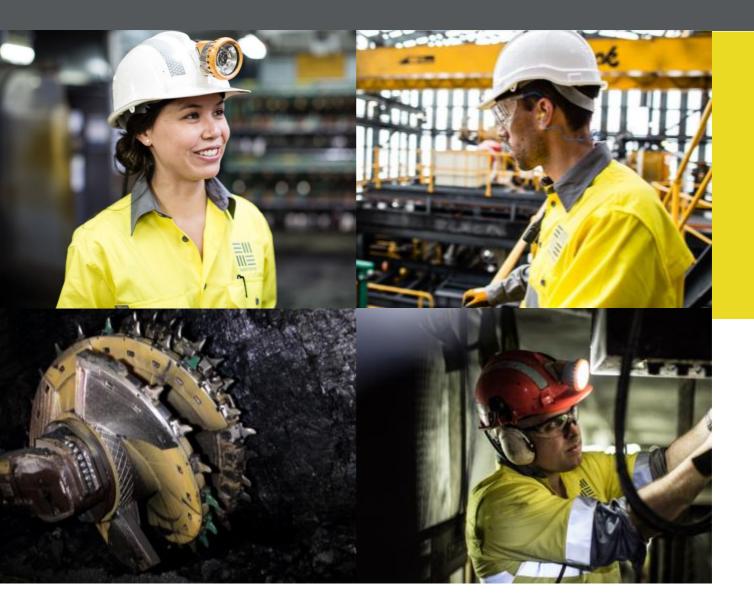
# EIII IIIE SOUTH32 Illawarra Metallurgical Coal



# APPIN MINE ENVIRONMENTAL MANAGEMENT STRATEGY

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | IMCMP0239      | Version          | 4.0            | Page 1 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2020 |              |



# **Table of Contents**

| 1.  | INTF  | RODUCTION  | 5  |  |  |  |
|-----|---|--|----|--|--|--|
|     | 1.1   | EMS Objectives   | 6  |  |  |  |
|     | 1.2   | EMS Purpose  | 6  |  |  |  |
|     | 1.3   | Scope  | 6  |  |  |  |
|     | 1.4   | Environmental Management System                                    | 7  |  |  |  |
|     | 1.5   | Consultation   | 7  |  |  |  |
| 2.  | ROL   | ES AND RESPONSIBILITIES  | 7  |  |  |  |
| 3.  | LEG   | ISLATION AND PLANNING  | 9  |  |  |  |
|     | 3.1   | Statutory Approvals  | 9  |  |  |  |
|     | 3.2   | Other Relevant Legislation   | 9  |  |  |  |
|     | 3.3   | Guidelines and Standards   | 11 |  |  |  |
| 4.  | ENV   | IRONMENTAL MANAGEMENT FRAMEWORK                                    | 11 |  |  |  |
| 5.  | CON   | IMUNICATION  | 13 |  |  |  |
|     | 5.1   | Internal and External Communications                               | 13 |  |  |  |
|     | 5.2   | Community Consultative Committee                                   | 14 |  |  |  |
|     | 5.3   | Access to Information  | 14 |  |  |  |
| 6.  | CON   | IPLAINTS AND NON-COMPLIANCE MANAGEMENT                             |    |  |  |  |
|     | 6.1   | Complaints and Dispute Resolution                                  | 15 |  |  |  |
|     | 6.2   | Non-Compliance, Corrective Action and Preventative Action          | 15 |  |  |  |
| 7.  | EME   |  | 16 |  |  |  |
| 8.  | REP   | ORTING AND REVIEW  | 17 |  |  |  |
|     | 8.1   | Annual Review  |    |  |  |  |
|     | 8.2   | Notification of Incidents to Government Authorities and the Public | 17 |  |  |  |
|     | 8.3   | Revision of Strategies, Plans and Programs                         | 17 |  |  |  |
|     | 8.4   | Audits   | 18 |  |  |  |
| 9.  | SUN   | IMARY OF COMMITMENTS   | 19 |  |  |  |
| 10  | ACR   | ONYMS  | 20 |  |  |  |
| 11. | REF   | ERENCES  | 22 |  |  |  |
| 12  | PLA   | NS   | 23 |  |  |  |
|     | Plan  | 1: Appin Mine Locality Plan  | 23 |  |  |  |
| 13  | APP   | ENDICES  | 24 |  |  |  |
|     | Appendix 1: Appin Mine Approval Conditions: EMS24 |  |    |  |  |  |

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | IMCMP0239      | Version          | 4.0            | Page 2 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2020 |              |



| Appendix 2: Environmental Monitoring Programs Matrix | 25 |
|--|----|
| Appendix 3: EMS Approval                             | 26 |

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | IMCMP0239      | Version          | 4.0            | Page 3 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2020 |              |



## **DOCUMENT REVISION LOG**

## Persons authorising this Plan

| NAME          | TITLE            | DATE           |
|---------------|------------------|----------------|
| Chris Schultz | Lead Environment | September 2020 |

## **Document Revisions**

| REVISION | DESCRIPTION OF CHANGES   | DATE           |
|----------|--|----------------|
| 1.0      | Original document  | August 2012    |
| 2.0      | Update following Triennial Independent Audit   | October 2014   |
| 3.0      | <ul> <li>The following changes have been made:</li> <li>Updated role and responsibilities</li> <li>References to parent company changed</li> </ul> | March 2017     |
| 4.0      | Update to new template, site naming, roles and responsibilities  | September 2020 |
|          |  |                |
|          |  |                |
|          |  |                |
|          |  |                |

### Persons involved in the review of this Plan

| NAME          | TITLE                      | COMPANY     | EXP<br>(YRS) | DATE              |
|---------------|----------------------------|-------------|--------------|-------------------|
| Chris Schultz | Lead Environment           | South32 IMC | 25           | September<br>2020 |
| Casey Bishop  | Specialist Environment     | South32 IMC | 8            | September<br>2020 |
| Simon Pigozzo | Specialist Environment     | South32 IMC | 9            | September<br>2020 |
| David Gregory | Specialist Environment     | South32 IMC | 12           | September<br>2020 |
| Amber Cleary  | Manager Corporate Affairs  | South32 IMC | 10           | September<br>2020 |
| Nicola Curtis | Principal Mining Approvals | South32 IMC | 7            | September<br>2020 |

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | IMCMP0239      | Version          | 4.0            | Page 4 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2020 |              |



## 1. INTRODUCTION

Appin Mine incorporates the underground mining operations, which extract coal from the Bulli Seam, and associated surface activities, including the West Cliff Coal Preparation Plant (WCCPP) and Coal Wash Emplacement Area (CWEA). Appin Mine is located approximately 25 kilometres (km) north-west of Wollongong in New South Wales (See Plan 1). Appin Mine is owned and operated by Endeavour Coal Pty Ltd, a subsidiary of Illawarra Coal Holdings Pty Ltd (ICHPL), which is a wholly owned subsidiary of South32 Limited. Appin Mine, Cordeaux Colliery and Dendrobium Mine (and associated facilities) collectively operate as South32 Illawarra Metallurgical Coal (IMC).

Run-of-Mine (ROM) coal is extracted from the Appin underground mining operations and delivered directly to the WCCPP by winder and conveyor or is transported from the Appin East Pit Top via truck along Appin and Wedderburn Roads to the WCCPP. Processed coal (clean coal product) from the WCCPP is transported by road to the Port Kembla Coal Terminal (PKCT) for shipping to domestic and international customers, or to BlueScope Steel or other local customers.

The coal wash generated as part of the washing process is emplaced at the purpose-built emplacement area located at Appin North.

Activities associated with Appin Mine are undertaken within the existing mining tenements Consolidated Coal Lease (CCL) 724 and CCL 767, Coal Lease (CL) 381 and CL 388, Mining Leases (ML) 1382, 1433, 1574, 1678, 1698 and 1473 and Mining Purposes Lease (MPL) 200 and MPL 201.

In September 2009, ICHPL submitted an Environmental Assessment (EA) for its Bulli Seam Operations (BSO) Project to the then NSW Department of Planning and Infrastructure (DoPI) for the continuation of existing underground coal mining operations for Appin Mine and West Cliff Mine. In October 2010, ICHPL submitted a Preferred Project Report (PPR) to the Secretary of the DoP requesting that the North Cliff, Area 2 and the majority of the Area 3 mining domains be removed from the BSO Project Application. This resulted in removal of most of the proposed mining beneath the Dharawal State Conservation Area and all 226 upland swamps previously identified within the Application Area.

The Company submitted a PPR Amendment in October 2011 which addressed changes to the Application Area which substantially relate to the proposed declaration of the Dharawal National Park.

ICHPL received Project Approval 08\_0150 (the Project Approval) from the Planning Assessment Commission of NSW under delegation of the Minister for Planning and Infrastructure on 22 December 2011 for current and proposed mining at Appin Mine for the next 30 years, and production of up to 10.5 million tonnes per annum of ROM coal. This approval incorporates underground mining, transport and coal wash emplacement activities undertaken 24 hours a day, seven days per week.

This Environmental Management Strategy (EMS) has been prepared to meet the requirements of Condition 1 of Schedule 6 of the Project Approval.

| This document UNCONTROLLED once printed |                                   |                  |            |  |  |  |
|---|-----------------------------------|------------------|------------|--|--|--|
| Document ID                             | Document ID ICHMP0259 Version 3.0 |                  |            |  |  |  |
| Last Date Updated                       | 30/06/2020                        | Next Review Date | 30/06/2023 |  |  |  |



### 1.1 EMS Objectives

The objectives of the EMS are to:

- a) provide the strategic framework for environmental management at Appin Mine;
- b) identify the statutory approvals that apply to the project;
- c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;
- d) describe the procedures that would be implemented to:
  - keep the local community and relevant agencies informed about the operation and environmental performance of the project;
  - receive, handle, respond to, and record complaints;
  - resolve any disputes that may arise during the course of the project;
  - respond to any non-compliance;
  - respond to emergencies; and
- e) include:
  - copies of any strategies, plans and programs approved under the conditions of the Project Approval; and
  - a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.

Appendix 1 outlines the Project Approval conditions in relation to the EMS and the relevant sections in the EMS where relevant conditions are addressed.

#### 1.2 EMS Purpose

The purpose of the EMS is to provide the framework for environmental management across Appin Mine in accordance with:

- the Project Approval (as modified);
- ISO 14001 Environmental Management Standard; and
- legislative and other statutory requirements.

#### 1.3 Scope

The scope of the EMS includes the following sites, facilities, surface activities and mining areas:

- Appin West Pit Top, located on Douglas Park Drive. This is the primary access and egress point for personnel and materials into Appin Mine. Ventilation Shaft 6 (upcast) is located in Douglas Park.
- Appin East Pit Top, located adjacent to Appin Village. This is a secondary access and egress point for personnel and materials into Appin Mine.

| This document UNCONTROLLED once printed |                                   |                  |                |  |
|---|-----------------------------------|------------------|----------------|--|
| Document ID                             | Document ID ICHMP0239 Version 4.0 |                  |                |  |
| Last Date Updated                       | September 2020                    | Next Review Date | September 2023 |  |



Ventilation Shafts 1 (downcast), 2 (upcast) and 3 (downcast) are located in the vicinity.

- Appin North Pit Top, located off Wedderburn Road. This site is an alternative access and egress point for personnel and materials into Appin Mine.
- WCCPP, located on Wedderburn Road, This facility washes ROM coal extracted from the Appin underground mining operations, that is delivered by winder and conveyor or is transported from the Appin East Pit Top via truck along Appin and Wedderburn Roads. Ventilation Shaft 1 (downcast) is located at this site.
- CWEA, located at the Appin North site, that receives coal wash from the WCCPP and from the Dendrobium Coal Preparation Plant (DCPP) where alternative beneficial uses are not available.
- Surface gas drainage and other surface works.
- Underground mining areas (currently operating in Areas 7 and 9).
- North Cliff Pit Top (Shafts 1 and 2) and Bulli shafts 1, 2 and 3 (rehabilitation activities only).

Methane extracted from the underground workings is utilised to generate electricity at two power stations operated by Energy Developments Limited (EDL). One plant is located at Appin West and the second plant is located adjacent to Ventilation Shafts 1/2 in the vicinity of Appin East.

#### 1.4 Environmental Management System

IMC has a comprehensive Environmental Management System in place to minimise the impact of its operations on the local environment and community. The EMS is a component of the Environmental Management System which is certified to ISO 14001:2015.

#### 1.5 Consultation

No consultation is required in preparation of the EMS. Comments received from the Department of Planning, Industry and Environment (DPIE) will be incorporated into the EMS if received.

## 2. ROLES AND RESPONSIBILITIES

Roles and responsibilities associated with environmental management at Appin Mine are defined in the EMS. Table 1 outlines the roles and responsibilities associated with the implementation and periodic review of the EMS.

| This document UNCONTROLLED once printed |                                   |                  |                |  |
|---|-----------------------------------|------------------|----------------|--|
| Document ID                             | Document ID ICHMP0239 Version 4.0 |                  |                |  |
| Last Date Updated                       | September 2020                    | Next Review Date | September 2023 |  |



## Table 1: Roles and Responsibilities

| Polo   | Responsibilities and  | Authorities   |
|--|---|---|
| Role   | Accountabilities  |   |
| Vice President<br>Operations (IMC)/ Site<br>General Manager    | <ul> <li>Ensure adequate operational<br/>resources are available to assist<br/>Environmental representatives to<br/>allow the EMS to be implemented<br/>effectively and maintained</li> </ul>   | <ul> <li>Make changes to the plan, stop<br/>or suspend operations as<br/>required to meet environmental<br/>obligations</li> </ul>  |
| Lead Environment<br>/Manager Health,<br>Safety and Environment | <ul> <li>Ensure environmental<br/>management strategies, plans,<br/>programs and associated<br/>procedures are implemented in<br/>accordance with the requirements<br/>of this EMS and other external<br/>requirements</li> <li>Provide leadership and support to<br/>the IMC Environment Team to<br/>ensure that the EMS is<br/>implemented effectively and<br/>maintained</li> </ul>                  | <ul> <li>Make recommendations to<br/>suspend operations as required<br/>to meet environmental obligations</li> <li>Liaise with Government<br/>authorities re: environmental<br/>issues on behalf of the operations</li> <li>Recommend any additional<br/>environmental controls as<br/>necessary to meet environmental<br/>obligations</li> </ul>                               |
| Specialist Environment   | <ul> <li>Ensure environmental<br/>management strategies, plans,<br/>programs and associated<br/>procedures are implemented</li> <li>Collect and review monitoring<br/>data</li> </ul>   | <ul> <li>Liaise with operations personnel<br/>to implement corrective actions</li> <li>Recommend any additional<br/>environmental controls as<br/>necessary to meet environmental<br/>obligations</li> </ul>  |
| Manager Approvals  | - Ensure approval outcomes in<br>mining and surface areas are<br>managed with appropriate<br>systems at a high standard that is<br>consistent with company and<br>government expectations and<br>reasonable expectations of the<br>broader community  | <ul> <li>Undertake Environmental<br/>Assessments and monitoring for<br/>mining areas, surface facilities<br/>and infrastructure (until hand over<br/>to operations)</li> <li>Submission of approval<br/>applications for mining</li> <li>Liaison with Government on the<br/>progress of approvals</li> <li>Reporting mining impacts and<br/>management to Government</li> </ul> |
| Specialist Community<br>and Manager Corporate<br>Affairs       | <ul> <li>Develop pro-active strategies and<br/>consistent approaches to address<br/>community consultation and<br/>media issues.</li> <li>Ensure that the IMC Stakeholder<br/>Engagement Management Plan is<br/>fully implemented.</li> <li>Ensure access to information is<br/>available as required in the<br/>Project Approval.</li> <li>Manage IMC complaints and<br/>management process</li> </ul> | <ul> <li>Facilitate and implement<br/>consultation and communication<br/>strategies for all stakeholders<br/>including community, and<br/>employees.</li> <li>Liaise with operations personnel<br/>to implement corrective actions in<br/>response to complaints</li> </ul>   |
| Principal Infrastructure<br>Protection and Legacy<br>Sites     | - Ensure approval outcomes for<br>infrastructure are managed with<br>appropriate systems at a high<br>standard that is consistent with<br>company and government<br>expectations and reasonable<br>expectations of the broader<br>community   | <ul> <li>Undertake assessments and<br/>monitoring for infrastructure for<br/>mining areas</li> <li>Reporting infrastructure impacts<br/>and management to Government</li> </ul>   |

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 8 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |              |



# 3. LEGISLATION AND PLANNING

Environmental legislation and other statutory requirements apply to the Appin Mining Area (current and proposed) and the Appin Mine operational sites.

Adherence to statutory requirements has been required throughout Appin Mine's operational life and will continue to be applied as required.

## 3.1 Statutory Approvals

Under current legislation, the major approvals required for Appin Mine include:

- Project Approval MP08\_0150, as modified. The approval requires the development of and implementation of management plans, monitoring programs and strategies across operational and mining areas to ensure all aspects are managed in an environmentally responsible manner.
- Consolidated Coal Lease (CCL) 724 and CCL 767, Coal Lease (CL) 381 and CL 388, Mining Leases (ML) 1382, 1433, 1574, 1678, 1698 and 1473 and Mining Purposes Lease (MPL) 200 and MPL 201.
- Various approvals required under the mining lease associated with land use and environmental impacts. An Extraction Plan (EP)<sup>1</sup> must be prepared and approved by DPIE and be to the satisfaction of the Secretary.
- Environmental Protection and Biodiversity Conservation (EPBC) Act Approvals: EPBC 2010/5722 and EPBC 2010/5350.
- Environment Protection Licence (EPL) 2504, issued by the Environment Protection Authority (EPA).

Updates to the list of approvals, licences, leases and/or permits are provided annually via the Annual Review which is made available on the South32 website.

Supplementary approvals are progressively obtained in accordance with the requirements of the conditions of existing mining tenements.

## 3.2 Other Relevant Legislation

Key regulatory and other obligations applicable to Appin Mine are managed via an online obligations management database. The obligations are allocated to responsible personnel. This process is detailed in the Environmental Compliance/Conformance Assessment and Reporting Procedure.

<sup>&</sup>lt;sup>1</sup> A Subsidence Management Plan (SMP) that is substantially consistent with Condition 5 of Schedule 3 of the Appin Mine approval and which is approved by the Department of Resources and Energy (or equivalent Department) prior to 30 September 2012 is taken to satisfy the requirements of this condition.

| This document UNCONTROLLED once printed |                |                  |                |              |
|---|----------------|------------------|----------------|--------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 9 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |              |



Acts and Regulations are applicable to mining operations within the approved Appin mining domains and the operations of Appin Mine. These include, but are not limited to, the:

- Contaminated Land Management Act, 1997;
- Environmental Planning and Assessment Act, 1979;
- Environmental Protection and Biodiversity Conservation Act, 1999;
- Protection of the Environment Operations Act, 1997;
- Biodiversity Conservation Act, 2016;
- Heritage Act, 1977;
- Mining Act, 1992;
- Coal Mine Subsidence Compensation Act, 2017;
- National Parks and Wildlife Act, 1974;
- Biosecurity Act, 2015;
- Rail Safety National Law (NSW) No. 82;
- Dangerous Goods (Road and Rail Transport) Act, 2008;
- Roads Act, 1993;
- Water NSW Act, 2014;
- Crown Lands Act, 1989;
- Dams Safety Act, 2015;
- Energy and Utilities Administration Act, 1987;
- Fisheries Management Act, 1994;
- Water Act, 1912;
- Water Management Act, 2000;
- Work Health and Safety (Mines) Act, 2013;
- Occupational Health and Safety Amendment (Dangerous Goods) Act, 2003; and
- Local Land Services Amendment Act, 2016.

Relevant licences and approvals required under applicable Acts will be obtained as required.

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 10 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



## 3.3 Guidelines and Standards

This EMS has been developed to be consistent with the principles of the following:

- ISO 14001:2015 Environmental Management Systems;
- South32 Sustainability Policy; and
- South32 Environment Standard.

The South32 Environment Standard prescribes the mandatory requirements for management of land, biodiversity, water, air, greenhouse gases, hydrocarbons and waste to ensure environmental responsibilities aim to minimise impacts while contributing to enduring benefits to biodiversity, ecosystems and other environmental resources.

# 4. ENVIRONMENTAL MANAGEMENT FRAMEWORK

Environmental management strategies, plans, and programs for Appin Mine have been developed to comply with legislative, corporate and ISO 14001 certification standards. These strategies, plans and programs are subject to regular auditing and review and are used to provide site personnel and management with specific environmental management guidelines relative to the operation with which they are involved.

An overview of the Environmental Management Framework relevant to Appin Mine is shown as Figure 1.

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 11 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



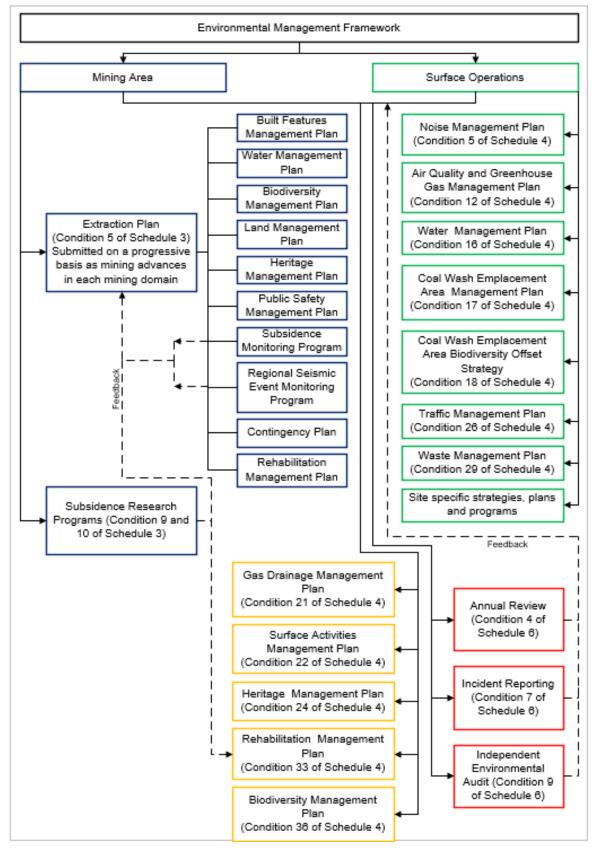


Figure 1: Environmental Management Framework

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 12 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



Plans showing the established environmental monitoring sites required by the Management Plans and Programs identified in Figure 1 are provided in the respective management plan. A summary of monitoring undertaken under the management plans is provided in Appendix 2. Copies of the approved management plans are available on the South32 website, accessible via the following link: <a href="https://www.south32.net/our-business/australia/illawarra-metallurgical-coal/documents">https://www.south32.net/our-business/australia/illawarra-metallurgical-coal/documents</a>.

## 5. COMMUNICATION

### 5.1 Internal and External Communications

IMC's community consultation and communication is guided by the Stakeholder Engagement Management Plan. The plan is consistent with the relevant South32 corporate policies as well as ISO 14001 requirements. The plan identifies key stakeholders and appropriate communication and consultation processes.

Key regional stakeholders include:

- local communities in the vicinity of Appin Mine operations;
- local and state government agencies and authorities;
- employees and contractors;
- local and regional business groups;
- community groups;
- residents potentially impacted by Appin Mine operations;
- indigenous community Tharawal Aboriginal Land Council and others;
- local schools and volunteer groups; and
- broader regional community.

Community information is provided through the following mechanisms:

- community information sheets and letter box drops;
- media releases and other media activities;
- direct engagement with community members including affected landholders;
- briefings with local government, business and community groups;
- bi-monthly meetings with regulatory and non-regulatory community groups;
- general community surveys and reports;
- Face2Face a bi-monthly IMC publication for employees;
- start of shift briefings and toolbox talks delivered to employees and contractors as required;
- IMC Community News a quarterly publication distributed to the community;

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 13 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



- South32 internet site (<u>https://www.south32.net/our-business/australia/illawarra-metallurgical-coal/documents</u>);
- Annual Review (Condition 4 of Schedule 6); and
- information days.

IMC coordinates the following stakeholder committees and working groups:

- Illawarra Coal Community Consultative Committee (ICCCC);
- Illawarra Coal Community Partnerships Program; and
- Douglas Park Advisory Panel.

## 5.2 Community Consultative Committee

In accordance with Condition 6 of Schedule 6 of the Project Approval, IMC has established and operates the ICCCC. The ICCCC is operated in accordance with the Community Consultative Committee Guideline for State Significant Projects (January 2019, or its latest version), and has been operating since September 2012.

The ICCCC provides a forum that enables regular two-way communication between IMC and the community/stakeholders, and promotes open discussion on IMC's Appin Mine operations. The basis of discussion includes information on mining operations, environmental performance of the mine, community relations activities, and issues/ outcomes as they arise during mining activity. Topics discussed in the meeting generally reflect community concerns and interests at the time. Site visits are used to further increase the ICCCC's collective knowledge of IMC's operations.

The ICCCC nominally comprises 11 members including representatives of IMC, local councils, local community and other key stakeholders who have an interest in IMC's operations and the potential impacts of mining in the area. The committee is chaired by an independent chairperson, who is appointed by the Secretary of DPIE. Formal meetings are generally held nominally every two months with additional site visits and extraordinary meetings as required.

#### 5.3 Access to Information

In accordance with Condition 11 of Schedule 6 of the Project Approval, IMC makes the following documents publicly available on the South32 website:

- documents referred to in Condition 2 of Schedule 2 (EA, Statement of Commitments, PPR and the Project Approval);
- all current statutory approvals for the project;
- all approved strategies, plans and programs required under the conditions of this approval;
- a comprehensive summary of the monitoring results of the project;
- a complaint register, updated on a monthly basis;
- minutes of ICCCC meetings;

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 14 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



- the Annual Reviews of the project;
- any independent environmental audit of the project, and the IMC response to the recommendations in any audit; and
- any other matter required by the Secretary.

IMC is responsible for keeping the above information up to date, to the satisfaction of the Secretary. Where privacy of information is requested or required from external parties or considered commercial in confidence, the related strategies, plans and/or programs (or portions of these documents) will not be available to the public.

## 6. COMPLAINTS AND NON-COMPLIANCE MANAGEMENT

### 6.1 Complaints and Dispute Resolution

IMC has a 24 hour, free call community hotline number (1800 102 210) and email address (<u>illawarracommunity@south32.net</u>) through which all complaints and general enquiries regarding environmental or community issues associated with IMC's operations can be reported.

All complaints and enquiries received in relation to Appin Mine will be managed in accordance with the Handling Community Complaints, Enquiries and Disputes Procedure.

Upon receipt of a community complaint, preliminary investigations will commence as soon as practicable to determine the likely cause of the complaint. An initial response will be provided to the complainant within 24 hours of the complaint being made, with a follow up response being provided as soon as practicable once a more detailed investigation is complete.

A summary of all complaints received during the reporting year is provided as part of the Annual Review. A log of complaints is also maintained on the South32 website at:

https://www.south32.net/our-business/australia/illawarra-metallurgicalcoal/documents.

In the event that an issue cannot be resolved between the IMC representative and complainant, the issue is escalated within IMC. The escalation of the issue is aligned with the risk associated with the nature of the complaint.

In the event that the matter remains unresolved, it may be appropriate that the matter be taken to third-party mediation (e.g. Subsidence Advisory NSW, DPIE, EPA or other relevant agencies) in order to achieve an outcome.

#### 6.2 Non-Compliance, Corrective Action and Preventative Action

Events, non-compliances, corrective actions, and preventative actions are managed in accordance with the Reporting and Investigation Standard and Environmental Compliance/Conformance Assessment and Reporting Procedure. These procedures, which relate to all IMC operations, detail the processes to be

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 15 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



utilised with respect to event reporting and identification of non-conformances, the application of appropriate corrective action(s) to address non-conformances and the establishment of preventative actions to avoid non-conformances.

The key elements of the process include:

- identification of events, non-conformances and/or non-compliances:
- recording of event, non-conformance and/or non-compliance in G360;
- evaluation/investigation of the event, non-conformance and/or noncompliance to determine specific corrective and preventative actions;
- corrective and preventative actions to be assigned to responsible persons and entered into G360; and
- management review of corrective actions to ensure the status and effectiveness of the actions.

Non-compliances will be reported to all relevant agencies via the Annual Review.

## 7. EMERGENCY RESPONSE

The Emergency Response Control Plans for Appin Mine and the WCCPP detail the actions required during an emergency and, in particular, in the early stages of an emergency. They also define the organisational structure during an emergency and the duties to be carried out by members of the Incident Management and Incident Support Teams.

The key emergency response document for Appin Mine in relation to environmental incidents is the Pollution Incident Response Management Plan (PIRMP) for EPL 2504.

The PIRMP has been prepared in accordance with Part 5.7A Section 153A of the *Protection of the Environment Operations Act* 1999 (POEO Act) and Part 3A Section 98C of the *Protection of the Environment Operations (General) Regulation* 2009 (POEO Regulation).

The objectives of the PIRMP (as per the EPA's Environmental Guidelines for the preparation of pollution incident response management plans dated 2012) are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as the Department of Planning, Industry and Environment, local councils, Public Health, Workcover NSW, and Fire and Rescue NSW) and people outside of the facility (community members) who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 16 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



The PIRMP is tested at least once every 12 months to ensure that the information contained within the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

## 8. **REPORTING AND REVIEW**

#### 8.1 Annual Review

IMC will report on the environmental performance of Appin Mine in the Annual Review.

The Annual Review is prepared in accordance with the requirement of Condition 4 of Schedule 6 of the Project Approval, Condition 4 of CCL 724 and Condition 4 of CCL 767, and is submitted to relevant agencies in September each year. Annual Reviews are made publicly available via the South32 website.

#### 8.2 Notification of Incidents to Government Authorities and the Public

In accordance with Condition 7 of Schedule 6 of the Project Approval and Condition R2 of EPL 2504, IMC is to notify DPIE, EPA and other relevant agencies of any incident that has caused (or threatens to cause) material harm to the environment. The process and contact numbers for these notifications is outlined in the PIRMP. For any other incidents<sup>2</sup> associated with Appin Mine operations, the proponent shall notify the Secretary and any other relevant agencies as soon as practicable after the proponent becomes aware of the incident.

#### 8.3 Revision of Strategies, Plans and Programs

In accordance with Condition 5 of Schedule 6 of the Project Approval, strategies, plans and programs required under the approval<sup>3</sup> will be reviewed, and if necessary revised, within three months, of:

- the submission of an Annual Review;
- the submission of an incident report;
- the submission of an Independent Environmental Audit (IEA) report; or
- any modification to the conditions of the Project Approval (unless the conditions require otherwise).

Outcomes from each review will be documented in the Management Plan Review Log. Documents required under the approval will only be resubmitted to DPIE for approval where a material change to site operations or environmental management

<sup>&</sup>lt;sup>3</sup> This does not include documents submitted under an Extraction Plan, unless the Extraction Plan is modified, and a review of documents included in the Extraction Plan is requested by the Secretary.

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 17 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |

<sup>&</sup>lt;sup>2</sup> Under the Project Approval, an incident is defined as a set of circumstances that:

<sup>•</sup> causes or threatens to cause environmental harm to the environment; and/or

<sup>•</sup> breaches or exceeds the limits or performance measures/criteria in this approval.



has occurred, or in accordance with the review period on the respective document. Administrative or descriptive changes do not constitute a material change.

Consultation with relevant external stakeholders will be undertaken in accordance with the relevant condition of the Project Approval. Details of feedback provided and consultation required are included the respective management plan.

#### 8.4 Audits

#### 8.4.1 Independent Environmental Audit

In accordance with Condition 9 of Schedule 6 of the Project Approval, an IEA shall be commissioned every three years, that will include a review of the strategies, plans and programs required under the approval. The report is required to be submitted to the Secretary within six weeks of completion of the audit, in accordance with Condition 10 of Schedule 6.

IEAs have been conducted in 2013, 2016/17 and 2019, with the next IEA to be conducted in 2022. Recommendations from the IEA will be incorporated into the relevant documents where appropriate.

#### 8.4.2 ISO 14001

As part of the ISO 14001 certification, IMC maintains an environmental auditing and governance program across all of its operational sites. The program, which includes the use of competent internal and accredited external auditors, is an integral part of maintaining certification under the ISO 14001 standard.

A Governance Review process is in place which targets the environmental management system across the operational sites. The process has been designed to ensure IMC meets process and monitoring requirements as per the approved management plans and/or EPLs and identifies emerging trends in data to allow adaptive management processes to be enacted to minimise possibility of a non-compliance. The frequency of Governance Reviews is determined based on risk.

A summary of the audit and governance program, directly relevant to the environmental management at Appin Mine, is provided in Table 2.

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 18 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



## Table 2: Audit Program - Appin Mine

| Process Audit Type  | Frequency  |
|---|--|
| Internal (Environmental) – Management<br>Plan Governance Checks           | Minimum three yearly. Risk based<br>approach in accordance with the<br>Aspects and Impacts Register or<br>non-compliance issues. |
| Internal (Environmental) - EPL Monitoring data trend and compliance check | Monthly  |
| External (Environmental) – ISO 14001<br>Surveillance                      | Every 12 months  |
| External (Environmental) – ISO 14001<br>Recertification                   | Every three years  |
| External (Environmental) – IEA under<br>Project Approval                  | Every three years  |

# 9. SUMMARY OF COMMITMENTS

| Commitment  | Section in<br>EMS |
|---|-------------------|
| IMC will provide personnel and resources to implement the EMS.  | Section 2         |
| IMC will comply with the conditions of the Project Approval and relevant legislation.   | Section 3         |
| IMC will maintain internal and external communication channels.   | Section 5         |
| IMC will report and investigate complaints, incidents and exceedances of limits as required, and identify and implement corrective actions. | Section 6         |
| IMC will respond to emergencies in accordance with relevant plans.  | Section 7         |
| IMC will undertake reporting as required.   | Section 8         |
| IMC will review the EMS as required.  | Section 8.3       |
| IMC will undertake audits as required.  | Section 8.4       |

| This document UNCONTROLLED once printed |  |  |  |               |
|---|--|--|--|---------------|
| Document IDICHMP0239Version4.0          |  |  |  | Page 19 of 26 |
| Last Date Updated                       | Last Date Updated         September 2020         Next Review Date         September 2023 |  |  |               |



# 10. ACRONYMS

| Term     | Definition   |
|----------|--|
| BSO      | Bulli Seam Operations                                  |
| ССС      | Community Consultative Committee                       |
| CCL      | Consolidated Coal Lease                                |
| CL       | Coal Lease   |
| CWEA     | Coal Wash Emplacement Area                             |
| DCPP     | Dendrobium Coal Preparation Plant                      |
| DoPI     | Department of Planning and Infrastructure              |
| DPAP     | Douglas Park Advisory Panel                            |
| DPIE     | Department of Planning, Industry and Environment       |
| EA       | Environmental Assessment                               |
| EDL      | Energy Developments Limited                            |
| EMS      | Environmental Management Strategy                      |
| EP       | Extraction Plan  |
| EPA      | Environment Protection Authority                       |
| EP&A Act | Environmental Planning and Assessment Act              |
| EPBC     | Environmental Protection and Biodiversity Conservation |
| EPL      | Environment Protection Licence                         |
| G360     | IMC event reporting system                             |
| ICHPL    | Illawarra Coal Holdings Pty Ltd                        |
| IMC      | Illawarra Metallurgical Coal                           |
| km       | kilometre  |
| ML       | Mining Lease   |
| MPL      | Mining Purposes Lease                                  |
| PIRMP    | Pollution Incident Response Management Plan            |

| This document UNCONTROLLED once printed |   |               |  |  |
|---|---|---------------|--|--|
| Document ID                             | ICHMP0239   | Page 20 of 26 |  |  |
| Last Date Updated                       | ast Date Updated September 2020 Next Review Date September 2023 |               |  |  |



| РКСТ  | Port Kembla Coal Terminal                |  |
|-------|--|--|
| POEO  | Protection of the Environment Operations |  |
| PPR   | Preferred Project Report                 |  |
| WCCPP | West Cliff Coal Preparation Plant        |  |

| This document UNCONTROLLED once printed |  |  |  |               |
|---|--|--|--|---------------|
| Document IDICHMP0239Version4.0          |  |  |  | Page 21 of 26 |
| Last Date Updated                       | Last Date Updated         September 2020         Next Review Date         September 2023 |  |  |               |



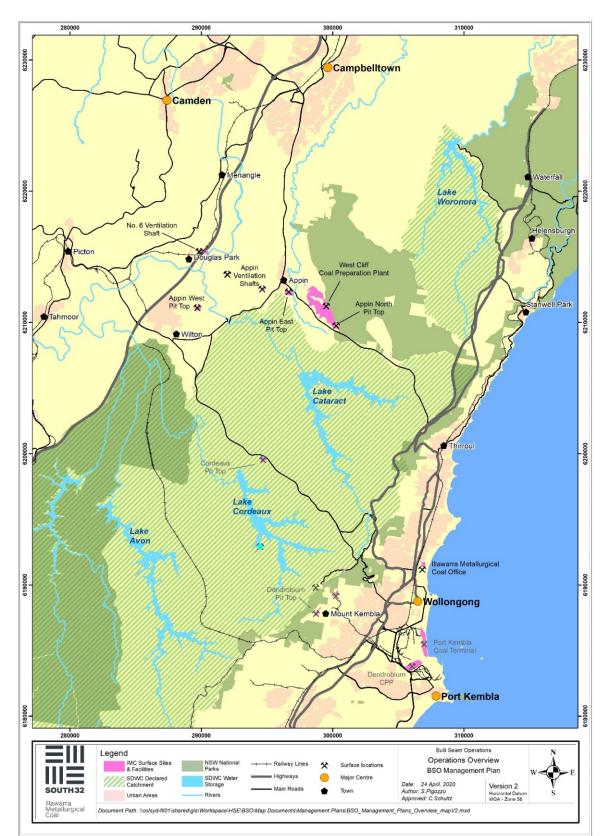
# 11. **REFERENCES**

- BSO Project Approval (08\_0150)
- BSO Project Environmental Assessment 2009
- Handling Community Complaints, Enquiries and Disputes Procedure (ICHP0112)
- Environmental Compliance/Conformance Assessment and Reporting Procedure (IMCP0186)
- ISO 14001:2015 Environmental Management Systems Standard
- Reporting and Investigation Standard (IMCSTD0069)
- Emergency Response Control Plan Appin Mine (APNMP0005)
- Emergency Response Control Plan West Cliff Coal Preparation Plant (WCPMP0009)
- Noise Management Plan (IMCMP0232)
- Air Quality and Greenhouse Gas Management Plan (IMCMP0233)
- Water Management Plan (IMCMP0235)
- Coal Wash Emplacement Area Management Plan (WCPMP0019)
- Coal Wash Emplacement Area Biodiversity Offset Strategy
- Traffic Management Plan (IMCMP0259)
- Waste Management Plan (IMCMP0234)
- Gas Drainage Management Plan
- Surface Activities Management Plan (IMCMP0257)
- Heritage Management Plan (IMCMP15129)
- Rehabilitation Management Plan/Mining Operations Plan (APNMP0107)
- Biodiversity Management Plan
- Extraction Plan LW 901 904
- Subsidence Management Plan LW 705 710
- Pollution Incident Response Management Plan (IMCMP0229)
- Stakeholder Engagement Management Plan (ICHMP0016)

| This document UNCONTROLLED once printed |  |  |  |               |
|---|--|--|--|---------------|
| Document ID ICHMP0239 Version 4.0 P     |  |  |  | Page 22 of 26 |
| Last Date Updated                       | Last Date Updated         September 2020         Next Review Date         September 2023 |  |  |               |



## 12. PLANS



## Plan 1: Appin Mine Locality Plan

| This document UNCONTROLLED once printed |   |  |  |               |
|---|---|--|--|---------------|
| Document ID                             | ICHMP0239 Version 4.0   |  |  | Page 23 of 26 |
| Last Date Updated                       | ated         September 2020         Next Review Date         September 2023 |  |  |               |



# 13. APPENDICES

# Appendix 1: Project Approval Conditions: EMS

| Condition                       | Requirement   | Section                                      |
|---------------------------------|---|--|
|                                 | The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:  |  |
|                                 | a) be submitted to the Secretary for approval by 30 September 2012;   |  |
|                                 | <ul> <li>b) provide the strategic framework for environmental<br/>management of the project;</li> </ul>   | Section 4                                    |
|                                 | c) identify the statutory approvals that apply to the project;  | Section 3                                    |
|                                 | <ul> <li>d) describe the role, responsibility, authority and accountability of<br/>all key personnel involved in the environmental management<br/>of the project;</li> </ul>                                    | Section 2                                    |
| Condition 1<br>of Schedule<br>6 | <ul> <li>e) describe the procedures that would be implemented to:</li> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> </ul> | Section 5                                    |
|                                 | <ul> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise during the course of the project;</li> </ul>  | Section 6                                    |
|                                 | <ul> <li>respond to any non-compliance;</li> </ul>  | Section 6                                    |
|                                 | <ul> <li>respond to emergencies; and</li> </ul>   | Section 7                                    |
|                                 | <ul> <li>f) include:</li> <li>copies of any strategies, plans and programs approved under the conditions of the Project Approval; and</li> </ul>  | Documents are<br>referenced in<br>Section 11 |
|                                 | • a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.   | Section 4<br>Appendix 2                      |

| This document UNCONTROLLED once printed  |   |  |  |  |
|--|---|--|--|--|
| Document ID  | ent ID ICHMP0239 Version 4.0 Page 24 of |  |  |  |
| Last Date Updated         September 2020         Next Review Date         September 2023 |   |  |  |  |



# Appendix 2: Environmental Monitoring Programs Matrix

|  | Mining Area   |  |  |  |
|--|---|--|--|--|
|  | Area 7  | Area 9   |  |  |
| Surface Operations                       |   |  |  |  |
| Noise Monitoring                         | Noise Management Plan -<br>Section 6                | Noise Management Plan - Section 6                                |  |  |
| Air Quality Monitoring                   | Air Quality Management -<br>Section 6               | Air Quality Management - Section 6                               |  |  |
| Surface Water Monitoring                 | Water Management Plan -<br>Section 7                | Water Management Plan - Section 7                                |  |  |
| Coal Wash Emplacement<br>Area Monitoring | CWEA Management Plan -<br>Section 8                 | CWEA Management Plan - Section<br>8                              |  |  |
| Mining Area (Extraction Pla              | n)  |  |  |  |
| Surface and Groundwater<br>Monitoring    | Area 7 Environmental<br>Management Plan – Table 1.1 | Area 9 (LW901 – 904) Water<br>Management Plan - Section 6        |  |  |
| Biodiversity Monitoring                  | Area 7 Environmental<br>Management Plan – Table 1.1 | Area 9 (LW901 – 904) Biodiversity<br>Management Plan - Section 6 |  |  |
| Heritage Management                      | Area 7 Environmental<br>Management Plan – Table 1.1 | Area 9 (LW901 – 904) Heritage<br>Management Plan - Section 6     |  |  |
| Cliffs and Steep Slopes                  | Area 7 Environmental<br>Management Plan – Table 1.1 | Area 9 (LW901 – 904) Land<br>Management Plan - Section 6         |  |  |

| This document UNCONTROLLED once printed |                |                  |                |               |
|---|----------------|------------------|----------------|---------------|
| Document ID                             | ICHMP0239      | Version          | 4.0            | Page 25 of 26 |
| Last Date Updated                       | September 2020 | Next Review Date | September 2023 |               |



## Appendix 3: EMS Approval

To be included when received

| T                 |                |                  |                |               |
|-------------------|----------------|------------------|----------------|---------------|
| Document ID       | ICHMP0239      | Version          | 4.0            | Page 26 of 26 |
| Last Date Updated | September 2020 | Next Review Date | September 2023 |               |