



ABN: 46 099 761 289



Environmental Management Strategy

for the

Broken Hill North Mine

Prepared by:



R.W. CORKERY & CO. PTY. LIMITED

May 2022

TITLE BLOCK

Name of Mine:	Broken Hill North Mine
Development Application Number	SSD 7538
Applicant	Perilya Broken Hill Limited
Development Consent Date	22 December 2017, Last Modified 9 December 2021
Development Consent Condition Number & Title	Condition 1 of Schedule 4 Environmental Management Strategy

VERSION CONTROL

Summary of Document Revisions				
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1 Introduction and Scope

This *Environmental Management Strategy* (EMS) is one of several documents required by Development Consent SSD 7538. These plans are listed in Section 4.2. This EMS contextualises the various environmental Management Plans for the Broken Hill North Mine (the North Mine) and includes generic systems-based details that are common to all plans.

This document represents a staged approach to the preparation of the various management plans and covers the post-construction phase of the North Mine following formal notification of the commencement of mining operations under Condition 10(b) of Schedule 2 of SSD 7538.

Development Consent SSD 7538 defines mining operations as:

“the removal of waste rock and extracting, crushing, transporting handling and storage of ore material on site.”

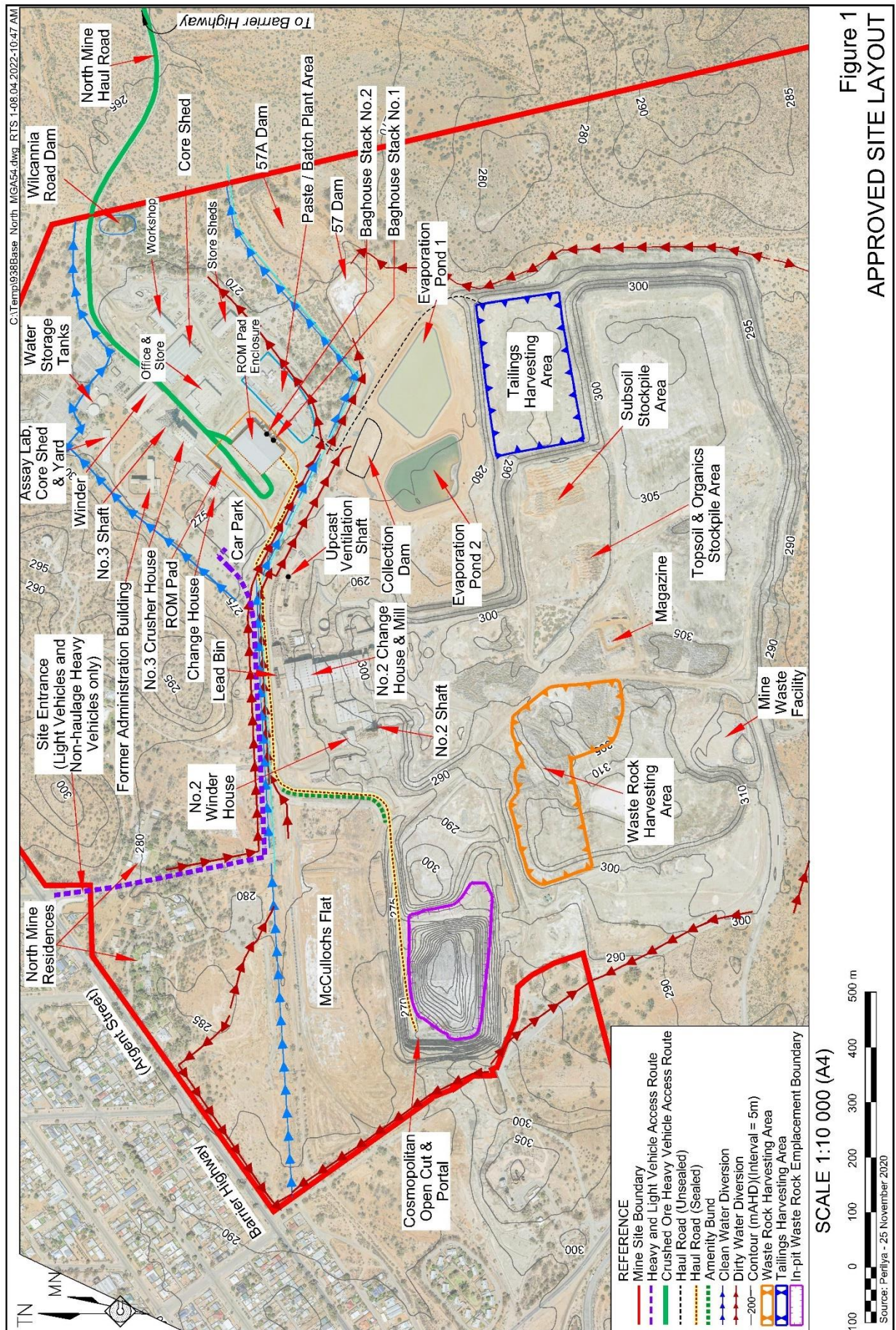
Responsibility for preparation of the document has been as follows.

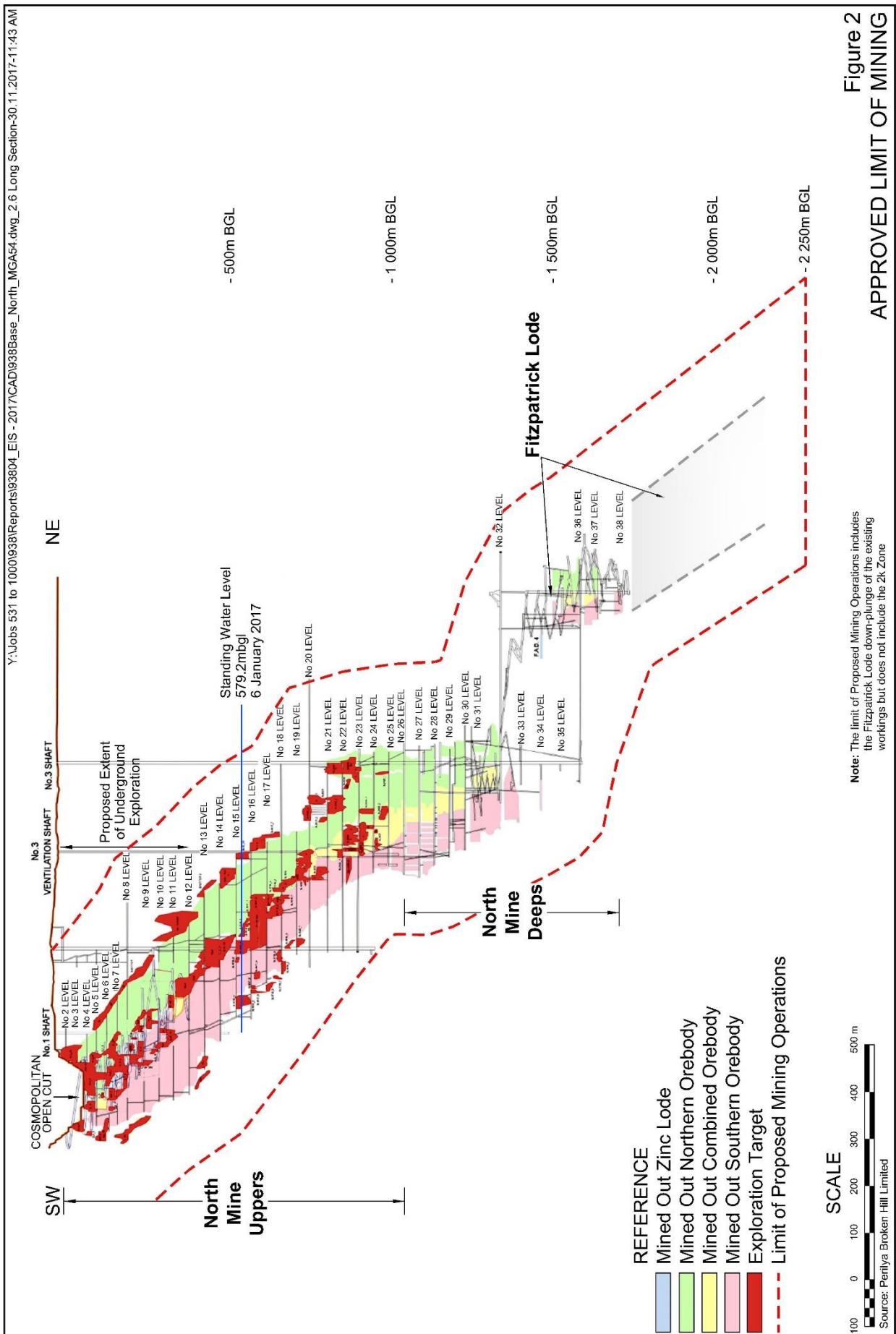
- R.W. Corkery & Co. Pty Limited (RWC) – Mr Mitchell Bland of RWC prepared the initial draft of this document based on information provided by Mr Brett Bussell, Environmental Superintendent with PBHL. Mr Bland also ensured consistency between this document and the commitments made throughout the development application process and the other Management Plans prepared for the North Mine. RWC also provided administrative assistance in the finalisation of this report.
- Perilya Broken Hill Limited (PBHL) – was intimately involved in all stages of the preparation of this document and reviewed the preliminary and final drafts and approved the final version for release.

2 Project Description

The North Mine first started operations in 1883. Perilya Broken Hill Limited (PBHL) acquired assets of Pasminco Ltd in Broken Hill, including the North and South Mines, in 2002. Operations recommenced at the North Mine in 2003, with ore from the North Mine crushed and transported to PBHL Southern Operations (“Southern Operations”) for processing. The North Mine was placed under care and maintenance in August 2008. Underground exploration and maintenance re-commenced in April 2017. Development Consent SSD7538 for the recommencement of mining operations at the North Mine was granted under Section 89E of the *Environmental Planning and Assessment Act 1979* on the 22 December 2017 and subsequently modified on 7 September 2018, 31 July 2019 and 9 December 2021. The approved activities within the North Mine include the following work (**Figures 1 and 2**).

- Remediate the existing Cosmopolitan access ramp, portal and decline to the 12 Level (the limit of the existing decline) to facilitate safe and efficient access to the underground workings
- Restore and upgrade existing electrical, ventilation, air and water services, including on surface and within the decline, No. 2 and No. 3 Shafts, No. 3 Vent Rise.
- Extend the existing decline from the 12 Level to link with the existing decline between the 32 Level and the 38 Level.
- Undertake exploration drilling from underground to further define remnant ore and identify additional ore lenses and lodes.
- Develop access drives to permit access by modern mining equipment.
- Extract up to 400 000 tonnes per annum of remnant ore and ore below the base of previous mining operations, including within the Fitzpatrick Area.
- Transport extracted ore to the surface ROM Pad using underground haul trucks, including establishment of a haulage route utilising existing roads and a proposed haul road cutting.
- Transport extracted waste rock for placement either within completed stopes underground or within the in-pit waste rock emplacement in the Cosmopolitan Open Cut.
- Extract waste rock from the existing surface waste rock emplacement for transportation back underground as required.
- Extract tailings from a former Tailings Storage Facility for mixing with water and cement in a pastefill plant for use backfilling completed stopes.
- Re-establish surface infrastructure required to support the mining operation, including a ROM pad, office and store, workshop and fuel store, change house and car park, services (power, water, air and communications), surface magazine and ancillary infrastructure.
- Stockpile and crush ore within the existing ROM Pad using a mobile crusher.
- Load and transport up to 400 000 tonnes per annum of crushed ore to the Southern Operations using A-double road trains via the approved transport route, namely the Potosi Mine Haul Road, Barrier Highway, Iodide Street, Crystal Street and Gypsum Street.





- Generate up to:
 - 32 ore laden truck movements per day;
 - 4 ore laden truck movements per hour;
 - 21 ore laden truck movements per day when averaged over a calendar year; and
 - 42 ore laden truck movements per day from the North Mine and the Potosi Mine when averaged over a calendar year.
- Process the transported ore within the Southern Operations Concentrator under the continuing use rights held for that operation.
- Dewater the existing workings and transfer that water to the Southern Operations or on site evaporation ponds.

3 Legal and Other Requirements

3.1 Introduction

A range of legislation, approvals, licenses and consents exist for the North Mine, each of which include requirements that address the environmental management of the North Mine. The following subsections present the statutory commitments relevant to environmental management of the North Mine. It is acknowledged that a range of additional requirements exist for non-environmental aspects of the North Mine (occupational health and safety for example). Those aspects are beyond the scope of this document and are not addressed here.

3.2 Legislation

Legislation (and associated regulation) relevant to environmental management of the North Mine includes the following. Except where expressly stated, all legislation is NSW legislation.

- *Environmental Planning and Assessment Act 1979.*

This Act regulates matters relevant to the development consent. SSD 7538 was issued under Part 4 of the Act and the conditions therein are enforceable by the NSW Department of Planning and Environment.

- *Protection of the Environment Operations Act 1997.*

This Act regulates matters related to pollution and waste. EPL2683 was issued under that Act and the conditions therein are enforceable by the Environment Protection Authority. EPL2683 principally regulates matters associated with “pollution.” Matters administered by this act relevant to the North Mine include noise, dust, water and vibration. Management of the North Mine Waste Facility is also regulated under this Act. No licenced discharge point for water exists under this licence.

- *Mining Act 1992.*

This Act regulates matters related to mining for minerals. CML4 and CML5 were issued under predecessors to this Act and the conditions therein are enforceable under the current Act by the Resources Regulator and Mining, Exploration and Geosciences.

- *Mining Regulation 2016*

This Regulation includes the provision of standard conditions for all Mining Leases (including Consolidated Mining Leases). For the purposes of environmental management, the principal requirement is for the implementation of a *Rehabilitation Management Plan*, Rehabilitation outcome documents, and a rehabilitation *Foreword Plan* including annual reporting.

- *Water Management Act 2000.*

This Act regulates access to water resources. The various water access licences and water supply works approvals held by PBHL were issued under this Act (see Section 3.3) and the conditions therein are enforceable under the Act.

- *National Parkes and Wildlife Act 1974.*

This Act relevantly regulates disturbance to Aboriginal objects. No Aboriginal objects are known within the Mine Site, however, unanticipated finds retain their protection under the Act.

- *Heritage Act 1977.*

This Act regulates management of items of historic or non-Aboriginal heritage significance. A range of such items occur within the Mine Site and are, as a result, protected under the Act.

- *Environment Protection and Biodiversity Conservation Act 1999 (Cth).*

This Commonwealth Act regulated matters of National Environmental Significance. Relevantly, the entire City of Broken Hill has been registered on the National Heritage Register and this Act is relevant to the ongoing management of items of historic heritage significance within the Mine Site.

3.3 Approvals, Licences and Permits

Table 1 presents the required, approvals, licenses and permits that apply to the development. Section 3.4 presents the requirements of SSD 7538 relevant to this EMS.

Table 1 North Mine Approvals, Licenses and Permits

<i>Licence/Permit</i>	<i>Authority</i>	<i>Expiry Date</i>
Development Consent (SSD 7538)	Department of Planning and Environment	25 years from the commencement of construction on 17 August 2018
Consolidated Mining Lease 4	Mining, Exploration and Geoscience and the Resources Regulator	06/2024
Consolidated Mining Lease 5		06/2038
EPL2683	Environment Protection Authority	Nil Last varied – 10/06/2020
Water Access Licence WAL40959	Department of Planning and Environment - Water	Nil
Water Supply Works Approval 60WA583325	Department of Planning and Environment - Water	10/05/2026

3.4 Development Consent

Development Consent SSD 7538 was granted on 22 December 2017 and subsequently modified on 9 September 2018 and 9 December 2021. Conditional requirements identified in SSD 7538 that are relevant to this Plan are reproduced in **Table 2** with a reference provided to the section(s) of this document where each conditional requirement is addressed.

Table 2 Conditions of consent associated with the Environmental Management Strategy

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Cond No.	Conditions of Consent	Document Reference
4(1)	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must: (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (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 development; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise; - respond to any non-compliance; - respond to emergencies; and (e) include: - references to any strategies, plans and programs approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out in relation to the development.	Sect 4 Sect 3 Sect 4.4 Sect 6.1 Sect 7.1 Sect 7.2 Sect 8.2 Sect 8.3 Sect 4.2 Sect 5.2
4(2)	The Applicant must implement the approved Environmental Management Strategy for the development.	Noted
4(6)	Within 3 months, unless otherwise agreed with the Secretary, of: (a) the submission of an annual review under condition 5 above; (b) the submission of an incident report under condition 9 below; (c) the submission of an audit under conditions 12 to 13A below; (d) any modification to the conditions of this consent, (unless the conditions require otherwise); or (e) a direction of the Secretary under condition 2 of Schedule 2. the Applicant must review and, if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.	Sect 10
4(7)	To ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development, the Applicant may submit revised strategies, plans or programs required under this consent at any time. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis. The Secretary may approve a revised strategy, plan or program required under this consent, or the staged submission of any of these documents, at any time. With the agreement of the Secretary, the Applicant may prepare the revised or staged strategy, plan or program without undertaking consultation with all parties nominated under the applicable condition in this consent.	Sect 10
4(7)	To ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development, the Applicant may submit revised strategies, plans or programs required under this consent at any time. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis. The Secretary may approve a revised strategy, plan or program required under this consent, or the staged submission of any of these documents, at any time. With the agreement of the Secretary, the Applicant may prepare the revised or staged strategy, plan or program without undertaking consultation with all parties nominated under the applicable condition in this consent.	Sect 10

Table 2 Conditions of consent associated with the Environmental Management Strategy (Cont'd)

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Cond No.	Conditions of Consent	Document Reference
4(14)	<i>Before the commencement of construction until the completion of all rehabilitation required under this consent, the Applicant must:</i> <i>(a) make copies of the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website as relevant to the stage of the development:</i> <i>the EIS</i> <i>current statutory approvals for the development;</i> <i>approved strategies, plans or programs required under the conditions of this consent;</i> <i>the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</i> <i>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;</i> <i>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;</i> <i>a summary of the current phase and progress of the development;</i> <i>contact details to enquire about the development or to make a complaint;</i> <i>a summary of complaints, which is to be updated monthly;</i> <i>the last five annual reviews;</i> <i>any independent environmental audit, and the Applicant's response to the recommendations in any audit;</i> <i>any other matter required by the Secretary; and</i> <i>(b) keep this information up to date, to the satisfaction of the Secretary.</i>	Sect 6.1

4 Strategic Framework for Environmental Management

4.1 Environmental Policy

Figure 3 presents the Environmental Policy of Perilya Limited, PBHL's parent Company. This Policy is signed by PBHL's General Manager and is approved and endorsed by Perilya Limited's and PBHL's Boards and Senior Management teams.

4.2 Environmental Management System

The Environmental Management System for the North Mine comprises the following principal documents.

- *Environmental Management Strategy (EMS) (this document)*

The EMS defines the broader environmental management system requirements that are common to all relevant environmental aspects for the North Mine.
- *Air Quality Management Plan*
- *Noise Management Plan*
- *Blast Management Plan*
- *Transportation Management Plan*
- *Water Management Plan*
- *Operational Historic Heritage Management Plan*
- *Strategic Historic Heritage Management Plan*
- *Aboriginal Cultural Heritage Chance Finds Protocol*
- *Lead Monitoring & Education Program*
- *Rehabilitation Management Plan*

4.3 Standard Operating Procedures

A range of Standard Operating Procedures (SOPs) are in place to manage implementation of the above Environmental Management Strategy and Management Plans. These SOPs provide operational personnel with a detailed description of how each of the identified measures is to be implemented. These SOPs are live documents and are introduced, amended, removed and replaced as required.

4.4 Responsibility for Environmental Management

Table 3 presents the responsibility for environmental management.

Figure 3 Environmental Policy



Perilya Environment Policy

The *Perilya Way* is to prevent or otherwise manage the harmful effects of our activities on the environment. We hold ourselves and each other to account for this. *We achieve this by:*

- ▶ Empowering employees to work in an environmentally responsible way and stop any activity that will result in non-compliance.
- ▶ Caring for the environment and encouraging environmentally responsible behaviour in others.
- ▶ Encouraging everyone to **take responsibility for the environment** and clearly describing individual environmental responsibilities in our role descriptions.
- ▶ Demonstrating **visible leadership** that provides recognition for environmentally responsible behaviours and consequences for non-compliance.
- ▶ Providing and maintaining an integrated **environment management system** that supports best practice.
- ▶ Engaging our workforce and host communities and regularly reviewing our performance to achieve **continuous improvement**.

Good environmental performance contributes to business success.



HSE Management System



Table 3 Responsibility for Environmental Management

<i>Person</i>	<i>Responsibilities</i>
General Manager	• Overall site responsibility for environmental performance and legal compliance. • Ensure adequate resources available to enable implementation of the Plan. • Liaise as required with the Community Consultative Committee and other stakeholders. • Resolve community/regulatory environmental issues where required. • Consult with regulatory agencies as required.
North Mine Manager	• Accountable for the overall environmental performance of the North Mine. • Understand environment risks and management measures applicable to the scope of responsibility and facilitate the training of relevant staff of the same. • Provide sufficient resources to perform actions required for the maintenance of compliance and the prevention of material environmental harm. • Participate in the investigation of incidents and implement corrective actions as required. • Provide technical expertise for the development of management plans and procedures required for the maintenance of compliance and the prevention of material environmental harm • Respond to proactive and reactive monitoring data for the maintenance of compliance and the prevention of material environmental harm.
Health, Safety, Environment and Training (HSET) Manager	• Participate in the preparation and processing of budgets for environmental management purposes. • Facilitate the integration of environmental risks and management processes within the site wide HSET management systems. • Support the Environment Superintendent & Environmental Advisor in the extension of environmental management information across the site. • Participate in the development and dissemination of environmental improvement plans for the site. • Participate in significant environmental incident investigations as required or delegate as required.. • Participate in PBHL Environmental Management System review.
Environment Superintendent	• Accountable for the implementation of this Strategy and associated Management Plans, including all management and mitigation measures, monitoring and reporting. • Coordinate critical incident root cause analysis and review. • Undertake required health risk assessment and environmental lead education programs. • Prepare annual budget for the PBHL environmental management program. • Ensure compliance against regulatory and other commitments made across all PBHL operations. • Project manages environmental approvals required for new mine developments. • Accountability for all statutory and non-statutory (environmental) reporting and documentation.
Environment Advisor	• Accountable for the day-to-day implementation of this Strategy and associated Management Plans, including ensuring standard operating procedures re complied with and all monitoring data is collected and stored appropriately. • Design, install and maintain monitoring systems as required under this Strategy and associated Management Plans. • Develop, implement and perform data validation and statutory reporting systems for PBHL environmental management program. • Provide ongoing maintenance and calibration of relevant monitoring and sampling equipment. • Design and implement rehabilitation management programs for disturbed sites on PBHL mining and ship loading leases.
Supervisors	• Understand environment risks and management measures applicable to the scope of responsibility and facilitate the training of relevant staff of the same. • Conduct operational activities in accordance with site specific environmental procedures. • Maintain environmental control systems in a proper and effective condition. • Assist with the delivery environmental training programs as relevant to the work site. • Participate in the reporting and investigation of environmental incidents. • Ensure work areas have mitigated against identified environmental risks including hydrocarbon contamination, waste management, dust/lead emissions, chemical management, surface and ground water management.
All Staff and Contractor Personnel	• Be aware of environmental risk in the workplace and use PBHL risk assessment methods to mitigate against the same. • Participate in required training. • Follow environmental procedures. • Immediately report any environmental incident to their immediate supervisor.

5 Environmental Monitoring Strategy

5.1 Objectives

The objectives of the environmental monitoring strategy for the North Mine are as follows.

- To facilitate adaptive (proactive) and reactive management of environmental aspects of the North Mine.
- To demonstrate compliance or consistency with:
 - relevant internal objectives and targets;
 - modelling assumptions used during assessment of the North Mine;
 - conditional requirements associated with the North Mine; and
 - reasonable community expectations.

5.2 Overview of Environmental Monitoring

The various management plans identified in Section 4.2 describe in detail the monitoring that will be implemented throughout the life of the North Mine. **Table 4** and **Figures 4 to 6** present an overview of the environmental monitoring to be undertaken.

Table 4 Overview of Environmental Monitoring

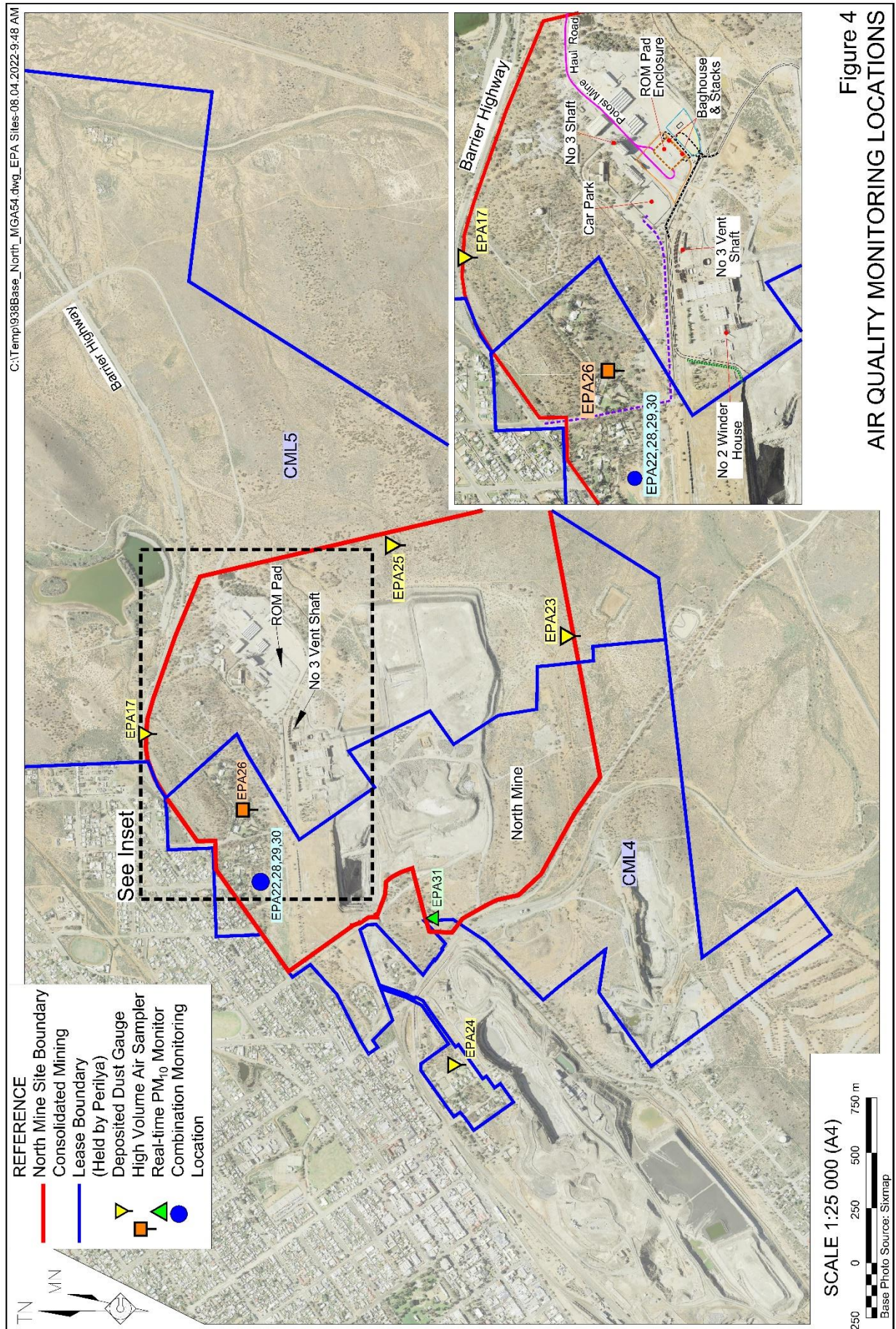
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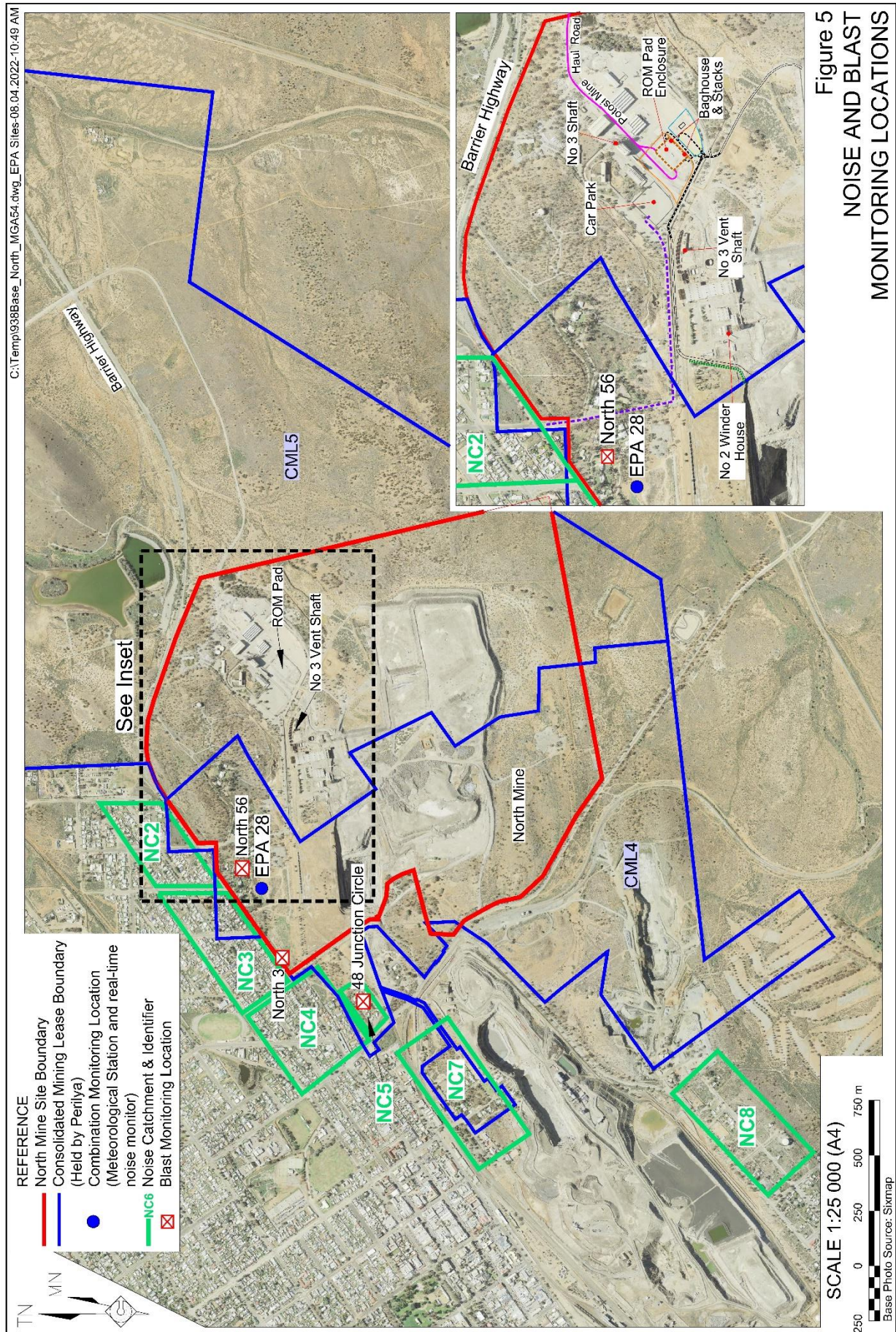
Parameter	Units	Location	Equipment	Frequency	Comment
Meteorology (see Figure 3)					
Temperature (2m and 10m)	Degrees Celsius	EPL28	Automated meteorological station	Continuous and real-time	The meteorological station is linked by telemetry to web interface
Wind direction (10m)	Degrees				
Wind speed (10m)	Metres per second				
Relative Humidity	Percent				
Rainfall	millimetres				
Air Quality (see Figure 3)					
Total PM _{2.5} Total PM ₁₀	µg/m ³ µg/m ³	Fixed – EPA29, EPA31 Mobile – EPA32	Beta-attenuated Monitor Portable nephelometer	Continuous and real-time As required	
TSP – total particulates TSP – total lead TSP – total mercury TSP – total nickel	µg/m ³ µg/m ³ µg/m ³ µg/m ³	EPA26, EPA30	High Volume Air Sampler	Every 6 days Every 6 days Every 6 days Every 6 days	
Deposited dust – Total particulates – Total lead – Total mercury – Total nickel	g/m ² /month g/m ² /month g/m ² /month g/m ² /month	EPA17, EPA22, EPA23, EPA24, EPA25	Deposited dust gauge	30±2 days 30±2 days 30±2 days 30±2 days	
Stack monitoring – Flow Rate – TSP – PM10 – PM2.5 – Type 1 substances ¹ , including Hg – Type 2 substances ² , including Ni	m ³ /s g/s g/s g/s g/s g/s	No. 3 Vent Rise Shaft ROM Pad enclosure baghouse stacks	Independent Contractor	Before 31 December each year thereafter. Subject to frequency review after three sampling events.	
Sealed roads- silt loading	µg/m ³	Variable	Portable nephelometer	Quarterly	
Free areas – emission control factor	µg/m ³	Free areas	Portable nephelometer	Annual	

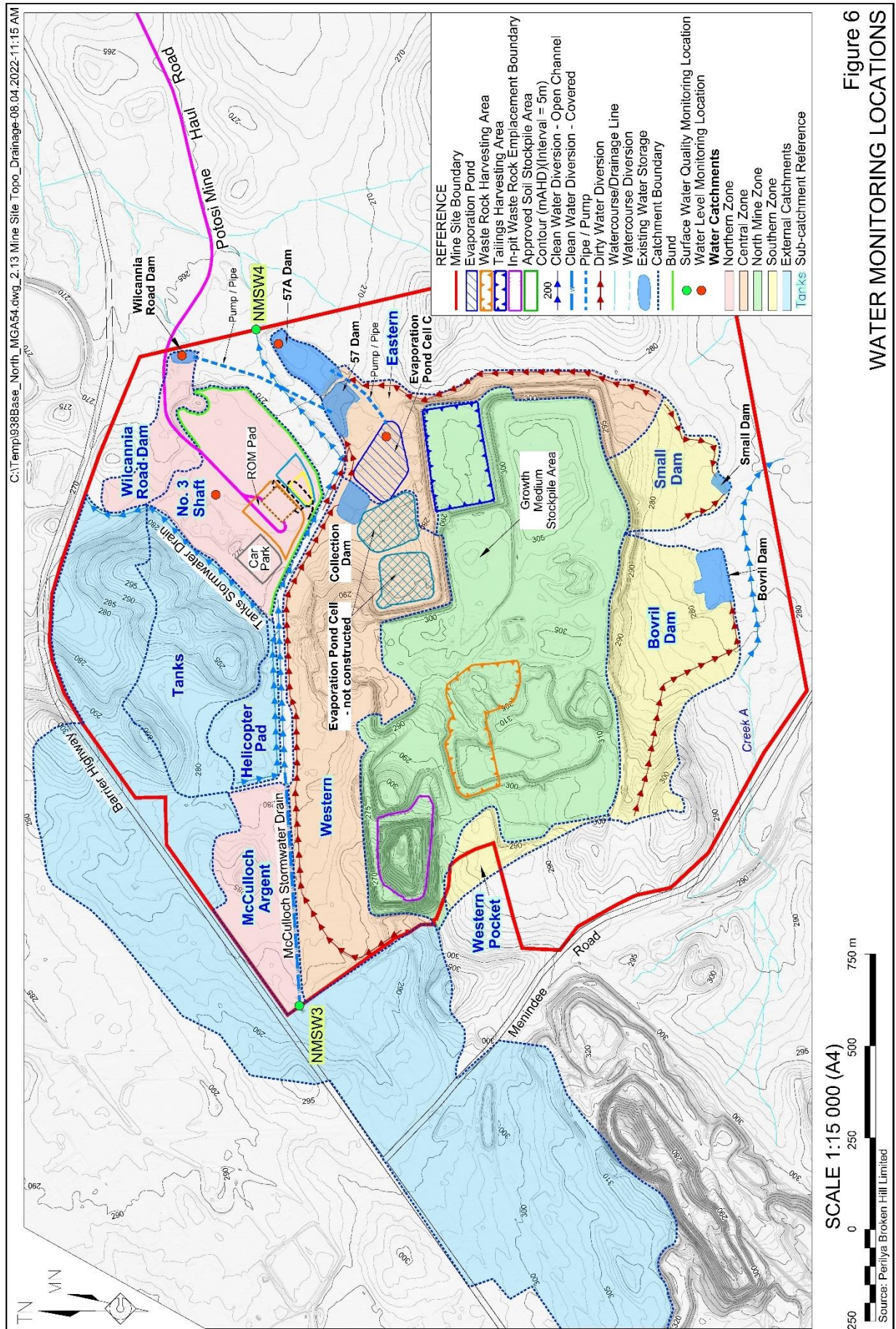
Table 4 Overview of Environmental Monitoring (Cont'd)

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Parameter	Units	Location	Equipment	Frequency	Comment
Noise (see Figure 4)					
Real-time noise monitoring	dBA	EPA28	Real-time noise logger	Continuous and real-time	The real time noise logger is linked by telemetry to web interface and may be monitored remotely. Alerts are provided to the North Mine Manager or their delegate if noise levels exceed relevant trigger levels.
Attended Noise Monitoring	dBA	NC1 to NC9	Independent Contractor	Quarterly	
Blasting (see Figure 4)					
Ground vibration Air blast overpressure	mm/s dBL	Junction Circle 56 North Mine North 3 Various	Fixed and mobile blast monitors	Every blast	Mobile blast monitors to be used to confirm blasting parameters and impacts for close proximity blasting (<700m point-to-point to closest residence).
Water (see Figure 5)					
Surface Water Quality – pH – Electrical Conductivity – Turbidity	pH units µS/cm NTU	NMSW1 NMSW2	Field water quality meter	Daily during surface water flows	
		NMSW3 NMSW4		During potential discharge events (rainfall exceeding 144mm/24 hours)	
Surface water level	mm below spillway	Wilcannia Road Dam 57A Dam Evaporation Pond	Automated water level monitors	Continuous and real-time Water level boards/posts (manual back up)	The water level monitors are/will be linked by telemetry to the Honeywell system and the Mine Control Centre. Alerts are provided to the North Mine Manager or their delegate if water levels exceed relevant trigger levels.
Groundwater level (fractured rock aquifer)	m below ground level	No. 3 Shaft	Automated water level monitor	Continuous and real-time	The water level monitor is linked by telemetry to the Honeywell system and the Mine Control Centre.
Groundwater level (seepage from Evaporation Pond)	m below ground level	Evaporation Pond Piezometers	Portable dip meter	Monthly	
Water volume transferred	ML	Various	In-line meters Pump hours	During flow	This information will be used to populate the annual water balance for the North Mine
Traffic (and production levels)					
Vehicle movements	Number and mass	ROM Pad enclosure	front-end loader scales	During transportation operations	
Note 1: Type 1 substances include antimony, arsenic, cadmium, lead and mercury or any compound containing one or more of those elements. Note 2: Type 2 substances include beryllium, chromium, cobalt, manganese, nickel, selenium, tin and vanadium or any compound containing one or more of those elements					







6 Availability of Information

6.1 Publicly Available Information

PBHL operates a website which includes the following information relevant to the North Mine.

- The EIS and any documentation prepared to support applications for modification of SSD 7538.
- All current approvals, licences and permits for the North Mine.
- All approved Management Plans and related documents, including this document.
- A monthly summary of the monitoring results of the North Mine, including:
 - the results of environmental monitoring undertaken during the month, including for meteorology, air quality, noise, blasting, water and traffic.
- A summary of the current phase and progress of the Mine.
- The mechanism by which members of the community may lodge a complaint or obtain more information about:
 - blasting operations;
 - managing lead in the environment, including details of the Education, Monitoring and Assistance Program available to Residents of District 5A; or
 - any other matter related to the North Mine.
- The Complaints Register, including details of each complaint, adjusted to preserve the privacy of the complainant, updated monthly. Statutory reporting completed for the North Mine, including:
 - The previous 5 Annual Reviews prepared in accordance with Condition 5 of Schedule 4 of SSD 7538 which provide:
 - a comprehensive summary of environmental performance;
 - a description of any non-compliance or incidents;
 - a description of any environmental improvements; and
 - any proposed environmental activities for the next reporting period.
 - The Rehabilitation Management Plan, Forward Program and Annual Rehabilitation Reports in accordance with Condition 16 of Division 3 of Schedule 8A of the *Mining Regulation 2016*.
- Links to relevant agency statutory reporting completed for the North Mine, including:
 - Annual Returns prepared under EPL2683; and
 - NPI and NGERS reports.
- Independent environmental audits and associated responses.
- Community Consultative Committee meeting agendas and minutes.

In addition, PBHL provides publicly available information via the following mechanisms.

- Detailed monthly briefings to all employees and contractors.
- An employee newsletter, *The Perilya Post*, published approximately monthly.

- Media interviews and briefings.
- Site tours and presentations on request, including to community groups, schools and other interested parties.

Finally, PBHL operates a 24-hour Community Information Line, (08) 8088 8999, email address (north.mine.project@perilya.com.au) and web-based “contact us” form (<http://www.perilya.com.au/contact-us>) that allows members of the public to contact PBHL to ask questions, make a complaint or seek further information.

Each of these information sources are advertised on a sign at the entrance to the Mine Site.

6.2 Community Consultative Committee

A Community Consultative Community has been established for the North Mine and operates in accordance with the *Community Consultative Committee (CCC) Guidelines for State Significant Projects (NSW Government, 2019)*, or its latest version. Members of the committee include an independent chairperson (Ms Margret Harvie) and representatives of the community, Council and PBHL.

The committee meets at a schedule determined by the committee, but typically quarterly. At each meeting, PBHL provide an overview of the operation of the North Mine since the last meeting and provide all committee members with an opportunity to ask questions and seek additional information.

The agenda and minutes of each meeting are made available on Perilya’s website.

6.3 Agency Reporting

The Environmental Superintendent, or delegate, will prepare regular reports required under the various approvals for the North Mine, including the following.

- Annual Review prepared in accordance with Condition 5 of Schedule 4 of SSD 7538 and the *Post Approval Requirements for State Significant Developments – Annual Review Guideline* dated October 2015 by 31 March each year.
- Annual Rehabilitation Report and Forward Program for large mines, in accordance with Clauses 9 and 13 of Schedule 8A of the Mining Regulation 2016 by 31 March each year.
- Annual Returns prepared under EPL2683.
- NPI and NGERS reports.

In addition, PBHL regularly meets with relevant government agencies to discuss the ongoing operation of the North Mine, including regular site inspections. In addition, PBHL operates an open-door policy whereby relevant agencies are at all times welcome to contact senior PBHL personnel to discuss particular matters of concern or inspect Mine Site.

Section 8 describes the incident, non-compliance and emergency management procedures to be implemented, including notification and reporting to relevant agencies.

7 Environmental Complaints and Dispute Resolution Process

7.1 Management of Environmental Complaints

Perilya's response to environmental complaints follows the procedure outlined in the flow chart presented in **Figure 7**. Complaints may be made directly to PBHL via the following mechanisms.

- The 24-hour Community Information Line (08) 8088 8999. Calls to this number are answered by personnel within the PBHL Mine Control Centre (MCC).
- Email – north.mine.project@perilya.com.au. Emails to this address are reviewed by administration personnel who forward all environmental-related matters on to the Environmental Superintendent.
- Web form – <http://www.perilya.com.au/contact-us>. Contact via the web form are reviewed by administration personnel who forward all environmental-related matters on to the Environmental Superintendent.

Perilya may also be advised by the various government agencies, including the NSW Environment Protection Authority (EPA) or Broken Hill City Council, that a complaint has been received from a member of the public.

Upon receipt of a complaint, the following information is recorded.

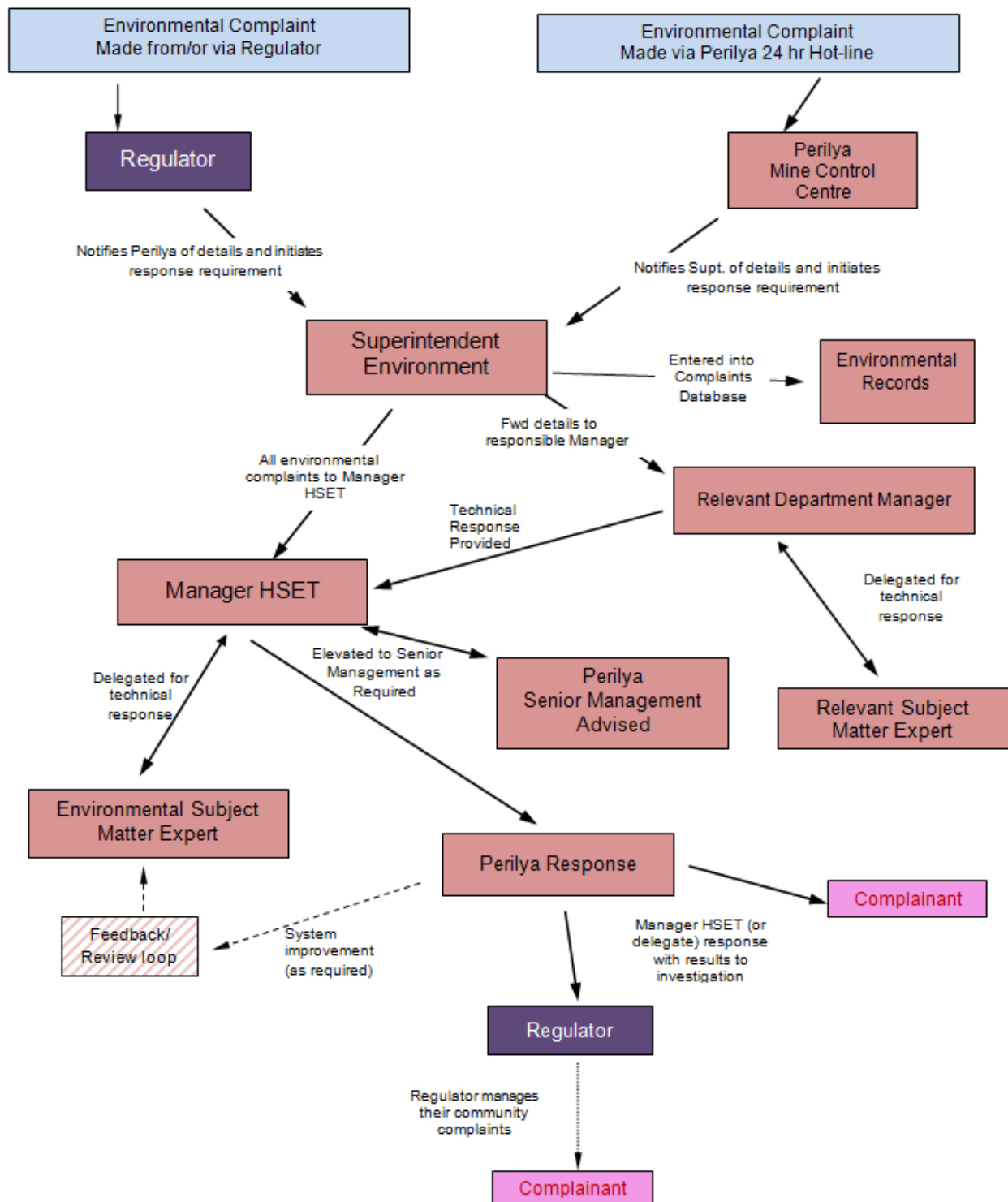
- Name of the complainant and relevant contact details.
- The nature of their complaint/concern, including date and time of the incident and as much information as the complainant is able/willing to provide.
- The date and time that the complaint was received.

Upon receipt all environmental complaints are:

- forwarded to and reviewed by the Environmental Superintendent or their delegate;
- entered onto the complaints database; and
- subject to an investigation by either the Manager HSET or Environmental Superintendent, including:
 - preparation of a technical response by the relevant technical manager or subject matter expert(s); and
 - review by the General Manager, Manager HSET or their delegate.

The results of the investigation are communicated to the complainant and/or the relevant regulator. If required, system improvements and further commitments in relation to the matter the subject of the complaint are implemented.

PBHL maintain communication with the complainant throughout the investigation process, informing them of the status of the investigation and the results of the investigation and remediation measures to be implemented.

Figure 7 Complaints Management Flow Chart

Following completion of the investigation, a report is prepared describing the nature of the complaint and any relevant supporting information and a summary (taking into account privacy-related matters) is included in the Monthly Environmental Report published on the PBHL website. A copy of the investigation is provided to the complainant if requested and appropriate.

7.2 Dispute Resolution

In the event of a disagreement between PBHL and a member of the community regarding environmental management issues, the Environment Superintendent, the HSET Manager, and relevant members of the senior leadership team, will work with the community member to resolve the issue.

External assistance may be sought to assist in the resolution of the dispute. This may include mediation facilitators, technical matter experts or relevant government agencies.

8 Incidents, Non-compliance and Emergency Management

8.1 Incident Management

An incident is defined as:

1. an event that causes, or threatens to cause, material environmental harm; or
2. breaches or exceeds the limit or performance measure or criteria associated with the Conditions of Consent or Environmental Protection License (i.e. a “non-compliance”).

In the case of an event that causes, or threatens to cause, material environmental harm the Environmental Superintendent, or their delegate, would undertake the following:

- Implement measures to control and/or manage the incident, including implementing emergency management measures identified in Section 8.3. Management of incidents that are not classified as emergencies would include immediately implementing procedures to:
 - control the source of the incident, including turning off/turning on/removing/sourcing equipment as required;
 - contain the incident and ensure environmental impacts are limited to the extent practicable; and
 - clean up and or remediate any environmental impacts.
- Notify the following government agencies immediately.
 - Environmental Protection Authority (using telephone number 131 555).
 - Resources Regulator (using 1300 814 609).
 - Department of Planning and Environment (via the Major Projects website).
- Within 7 days of the incident, prepare a written notification report including the following information.
 - The name of the development (Broken Hill North Mine) and applicant number (SSD 7538)
 - Details of the incident (date, time, location, brief description and reason for classification as incident)
 - How the incident was detected.
 - When PBHL became aware of the incident.
 - Identification of any actual or potential non-compliance with conditions of consent.
 - Description of the immediate steps undertaken in relation to the incident.
 - Identification of any further action(s) that will be undertaken in relation to the incident.
 - Identification of the relevant North Mine contact for further communication regarding the incident.

A copy of the notification report is to be provided to the Department of Planning and Environment via the Major Projects website and any other agencies as required/directed.

- Within 30 days of the incident, prepare a report outlining:
 - the nature of the incident;
 - the reasons/causes of the incident; and
 - the actions have been or will be undertaken to address the incident.

A copy of the report is to be provided to the above agencies and any other agencies as required.

Follow up actions will be implemented in accordance with the prepared report and the status of required actions provided to the relevant government agencies at suitable intervals.

8.2 Non-compliance Management

Non-compliance is defined as any event which is not in conformance with threshold levels as determined within the conditions of consent or an exceedance of any criteria under other approval or legislation, including EPL2683. In the event that an exceedance is identified then the Environmental Superintendent, or their delegate, would undertake the following:

- Implement measures to control and/or manage the non-compliance. Where the non-compliance is associated with an environment incident or emergency, the measures identified in Sections 8.1 or 8.3 would be implemented.
- Notify the following government agencies immediately:
 - Environmental Protection Authority (using telephone number 131 555).
 - Resources Regulator (using 1300 814 609).
 - Department of Planning and Environment (via the Major Projects website).
- Within 7 days of the incident, prepare a written notification report identifying:
 - The name of the development (Broken Hill North Mine) and applicant number (SSD 7538);
 - The relevant condition(s) of consent for the non-compliance;
 - the reasons for the non-compliance; and
 - the actions have been or will be undertaken to address the non-compliance.

A copy of the notification report is to be provided to the above agencies and any other agencies as required.

Follow up actions will be implemented in accordance with the prepared notification report and the status of required actions provided to the relevant government agencies at suitable intervals.

Further where any exceedance of these criteria and/or performance measures has occurred, PBHL, at the earliest opportunity will:

- take all reasonable and feasible steps to ensure that the non-compliance ceases and does not recur;
- consider all reasonable and feasible options for remediation (where relevant) and submit a report to the relevant government agencies describing those options and any preferred remediation measures or other course of action; and
- implement remediation measures as directed by the Secretary.

Extraordinary events which exceed the criteria but are not attributable to PBHL, such as dust storms or offsite noise, shall not be classified as non-compliances and will not be reported. This data will however be incorporated into annual reporting process.

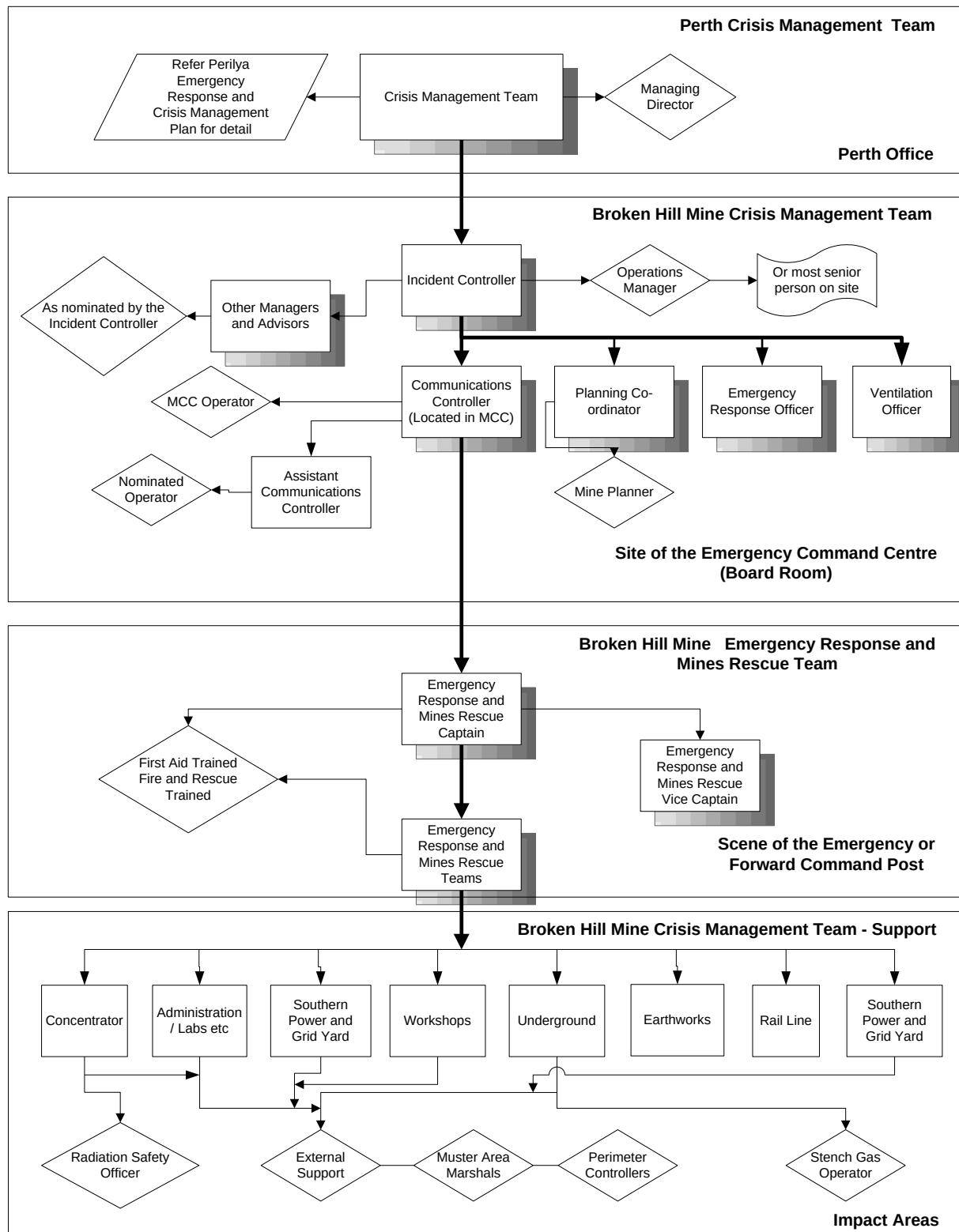
8.3 Emergency Management

The PBHL *Emergency Response and Crisis Management Procedure* is the prevailing document that governs emergency response actions. That document incorporates the *Pollution Incident Response Management Plan* required under EPL2683. Requirements within that document are provided to assist in the development of detailed procedures at each of the three individual mine sites. Site specific procedures detail the following information.

- Determination of site specific, credible emergency events.
- Requirements for supply and maintenance of emergency response equipment.
- Requirements for supply and maintenance of emergency response personnel.
- Requirements for effective communication of emergency events to internal and external personnel.
- Requirements for defining roles for personnel involved in emergency response activities.
- Requirements to minimise impacts on the business resulting from emergency events.
- Requirements to review the efficiency of emergency response following emergency events and exercises to ensure continual improvement of response and reduce risk to people and assets.
- Written instructions that are available on specific roles during an emergency event.
- A documented process for initial communication and ongoing communication of emergency events internally and externally.

In a crisis event and depending on the severity of the event a number of crisis management teams are convened.

The flow chart presented in **Figure 8** details the composition of those teams.

Figure 8 Emergency Response Organisation Structure

9 Environmental Training and Awareness

The Manager HSET is responsible for ensuring that all PBHL employees, contactors and visitors review appropriate training in environmental management of the Mine Site, appropriate to their role and level of responsibility. Primary training tools include the following.

- General site induction.

All personnel working within the Mine Site are required to be inducted. The inductions address several elements including occupational health and safety, quality, and environmental issues.

The environmental component of the induction, addresses a range of environmental issues including, but not limited to:

- Legal requirements including due diligence and duty of care;
- Environmental responsibilities;
- PBHL Environment Policy;
- Significant environmental issues and sensitive areas within the Mine Site;
- Identification of acceptable and unacceptable environmental conditions and incidents;
- Incident management and emergency plans;
- Minimisation of dust and noise on site;
- Control and management of water on site;
- Identification and management of heritage items on site; and
- Reporting structures and where to obtain additional information if required.

- Tool box and pre-start meetings

All PBHL employees and contractors participate in regular toolbox meetings. Each toolbox meeting has a theme and the themes addressed will vary depending on the tasks undertaken by the participants in the toolbox meeting and recent incidents and non-compliances. In the event that specific environmental issues are identified that are required to be communicated to sections or all of the workforce, the tool box and pre-start meeting would be used to do so.

- Job-specific training

Particular roles have supervisory or managerial responsibility for environmental performance of the North Mine. Those individuals receive specialist training in those environmental aspects particular to their role. This may include, but are not limited to, management of:

- particulate emissions;
- noise emissions;
- blast impacts;
- traffic impacts;
- heritage items;
- water, including under extreme rainfall events; and
- environmental monitoring.

10 Review and Revision Process

In accordance with the requirements of Condition 6 of Schedule 4, this Plan will be reviewed within 3 months of:

- a) the submission of an annual review
- b) the submission of an incident report;
- c) the submission of an audit;
- d) any modification to the conditions of this consent, (unless the conditions require otherwise); and/or
- e) a direction from the Secretary.

In addition to the above, PBHL will review and, if necessary, revise the strategies, plans, and programs of the Environmental Management System as required under the consent.

Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document will be submitted to the Secretary for approval in accordance with Condition 7 of Schedule 4, unless otherwise agreed with the Secretary.