will be monitored and managed in accordance with PA 08_0101 and management plans and monitoring plans described in **Section 6.1**. In the event monitoring results identify unpredicted cumulative impacts, Integra Underground will seek to cooperate with other mining operations.

5. Environmental Reporting

5.1 Internal Reporting

There are numerous internal reporting mechanisms in place for reporting environment and community aspects internally within the wider GCAA group. The scheduled internal reporting of environment and community aspects and social performance is provided in **Table 5-1**.

Table 5-1 – Internal Environmental Reporting Requirements

Type	Frequency	Description
Environmental and Community Status Report	Monthly	Summary of main environment and community aspects for Integra Underground for the previous month
GCAA Closure Control Group Meetings	Quarterly	Progress report of mine closure planning and execution
Glencore Corporate Practice Reporting	Monthly	Report on key environment, community, and social performance indicators

5.2 External Reporting

Integra Underground will provide regular reporting on the environmental performance of the site on its website, in accordance with Schedule 5 Condition 10 of PA 08_0101. Condition 14 of Schedule 5 also requires that the following up-to-date documents be made publicly available on the website:

- Previous EAs and EA for subsequent modifications;
- Project layout plan;
- Project Approval and Statement of Commitments;
- All current statutory approvals for the project;
- All approved strategies, plans and programs required under the conditions of this approval;
- Monitoring results;
- A complaints register, which is updated on a monthly basis;
- Minutes of CCC meetings;

- Annual reviews over the life of the mine; and
- Any independent environmental audit, and Integra Underground's response to the recommendations.

Further to the above, many of the approvals and licences held by Integra require forms of external reporting, a summary of which is shown in **Table 5-2**.

Table 5-2 – External Environmental Reporting Requirements

Report	Recipient	Required by
EPL Annual Return and Statement of Compliance	EPA	EPL 3390
Annual Review	DPIE, Resources Regulator, EPA, CCC, Singleton Council	PA 08_0101 Schedule 5 Condition 11 by the end of March each year, or as otherwise agreed with the Secretary
National Pollutant Inventory Report (NPI)	EPA	National Environment Protection (National Pollutant Inventory) Measure
National Greenhouse and Energy Reporting (NGERS)	Federal Department of the Environment and Energy (DoEE)	<i>National Greenhouse and Energy Reporting Act 2007</i>
Monthly EPL monitoring summaries and any exceedance of EPL conditions.	General Public (website)	<i>POEO Act (2011 Amendment) & "Requirements for publishing pollution monitoring data" (EPA, 2012)</i>
Longwall Progress Updates	Asset owners and landholders	Extraction Plan
Subsidence Reports	Resources Regulator and DPIE	Extraction Plan

In accordance with Schedule 4, Condition 3 of PA 08_0101, in the event a non-conformance of any environmental impact assessment criteria is identified, Integra Underground will notify DPIE and any affected landowners and/or tenants accordingly, and provide regular monitoring results to each of these parties until the results show that the operation is complying with the relevant criteria.

6. Review and Improvement

6.1 Environmental Monitoring

Measuring, monitoring and evaluating are key activities that ensure Integra Underground is performing in accordance with the EMS Policy and objectives and targets, and is an important input into the continual improvement process. Environmental monitoring programs have been developed in accordance with PA 08_0101 and EPL 3390 to ensure that the required environmental monitoring is undertaken at Integra Underground. The relevant Management Plans outline the monitoring program, roles and responsibilities and details for assessing compliance with the relevant impact assessment criteria outlined in PA 08_0101, for each environmental discipline. Monitoring is completed as detailed in the following management plans:

- Noise Management Plan;
- Air Quality and Greenhouse Gas Management Plan;
- Water Management Plan;
- Aboriginal Heritage Management Plan;
- Biodiversity Management Plan; and
- Extraction Plan.

A plan showing environmental monitoring undertaken at Integra Underground is provided in **Figure 3**. A copy of the abovementioned management plans can be found on the Integra Underground website:

www.glencore.com.au/IntegraUnderground

6.2 Environmental Inspections

Inspections are carried out as required under each supplementary management plan at a frequency that matches the aspects and risks.

Monthly environmental housekeeping inspections are undertaken by the Environment and Community Department, with the objective being to identify any potential non-conformances or environmental incidents that have not been previously identified/reported. The goal of these inspections is to also identify areas of potential non – conformances prior to issues occurring. Undertaking inspections also maintains a visual presence around the site to promote environmental awareness to mine personnel and contractors. A summary of the routine inspections carried out at Integra Underground is listed in **Table 6-1**.

In the event a non-conformance is identified during the inspection, corrective and/or preventative actions are to be developed in accordance with **Section 6.4** and tracked in a software program. The completion and effectiveness of the corrective and/or preventative action is assessed during the next monthly inspection.

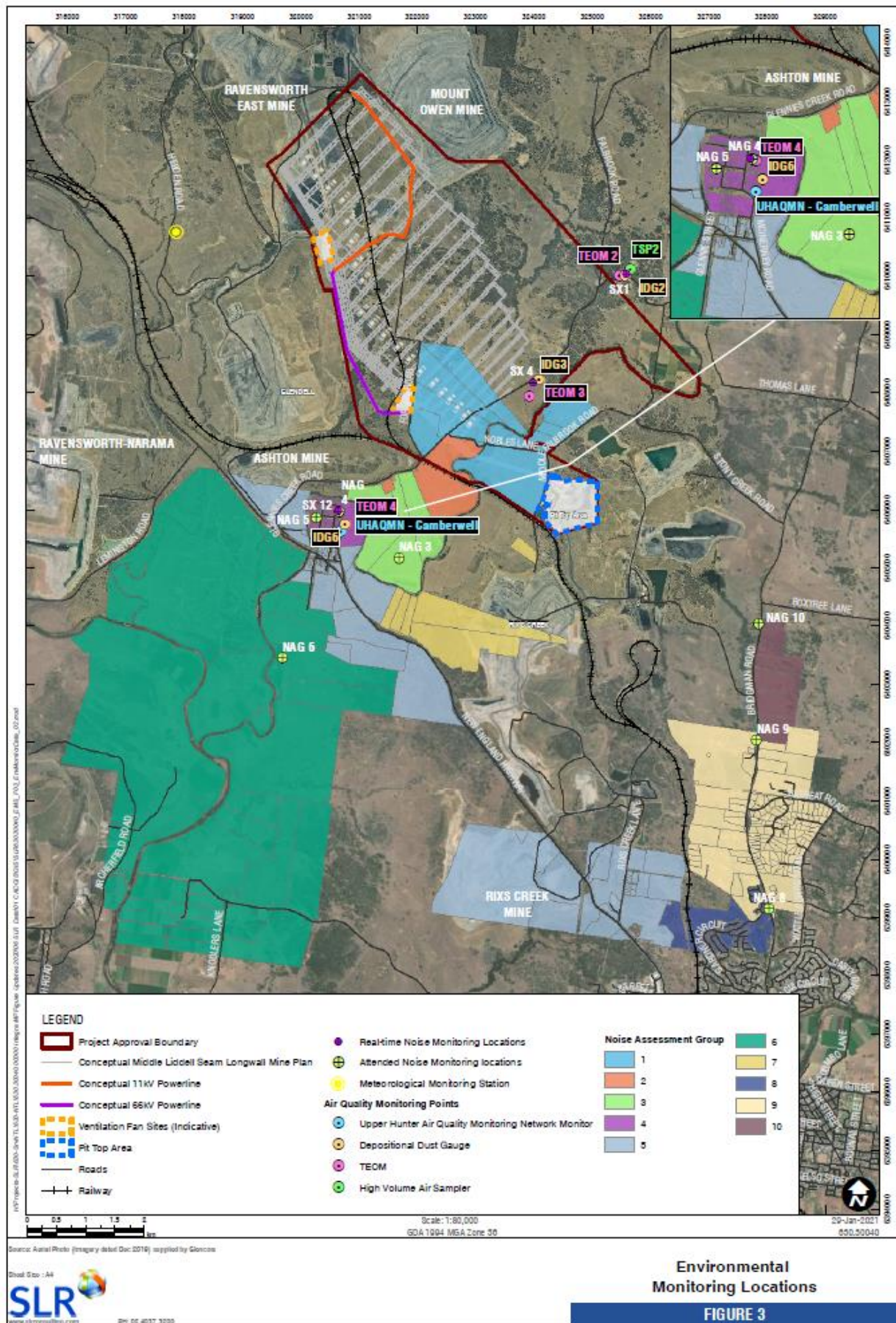


Table 6-1 Environmental Inspections

Type	Frequency	Description
Work Authorisation	As required on a risk-based frequency	Task Coordinators
Review of approval document compliance	Annually	Environment and Community personnel
Environmental housekeeping	Monthly	Environment and Community personnel
Rehabilitation and erosion and sediment control structures	As per Mining Operations Plan (Rehabilitation Management Plan) and Exploration Activities and Minor Surface Infrastructure Management Plan	Environment and Community personnel
Flora and fauna	As per program outlined in the Biodiversity Management Plan	Environment and Community personnel
Subsidence	As per approved Extraction Plan	Environment and Community personnel and stakeholders as per approved Extraction Plan

6.3 Environmental Audits

Internal and external audits are to be undertaken to verify compliance with legislation, licences, approvals and the EMS. The results of internal and external audits are to be communicated to the Integra Underground management team and to the GCAA General Manager Environment and Community where relevant. The recommendations from internal and external audits are to be consolidated into action plans and entered into an electronic database to allow tracking of progress against the audit actions.

In accordance with Condition 12 of Schedule 5 of PA 08_0101, independent environmental audits of Integra Underground will be commissioned every three years. These audits will:

- be conducted by a suitably qualified, experienced and independent team of experts whose appointment will have been endorsed by the Secretary;
- include consultation with the relevant agencies;
- assess the environmental performance of the mine and determine whether it is complying with the relevant requirements in the PA 08_0101, EPL 3390 or Mining Lease (including any assessment, plan or program required under these approvals);
- review the adequacy of any approved strategies, plans or programs required under these approvals, with particular reference to management practices to ensure that they align with contemporary best practice industry standards;
- recommend appropriate measures or actions to improve the environmental performance of Integra Underground, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and
- be conducted and reported to the satisfaction of the Secretary.

Within 12 weeks of commissioning an environmental audit or otherwise agreed by the Secretary, Integra Underground will submit a copy of the audit report to the Secretary. Where applicable, a response to any recommendations contained within the audit will be included with this submission.

6.4 Social Performance

Social performance and social performance data will be monitored and recorded in accordance with the Social Performance Management Plan, including:

- Recording and monitoring consultation carried out under the Stakeholder Engagement Strategy in the GCAA Stakeholder Engagement System; and
- Assessing, approving, monitoring and recording community investments in the GCAA Grants Management System.

6.5 Human Rights

The measurement, monitoring, reporting and assurance of Human Rights data and performance is managed through the HSEC and Human Rights Management Plan for Integra Underground.

6.6 Assurance

An annual internal environment and community assurance schedule will be prepared as part of the development of the Environment and Community Plan.

Assurance activities will be undertaken in accordance with the schedule. The purpose is to review environment, community and social performance and verify environment and community risk management and compliance processes.

6.7 Incidents and Corrective Action

The definitions section within PA 08_0101 defines an incident as “a set of circumstances that causes or threatens to cause material harm to the environment, and/or breaches or exceeds the limits or performance measures/criteria in this approval.” All personnel are required to report environmental incidents that cause potential or actual harm to the environment and/or are determined to be a non-compliance. Reportable environmental incidents are subject of a formal report to appropriate regulators. The relevant agency will be notified of reportable incidents as soon as practicable with a written report provided within seven days.

The following information is provided under incident reporting:

- Time, date, location and name of person who identified the incident;
- Description of the incident and investigation;
- How and why the incident occurred;
- What were the actual and potential environmental impacts;
- Corrective actions to reduce short term recurrence and risk; and
- Preventative actions to prevent long term recurrence of the incident.

In accordance with Condition 9 of Schedule 5 of PA 08_0101, Integra Underground will notify the Secretary and any other relevant agencies of any incident associated with the mine as soon as practicable after being made aware of the incident. As noted above, a detailed report will be provided to the Secretary and any relevant agencies within 7 days of the date of the incident.

Incident data is recorded in a software program to allow retrieval of records for analysis and reporting. Incidents to be reported in this system include:

- HSEC Hazards;

- Near misses;
- Injury, illness or disease;
- Environmental incidents;
- Equipment damage or loss;
- Community complaints, issues or concerns;
- Impact to corporate image or reputation; and
- Non-compliance issues.

The *Protection of the Environment Operations Act 1997* (POEO Act) includes a requirement for holders of EPLs to prepare, keep, test and implement a PIRMP. Reporting of incidents where material environmental harm is caused or threatened (as defined in the POEO Act) occurs immediately in accordance with Integra Underground's PIRMP. Authorities which must be immediately advised of environmental harm incidents include:

- Appropriate Regulatory Authority (ARA);
- EPA (if not the ARA);
- Ministry of Health via the local Public Health Unit;
- SafeWork NSW;
- Local Authority (Council) if not the ARA; and
- NSW Fire and Rescue.

In the case where immediate threat to human health or property has been identified, NSW Fire and Rescue is contacted as a first priority. The decision on whether to notify will not delay immediate actions to ensure the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe to do so.

The information about a pollution incident that must be notified includes:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred, including the cause of the incident, if known; and
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

Incident reporting requirements are summarised below in **Table 6-2**.

Table 6-2 Environmental Inspections

Incident	Notification	Recipient	Requirement
Pollution incident that causes, or may lead to, material harm to the environment	Immediately	EPA, DPIE, Resources Regulator, Ministry of Health, SafeWork NSW, Singleton Council and emergency services	EPL 3390 PA 08_0101
Exceedance of the limits/performance criteria of the consent. Exceedance of noise criteria in licence.	Within 7 days	Written report to DPIE, EPA and Resources Regulator containing; • Date, time and nature of exceedance/incident; • Identifies the cause of exceedance/incident; • Actions to date; and Proposed measures to address the exceedance.	EPL 3390 PA 08_0101
All environment and community incidents on site	By the end of shift	Integra Underground Environment and Community Manager	GCAA and site

6.8 Adaptive Management

The definitions section within PA 08_0101 describes Adaptive Management as including “the monitoring subsidence effects and impacts and, based on the results, modifying the mine plan as mining proceeds to ensure that the effects, impacts and/or associated environmental consequences remain within predicted and/or designated ranges”

Where an exceedance of the performance measures in PA 08_0101 occurs, at the earliest opportunity the site will:

- Take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;
- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the DPE describing those options and any preferred remediation measures or other course of action; and
- Implement remediation measures as directed by the Secretary.

7. DA Compliance Table

Table 7-1 is a cross reference between sections of this EMS the relevant consent conditions listed in PA 08_0101.

Table 7-1 DA Compliance Table

PA 08_0101 Condition	Condition Description	Relevant Section
Schedule 5, Condition 1	Environmental Management Strategy If the Secretary requires, the Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:	This document
	a) be submitted to the Secretary for approval;	Appendix A
	b) provide the strategic framework for the environmental management of the project;	Section 1.2
	c) identify the statutory approvals that apply to the project;	Section 3.5
	d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Section 4.1
	e) 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 any complaints; - resolve any disputes that may arise during the course of the project; - respond to any non-compliance; and - respond to emergencies; and	Section 4
Schedule 5, Condition 2	f) include: - copies of any strategies, plans and programs approved under the conditions of this approval; and - a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	Section 6.1 Figure 3
	Management Plan Requirements The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:	
	a) detailed baseline data;	Section 3.4
	b) a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures/criteria; and - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;	Section 3.5
	c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Section 4
	d) a program to monitor and report on the: impacts and environmental performance of the project; and effectiveness of any management measures;	Section 6

PA 08_0101 Condition	Condition Description	Relevant Section
	e) a contingency plan to manage any unpredicted impacts and their consequences;	Separate contingency plans have been developed with Site Environmental Management Plans
	f) a program to investigate and implement ways to improve the environmental performance of the project over time;	Section 6
	g) a program to regularly review management practices to align with contemporary best practice industry standards;	Section 6
	h) a protocol for managing and reporting any: incidents; complaints; non-compliances with the conditions of this approval and statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and	Section 6.4
	i) a protocol for periodic review of the plan.	Section 8.3
Schedule 5 Condition 3	Preparation of Management Plans 3Prior to approval of management plans required under Schedule 3, all existing management plans, monitoring programs, strategies, programs, protocols, etc approved as at the date of approval of Modification 5 shall continue to have full force and effect, and may be revised under the requirements of condition 6 below as if subject to the conditions of this approval that applied prior to the approval of Modification 5, or otherwise with the approval of the Secretary.	Section 4.4
Schedule 5, Condition 6	Revisions of Strategies, Plans and Programs Within 3 months of: a) the submission of an incident report under condition 9 below; b) the submission of an annual review under condition 11 below; c) the submission of an audit report under condition 12 below, or d) approval of a modification to this consent. The Proponent must review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Within 4 weeks of conducting any such review, the Proponent must advise the Secretary of the outcomes of the review, and provide any documents that have been revised to the Secretary for review and approval.	Section 8.3
Schedule 5, Condition 8	Community Consultative Committee The Proponent must operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Department's <i>Community Consultative Committee Guidelines State Significant Projects November 2016</i> , or its latest version.	Section 4.5.2
Schedule 5, Condition 9	Incident Reporting The Proponent must notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent must provide the Secretary and any relevant agencies with a detailed report on the incident.	Section 6.2 Section 6.4
Schedule 5, Condition 10	Regular Reporting The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans or programs of the conditions of this approval.	Section 5

PA 08_0101 Condition	Condition Description	Relevant Section
Schedule 5, Condition 11	Annual Review By the end of March each year, or other timing as may be agreed by the Secretary, the Proponent must submit a report to the Department reviewing the environmental performance of the project to the satisfaction of the Secretary. This review must: a) describe the works (including any rehabilitation) that were carried out during the previous calendar year, and the works that are proposed to be carried out over the current calendar year; b) include a comprehensive review of the monitoring results and complaints records of the project over the previous calendar year, which includes a comparison of these results against the: relevant statutory requirements limits or performance measures/criteria; monitoring results of previous years; and relevant predictions in the documents referred to in condition 2 of Schedule 2; c) identify any non-compliance over the previous calendar year, and describe what actions were (or are being) taken to ensure compliance; d) identify any trends in the monitoring data over the life of the project; e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and f) describe what measure will be implemented over the current calendar year to improve the environmental performance of the project.	Section 5.2
Schedule 5, Condition 12 and 13	Independent Environmental Audit By the end of December 2011, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission, commence 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 Secretary; 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 or Mining Lease (including any assessment, plan or program required under these approvals); d) review the adequacy of any approved strategies, plans or programs required under these approvals, with particular reference to management practices to ensure that they align with contemporary best practice industry standards; e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and f) be conducted and reported to the satisfaction of the Secretary Within 12 weeks of commissioning this audit, or otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Section 6.3

PA 08_0101 Condition	Condition Description	Relevant Section
Schedule 5, Condition 14	Access to Information The Proponent must: a) make copies of the following publically available on its website: - the documents referred to in conditions 2 and 3 of Schedule 2; - all current statutory approvals for the project; - all approved strategies, plans and programs required under the conditions of this approval; - the monitoring results of the project, reported in accordance with the specifications in an conditions of this approval or any approved plans or programs; - a complaints register, which is to be updated on a monthly basis; - minutes of CCC meetings; - the annual reviews over the life of the project; - any independent environmental audit, and the Proponent's response to the recommendations in any audit; and - any other matter required by the Secretary. b) keep this information up-to-date, to the satisfaction of the Secretary.	This information is regularly updated and publically available on the Integra Underground website.

8. Document Information

8.1 Related Documents

Related documents, listed in **Table 8-1** below, are internal documents directly related to or referenced from this document. Internal procedures have not been reviewed or endorsed by DPE and Glencore is responsible for verifying these procedures are in accordance with this management plan and generally in accordance with the PA 08_0101.

Table 8-1 – Related documents

Number	Title
Glencore	
G HSEC POL 0005	Environmental Policy
Integra Underground	
INTUG-793190785-48	Air Quality and Greenhouse Gas Management Plan
INTUG-263795162-22	Biodiversity Management Plan
INTUG-793190785-49	Exploration Activities and Surface infrastructure Management Plan
INTUG-2673795162-23	Aboriginal Heritage Management Plan
INTUG-793190785-914	Historic Heritage Management Plan
INTUG-267395162-21	Noise Management Plan
INTUG-263795162-25	Water Management Plan
INTUG-793190785-953	Mining Operations Plan
INTUG-793190785-47	Pollution Incident Response Management Plan
INTUG-793190785-151	Extraction Plan – Longwalls 13 and 14
INTUG-793190785-2055	Extraction Plan – Longwalls 15 and 16
INTUG-793190785-3013	Extraction Plan – Longwalls 17 to 20 (submitted for approval)

8.2 Reference Information

Reference information, listed in **Table 8-2** below, is information that is directly related to the development of this document or referenced from within this document.

Table 8-2 – Reference information

Reference	Title
AS/NZS 14001:2015	<i>Environmental Management Systems – Requirements with guidance for use</i>
ERM 2009	<i>Proposed Integra Underground Coal Project – Environmental Assessment.</i>
Hansen Bailey (2017a)	<i>Integra to Mount Owen Complex Water Pipeline Modification Environmental Assessment for Glencore Coal Pty Ltd</i>
Hansen Bailey (2017b)	<i>Integra Underground Mine Longwall Extension Modification Environmental Assessment for HV Coking Coal Pty Ltd</i>
Hansen Bailey (2018)	<i>Integra Underground Mine Longwall Extension Modification Response to Submissions for HV Coking Coal Pty Limited</i>

8.3 Change Information

The document control system aims to ensure that:

- Documents are periodically reviewed and are accessible;
- Relevant people are informed of new documents and changes to existing documents;
- Superseded and obsolete documents are promptly removed; and
- Documents to be retained for legal purposes are identified and stored.

Controlled document tracking is minimised by having one controlled hardcopy of the EMS with a controlled 'read only' access on the site intranet.

The review of this document will be in line with the requirements of the Environmental Management System. The reviews will be conducted after independent environmental reviews/audits and as required by relevant consent conditions. The purpose of the review is to ensure that the Strategy remains suitable, adequate and effective. Environmental performance will also be reviewed annually within the Annual Review which is submitted to the relevant agencies and stakeholders.

HVCC will review, and if necessary revise, the strategies, plans, and programs required under its approval to the satisfaction of the Secretary in accordance with Condition 6 of Schedule 5 of the PA 08_0101.

A summary of the document history is provided in **Table 8-3** below.

Table 8-3 – Change information

Version	Date	Review team (consultation)	Change Summary
1.0	8/12/2016	Mark Robinson John Watson	New plan for the underground operations
2.0	19/12/2017	Chloe Piggford (Integra Underground)	Changes made to satisfy DPE Approval.
3.0	June 2018	Sophie Nicholas and Chris Jones (SLR) Chloe Piggford (Integra Underground)	Update to reflect Modification 8 of PA 08_0101
3.1	July 2019	Keith Simkin (Integra Underground) Louise Hibbert (SLR)	Update to include ML1786 and ML1694 sublease, and revised location of TSP2.
4.0	June 2020	Chloe Piggford (Integra Underground)	Update to include ML1740 and ML1741, revised depositional dust monitoring locations and revised attended noise monitoring locations. Administrative changes, including transfer to new document template.
5.0	September 2023	Stuart Fredericks (Integra Underground) Scott Wolfenden (Integra Underground)	Update to include sections on Assurance, Social Performance and Human Rights. Update to approvals table for Modification 9 and Lease renewal dates.

Appendix A - EMS Approval



**Planning &
Environment**

Planning Services
Resource Assessments
Contact: Jessie Evans
Phone: 9274 6419
Email: jessie.evans@planning.nsw.gov.au

Chloe Piggford
Environment and Community Manager
Integra Underground
PO Box 320
Singleton NSW 2330


Dear Ms Piggford

**Integra Underground Mine (MP 08_0101)
Environmental Management Strategy**

I refer to the Environmental Management Strategy (Version 1), which has been prepared in accordance with condition 1 of Schedule 5 of the mine's project approval (MP 08_0101) and updated to reflect the Department's comments of 30 November 2017.

I advise that the Secretary approves the Environmental Management Strategy subject to Appendix 1 being included in the final copy. Please provide a final copy of this strategy to the Department at your earliest convenience and place a copy on your website.

Should you have any enquiries in relation to this matter, please contact Jessie Evans on the details above.

Yours sincerely,


Howard Reed 12.12.17
Director
Resource Assessments
as nominee of the Secretary



Planning Services
Resource Assessments
Contact: Jack Murphy
Phone: 8217 2016
Email: jack.murphy@planning.nsw.gov.au

Ms Chloe Piggford
Environmental and Community Manager
Integra Underground

Email: chloe.piggford@glencore.com.au

Dear Ms Piggford,

**Integra Underground Project (08_0101)
Environmental Management Plans**

I refer to your email dated 7 September 2018, submitting a revised environmental management strategy and revised environmental management plans for the Integra Underground Project. The Department has reviewed the following documents:

- Heritage Management Plan dated September 2018 (condition 33, Schedule 3);
- Air Quality and Greenhouse Gas Management Plan dated September 2018 (condition 15, Schedule 3);
- Biodiversity Management Plan dated September 2018 (condition 32, Schedule 3);
- Environmental Management Strategy dated September 2018 (condition 1, Schedule 5);
- Water Management Plan dated September 2018 (condition 31, Schedule 3);
- Construction Traffic Management Plan dated September 2018 (condition 42, Schedule 3);
- Noise Management Plan dated September 2018 (condition 9, Schedule 3); and
- Exploration Activities and Minor Surface Infrastructure Management Plan dated September 2018 (condition 41, Schedule 3).

The Secretary has approved the above documents. Please ensure finalised copies of these documents are made available on the company's website.

Should you have any enquiries in relation to this matter, please contact Jack Murphy.

Yours sincerely,

A handwritten signature in blue ink that reads 'Howard Reed'.

Howard Reed 10.9.18
Director
Resource Assessments
as nominee of the Secretary



Planning,
Industry &
Environment

Planning and Assessment
Energy and Resource Assessments
Name: Bailey Williams
Phone: 8275 1306
Email: bailey.williams@planning.nsw.gov.au

Mr Keith Simkin
Environment and Community Manager
Integra Underground – Glencore

By email: keith.simkin@glencore.com.au

Dear Mr Simkin

**Integra Underground Project (MP 08_0101)
Review of Management Plans**

I refer to your email dated 28 June 2019, seeking the Secretary's approval of three updated management plans for the Integra Underground Project (MP 08_0101), including the:

- Air Quality and Greenhouse Gas Management Plan (dated September 2018) (condition 15 of Schedule 3);
- Noise Management Plan (dated September 2018) (condition 9 of Schedule 3); and
- Environmental Management Strategy (dated September 2018) (condition 1 of Schedule 5).

The Department has reviewed these plans and considers that they address the relevant conditions of consent. As such, the Secretary has approved these plans. Please ensure that final untracked copies of these documents are provided to the Department by 1 August 2019 and are uploaded to the company's website.

Should you have any enquiries in relation to this matter, please contact Bailey Williams on the details listed above.

Yours sincerely

Howard Reed *26-7-19*
Director, Resource Assessments
as nominee of the Planning Secretary

320 Pitt Street Sydney 2000 | GPO Box 39 Sydney 2001 | dpie.nsw.gov.au | 1



Planning,
Industry &
Environment

Ms Chloe Piggford
Environment and Community Manager
Integra Underground
HV Coking Coal Pty Ltd
Singleton, NSW, 2330

19/02/2021

Dear Ms Piggford

**Integra Underground Project (MP 08_0101)
Environmental Management Strategy and Air Quality and Greenhouse Gas Management Plan**

I refer to the Environmental Management Strategy (EMS) and the Air Quality and Greenhouse Gas Management Plan (AQGHGMP) submitted in accordance with condition 1, Schedule 5 and condition 15, Schedule 3 of MP 08_0101 respectively.

The Department has carefully reviewed the documents and is satisfied that they adequately address the requirements of the relevant project approval.

Accordingly, the Planning Secretary has approved the EMS (Version 4.0) and the AQGHGMP (Version 4.0). Please ensure that the approved plans are placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Sarah Clibborn on 02 8837 6095 or via email at sarah.clibborn@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Sprott'.

Matthew Sprott
Director
Resource Assessments (Coal & Quarries)

as nominee of the Secretary

4 Parramatta Square, 12 Darcy Street, Parramatta 2150 | dpie.nsw.gov.au | 1