



**SIMEC**

MEMBER OF



**Tahmoor Coal Pty Ltd**



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# 1 Introduction

## 1.1 Background

Tahmoor Coal Pty Ltd (Tahmoor Coal) owns and operates Tahmoor Mine, an underground coal mine extracting coking coal which is an ingredient in the production of steel. The mine surface operations are located south of Tahmoor NSW, which is within the greater Sydney Basin - approximately 80 km southwest of Sydney. Tahmoor Mine is within the Wollondilly Shire Council (WSC) Local Government Area (LGA). Underground workings extend north under the town of Tahmoor and Picton with two ventilation shafts being located on the outskirts of town. The location of Tahmoor Mine in the regional context is shown in **Figure 1**.

Tahmoor Mine surface facilities are situated in between the townships of Tahmoor and Bargo, and adjacent to Remembrance Drive on land owned by Tahmoor Coal with mining conducted under both crown and freehold property (see **Figure 1**). Surface facilities at Tahmoor Mine include administration buildings and offices, a materials store, diesel tanks, electrical workshop, mechanical workshop, bathhouse, ventilation fan, Coal Handling Preparation Plant (CHPP), storage areas, run of mine stockpile and product stockpiles. A third party owned power station is also located on-site and utilises methane from the mines' gas drainage system to produce electricity. Extracted coal is processed on site prior to transportation via rail to the Port Kembla Coal Terminal.

An Environmental Impact Statement (EIS) was exhibited in early 2019 seeking approval for the extraction of up to 48 million tonnes (Mt) of ROM coal over a 13-year mine life. Tahmoor Coal subsequently revised the proposed mine design and submitted amended development applications on two occasions (in February and August 2020). In April 2021, Tahmoor Coal received Development Consent SSD 8445 (the Consent) for the Tahmoor South Project, which involves use of the existing surface infrastructure and the extension of underground longwall mining to the south of existing workings. The Project has consent to extract up to 4 Mtpa of ROM coal, with a total of up to 33 Mt of ROM coal extracted over a 10-year period until 31 December 2033.

## 1.2 Purpose

The purpose of this Traffic Management Plan (TMP) is to provide a framework for Tahmoor Coal (TC) personnel to ensure that compliance is achieved with relevant internal and external regulatory requirements related to traffic management at Tahmoor Coal. The plan ensures that impacts on the community are minimised and managed within a structured framework.

This plan is to ensure compliance with Development Consent (SSD 8445) (the Consent) Condition B67, Part B.

## 1.3 Scope

This TMP includes management measures and monitoring requirements relating to:

- a) Traffic management, including coal and reject transport;
- b) Hours of operations; and
- c) Road maintenance.

The TMP applies to all activities associated with Tahmoor Coal and forms part of the Environmental Management System (EMS). Separate Construction Environmental Management Plans will also be created for specific approved construction activities onsite, these plans will be used in conjunction with this TMP.

## 1.4 Preparation

This plan has been prepared by Michelle Grierson, Senior Environmental Scientist. Michelle is suitably qualified and experience in the preparation of environmental management plans and has been endorsed by the Planning Secretary (See **Appendix B**).



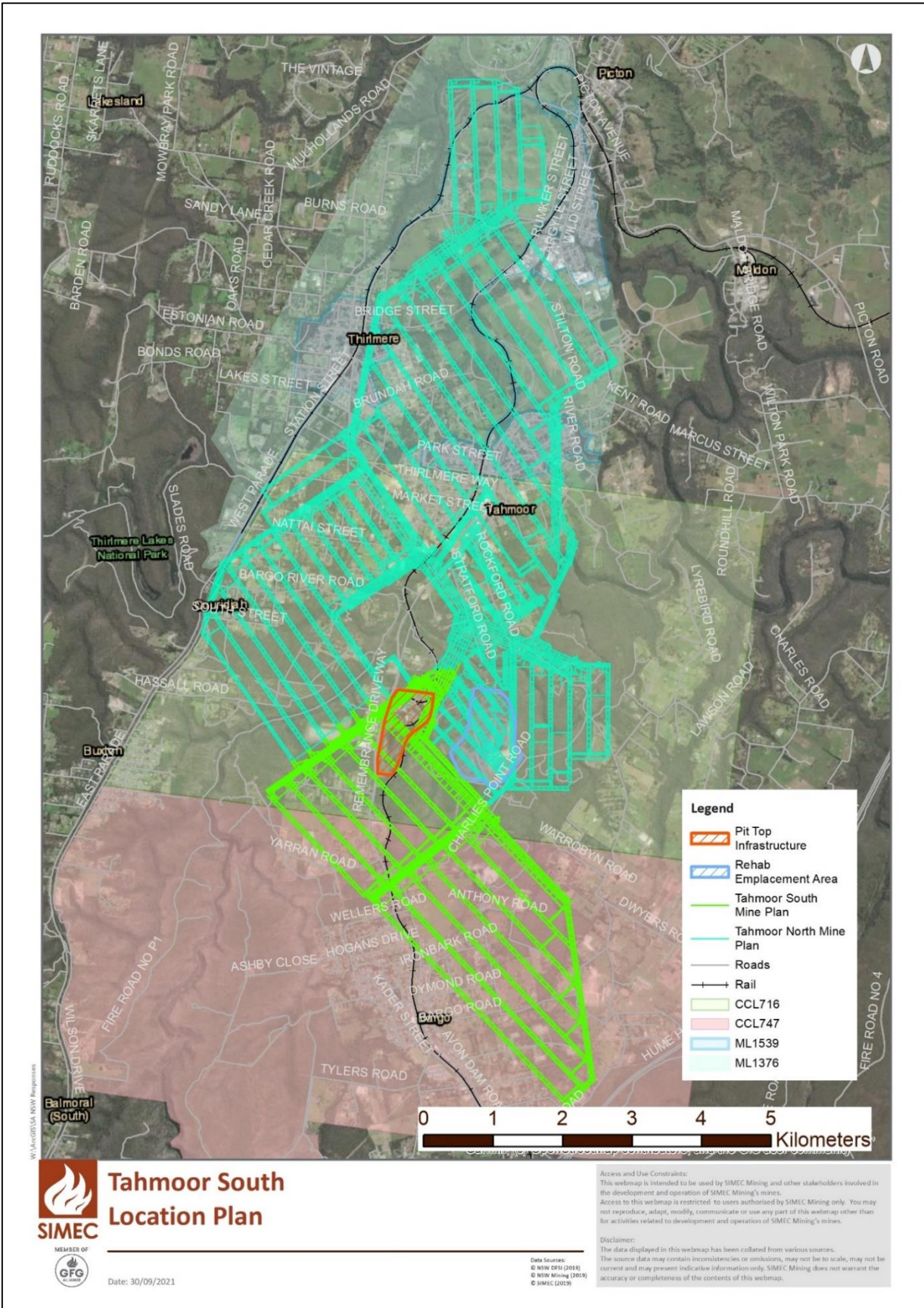


Figure 1 Tahmoor Coal Site Location

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## 2 Planning

### 2.1 Statutory Requirements and Legislation

#### 2.1.1 Development Consent Conditions

The requirement for this management plan is established by Condition B67 under Part B of the Consent. **Table 1** outlines the requirements under this condition and identifies where these requirements have been addressed.

**Table 1 Development Consent Conditions**

Condition Reference	Condition	Where Addressed
Coal Extraction and Processing and Transport		
A10	Until the commencement of second workings under this consent, coal processing, transport and any other relevant mining activities are to be undertaken in accordance with existing development consents for the site, including: <ul style="list-style-type: none"><li>a) processing a maximum of 3 million tonnes of ROM coal on the site in any calendar year;</li><li>b) transporting by road a maximum of:<ul style="list-style-type: none"><li>i. 50,000 tonnes of product coal from the site to locations within the Wollondilly local government area; and</li><li>ii. 50,000 tonnes of reject material from the site.</li></ul></li></ul>	Table 10
A11	Following commencement of second workings under this consent: <ul style="list-style-type: none"><li>a) a maximum of 4 million tonnes of ROM coal may be extracted and processed on the site in any calendar year;</li><li>b) a maximum of 33 million tonnes of ROM coal may be extracted and processed on site over the life of the development, under this consent;</li><li>c) a maximum of 200,000 tonnes of material (including ROM coal, product coal and coal reject material) may be transported to and from the site by road in any calendar year, including a maximum of:<ul style="list-style-type: none"><li>i. 3,000 tonnes per day;</li><li>ii. 16 truck movements in total per hour; and</li><li>iii. 158 truck movements in total per day.</li></ul></li></ul>	
A12	During construction activities at the ventilation shaft sites, truck movements at these sites must not exceed 16 movements per day.	
A13	A maximum of 4 laden trains may leave the site in any 24-hour period.	
Hours of Operation		
A15	Road transportation of coal and/or coal reject material to/from the site must only be undertaken between 7am to 6pm Monday to Saturday.	Section 4.4
Monitoring of Coal and Reject Transport		
B61	The Applicant must:	Section 7.2
(a)	keep accurate records of the: <ul style="list-style-type: none"><li>i. amount of coal and rejects transported to and from the site (on a daily basis);</li><li>ii. date and time of each truck movement to and from the site;</li></ul>	

	iii. date and time of each train movement generated by the development; and	
(b)	publish these results in the Annual Review.	Section 7.2
Transport Operating Conditions		
B62	The Applicant must:	
(a)	ensure that all laden* trucks entering or exiting the site have their loads covered;	Table 10
(b)	only transport product coal by road to end users without rail access; and	
(c)	take all reasonable steps to minimise traffic safety issues and disruption to local road users.  Notes: Truck movements to and from the site are also controlled by the conditions specified in A7 ( <i>noted by Tahmoor Coal as not related to truck movements</i> ), A11 and A15.	
Road Maintenance		
B63	The Applicant must:	
(a)	prepare a pre-dilapidation survey of the transport route/s prior to the commencement of any construction, road haulage or decommissioning works, or other timeframe agreed by the appropriate roads authority;	Table 10
(b)	prepare a post-dilapidation survey of the transport route/s within 1 month of the completion of construction, road haulage or decommissioning works, or other timeframe agreed by the applicable roads authority; and	
(c)	rehabilitate and/or make good any development-related damage identified in the post-dilapidation survey prepared under paragraph (b) within 2 months of completing the post-dilapidation survey, or other timing as may be agreed by the applicable roads authority,	
B64	If the construction, road haulage and/or decommissioning of the development is to be staged, the obligations in condition B63 apply to each stage.	Noted
B65	If there is a dispute about the scope of any remedial works or the implementation of the works, then either party may refer the matter to the Planning Secretary for resolution.	Noted
Road Upgrades		
B66	Prior to the commencement of second workings, the Applicant must upgrade the intersections of Remembrance Driveway and the Mine Access Road and Remembrance Driveway and Olive Lane, to the satisfaction of the relevant roads authority. <b>Notes:</b> <ul style="list-style-type: none"><li>The road upgrade works identified above include all road furniture and safety requirements required to meet relevant road standards, to the satisfaction of the appropriate roads authorities.</li><li>If there is a dispute between the relevant parties about the implementation of this condition, then any party may refer the matter to the Planning Secretary for resolution.</li></ul>	Section 4.1
Traffic Management Plan		
B67	The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	This Plan
(a)	be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;	Appendix B
(b)	be prepared in consultation with TfNSW and Council;	Section 3.3

	<p>(c) include details of:</p> <ul style="list-style-type: none"> <li>i. key transport routes and traffic types to be used for development-related traffic; and</li> <li>ii. the processes in place for the control of truck movements entering and exiting the site;</li> </ul>	Figure 2 & Section 4.3
	<p>(d) include a protocol for undertaking pre and post-dilapidation surveys and repairing any roads identified in the dilapidation surveys to have been damaged during construction, road haulage and/or decommissioning works;</p>	Table 10
	<p>(e) include details of the measures to:</p> <ul style="list-style-type: none"> <li>i. ensure compliance with the traffic operating conditions and transport-related conditions of consent;</li> <li>ii. minimise traffic safety issues and disruption to local road users during the construction and operational phases of the development, including: <ul style="list-style-type: none"> <li>• avoiding or minimising construction and mining-related traffic during school drop off/ pick-up and peak traffic periods;</li> <li>• periodically assess the performance of the Avon Dam Road and Remembrance Driveway intersection and minimise the development-related traffic impacts on the operating capacity of this intersection;</li> <li>• notifying the local community about development-related traffic impacts;</li> <li>• implementing temporary traffic controls, including detours and signage (where required);</li> <li>• responding to any emergency repair requirements or maintenance during construction and/or decommissioning;</li> <li>• managing any over-dimensional vehicles; and</li> <li>• minimising potential for conflict with school buses;</li> </ul> </li> </ul>	Table 10
	<p>(f) include a Drivers' Code of Conduct that includes procedures to ensure that drivers:</p> <ul style="list-style-type: none"> <li>i. adhere to posted speed limits or other required travelling speeds;</li> <li>ii. adhere to the designated transport routes and travel times; and</li> <li>iii. implement safe driving practices.</li> </ul>	Section 4.7 & Appendix A
	<p>(g) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct.</p>	Section 5.1
B68	The Applicant must not commence construction until the Traffic Management Plan is approved by the Planning Secretary.	Noted, Tahmoor Coal will not commence construction until the TMP is approved.
B69	The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.	Noted, Tahmoor Coal will implement this TMP once approved.

\*Note: in accordance with the Consent, the definition of Laden is the transporting of product coal from the site.

### 2.1.2 Management Plan Requirements

Consent Condition E5 outlines the general requirements for all management plans. **Table 2** outlines the requirements under this condition and identifies where these requirements have been addressed.

**Table 2 Management Plan Requirements**

Condition Reference	Condition	Where Addressed
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E5	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	NA
(a)	a summary of relevant background or baseline data;	Section 4.1 and 0
(b)	details of:	NA
(b) (i)	the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 2.1
(b) (ii)	any relevant limits or performance measures and criteria; and	Section 2.1.3
(b) (iii)	the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Section 2.1.5
(c)	any relevant commitments or recommendations identified in the document/s listed in condition A2(c);	Section 2.1.3
(d)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 4.3
(e)	a program to monitor and report on the:	NA
(e) (i)	impacts and environmental performance of the development; and	Section 4.6
(e) (ii)	effectiveness of the management measures set out pursuant to condition E5(d);	Section 4.7
(f)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6
(g)	a program to investigate and implement ways to improve the environmental performance of the development over time;	Sections 6.1 and 8
(h)	a protocol for managing and reporting any:	NA
(h) (i)	incident, non-compliance or exceedance of any impact assessment criterion or performance criterion;	Sections 7.3, 7.4 and 7.5
(h) (ii)	complaint; or	Section 7.6
(h) (iii)	failure to comply with other statutory requirements;	NA
(i)	public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	Section 9.1
(j)	a protocol for periodic review of the plan.	Section 8

### 2.1.3 EIS Commitments

Condition A2 (c) of the Consent states that the development may only be carried out generally in accordance with the EIS. The relevant EIS documents include:

- a) Tahmoor South Project Environmental Impact Statement, Volumes 1 and 7, dated January 2019;
- b) Tahmoor South Project Amendment Report, including Appendices A to R and response to submissions, dated February 2020;
- c) Tahmoor South Project Second Amendment Report, Appendices A to O and response to submissions, dated August 2020;
- d) Additional information responses dated 14 September 2020 (including Appendices A to L), 23 October 2020 and 4 November 2020; and
- e) Submission to the Independent Planning Commission (IPC), dated 25 February 2021.

EIS commitments relevant to this management plan are outlined in **Table 3**.

**Table 3 EIS Commitments**

EIS Reference	Commitment	Where Addressed
T-2	<p><b>Potential impact:</b> Impacts of construction traffic on the local road network</p> <p><b>Management and mitigation measure:</b></p> <p>Prioritise the staging of construction of the proposed ventilation shafts, with one ventilation shaft being drilled at a time. A benefit of this approach is that it will reduce the cumulative impact of heavy and light vehicle movements on the local road network and reduce the overall traffic volume generated by the Project.</p>	Table 10
Planning Secretary's Environmental Assessment Report December 2020	<b>The completion of upgrade works to the Mine Access Road and Remembrance Driveway intersection prior to the commencement of second workings.</b>	Noted, Tahmoor Coal will complete upgrade works prior to the commencement of second workings.

#### 2.1.4 Limits and Criteria

Consent Condition E5 (b) (ii) outlines the requirement for management plans to provide details of any relevant limits or performance measures and criteria. **Table 4** outlines the relevant limits and criteria relevant to this management plan. The following definitions have been applied:

**Limit** - Any limit set within the Consent or other statutory document.

**Criteria** –Any criterion set within the Consent or other statutory document.

**Table 4 Limits and Criteria**

Limit, Measure/Objectives or Criteria	Description
Until the commencement of second workings	<p>Until the commencement of second workings under this consent, coal processing, transport and any other relevant mining activities are to be undertaken in accordance with existing development consents for the site,</p> <p>A maximum of 3 million tonnes of ROM coal may be processed on the site in any calendar year</p> <p>A maximum of 50,000 tonnes of product coal may be transported on road from the site to locations within the Wollondilly local government area.</p> <p>A maximum of 50,000 tonnes of reject material may be transported on road from the site.</p>
Following commencement of second workings	<p>A maximum of 4 million tonnes of ROM coal may be extracted and processed on the site in any calendar year.</p> <p>A maximum of 33 million tonnes of ROM coal may be extracted and processed on site over the life of the development, under this consent</p> <p>A maximum of 200,000 tonnes of material (including ROM coal, product coal and coal reject material) may be transported to and from the site by road in any calendar year, including a maximum of:</p> <ol style="list-style-type: none"> <li>3,000 tonnes per day;</li> <li>16 truck movements in total per hour; and</li> <li>158 truck movements in total per day.</li> </ol> <p>During construction activities at the ventilation shaft sites, truck movements at these sites must not exceed 16 movements per day.</p> <p>A maximum of 4 laden trains may leave the site in any 24-hour period.</p> <p>Road transportation of coal and/or coal reject material to/from the site must only be undertaken between 7am to 6pm Monday to Saturday</p>

### 2.1.5 Performance Indicators

In accordance with Consent Condition E5 (b) (iii), **Table 5** outlines the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures (discussed in **Section 4.3**).

Performance Indicators are defined as ‘Tahmoor Coal derived environmental performance indicators set to maintain compliance with the performance measures and/or objectives outlined within Schedule 2 Part B of the Consent’. The below performance measures are intended for use throughout development of Tahmoor South.

Monitoring that will be conducted to assess Tahmoor Coal’s performance against these indicators is outlined within **Section 4.6**.

**Table 5 Performance Indicators**

Aspect	Indicator	Reporting Mechanism
Product Coal Trucking Tonnages	Coal transported offsite by road does not exceed 200,000 tonnes of material (including ROM coal, product coal and coal reject material) in any calendar year.	Annual Review
Product Coal Road Transport Movements	Road transportation movements do not exceed: <ul style="list-style-type: none"> <li>i. 3,000 tonnes per day;</li> <li>ii. 16 truck movements in total per hour; and</li> <li>iii. 158 truck movements in total per day</li> </ul>	Annual Review
Product Coal Rail Movements	Rail transportation will not exceed 4 laden trains may leave the site in any 24-hour period.	Annual Review
Traffic	Number of complaints regarding traffic from Tahmoor Mine	Annual Review

### 2.1.6 Other Leases and Licences

All development consents, leases, licences, and other relevant approvals are stored in the Cority Compliance Management database, which is administered by both site and Liberty GFG Corporate. A summary of the relevant mining leases is provided in **Table 6**. A summary of other approvals and licences is provided in **Table 7**.

**Table 6 Mining Lease**

Lease	Title	Granted	Expires
CCL 716	Original Tahmoor Leases	15/06/1990	13/03/2021
ML 1376	Tahmoor North Lease	28/08/1995	28/08/2035
ML 1308	Small Western lease to west of CCL716	02/03/1993	02/03/2035
ML 1539	Tahmoor North Extensions Lease	16/06/2003	16/06/2024

**Table 7 Approvals/Licences**

Approval Title / Description	Date Granted	Expiry Date
Environmental Protection Licence 1389	01/05/2012	No Expiry
WAL36442 and WAL25777	6/12/2013	No Expiry
Dangerous Goods Licence XSTR200005	18/01/2012	02/02/2017

## 3 Stakeholder Consultation

### 3.1 Internal Stakeholder Communication

Internal stakeholders include employees, contractors and visitors of Tahmoor Coal. *TAH-HSEC-00119-Communication and Engagement Procedure* has been developed to include the following:

- a) Methods of communication between internal stakeholders;
- b) Types of information that is communicated between internal stakeholders;
- c) Responsibilities for communication of information to internal stakeholders; and
- d) Review of communication methods, including the consideration of feedback to / from internal stakeholders.

### 3.2 External Stakeholder Communication

External stakeholders include neighbours and the local / regional community, local council, state and federal government agencies and regulators, and press / media. Any external communications relating to traffic will be conducted in accordance with Tahmoor Coals standard communications procedures.

External stakeholders are identified in accordance with the following:

- *TAH-HSEC-00031- Community Development Plan; and*
- *TAH-HSEC-00039 – Stakeholder Engagement Plan.*

External stakeholder communication is undertaken in accordance with:

- *TAH-HSEC-00039– Stakeholder Engagement Plan; and*
- *TAH-HSEC-00119- Communication and Engagement Procedure.*

These documents include information on the following topics:

- a) Methods of communication to external stakeholders.
- b) Types of information that is communicated between external stakeholders.
- c) Responsibilities for communication of information to external stakeholders.
- d) Review of communication methods, including the consideration of feedback to / from external stakeholders.

A key objective of *TAH-HSEC-00119 - Communication and Engagement Procedure* is to maintain positive relationships established with the local community and other external stakeholders.

Key methods of for notifying the community about development related traffic impacts include:

- Letter box drops
- Newsletter updates
- Website updates
- Door knocking

### 3.3 Consultation to Date

A draft version of this management plan was distributed to the following stakeholders for review and feedback:

- a) Transport for NSW; and**
- b) Wollondilly Council**

The feedback provided by stakeholders is summarised within **Table 8** below. Evidence of consultation is provided within **Appendix C**.



Table 8 Consultation to Date

Consulted Parties	Consultation	Outcomes of Consultation
Transport for NSW	Draft plan provided to Transport for NSW on 28.09.21.	Response received 11.10.21 noting no comments requiring action.
Wollondilly Council	Draft plan provided to Wollondilly Council on 28.09.21	Comments on plan received on 21.10.21. Comments and Tahmoor Coal’s responses outlined in Appendix C.

## 4 Traffic Management

### 4.1 Background

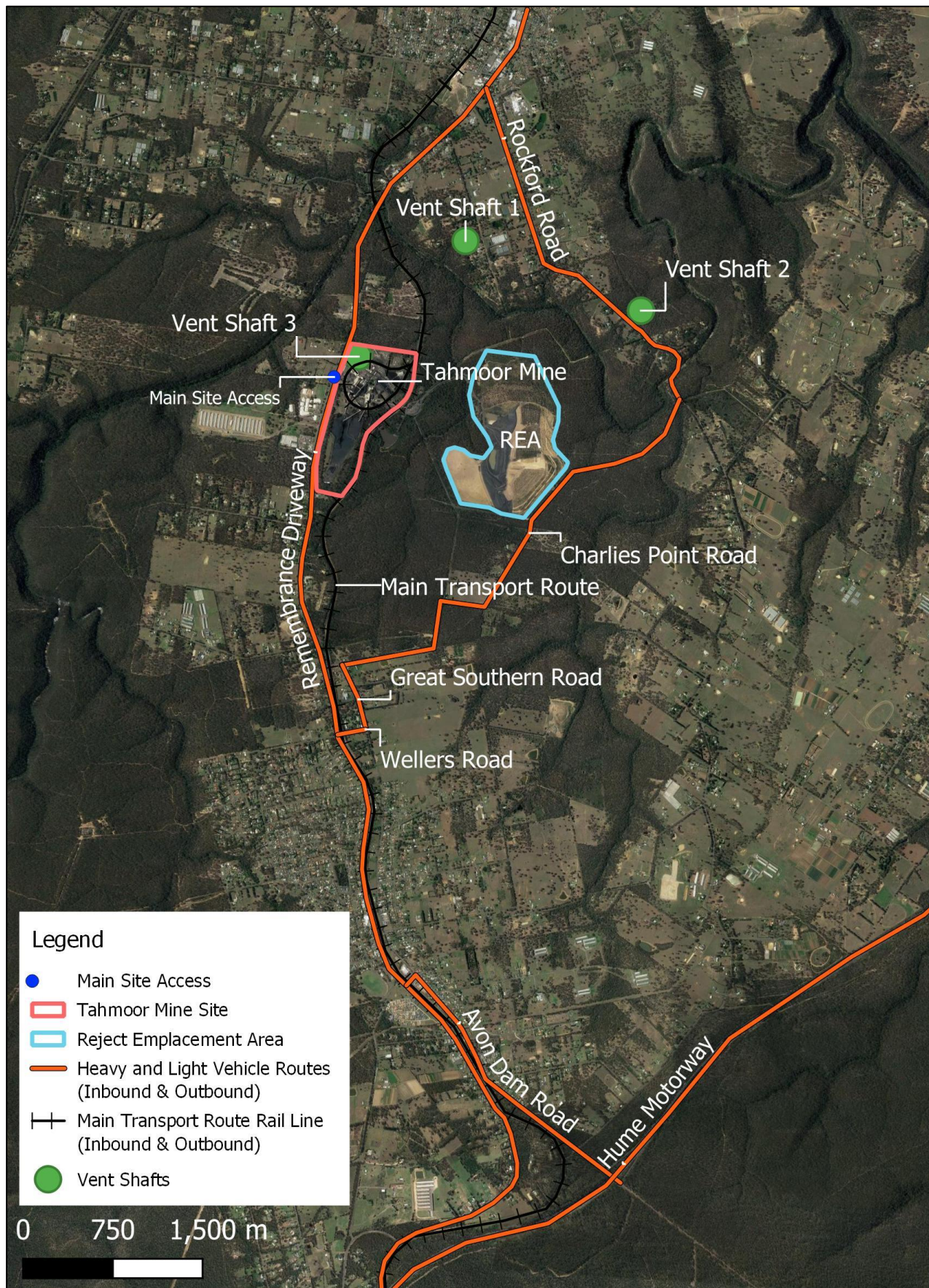
The main routes out of Tahmoor Mine are described in **Table 9** and

**Figure 2.** Tahmoor Mine's coal is processed at Tahmoor Mine's Coal Handling Preparation Plant (CHPP) and transported via the existing rail loop, the Main Southern Railway and the Moss Vale to Unanderra Railway to Port Kembla and Newcastle (from time to time) for Australian and international markets.

**Table 9 Main Transport Routes and Traffic Types**

Route	Traffic Types	Use
Main Southern Railway/Moss Vale to Unanderra Railway	<ul style="list-style-type: none"> <li>Main transportation route</li> <li>Daily transportation of coal</li> </ul>	Transportation of coal to Port Kembla and Newcastle (as required).
Remembrance Driveway	<ul style="list-style-type: none"> <li>Daily vehicle access to the mine.</li> <li>Heavy vehicle access to the mine for deliveries when required. The EIS found that the 7 day average of heavy vehicles to and from the mine is 58.</li> <li>Heavy vehicle access to Rockford Road and Charlies Point Road approximately 2-3 vehicle movements a day for oversize rejects.</li> <li>Infrequent heavy vehicle use for the transportation of coal (further discussed below).</li> </ul>	T junction intersection from Remembrance Driveway provides vehicle access to the Tahmoor Mines' infrastructure and compound.
Hume Highway	<ul style="list-style-type: none"> <li>As required vehicle access.</li> <li>Infrequent heavy vehicle use for the transportation of coal (further discussed below).</li> </ul>	Vehicle access and major transport route between Tahmoor Mine and various locations.
Avon Dam Road	<ul style="list-style-type: none"> <li>As required vehicle access.</li> <li>Infrequent heavy vehicle use for the transportation of coal (further discussed below).</li> </ul>	Avon Dam Road is a major local road that provides vehicle access and the link between Remembrance Driveway at Bargo and the Hume Highway interchange at Yanderra for traffic travelling to and from Sydney along the Hume Highway.
Rockford Road, Wellers Road, Great Southern Road and Charlies Point Road	<ul style="list-style-type: none"> <li>As required vehicle access to the REA and Vent Shaft sites.</li> <li>Heavy vehicle access to Rockford Road and Charlies Point Road approximately 2-3 times a day for oversize rejects.</li> </ul>	<p>Vehicle access to the eastern section of Tahmoor Mine site including the vent shafts which are located north east of Tahmoor Mine Access Road and near the Tahmoor township.</p> <p>Vehicle access to the reject emplacement area and reject office/compound is from Charlies Point Road, via Wellers Road/Great Southern Road or Rockford Road.</p>





**Figure 2 Main Transport Routes**



Whilst product coal is predominately transported by train and coal wash emplaced on-site at the Rejects Emplacement Area (REA), the approval allows transport of coal products and reject material up to 200,000 tonnes per annum (tpa) by road, with up to 3,000 tonnes per day via trucks with a 38-tonne capacity.

This is a very infrequent occurrence for Tahmoor Coal and the transportation of coal via road has not occurred in recent years. The trucking of coal would only typically occur under the following circumstances:

- Rail system shutdown, including the internal loading systems, southern and/or northern network, or destination unloader down for an extended period.  
Or
- Where a new contract with local customers is created, and they do not have rail access.

If required, these heavy vehicles would arrive and depart the mine to and from the south along Remembrance Drive and travel to/from the Hume Highway and travel either north or south. The following materials may be transported by road by Tahmoor Coal, if required (and only if end users do not have rail access):

- Product Coal Out may be transported to potential end users without rail access such as Berrima cement works (no rail unloading capability) and other smaller industrial users. This coal would head south from site to the Hume Highway.
- Run of Mine (ROM) Coal In may be transported to site from potential suppliers such as Wollongong Coal or South32. This coal from the Wongawilli Seam would enable Tahmoor Mine to make a blend with its Bulli seam coal. This ROM coal would travel along the Hume Highway from the north.
- Rejects Out material may be transported off-site as an alternative to disposal at the REA. Potential markets include use in road construction and brickmaking material and could be transported north to Sydney brickworks.

Construction works will include an upgrade to Tahmoor Mines' access intersections of Remembrance Driveway and the Mine Access Road and Remembrance Driveway and Olive Lane, as required under Consent Condition B66 and in consultation with Wollondilly Council. Specific Construction Environmental Management Plans will be completed for construction works, these plans will include specific traffic management measures, including outlining any changes to mine site access.

The road upgrade works will include all road furniture and safety requirements required to meet relevant road standards, to the satisfaction of the appropriate roads authorities. If there is a dispute between the relevant parties about the implementation of Condition B66, then any party may refer the matter to the Planning Secretary for resolution.

## 4.2 Baseline Data

The Tahmoor South EIS determined that a typical weekday (5 day average) Tahmoor Mine generates two way traffic volumes of 766 vehicles per day (vpd). Heavy vehicles (Austroad Classes 3 to 12) total 78 vpd. Heavy vehicles represent around 10.2% of the total volumes generated by Tahmoor Mine. Weekend volumes generated by Tahmoor Mine are lower than for weekdays, as staffing levels on weekends are lower than for weekdays and there are also lower numbers of heavy vehicles generated by the mine.

Further information can be found within Tahmoor South's Environmental Impact Statement (EIS) 2019, **Appendix P**.

## 4.3 Access

Vehicle (including heavy vehicle) access to Tahmoor Mine is controlled via boom gate access to the main pit top area at the T-junction intersection at Remembrance Driveway. Vehicle access to the eastern section of Tahmoor Mine site including the vent shafts and REA is restricted by locked gates from Charlies Point Rd.



Truck access/egress to any Tahmoor Mine Sites are controlled and monitored by CHPP Control.

#### 4.4 Hours of Operation

Underground mining operations may be undertaken 24 hours a day, 7 days a week, however any periodical transport of coal and/or coal reject material to/from the site by road will only be undertaken between 7am to 6pm Monday to Saturday.

Except for drilling activities at the ventilation shaft sites, construction activities at the surface facilities site and ventilation shaft sites will only be undertaken between the hours of 7am to 6pm Monday to Friday, and 8am to 1pm Saturday, with no construction activities on Sundays or public holidays.

#### 4.5 Management Measures

In accordance with Condition B62 (c), Tahmoor Coal will implement the following feasible and reasonable traffic management measures outlined within **Table 10** to minimise traffic safety issues and disruption to local road users.

**Table 10 Traffic Management and Mitigation Measures**

Control/Mitigation Measure	Responsibility
<p>Tahmoor Coal will conduct pre and post-dilapidation surveys (or other timeframe agreed by the appropriate roads authority) of transport roads relevant to the route pertaining to construction activities outlined within the Consent, infrequent road haulage (coal &amp; rejects) and/or decommissioning works. Surveys will provide a clear record and photographs of the road conditions to be used to monitor any dilapidation over time. Detailed photographic records of the relevant areas relating to the transport route will be undertaken to identify existing defects to assist in identifying damage possibly related to Tahmoor Mine and will include:</p> <ul style="list-style-type: none"> <li>• Remembrance Driveway (from Rockford Road to Wellers Road)</li> <li>• Avon Dam Road (from Remembrance Driveway to Hume Highway Tahmoor Exit)</li> <li>• Rockford Road (from Remembrance Driveway to Charlies Point Road)</li> <li>• Wellers Road (East of Remembrance Driveway)</li> <li>• Great Southern Road (from Wellers Road to Charlies Point Road)</li> <li>• Charlies Point Road (full length)</li> </ul> <p>The post-dilapidation survey will be conducted within 1 month of the completion of construction, road haulage or decommissioning works, or other timeframe agreed by the applicable roads authority. If the construction, road haulage and/or decommissioning of the development is to be staged, the obligations in condition B63 apply to each stage.</p> <p>Following the completion of each pre and post-dilapidation survey, Tahmoor Coal will provide the surveys to Wollondilly Council for their records. Tahmoor Coal will rehabilitate and/or make good any development-related damage identified in the post-dilapidation survey within 2 months of completing the post-dilapidation survey, or other timing as may be agreed by the applicable roads authority. If there is a dispute about the scope of any remedial works or the implementation of the works, then either party may refer the matter to the Planning Secretary for resolution.</p>	Project Manager (Construction), CHPP Manager (Road Haulage)
Product coal will only be transported by road to end users without rail access.	CHPP Manager
<p>All laden trucks entering or existing Tahmoor Mine shall:</p> <ol style="list-style-type: none"> <li>a) not be overloaded;</li> <li>b) have their loads covered;</li> <li>c) be under the legal transport height of 4.3 metres</li> <li>d) Be cleaned down by the driver prior to leaving site (where required);</li> <li>e) Should a truck spill any material on a public road then the driver shall contact the Environmental Specialist immediately and report the spillage. Drivers are required to report any spillage from other Colliery trucks they may note on the road.</li> </ol>	CHPP Manager

Control/Mitigation Measure	Responsibility
f) Where required, complete Equipment Dispatch Checklist TAHUG-502308417-6584, before the truck can leave site.	
<p>Until the commencement of second workings under SSD 8445, Tahmoor Coal will:</p> <ul style="list-style-type: none"> <li>process a maximum of 3 million tonnes of ROM coal on the site in any calendar year;</li> <li>transport by road a maximum of: <ul style="list-style-type: none"> <li>50,000 tonnes of product coal from the site to locations within the Wollondilly local government area; and</li> <li>50,000 tonnes of reject material from the site.</li> </ul> </li> </ul>	CHPP Manager
<p>Following commencement of second workings under SSD 8445, Tahmoor Coal will:</p> <ul style="list-style-type: none"> <li>Extract and process a maximum of 4 million tonnes of ROM coal on the site in any calendar year; and</li> <li>Extract and process a maximum of 33 million tonnes of ROM coal on site over the life of the development.</li> </ul> <p>If in rare circumstances coal transportation by road is required, Tahmoor Coal will:</p> <ul style="list-style-type: none"> <li>Transport a maximum of 200,000 tonnes of material (including ROM coal, product coal and coal reject material) to and from the site by road in any calendar year, including a maximum of: <ul style="list-style-type: none"> <li>3,000 tonnes per day;</li> <li>16 truck movements in total per hour; and</li> <li>158 truck movements in total per day.</li> </ul> </li> </ul>	Production Manager/CHPP Manager
During construction activities at the ventilation shaft sites, truck movements at these sites will not exceed 16 movements per day.	Project Manager (Vent Shaft)
A maximum of 4 laden trains will leave the site in any 24-hour period.	CHPP Manager
Heavy vehicle movements will be scheduled where possible to avoid school drop off/ pick-up, school bus times, and peak traffic periods.	Head of Operations
Construction activities will be staged to reduce traffic related impacts.	Project Manager(s) - Construction
Tahmoor Coal will notify the local community about development-related traffic impacts prior to major disturbances in accordance with Section 3.	Community Liaison Specialist
Temporary traffic controls, including detours and signage will be implemented where required.	Project Manager(s) - Construction
<p>Tahmoor Coal will respond to any emergency repair requirements or maintenance during construction and/or decommissioning. This may include;</p> <ul style="list-style-type: none"> <li>Temporary traffic controls, including detours and signage where required.</li> <li>Repair works, including resealing, patching, smoothing or replacement.</li> </ul>	Project Manager(s) - Construction
Oversized and over-dimensional vehicle movements will be minimised during peak traffic hours.	Head of Operations/CHPP Manager



## 5 Drivers Code of Conduct

The Driver Code of Conduct (**Appendix A**) has been prepared to ensure that drivers operate their vehicle in a safe manner, considering other road users and adjoining landowners, which reduces as far as possible noise generated by transport operations.

The Driver Code of Conduct will be incorporated as part of the induction process for all Tahmoor Coal employed workers and contractors and will include:

- a procedure to ensure that drivers adhere to driver fatigue management measures;
- adherence to appropriate travelling speeds and practices; and
- procedure to ensure drivers implement safe driving practices.

Drivers must report fatigue during operation and take appropriate mitigating steps, including but not limited to:

- taking short breaks, in safe locations, as required
- getting fresh air
- staying hydrated

It is noted that key transporting contractors are likely to operate under their own specific Drivers Code of Conducts of which Tahmoor Coal do not oversee.

### 5.1 Enforcement and Compliance

Failure to comply with the Drivers Code of Conduct and requirements nominated within this plan may lead to disciplinary action. Disciplinary action will be issued in accordance with the Tahmoor Mine Code of Conduct. Traffic related action may be issued for the following reasons:

- Unsafe driving practices;
- Failure to reduce noise emissions, including idling when not required and excessive acceleration/deceleration;
- Failure to properly secure the vehicle;
- Excessive use of engine brakes;
- Failure to adhere to specific instruction by management; and
- Failure to report any complaint received.



## 6 Contingency Plan

In accordance with Condition E5 (f) of the Consent, in the event that monitoring indicates performance measures are considered to have been exceeded or are likely to be exceeded, a contingency plan will be implemented. This contingency plan will include:

- Investigation, identification and assessment of exceedance or likely exceedance;
- An audit of the current TMP and existing traffic management measures;
- Identification of management measure improvements or required remediation measures;
- Identification of additional monitoring where required to inform proposed remediation measure effectiveness.

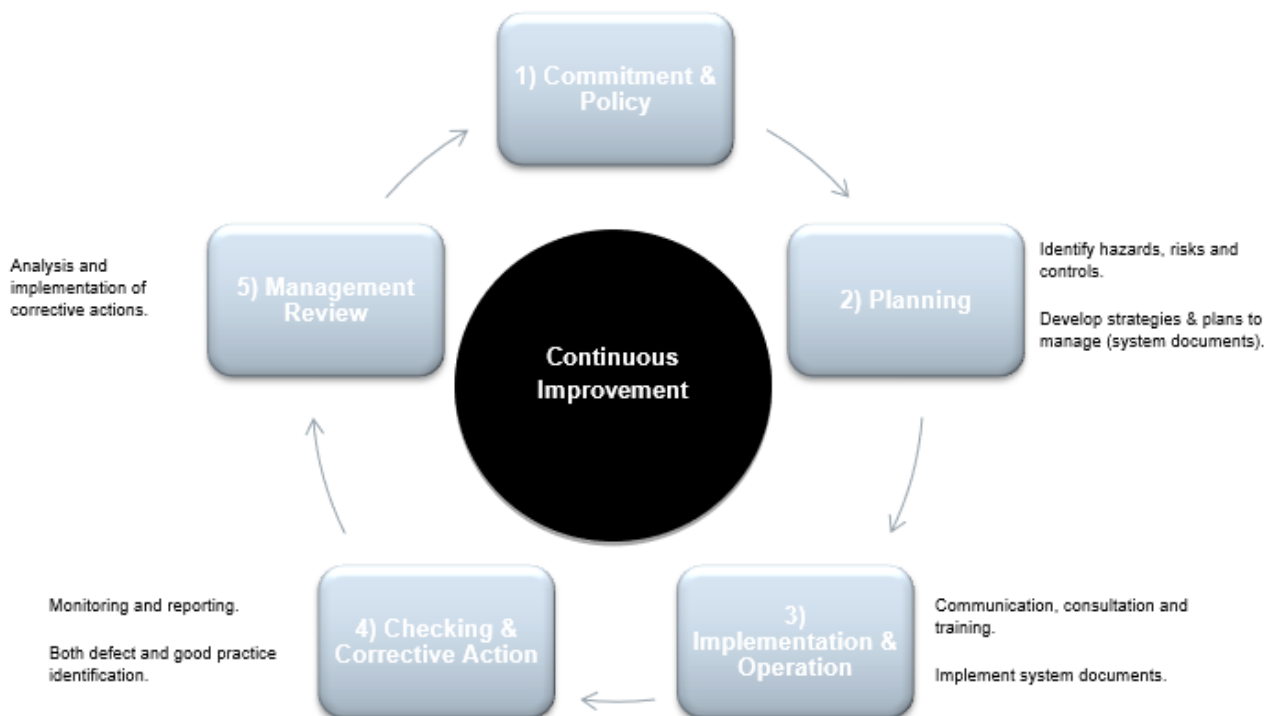
The success of remediation measures that have been implemented for any exceedance would be reviewed as part of any Corrective Action Management Plan and documented in the Annual Review.

### 6.1 Adaptive Management/Continuous Improvement

In accordance with Condition E4 of the Consent, where any exceedance of the criteria or performance measures outlined within this document has occurred, Tahmoor Mine will:

- a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;
- b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action;
- c) within 14 days of the exceedance occurring (or other timeframe agreed by the Planning Secretary), submit a report to the Planning Secretary describing these remediation options and any preferred remediation measures or other course of action; and
- d) implement reasonable remediation measures as directed by the Planning Secretary

Tahmoor Coal have adopted the “Plan-Do-Check-Act” model as shown in **Figure 3**. This model will be applied to all aspects of Tahmoor Coal’s environmental management and is utilised to embed the continuous improvement process in all system documents.



**Figure 3: Continuous Improvement Model**

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# 7 Implementation and Reporting

## 7.1 Tahmoor Environmental Management System (EMS) Framework

The Tahmoor Environmental Management System (EMS) Framework provides the strategic context for the environmental management of Tahmoor Coal and forms part of the broader Health, Safety, Environment and Community (HSEC) management systems at Tahmoor Coal. The EMS outlines how Tahmoor Coal manages environment and community (E&C) aspects, impacts and performance. It provides a framework for the standards, plans and procedures implemented to ensure operations are managed in accordance with the ISO:14001 principles.

The objectives of the EMS are:

- To provide an overall framework for environmental management at Tahmoor utilising the principles of ISO:14001;
- To ensure compliance with all development consent, licences and approvals at Tahmoor Coal;
- To detail the relationship and interactions between various operational and environmental components at Tahmoor Coal;
- To provide effective mechanisms for external communications, maintaining a relationship with the local community; and
- To assist Tahmoor Coal employees and contractors in administering their responsibilities regarding environmental management.

This plan will be implemented in conjunction with the EMS framework.

## 7.2 Reporting

Tahmoor Coals' reporting requirements are outlined in **Table 11**.

**Table 11 Tahmoor Coal Reporting Requirements**

Instrument	Report	Details	Submitted/Uploaded
Consent Condition E13 and E14	Annual Review	<p>Tahmoor Coal submit an Annual Review by the end of March each year. The Annual Review:</p> <ul style="list-style-type: none"> <li>- describes the development (including any rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</li> <li>- includes a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, including a comparison of these results against the relevant statutory requirements, limits or performance measures/criteria; requirements of any plan or program required under this consent; monitoring results of previous years; and relevant predictions in the EIS.</li> <li>- identifies any non-compliance or incident which occurred in the previous calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence; evaluates and reports on the effectiveness of air quality management</li> </ul>	<p>Copies of the Annual Review are submitted to DPIE, Council and relevant agencies and made available to the TCCC and any interested person upon request.</p> <p>Copies are also available on the Tahmoor Coal website  <a href="http://www.simec.com/mining/tahmoor-coal-pty-ltd/publications/">http://www.simec.com/mining/tahmoor-coal-pty-ltd/publications/</a></p>

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Instrument	Report	Details	Submitted/Uploaded
		<p>systems; and compliance with the performance measures, criteria and operating conditions of this consent;</p> <ul style="list-style-type: none"> <li>- identifies any trends in the monitoring data over the life of the development and provide any raw monitoring data as requested by the Planning Secretary;</li> <li>- identifies any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</li> <li>- describes what measures will be implemented over the next calendar year to improve the environmental performance of the development.</li> </ul> <p>For this TMP the following will be reported:</p> <ul style="list-style-type: none"> <li>- amount of coal and rejects transported to and from the site (on a daily basis);</li> <li>- date and time of each truck movement to and from the site; and</li> <li>- date and time of each train movement generated by the development.</li> </ul>	
B67 (e)	Stand Alone Assessment	Tahmoor Coal will periodically assess the performance of the Avon Dam Road and Remembrance Driveway intersection. These assessments will be completed on a three-yearly basis, with the intention to monitor and minimise the development-related traffic impacts on the operating capacity of this intersection.	Not required.

### 7.3 Incidents

The Consent defines an incident as 'an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance'.

Material Harm is defined within the Consent as 'harm to the environment that:

- involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or results in actual or potential loss or property damage of an amount, or
- amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

Tahmoor Coal manages and responds to incidents in accordance with the following plans:

- TAH-HSEC-232 - Emergency and Incident Manual;*
- TAH-HSEC-00155 - Pollution Incident Response Management Plan; and*
- TAH-HSEC-00224 - Notification of Environmental Pollution Incidents.*

These plans have been developed to manage preparation, incident response and reporting requirements under the Protection of the Environment Operations Act 1997 (NSW).

The management plans provide roles and responsibilities, management strategies, action and response plans and record management protocols for incidents and emergencies.

In accordance with Condition E9, the Planning Secretary will be notified in writing via the Major Projects website immediately after Tahmoor South becomes aware of an incident. The notification must identify

the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 8 of the Development Consent.

A Written Incident Notification will be submitted to the Planning Secretary via the Major Projects website within seven days after Tahmoor Coal becomes aware of an incident.

Written Incident Notifications will include:

- a) the development and application number;
- b) details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- c) how the incident was detected;
- d) when Tahmoor Coal became aware of the incident;
- e) any actual or potential non-compliance with conditions of consent;
- f) describe what immediate steps were taken in relation to the incident;
- g) identify further action(s) that will be taken in relation to the incident; and
- h) identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, Tahmoor Coal will provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a Detailed Incident Report.

Detailed Incident Reports will include:

- a) a summary of the incident;
- b) outcomes of an incident investigation, including identification of the cause of the incident;
- c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- d) details of any communication with other stakeholders regarding the incident.

## 7.4 Non-Compliances

The Consent defines a non-compliance as ‘an occurrence, set of circumstances or development that is in breach of the consent’. Non-compliances or system defects detected during monitoring, inspections and audits will be managed in accordance with the *TAH-HSEC-00173 Tahmoor Coal Environmental Management Framework Document*, with corrective action plans developed and implemented to rectify any issues.

The Planning Secretary will be notified in writing via the Major Projects website within seven days after Tahmoor Colliery becomes aware of any non-compliance.

If a non-compliance is detected, the following steps will be followed:

- a) Identify and confirm the non-compliance (i.e. review against approval criteria or condition and confirm that a non-compliance has occurred);
- b) Complete internal environmental incident reporting documentation including an investigation to capture all relevant information;
- c) In accordance with the relevant approval, determine what action (i.e. external reporting) is required. Specifically, determine if immediate reporting is required and to which stakeholders, or ensure that the event is captured for future reporting;
- d) Following the incident investigation, develop a corrective action plan aimed at preventing future re-occurrence; and
- e) Complete all required reporting and consult with relevant agencies on the corrective action plan to be implemented.

A non-compliance notification will identify the following:



- a) the development and the application number,
- b) the condition of consent that the development is non-compliant with
- c) the way in which it does not comply and the reasons for the non-compliance (if known); and
- d) any actions which have been, or will be, undertaken to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

## 7.5 Exceedances

For the purposes of this plan, an exceedance is defined 'any instance where monitoring results show an exceedance of criterion outlined within the Consent or other regulatory instrument'. Exceedances will be managed by Tahmoor Coal through the Contingency Plan process as outlined in **Section 6** and **Appendix A**.

## 7.6 Complaints and Disputes

Community Complaints at Tahmoor Coal are managed in accordance with *TAH-HSEC-00119- Communication and Engagement* and *TAH-HSEC-00120- Community Complaints & Enquiry Procedure*. Tahmoor Coal operates a 24-hour complaints line (1800 154 415) for receiving community complaints and other stakeholder communications. The general process detailed in *TAH-HSEC-00120- Community Complaints & Enquiry Procedure* for responding to complaints is:

- a) Acknowledging all complaints and responding to the complainant within 24 hours where practicable;
- b) Registering all complaint details in Cority;
- c) Investigating complaints impartially considering the facts and the circumstances prevailing at the time;
- d) Implementing corrective actions if required; and
- e) Reporting to relevant stakeholders of investigation outcomes and corrective actions taken.

A record of all community complaints in relation to activities undertaken by the licensee must be kept in a legible form and be in accordance to Tahmoor Coal's Environmental Protection Licence 1389.

The following information will also be kept in the event of a community complaint; as required by Section M4 in Tahmoor Coal's EPL 1389:

- a) The date and time of the complaint;
- b) The method by which the complaint was made;
- c) Any personal details of the complainant which were provided by the complainant or a note to that effect;
- d) The nature of the complaint;
- e) The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- f) If no action was taken by the licensee, the reasons why no action was taken.

These records must be kept for at least 4 years after the complaint was made and be able to be produced to any authorised officer who asks to see them.

In the event of a dispute or conflict between Tahmoor Coal personnel and a member of the community, the Tahmoor Coal E&C Manager will facilitate communication between both parties to reach a resolution, which may include a meeting with the complainant to discuss the issue.

Where relevant, negotiations will be initiated in accordance with any relevant Consent conditions. This general process is documented in *TAH-HSEC-00119- Communication and Engagement*. If a dispute cannot be resolved, the matter will be escalated to involve the site Operations Manager or General Manager as required and may involve consultation with the relevant government agency to assist in reaching a determination on the matter.

## 7.7 Risk and Change Management

Aspects and impacts of environmental matters at Tahmoor Coal are considered for operational activities, legislative requirements and internal and external stakeholder views, in accordance with Condition E4 of the Consent. Key aspects and impacts related to traffic management are identified during the annual review of the Tahmoor Coal Environment and Community (E&C) Broad Brush Risk Assessment (BBRA) and the operational Life of Mine (LOM) Risk Assessment and Site Wide Broad-Brush Risk Assessment (Mine BBRA).

The purpose of the E&C BBRA is to identify significant E&C aspects and impacts across the site, the risk they pose and the controls necessary to effectively manage them. Management of potential impacts is prioritised according to the level of risk each aspect is assigned. Once all identified aspects, impacts, risks and management controls have been identified within the Annual E&C Risk Assessment, associated plans are updated accordingly.

The purpose of the Mine BBRA is to identify significant aspects and impacts of operations at a site level. Existing or proposed management controls are identified to reduce the risk of impacts on the E&C. The need for any new (or modifications to existing) approvals is also identified during this process.

The LOM Risk Assessment considers aspects and impacts of business activities at a strategic level. These risk assessments cover the life of mine risks associated with each operation. The outcomes of the LOM Risk Assessment are used in conjunction with the Tahmoor Coal E&C BBRA and Mine BBRA to develop the annual capital and operational budget and the associated work schedule.

In accordance with Tahmoor Coal's Health & Safety Management System, project and activity specific risk assessments are completed as required and include assessment of E&C risks.

## 7.8 Roles & Responsibilities

E&C management is regarded as part of the responsibilities of all employees and contractors at Tahmoor Coal. Specific information pertaining to the role, responsibility, authority and accountability of key personnel involved in environmental management at Tahmoor Coal is provided in **Table 12** below.

**Table 12 Accountabilities**

Role	Accountabilities for this document
Operations Manager	Provide adequate resources for implementation of this plan and associated plans.
Environment & Community Manager	Facilitate a process of managing overall compliance with regulatory requirements and undertake external reporting for legislative non-compliances as required. Determine adequate resources and funds are available to ensure the effectiveness of this procedure; and certify compliance and adherence to this plan. Develop, implement and maintain this plan. Liaise with relevant government authorities in relation to regulatory conditions and compliance issue. Liaise with the community as required and as per the Stakeholder Engagement Strategy, including facilitation of Community Consultative Committee meetings.
All Managers	Activities under their control are to be undertaken in accordance with this plan and associated management plans and site procedures. Manage controls within their jurisdiction are operated and maintained in a proper and efficient manner. Report all incidents and complaints in a timely manner.

Role	Accountabilities for this document
Environmental Specialist	<p>Responsible for coordinating compliance on-site including timely completion of monitoring and reporting in accordance with internal and external requirements. Sign off on the accuracy of reports and the suitability of recommendations.</p> <p>Develop, implement, review and maintain this plan and system documents.</p> <p>Implement process for self-assessment audits. Assign persons responsible for completion of audit actions and set a due by date. Monitor that planned actions arising out of audits are implemented.</p> <p>Ensure all community complaints are addressed, investigated and appropriately managed as per site procedures, and reported internally as per internal requirements.</p>
All Coordinators	<p>Activities under their control are to be undertaken in accordance with this plan and associated management plans and site procedures.</p> <p>Manage controls within their jurisdiction are operated and maintained in a proper and efficient manner.</p> <p>Report all incidents and complaints in a timely manner.</p>
All Persons/Drivers	<p>Activities under their control are to be undertaken in accordance with this plan and associated management plans and site procedures.</p> <p>Manage controls within their jurisdiction are operated and maintained in a proper and efficient manner.</p> <p>Report all incidents and complaints in a timely manner.</p>

## 7.9 Internal Audits & Reviews

In accordance with internal company requirements, Tahmoor Coal has implemented a system for the monitoring and review of E&C performance at the site. Tahmoor Coal is to provide ongoing monitoring and regular management review of E&C performance to:

- Confirm the adequacy and effectiveness of management plans, procedures and standards;
- Address any identified weaknesses;
- Share good performance and lessons learnt with other sites; and
- Ensure ongoing compliance with all leases, licences and approvals.

Process or area specific internal audits are also conducted periodically, generally administered by the General Manager E&C, focussing on the following areas:

- Air quality;
- Water management;
- Erosion and sediment control; and
- Statutory approvals.

These audits may be conducted by consultants on behalf of Tahmoor Coal, by Liberty GFG employees or may be self-assessments conducted by Tahmoor Coal personnel. Audit results and corrective actions are recorded in Cority and assigned to responsible personnel for completion within appropriate timeframes.

## 7.10 Independent Environmental Audit

In accordance with Conditions E15 – E20 of the Consent, Tahmoor Coal will complete Independent Environmental Audits of the development at the frequencies determined within DPIE's *Independent Audit Post Approval Requirements (2020)* and outlined in **Table 13**.

Tahmoor Coal will complete independent audits in accordance with the following Consent Conditions:

- E15: Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).
- E16: Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

- c. E17: Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020), upon giving at least 4 weeks' notice (or timing) to Tahmoor Coal of the date upon which the audit must be commenced.
- d. E18: In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), Tahmoor Coal will:
  - i. review and respond to each Independent Audit Report prepared under Condition C5 of the Development Consent, or Condition C6 where notice is given by the Planning Secretary;
  - ii. submit the response to the Planning Secretary; and
  - iii. make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.
- e. E19: Independent Audit Reports and Tahmoor Coal's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.
- f. E20: Notwithstanding the requirements of the *Independent Audit Post Approvals Requirements (2020)*, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.

**Table 13 Independent Audit Frequencies**

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure /Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.

The audits will assess:

- a) Environmental performance of the Mine;
- b) Compliance with the requirements of all relevant:
  - i. Development consents;
  - ii. Mining leases;
  - iii. Exploration Authorisations; and
  - iv. Site environmental protection licence

The audit will also assess:

- c) Environmental assessments; and
- d) Plans and programs required by above approvals.

The audit will review the adequacy of the following requirements under the abovementioned approvals:

- e) Strategies;
- f) Plans; and
- g) Programs

The audit will recommend appropriate measures and corrective actions to improve environmental performance at Tahmoor Coal. Audit results and corrective actions are recorded in Cority and assigned to responsible personnel for completion within appropriate timeframes.

7.11 Employee & Contractor Training

All drivers accessing GFG sites are required to be inducted and informed about critical items relating to on-site road transport safety, such as exclusion zone arrangements, can't see load provisions, working at heights/top of truck expectations, load containment and traffic management, in accordance with the SIMEC Surface Transport Principle Hazard Management Plan (TAH-HSEC-0012).

Inductions may also include information regarding key GFG policies and procedures, risk management and incident/event management requirements, load restraint, and driver responsibilities.

Environmental training for Tahmoor Coal employees and contractors is conducted in accordance with the Environment & Community Training Needs Analysis, which Tahmoor Coal manages through the Scenario Training Database. General environmental awareness training is provided to all employees and contractors annually through a generic visitor induction and the SafeCoal training session scheduled by the Tahmoor Coal Health, Safety & Training Department.

# 8      Review and Improvement

## 8.1    Plan Audit

Audits of the **TMP** will be conducted in consultation with the Plan owner and nominated individuals and shall focus on the content and implementation. Audits on the implementation shall consist of reviews of the safe working procedures and risk assessments developed to ensure safe operation of this **TMP**, they may also involve discussions with personnel involved in the management plan to determine understanding and compliance.

Should an audit of this **TMP** determine that a deficiency is evident in the content or implementation; a corrective action must be developed and implemented. Actions will be assigned to a nominated individual and tracked in Cority.

The Environment and Community Manager is responsible to verify that the nominated corrective action has been implemented by way of a follow up audit. Any changes to the **TMP** are to be managed and communicated to all personnel in line with the Change Management Process.

## 8.2    Plan Review

This **TMP** will be reviewed:

- Event based:

In accordance with Condition E7 (a) of the Consent, a review will be required within 3 months of any incident, event or finding that identifies an inadequacy in the **TMP**, risk assessment or associated documents to continue to effectively manage the identified hazard; a change to the workplace itself or any aspect of the work environment, a change to a system of work, a process or a procedure; or  
  
If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, strategies, plans and programs will be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document will be submitted to the Planning Secretary for approval within six weeks of the review; or
- Time based:

in the absence of regular event-based reviews and in accordance with Condition E7 (b-e) of the Consent, this plan will be reviewed within three months of:  
  
b) the submission of an Annual Review under Condition E13;  
c) the submission of an Independent Environmental Audit under Condition E15;  
d) (the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or  
e) notification of a change in development phase under Condition A19;

If deemed appropriate, external service providers may be included in the review process. All reviews are to be documented.



# 9 Document Information

Relevant legislation, standards and other reference information will be regularly reviewed and monitored for updates and will be included in the site management system. Related documents and reference information in this section provides the linkage and source to develop and maintain site compliance information.

## 9.1 Access to Information

Information pertaining to Tahmoor Coal’s general environmental performance against internal targets and external approvals criteria is reported to the community via the mine website and Tahmoor Coal’s Community Consultative Committee (TCCCC). Examples of reports to government agencies include:

- a) Environmental Protection Licence Annual Return (submitted to Environment Protection Authority);
- b) Annual Review (submitted to Department of Planning & Infrastructure, Council, TCCCC etc.); and
- c) Independent Environmental Audit (submitted to Department of Planning & Infrastructure).

These reports are prepared in accordance with relevant guidelines and *TAH-HSEC-00119- Communication and Engagement* and are published on Tahmoor Coal’s website in accordance with *TAH-HSEC-00221- Website Management Procedure*.

In accordance with Condition E23, Tahmoor Coal have made the following information and documents publicly available on its website:

- i. the EIS;
- ii. all current statutory approvals for the development;
- iii. all approved strategies, plans and programs required under the conditions of this consent;
- iv. the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;
- v. minutes of CCC meetings;
- vi. regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;
- vii. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- viii. a summary of the current phase and progress of the development;
- ix. contact details to enquire about the development or to make a complaint;
- x. a complaints register, updated monthly;
- xi. a register of incident and non-compliance notifications made to the Planning Secretary, updated monthly;
- xii. the Annual Reviews of the development;
- xiii. audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant’s response to the recommendations in any audit report;
- xiv. annual returns made under the National Greenhouse and Energy Reporting legislation
- xv. any other matter required by the Planning Secretary; and

Tahmoor Coal will keep such information up to date, to the satisfaction of the Planning Secretary.

## 9.2 Related Documents

Related documents, listed in the below table, are internal documents directly related to or referenced from this document.

Table 14 Related Documents

«Docum ent.Code »	«Document. DocumentSt atus»	«Document.Curre ntRevision.Effecti veDate»
Uncontrolled when printed		

Number	Title
TAH-HSEC-00173	Tahmoor Coal Environmental Management Strategy
TAH-HSEC-0012	SIMEC Surface Transport Principle Hazard Management Plan
TAH-HSEC-00119	Communication and Engagement
TAH-HSEC-00120	Community Complaints & Enquiry Procedure
TAH-HSEC-00221	Website Management Procedure
TAH-HSEC-00031	Community Development Plan
TAH-HSEC-00039	Stakeholder Engagement Plan
TAH-HSEC-232	Emergency and Incident Manual
TAH-HSEC-00079	Noise Alarm Procedure
TAH-HSEC-00068	Surface Noise Trigger Action Response Plan
TAH-HSEC-00155	Pollution Incident Response Management Plan
TAH-HSEC-00224	Notification of Environmental Pollution Incidents
NA	GFG Alliance Code of Conduct
KN-7-231	Road Transport Safety Management System Manual

### 9.3 Reference Information

Reference information, listed in the below table, is information that is directly related to the development of this document or referenced from within this document.

**Table 15 Reference Information**

Title
Transport & Urban Planning Pty Ltd, Tahmoor South Project Environmental Impact Statement, Appendix P – Traffic Impact Assessment for Tahmoor South Project
AECOM (2019). Tahmoor South Project Environmental Impact Statement, Volumes 1 to 7

# 10      Change Information

Table 16 Document History

Version	Date Reviewed	Review team (Consultation)	Change Summary
V1	27/09/2021	Michelle Grierson, Natalie Brumby, Zina Ainsworth	Version 1
V2	02/02/2022	Zina Ainsworth, Charlie Wheatley	Version 2. Amendments following DPIE comments.

# Appendices

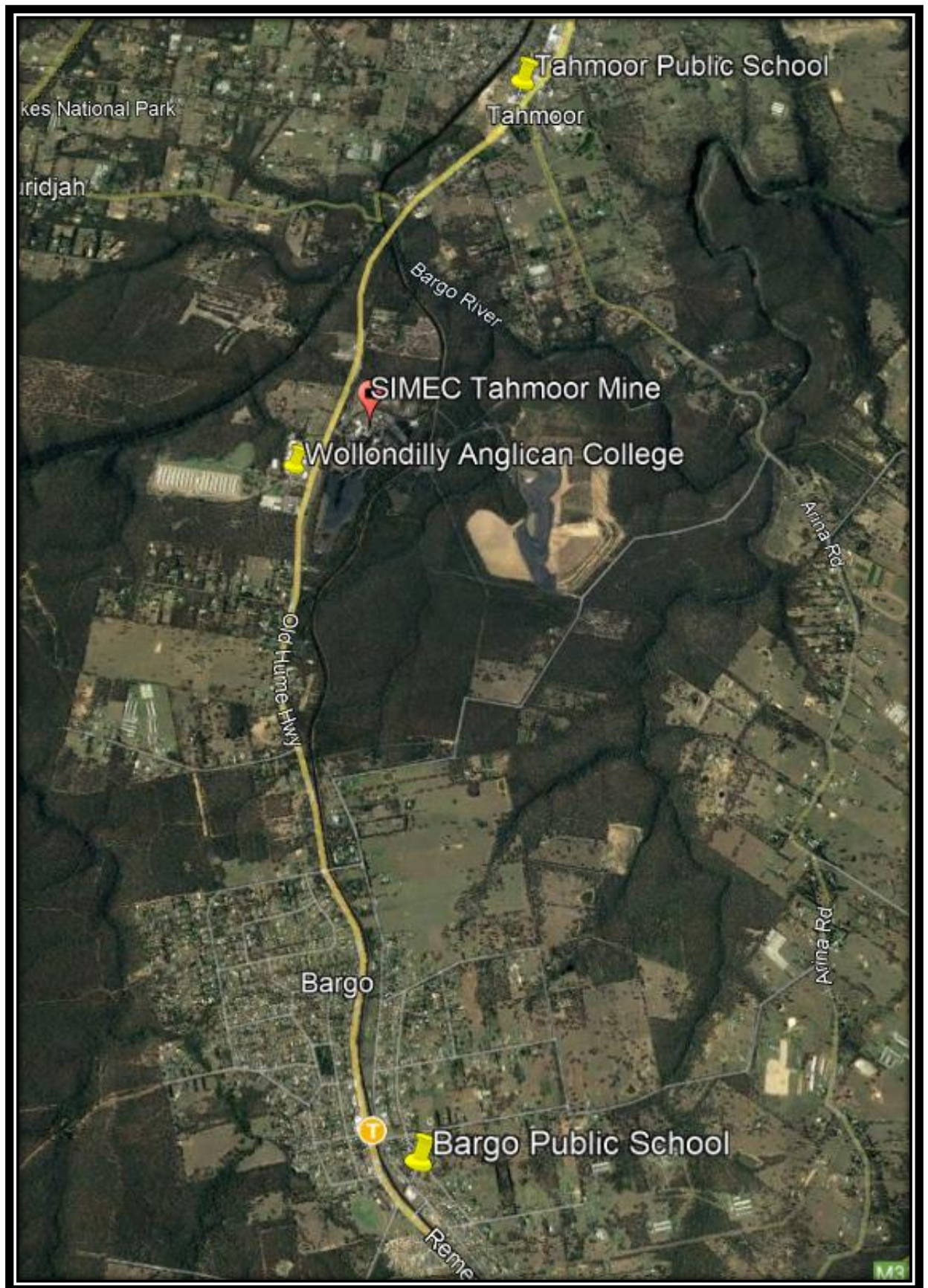
## APPENDIX A - Driver Code of Conduct

### Tahmoor Coal Driver Code of Conduct

All drivers associated with Tahmoor Coal and the transportation of materials between Tahmoor Mine and its associated logistics locations will:

- Be appropriately licensed to operate the vehicle.
- Be fit for work and fit for task (fatigue appropriately managed and drug & alcohol free).
- Adhere to posted speed limits or other required travelling speeds.
- Adhere to the designated transport routes and travel times.
- If applicable, be familiar with heavy vehicles travel restrictions and avoid heavy vehicle travel through school zones during school drop off and pick up.
- Avoid the use of loud braking (e.g. engine braking) in areas with sensitive receivers (residents, schools etc.). See map on next page for reference.
- Implement safe driving practices, including:
  - not using a hand-held mobile phone whilst driving a vehicle, unless fitted with Bluetooth capacity
  - only using a hand-held mobile phone within the vehicle if the engine is switched off and the vehicle is in a safe position off the road
  - obey all road traffic regulations, signs, directions, and instructions and display respect for other road users at all times
  - ensure any loads are appropriately secured.

Failure to comply with this code of conduct may lead to disciplinary action issued in accordance with the Tahmoor Mine Code of Conduct and Employee Grievance Policy.





# APPENDIX B - Letter of Endorsement



Planning,  
Industry &  
Environment

Ms Zina Ainsworth  
Manager Environment and Community  
SIMEC Mining  
2975 Remembrance Drive  
Tahmoor NSW 2573

16/08/2021

Dear Ms. Ainsworth

## Tahmoor South Coal (SSD-8445) Management Plan Experts Endorsement

I refer to your request (SSD-8445-PA-2) for the Secretary's approval of suitably qualified persons to prepare the Management Plans for the Tahmoor South Coal (SSD-8445).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the following experts to prepare the following Management Plans:

Management Plan	Suitably Qualified Person
Noise Management Plan	Michelle Grierson – Senior Environmental Scientist Umwelt Australia Pty Ltd Katie Teyhan (Technical Reviewer) - Associate Acoustics Manager Newcastle EMM
Spontaneous Combustion Management Plan	Michelle Grierson – Senior Environmental Scientist Umwelt Australia Pty Ltd
Water Management Plan	Camilla West - Senior Water Resources Scientist Tony Marszalek - Director and Principal Water Resources Engineer Hydro Engineering & Consulting Pty Ltd
Groundwater Management Plan	Will Minchin – Hydrogeologist Maxime Philibert - Hydrogeologist SLR Consulting
Biodiversity Management Plan	Luke Baker - Team Leader Ecology Niche Environment and Heritage
Rehabilitation Strategy	Michelle Grierson – Senior Environmental Scientist Umwelt Australia Pty Ltd
Traffic Management Plan	Michelle Grierson – Senior Environmental Scientist Umwelt Australia Pty Ltd
Social Impact Management Plan	Amanda Bateman – Community Liaison Specialist Tahmoor Coal Pty Ltd

It is noted that it was proposed that Michelle Grierson – Senior Environmental Scientist Umwelt Australia Pty Ltd was proposed to prepare the Air Quality and Greenhouse Gas Management Plan. Given the significance of the technical aspects associated with air quality and greenhouse gas emissions at the project, the Department requests that a technical specialist be proposed to work with Ms Grierson to prepare this Air Quality and Greenhouse Gas Management Plan. Please provide further details of the proposed air quality expert by lodging further details via the portal.

320 Pitt Street Sydney 2000 | GPO Box 39 Sydney 2001 | [dpie.nsw.gov.au](http://dpie.nsw.gov.au) | 1

If you wish to discuss the matter further, please contact Wayne Jones on (02) 6575 3406.

Yours sincerely



Stephen O'Donoghue  
Director  
Resource Assessments  
As nominee of the Secretary

# APPENDIX C – Consultation

Agency	Date response received	Comments	Response
Transport for NSW	Via email on 11.10.2021	<p>TfNSW notes for this proposal:</p> <ul style="list-style-type: none"> <li>Access to the development site is via Remembrance Driveway, a regional classified road managed by Council.</li> <li>Extracted coal is processed on site prior to transportation via rail to the Port Kembla Coal Terminal, with coal only being transported by road to end users without rail access.</li> <li>According to the Conditions of Consent (Condition B67 under Part B) the applicant must prepare a Traffic Management Plan (TMP) for the development to the satisfaction of the Planning Secretary, in consultation with TfNSW.</li> </ul> <p>TfNSW has reviewed the TMP and given the above, has no further comments.</p>	Noted – no comments required to be addressed.
Wollondilly Shire Council	Via email on 21.11.2021	1. The plan does not appear to be prepared by a suitably qualified person (noting the Dept's endorsement that it has – we are pursuing this directly).	Noted. Michelle has been endorsed by DPIE and a copy provided in Appendix B.
		2. The plan does not appear to be prepared in accordance with Transport for NSW Traffic Control at Worksites Technical Manual (the appropriate NSW industry practice for Transport Management Plans). Whilst the road network is not the primary method to freight product, we note the provision to use trucks when needed and the principles (including the process to verify the strategy (that's now 3+ years old) and the risk assessment) in the manual set out the issues to be addressed and give more specificity around potential mitigation measures to address risks such as school zones etc.	<p>The Transport for NSW Traffic Control at Worksites Technical Manual (TCAWS) states that it must be applied to the following:</p> <ul style="list-style-type: none"> <li>Transport work sites requiring temporary traffic management (TTM); and</li> <li>Works involving temporary traffic management being undertaken for or on behalf of Transport (by contractors, local government and public utility bodies or similar).</li> </ul> <p>The TCAWS provides the following definitions:</p> <ul style="list-style-type: none"> <li><b>Work Sites:</b> an area of road or road reserve which includes the work area or areas and any additional length of road required for traffic control such as signs and tapers.</li> <li><b>Work Area:</b> area on the road or within the road reserve where the construction or maintenance work is being undertaken.</li> <li><b>Temporary Traffic Management:</b> the organisation, arrangement, guidance and control of both stationary and moving traffic, including pedestrians, cyclists and</li> </ul>

Agency	Date response received	Comments	Response
			<p>all types of vehicles, around a hazard or work site for the safety of both road workers and road users.</p> <p>This Traffic Management Plan is for the ongoing operation of Tahmoor Mine and does not apply to the definitions outlined above.</p> <p>Any temporary traffic management works conducted by Tahmoor Mine including the intersection upgrade scheduled for March 2022, will be conducted in accordance with the TCAWS. Project specific Construction Environmental Management Plans will include traffic management protocols.</p>
		3. Figure 2 gives no clarity around transport routes.	Figure 2 amended.
		4. Table 8 gives no clarity of the quantity of trucks to be used on the nominated roads and appears open ended 'as required', nor the role Charlies Point Rd and Rockford Rd (not addressed otherwise in Sect 4).	Table 8 and Section 4.1 amended to include further details on truck movements and the use of Charlies Point Rd and Rockford Rd.
		5. In this regard key transport routes and traffic types to be used for development-related traffic; needs to be clarified.	Table 8 and Section 4.1 amended to provide clarification.
		6. Given inclusion of Charlies Point Rd and Rockford Rd in Table 8 – confirmation of what other sites require access/egress (within the Wollondilly Shire) and details around the processes in place for the control of truck movements entering and exiting the site; (acknowledging the key access is from Remembrance Dr that's being upgraded).	<p>Access to the REA via Rockford Rd and Charlies Point Rd described in Section 4.3. Further details around the control of truck movements added to Section 4.3. Table 10 outlines management measures for truck movements.</p> <p>Specific Construction Environmental Management Plans will be completed for construction works, these plans will include specific traffic management measures, including outlining any changes to mine site access.</p>
		7. The proposal/protocol for pre & post construction dilapidation surveys needs clarification and the mechanism proposed to submit to Council as the Roads Authority.	Table 10 amended. Further details provided.

Agency	Date response received	Comments	Response
		8. The periodic assessment frequency appears to be too long and should be validated through the risk assessment process detailed through the manual.	The transport of coal by road is currently a rare occurrence for Tahmoor Coal, with the intersection of Avon Dam Road and Remembrance Driveway only regularly utilised by the mine for ad-hoc deliveries. Three yearly assessments of the Avon Dam Road and Remembrance Driveway intersection is appropriate for the current transport operations at the mine. If road transportation of coal becomes more frequent, this assessment frequency will be reviewed and updated if required. Table 10 amended to reflect the above.



# Appendix D – Evidence of Consultation

## Michelle Grierson

**From:** Mike Nelson <Mike.Nelson@wollondilly.nsw.gov.au>  
**Sent:** Thursday, 21 October 2021 2:57 PM  
**To:** Zina Ainsworth  
**Cc:** Norma Towee; Michelle Grierson  
**Subject:** RE: HPE CM: FW: Tahmoor Coal - Tahmoor South Traffic Management Plan Consultation

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Zina,

Thank you for the discussions to date.

We acknowledge our position that the Traffic Management Plan is not an assessment document. However, we would expect the TMP to be the next level of detail, expanding on the TIA, prepared in accordance with the appropriate industry practice

We have had a chance to review and provide the following comments;

1. The plan does not appear to be prepared by a suitably qualified person (noting the Dept's endorsement that it has – we are pursuing this directly).
2. The plan does not appear to be prepared in accordance with Transport for NSW Traffic Control at Worksites Technical Manual (the appropriate NSW industry practice for Transport Management Plans). Whilst the road network is not the primary method to freight product, we note the provision to use trucks when needed and the principles (including the process to verify the strategy (that's now 3+ years old) and the risk assessment) in the manual set out the issues to be addressed and give more specificity around potential mitigation measures to address risks such as school zones etc.
3. Figure 2 gives no clarity around transport routes.
4. Table 8 gives no clarity of the quantity of trucks to be used on the nominated roads and appears open ended 'as required', nor the role Charlies Point Rd and Rockford Rd (not addressed otherwise in Sect 4).
5. In this regard *key transport routes and traffic types to be used for development-related traffic*; needs to be clarified.
6. Given inclusion of Charlies Point Rd and Rockford Rd in Table 8 – confirmation of what other sites require access/egress (within the Wollondilly Shire) and details around *the processes in place for the control of truck movements entering and exiting the site*; (acknowledging the key access is from Remembrance Dr that's being upgraded).
7. The proposal/protocol for pre & post construction dilapidation surveys needs clarification and the mechanism proposed to submit to Council as the Roads Authority.
8. The periodic assessment frequency appears to be too long and should be validated through the risk assessment process detailed through the manual.

We trust this assists in confirming Councils position – we look forward to your response



**Mike Nelson**  
Manager Assets, Transport & Engineering

**T** 0246779580  
**A** P.O. Box 21 Picton, NSW, 2571  
**E** [Mike.Nelson@wollondilly.nsw.gov.au](mailto:Mike.Nelson@wollondilly.nsw.gov.au)  
**W** <http://www.wollondilly.nsw.gov.au>



## Michelle Grierson

**From:** Rachel Carocci <Rachel.Carocci@transport.nsw.gov.au>  
**Sent:** Monday, 11 October 2021 9:38 AM  
**To:** Michelle Grierson  
**Cc:** Development Southern  
**Subject:** RE: Tahmoor Coal - Tahmoor South Traffic Management Plan Consultation  
**Attachments:** Attachment 1.pdf.docx

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

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Michelle

Transport for NSW refers to your email below, dated 28 September 2021.

TfNSW has completed an assessment of the development, based on the information provided and focussing on the impact to the State road network.

TfNSW notes for this proposal:

- Access to the development site is via Remembrance Driveway, a regional classified road managed by Council.
- Extracted coal is processed on site prior to transportation via rail to the Port Kembla Coal Terminal, with coal only being transported by road to end users without rail access.
- According to the Conditions of Consent (Condition B67 under Part B) the applicant must prepare a Traffic Management Plan (TMP) for the development to the satisfaction of the Planning Secretary, in consultation with TfNSW.

TfNSW has reviewed the TMP (Attachment 1) and given the above, has no further comments.

If you have any questions please contact Rachel Carocci on 4221 2548.

Please ensure that any further email correspondence is sent to [development.southern@transport.nsw.gov.au](mailto:development.southern@transport.nsw.gov.au).

Regards,  
Rachel

Rachel Carocci  
Development Services Case Officer  
South Region  
Transport for NSW

*Please note: I work part time (Monday and Tuesday)*