

MGO
MT OWEN / GLENDELL

GLENCORE



Environmental Management Strategy

06/12/2024

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1. Commitment and Policy

1.1 Background

Mt Owen Glendell Operations (MGO) is located within New South Wales (NSW), approximately 20 kilometres north-west of Singleton. Mount Owen Pty Limited (Mt Owen), a subsidiary of Glencore Coal Pty Limited (Glencore) currently owns the three open cut operations in MGO:

- Mount Owen Mine (North Pit), approved under Development Consent State Significant Development (SSD)–5850;
- Ravensworth East Mine (Bayswater North Pit), approved under Development Consent SSD–5850; and
- Glendell Mine (Barrett Pit) approved under Development Consent DA 80/952.

Mount Owen Mine and Ravensworth East Mine collectively comprise the Mount Owen Continued Operations (MOCO). Mining operations at MGO include the integrated use of the Mount Owen coal handling and preparation plant (CHPP), coal stockpiles and rail load-out facility.

The *MGO Environmental Management Strategy* (Strategy) documents the strategies and procedures for environmental management across the Mount Owen Mine (SSD 5850) and the Glendell Mine (DA 80/952).

Seven modifications have been approved to SSD-5850, including:

- Modification 1 (MOD 1) to Mount Owen Continued Operations (MOCO) Development Consent (SSD-5850) was approved by the NSW Department of Planning and Environment (DPE) on 19 September 2017 for the construction and operation of a water pipeline from Integra Underground Operations to MGO;
- Modification 2 (MOD 2) to MOCO SSD-5850 was approved by DPE on 4 September 2019 permitting the recovery of an additional 35 Mt of ROM Coal from the North Pit and extending Life of Mine to 2037;
- Modification 3 (MOD3) to MOCO SSD-5850 was approved by DPE on 30 January 2020, which allowed for an additional parcel of land to be added to the Schedule of Lands included in Appendix 1 of SSD-5850 as well as an update to Figure 3 illustrating the land ownership data;
- Modification 5 (MOD 5) to MOCO SSD-5850 was approved by DPE on 15 January 2021, which removed the Travelling Stock Reserve (TSR) as an Offset property (Umwelt, 2020a). Crown lands did not wish to sell this land parcel, therefore alternative offset arrangements are to be made to ensure Offset requirements in SSD-5850 are met;

- Modification 6 (MOD 6) was approved by the DPE on 3 June 2021. MOD 6 allows the construction and operation of an additional pipeline between MGO and Ravensworth Operations to transfer water under the already approved Greater Ravensworth Area Water and Tailings Sharing System (GRAWTS) (Umwelt 2020b). An additional disturbance area of approximately 7.5 ha is required for the construction and ongoing maintenance of the proposed pipeline; and Modification 7 (MOD7) to SSD-5850 was approved on 15 May 2023 and facilitated GRAWTS Stage 2, which includes additional tailings and water pipelines at MGO.
- Modification 7 (MOCO MOD 7), as approved by DPE on 15 May 2023. MOCO MOD 7 allows for operational efficiencies between Liddell Coal Operations and MGO by facilitating more efficient water and tailings transfers. This would enable additional tailings emplacement within the South Cut Void at Liddell Coal Operations to minimise the overall size and depth of the final void, as well as minimise the need to establish additional tailings emplacement areas at Mount Owen and Ravensworth Operations.
- Modification 9 (MOCO MOD 9) was approved by DPHI on 21 August 2024 to make changes to minor errors within the consent and correct miscalculations in the offset areas in Table 9.

DA 80/952 has been modified on four occasions, of which the following remain applicable:

- Glendell MOD2 was approved on 25 February 2008 and increased the production rate to 4.5 Mtpa of ROM coal and extended the period of mining until 30 June 2024;
- Glendell MOD3 was approved on 1 December 2016 and facilitated the realignment of a powerline;
- Glendell MOD4 was approved by DPIE on 4 March 2020 and allowed for a minor extension of the western boundary of the approved pit shell in order to access an additional approximate 2.0 million tonnes run of mine (Mt ROM) coal from the Barrett Pit under the existing approval (Umwelt, 2018b); and
- Glendell MOD5 was approved on 1 July 2024 and permits the carrying out of mining operations until the 30 June 2026 to enable recovery of the remaining coal reserves approved for mining in MOD4

Figure 1.1 illustrates the operational areas of MGO as approved by SSD 5850 and DA 80/952. MGO's monitoring network is presented in **Appendix A.3**.

This Strategy has been updated in 2024 to incorporate the requirements of Glendell MOD5 and MOCO MOD 9 and supersedes the previous version of the EMS.

1.2 Purpose

This Strategy outlines how MGO manages environment and community aspects, impacts and performance.

It provides an overview for the standards, plans and procedures implemented so operations are managed in accordance with Glencore's business principles as well as all relevant approvals and licences held by the operation.

This Strategy is an integral part of the overall MGO Environmental Management System (EMS), which outlines MGO's commitment to proactive community and environmental management and demonstrates MGO's commitment to managing, mitigating and reducing environmental and community impacts.

1.3 Objectives

The objectives of this Strategy are to:

- Provide the overall framework for environmental management at MGO utilising the principles of *ISO 14001:2015 – Environmental Management Systems*;
- Maintain compliance with:
 - Mount Owen and Ravensworth East Mines (SSD-5850) and Glendell Mine (DA 80/952) development consents;
 - environmental licences and permits; and
 - commitments contained in environmental assessments, and other relevant legal requirements.
- Effectively integrate the requirements of the *Glencore Environmental Management Framework* and relevant legal and other requirements into a site-specific document, detailing environmental management objectives and responsibilities at MGO; and
- Provide effective mechanisms for external communications, in particular the on-going relationship with the local community.

This Strategy sets out the procedures for periodic review, auditing and revision so that it is maintained to reflect current mining operations to the satisfaction of the Department of Planning, Housing and Industry and Environment (DPHI).

This Strategy has been prepared to satisfy relevant conditions of SSD-5850 and DA 80/952 (refer to **Section 1.4**) and to align with the GCAA requirement (*11.0 Environment GCAA-625378177-9978*) or most recent version.

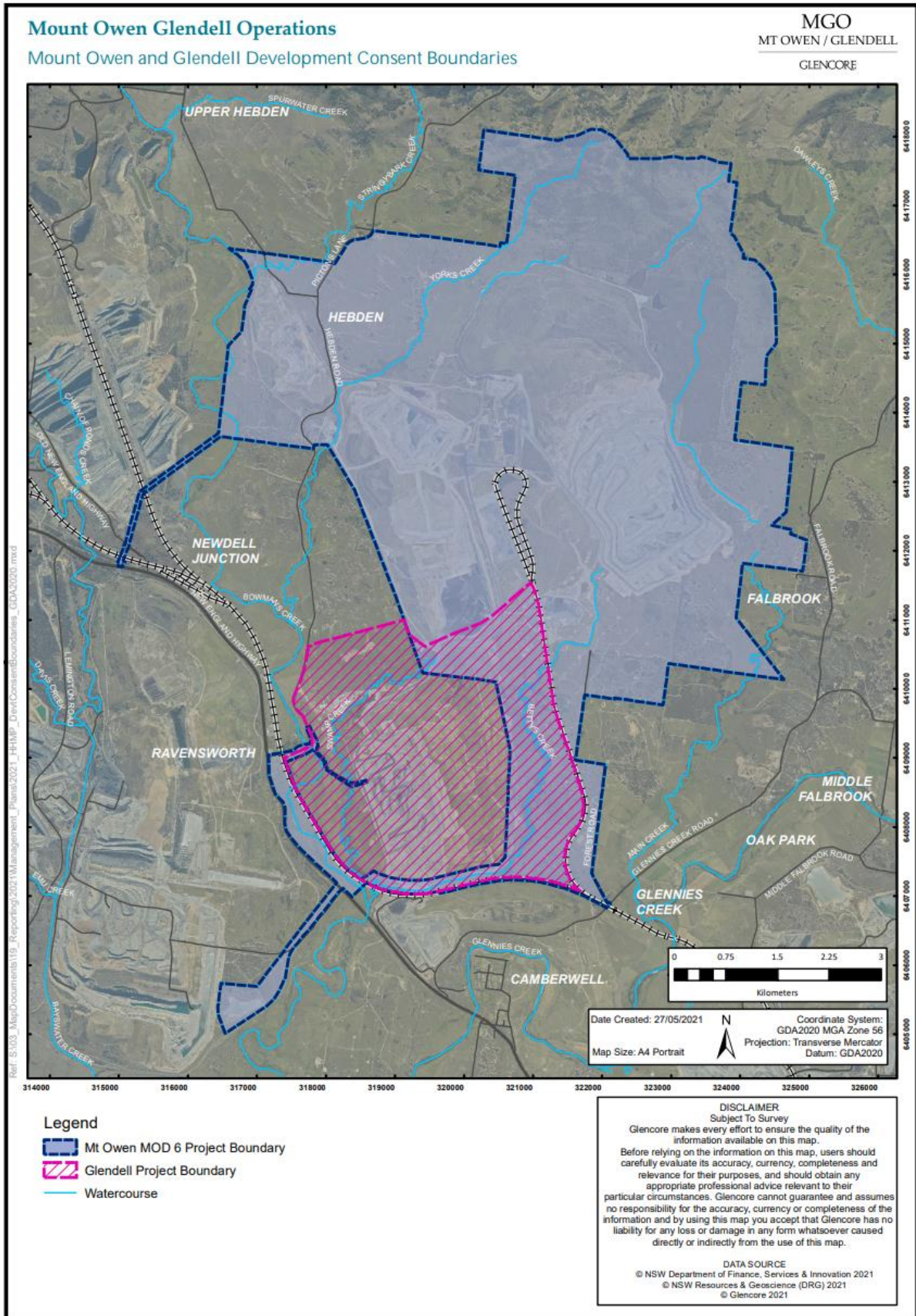


Figure 1.1 - Mt Owen Glendell Operations

1.4 Statutory Requirements

Details of all statutory approvals held by MGO are maintained in the compliance database, CMO. An outline of statutory approvals maintained by MGO is provided in **Appendix A.1**.

The specific requirements of the consent conditions and where they are addressed within this document are listed in **Appendix A.1**.

The MGO *Environmental Protection and Biodiversity Conservation Act 2000* (EPBC) Approval (EPBC 2013/6978) also contains conditions that specify relevant considerations for the EMS. These conditions and where they are addressed within this document are listed in **Appendix A.1**.

MGO notes this document has been prepared in accordance with Schedule 5 Condition 2 of both SSD-5850 and DA 80/952.

1.5 GCAA Requirements

GCAA has developed a comprehensive set of health, safety, environment and community (HSEC) standards. These standards have been developed to address the Glencore requirements as a minimum and provide guidance to operations on their effective implementation.

The requirements of the Glencore HSEC Standards and Policies have been incorporated into the Strategy documentation where relevant.

1.5.1 Glencore Corporate Practice Framework

The Glencore Corporate Practice provides the corporate governance framework and fundamental requirements that apply across the Group. Our Values, the Code of Conduct, and the underlying policies supporting them, represent the commitment to upholding good business practices to work with every day.

All employees, including contractors, are to uphold these expectations and may be held accountable for any breach.

1.6 Supplementary Documents

The supporting documents relevant to this Strategy are listed in **Section 3.2**.

1.7 Consultation

This Strategy was reviewed by members of the Mount Owen Environment and Community (E&C) Steering Committee and initially endorsed at the meeting on 27 October 2016.

Version and revision history of this document is provided in **Section 8**.

From November 2019, consultation records for post approval documents can be found on the DPHI Major Projects website. DPHI correspondence approving the Strategy is included in **Appendix A.4**.

2. Planning

2.1 Annual Planning Process

MGO undertakes an annual review of E&C issues and performance, which is completed in conjunction with the E&C Risk Assessment (ECRA). MGO may engage external stakeholders to assist in completing the risk assessment process.

The annual management reviews consider the following key aspects:

- Outcomes from monitoring and review activities;
- Internal and external inspections, assessments and audits;
- HSEC incident reports and investigation findings;
- Hazardous properties and volumes of materials;
- Inputs and views of external stakeholders;
- Status of corrective and preventative actions;
- Outcomes from previous management reviews; and
- Government policies and regulation;
- Human factors that may contribute to risks;
- Receiving environments (or receptors) that may be impacted.

Following the annual management review strategies, plans, processes, objectives and targets are to be updated as part of the annual planning process. Actions identified are recorded in CMO and assigned to relevant site personnel for implementation.

2.2 Environmental Aspects and Impacts

The planning process aims to identify environmental aspects and impacts focused on key aspects of relevance to the environmental and community performance of MGOs operation. It is based upon the *GCAA Risk Management Standard (GCAA-625378177-2844)* or most relevant version.

The process requires:

- Identification of hazards/aspects and impacts;
- Assessment of the risk associated with those hazards/aspects and impacts; and
- Identification of the controls necessary to eliminate or otherwise reduce those risks.

This process is also undertaken to identify infrastructure that could potentially pose a significant environmental impact should that infrastructure fail (i.e. tailings storage facility, tailings transfer pipeline or mine water storage dam). All infrastructure identified under this process is to be designed, operated, maintained and inspected in accordance with relevant standards to minimise the risk of adverse environmental impacts.

If new aspects and impacts are identified during the risk assessment, they are added to the register.

Operational specific Life of Mine (LOM) risk assessments are also undertaken annually. The LOM identifies key financial and operational risks.

Changes identified during the LOM generally lead to modifications in Development Consents or other main licences.

The results of risk reviews are to be incorporated into the environmental objectives and targets (where appropriate), management programs and work procedures at the next review of the EMS.

2.3 Environmental Approval Documents

Several environmental assessments have been undertaken for MGO as part of development applications and development modification applications.

Recent major assessments undertaken at MGO are listed in Table 2.1 and are also available through the MGO website; www.glencore.com.au/operations-and-projects/coal/current-operations/mt-owen-glendell-open-cut and the DPE Major Projects Planning Portal; <https://www.planningportal.nsw.gov.au/major-projects>.

Each of the environmental assessments listed in **Table 2.1** contain various specialist impact assessments and strategies for the various environmental aspects, including but not limited to air quality, noise, surface and groundwater, biodiversity and rehabilitation. Additional approval documents are available on the MGO website; and the DPHI Major Projects Planning Portal.

If an activity is proposed that falls outside of the approved development however is still considered *generally in accordance with the development consent*, or the Resources State Environmental Planning Policy (SEPP), smaller environmental assessments (due diligence works) are undertaken.

2.4 Objectives and Targets

The objectives and targets set in this Strategy have been developed in consideration of a number of Glencore policies. The targets are specific and measurable and achievement of these aim to demonstrate environmental improvement.

In order to meet the objectives and targets MGO implements environmental programs through the action-based reporting tool CMO (see **Section 3.1**).

Progress against the site HSEC annual plan is also documented in the CMO database.

Table 2.1– Environmental Approval Documents

Environmental Assessment	Year
Environmental Assessment for Modification of Glendell Mine Operations (Modification 2)	2007
Mount Owen Continued Operations Project Environmental Impact Statement	2015
Mount Owen Continued Operations Project, Environmental Impact Statement, Response to Submissions Report	2015
Mount Owen Continued Operations Project, Response to Submissions to PAC Review Report	2016
Glendell Development Consent DA 80-952 (Modification 3)	2016
Mount Owen Continued Operations Development Consent SSD-5850	2016

Environmental Assessment	Year
Environmental Assessment for Modification to Mount Owen Continued Operations Development Consent SSD5850 (Modification 1)	2017
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 1)	2017
Statement of Environmental Effects for Modification to Mount Owen Continued Operations Development Consent SSD5850 (Modification 2)	2018
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 2)	2019
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 3)	2020
Glendell Development Consent DA 80-952 (Modification 4)	2020
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 5)	2021
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 6)	2021
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 7)	2023
Glendell Development Consent DA 80-952 (Modification 5)	2024
Mount Owen Continued Operations Development Consent SSD-5850 (Modification 9)	2024

2.5 Environmental Baseline Studies

Operations at MGO are supported by several baseline studies which were conducted during the application for Development Consent and/or for modifications to existing consents. The major studies as part of these approvals are detailed in *Table 2.1* above.

Numerous minor studies are conducted for developing management plans, as required under licence conditions, depending on whether the aspects have been adequately addressed by the initial assessments. Minor studies and baseline information are detailed further in each respective management plan required for implementation at MGO.

For deviations from the original plan that are still generally in accordance with approvals, due diligence surveys are undertaken to prevent impacts. If significant changes to the operations lead to works not being generally in accordance with approvals, then new assessments are undertaken to support modifications.

These baseline studies together with the conditions of approvals and licences form the core of MGO's environmental compliance management (refer to *Section 3.2*).

3. Implementation

3.1 Environmental Systems

MGO uses core systems for the administration of environment and community aspects and impacts. The main systems are outlined in *Table 3.1* and are implemented in pillars (refer to *Figure 3.1*).

Table 3.1 - MGO Environmental Management Systems

System	Purpose
Environmental Management System	The collection of management plans, procedures and related documents concerning this Strategy.
Microsoft SharePoint	The GCAA document management software and operating system used for the storage and publication of documents, including approved plans. E&C management plans that cover MGO are located in SharePoint so that plans are accessible on the individual site intranets.
MGO ArcGIS	MGO uses ArcGIS TM software to manage geo-spatial data. The GCAA-625378177-10499 Spatial Data Management Guideline addresses the standard operation procedures for the storage and control of these spatial records.
Environmental Monitoring Database (EMD)	The repository for ground water, surface water, air quality, noise, blast and meteorological records.
CMO™	The GCAA approvals and licences compliance storage database. CMO is also used for scheduling compliance actions pertaining to the requirements of licences.
Sentinex and Datamaster Systems	Real-time noise, air quality monitors, and blast monitors.
Consultation Manager™	The GCAA storage database for records of stakeholder consultation.

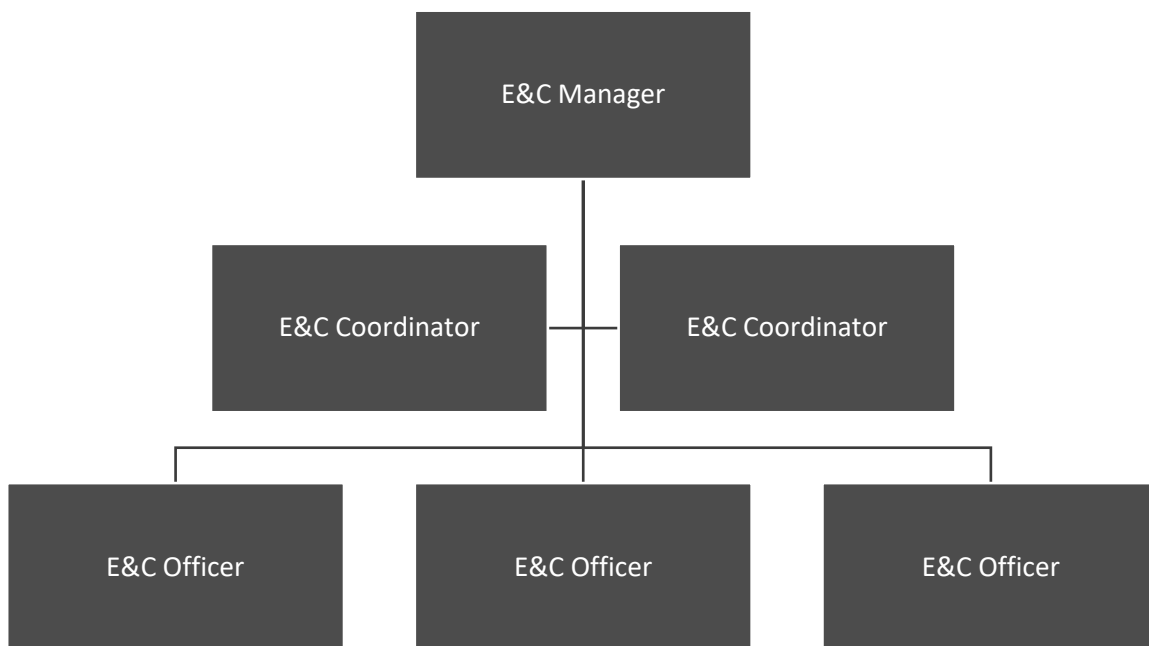


Figure 3.1 - MGO Environmental Team Organisational Chart

3.1.1 Compliance Management

Compliance management at MGO is undertaken in accordance with GCAA HSEC Protocol *11.01 Compliance Management (GCAA-625378177-10301)*. For MGO to maintain compliance with relevant statutory requirements, these requirements need to be identified and performance against them be regularly reviewed.

3.1.1.1 CMO

MGO store obligations from all tier 1 and tier 2 approvals in CMO. Actions are assigned to applicable team members responsible for addressing relevant obligations. Evidence is then uploaded against each obligation to confirm the completion of assigned actions.

MGO E&C personnel then track actions due via an automated email alert, or during the review of actions in the weekly planning meeting.

MGO also upload evidence of compliance to general obligations where no actions are required.

A comprehensive list of MGO approvals and licences is contained in **Appendix A.1**.

3.1.1.2 Changes to Standards, Codes, Legislation

Awareness of changes to GCAA standards or protocols, codes or legislation is addressed in the following ways:

- Receipt of regular updates from GCAA legal advisers;
- Participation in industry groups, such as:
 - NSW Minerals Council
 - Hunter Coal Environment Group;
- Notification from the Glencore General Manager for Environment and Community; and
- Access to State and Federal legislation via the internet.

3.1.1.3 Work Authorisations

MGO uses the work authorisation process in accordance with *CAA HSEC PCL 0036 – Work Authorisation and Permit System*. The *CAA HSEC PER 0001 – Work Authorisation* form contains a checklist of environmental aspects.

A GCAA work authorisation is required where:

- there are changes to existing activities/processes; and
- new projects are proposed that have potential for environmental impact.

The purpose of work authorisations is to consider whether:

- the proposed works have the required environmental approval; and
- the person(s) undertaking the works have appropriately managed risks to minimise impacts on the environment and community.

The work authorisation form may trigger a Ground Disturbance Permit (GDP).

A GDP is required for all surface disturbance work up to and including removal of topsoil. This includes, but is not limited to, tree lopping, removal of topsoil and vegetation clearing.

3.1.2 Statutory Approval Management

MGO follows a specific approvals and compliance process where:

- approvals required for the continuity of the operations are obtained within the required time frame;
- compliance with these approvals is maintained;
 - Compliance to MGO licences and approvals is managed through CMO. MGO licences and approvals are outlined on the MGO Approvals Register. The objective of the register is to accurately record all current approvals for the MGO, including:
 - date of approval / renewal;
 - date of expiry;
 - whether CMO has been updated with approval:
 - conditions / commitments
 - actions;
 - GCAA applicable protocols.

Where MGO requires a new Development Consent or a modification, the steps to be followed are in accordance with *11.20 Statutory Approval Management (GCAA-625378177-9978)*. A comprehensive list of MGO approvals and licences is contained in **Appendix A.1**.

3.1.3 ArcGIS Spatial Data Management

The Spatial Management Database (SMD) at MGO is a core E&C system. The operating policy for managing the SMD is the 11.19 GIS Spatial Data Management (**GCAA-625378177-10499**). The SMD stores the information listed in **Figure 3.2**. Spatial data has been transitioned to GDA2020 format from October 2020.

Figure 3.2 - MGO SMD Structure

Folder	Information
Documents	Non-spatial information that describes how the SMD operates. This includes this document, procedures, support documents, styles and scripts.
Geospatial Data	Vector and raster data within data themes. The datasets are described within the data register, which provides an overview of the available data, where it is located, data currency and responsibilities for maintaining data.
Mapping	Contains mapping templates and workspaces. Templates have been developed for specific reporting/constraints requirements, overarching themes and blank bases to complete mapping. Templates are saved as mapping documents/workspaces for manipulation and future retrieval.
Plots	Mapping outputs for use in reporting, constraints analysis, field mapping and community distribution. All plots are maintained within this file as an original record and copied to other

Folder	Information
	locations if required. The structure of the Plots folder mirrors the mapping folder.
Transfer	GIS related data and information that is received to or sent from site. All received and sent data is maintained in the transfer folder as a record of the original data package.
Archive	All historic ArcGIS and MapInfo datasets and workspaces.

3.2 Environmental Controls

Environmental impacts associated with MGO are mitigated and/or managed through the implementation of the EMS.

The EMS comprises environmental procedures, management plans and monitoring programs. These provide an overview of specific environmental aspects and impacts associated with the operations. They also outline the management measures that the site undertakes to minimise environmental impacts.

The documents associated with this EMS are listed in **Table 3.2**. Each of these management plans are supported by the GCAA EC Protocols, listed in **Section 8.1**.

The implementation of these management plans, monitoring programs and the associated procedures will assist MGO to effectively manage environmental and community performance and reduce cumulative environmental impacts.

The implementation of these management plans is the responsibility of all employees at MGO and is overseen by the MGO E&C Manager.

MGO maintains the latest version of strategies, plans or programs on its public website at <https://www.glencore.com.au/operations-and-projects/coal/current-operations/mt-owen-glendell-open-cut>.

Since November 2019, post approval documents have been provided to DPE via the DPE Major Projects Planning Portal.

Procedures are also developed as required to provide specific guidance where legislation or management plans require more detailed explanation or guidance to relevant.

3.2.1 Managing Cumulative Impacts

Cumulative environmental impacts from mining operations, along with the mitigation and management measures implemented (including an assessment of their effectiveness), are addressed in the Annual Review. The air, noise and blasting management plans provide specific procedures in relation to the management of cumulative impacts.

Table 3.2 MGO Environmental Management Plans and Programs

Area of Management	Mt Owen Mine Development Consent (SSD-5850)	Glendell Mine Development Consent (DA 80/952)	MGO Approach
Air Quality	Air Quality and Greenhouse Gas Management Plan	Air Quality and Greenhouse Gas Management Plan	Air Quality and Greenhouse Gas Management Plan (Incorporates the previous Glendell Greenhouse Gas and Energy Efficiency Plan)
Noise	Noise Management Plan	Noise Monitoring Program	Noise Management Plan
Blasting and Vibration	Blast Management Plan	Blast Monitoring Program	Blast Management Plan
Rehabilitation	Rehabilitation Strategy Rehabilitation Management Plan	Rehabilitation Strategy Rehabilitation Management Plan	Rehabilitation Strategy Rehabilitation Management Plan
Water Resources	Water Management Plan that includes: <ul style="list-style-type: none"> • Water Balance • Salt Balance • Erosion and Sediment Control Plan • Surface Water Management Plan • Groundwater Management Plan 	Water Management Plan that includes: <ul style="list-style-type: none"> • Erosion and Sediment Control Plan • Site Water Balance • Surface Water Management and Monitoring Program • Groundwater Monitoring Program • Surface and Ground Water Response Plan • Bettys and Swamp Creek Diversion Plans 	Water Management Plan that includes: <ul style="list-style-type: none"> • Water and Salt Balance • Erosion and Sediment Control Plan • Surface Water Management Plan • Groundwater Management Plan • Creek Diversion Management Plan

Area of Management	Mt Owen Mine Development Consent (SSD-5850)	Glendell Mine Development Consent (DA 80/952)	MGO Approach
Biodiversity and Flora and Fauna	Biodiversity Management Plan	Biodiversity Offset Strategy Biodiversity Offset Management Plan	Biodiversity & Offset Management Plan & Strategy
Aboriginal Cultural Heritage	Aboriginal Heritage Management Plan	Aboriginal Cultural Heritage Management Plan	Aboriginal Cultural Heritage Management Plan
Historic Heritage Management Plan	Historic Heritage Management Plan	N/A	Historic Heritage Management Plan

N/A: Plan or Program not applicable to Development Consent

3.2.2 Carbon Management

Glencore is undertaking a range of broad initiatives to address greenhouse gas emissions including the funding of research and development of low emission technologies, implementing projects to capture coal seam gas and convert it to electricity and improving energy efficiency across operations.

Energy consumption at MGO is monitored and reported in accordance with Glencore protocol *11.03 Carbon Management*. MGO Air Quality Greenhouse Gas Management Plan (AQGHGMP) provides more details regarding this matter. MGO uses a Greenhouse and Energy Efficiency Process to monitor greenhouse gas emissions and energy use generated by operations, and to provide a framework for investigating and implementing measures to reduce greenhouse gas emissions and energy use.

3.2.3 Cultural and Historic Heritage Management

The *MGO Aboriginal Cultural Heritage Management Plan (ACHMP)* (in its most recent version) was developed in-line with the requirements of SSD-5850 and DA 80/952 and with the Glencore protocol *11.21 Aboriginal Cultural Heritage Management – NSW (GCAA-625378177-10266 or most recent version)*.

The objectives of the ACHMP are to set out controls and protocols to prevent unapproved impact to any identified and/or unidentified Aboriginal cultural heritage sites and values on land occupied by the MGO.

The ACHMP:

- Details the management procedures for Aboriginal heritage within the MGO;
- Details reporting requirements;
- Presents a detailed process for on-going Aboriginal consultation;
- Outlines the obligations of project personnel to protect Aboriginal sites not subject to approved harm;
- Describes the roles and responsibilities of MGO staff in managing Aboriginal heritage sites before and after salvage works; and
- Provides for continuous improvement through auditing and plan modification.

The *MGO Historic Heritage Management Plan (HHMP)* (in its most recent version) documents procedures for the management of historic heritage values *within* MGO. The purpose of the HHMP is to provide a description of the measures to be implemented by Glencore to manage and protect known heritage values within and in the vicinity of MGO.

Any incident relating to Aboriginal Cultural or Historic Heritage at MGO will be managed in accordance with *GCAA HSEC and HR Standard 6.0 – Incident*.

3.2.4 Surface Blast Management

Blasting operations at MGO will be undertaken within the Mount Owen North Pit, Bayswater North Pit (part of the West Pit) and Barrett Pit.

The E&C impacts of surface blasting are managed using the *MGO Blast Management Plan (BMP)* (in its most recent version).

The BMP applies to all blasting activities within MGO and addresses the relevant conditions of Development Consents SSD-5850 and DA 80/952, as well as conditions of the relevant Environment

Protection Licences (EPL) and the Glencore protocol *11.12 Blast Management* (in its most recent version)).

The objectives of the BMP are to:

- Establish a blast monitoring system to assess the blast and vibration impact on surrounding receivers;
- Detail the controls to be implemented to minimise blasting impacts from the site;
- Provide a blast protocol to assess monitoring results against blast impact assessment criteria to evaluate compliance;
- Manage blast-related community complaints in a timely and effective manner; and
- Detail the procedure for reporting blast criteria exceedances to relevant stakeholders.
- Blast monitoring locations are shown in **Appendix A.3**.

3.2.5 Exploration and Drilling

Exploration and drilling activities at MGO are undertaken in accordance with *11.09 Exploration and Drilling* (in its most recent version)). To assist with the planning of drilling programs, E&C personnel undertake inspections prior to, during and post drilling, so that works are performed in a safe manner and adequate controls are in place to minimise impacts on the environment and community.

3.2.6 Hydrocarbon Management

Hydrocarbon storage and inspections at MGO are addressed by the *MGO Hydrocarbon Management Plan* (in its most recent version), which was developed in accordance with the Glencore protocol *11.07 Hydrocarbon Management* (in its most recent version).

Bulk fuel facilities at MGO are fully bunded in facilities designed to hold 110% of the largest fuel storage tank in accordance with *AS 1940:2017 – The Storage and Handling of Flammable and Combustible Liquids*, and all emergency measures and safeguards are in place in the event of a spill.

Hydrocarbon storage facilities are included in the Annual E&C Risk Assessment (ECRA) and are recorded on MGO's aspects and impacts register as significant infrastructure. These storage locations are reviewed and inspected on a regular basis. The risk for offsite contamination once fuel is received on-site is considered low as all handling and transport of bulk fuel is contained within MGO's dirty water management system.

3.2.7 Air Quality Management

Air Quality at MGO is managed in accordance with the *MGO Air Quality and Greenhouse Gas Management Plan* (AQGGMP) (in its most recent version) and the Glencore protocol *11.10 Air Quality Management* (in its most recent version).

The MGO air quality monitoring program includes a combination of dust deposition gauges, TSP and PM₁₀ high volume air samplers (HVAS), continuous PM₁₀ monitoring units (TEOMs and EBAMs) and PM_{2.5} monitoring units (TEOM). The location of air quality monitoring units are shown in **Appendix A.3**.

The objectives of the AQGGMP are to:

- Identify the potential impacts of MGO on the local air quality environment;
- Identify energy efficiencies associated with MGO;

- Detail the controls to be implemented to minimise air quality impacts, including greenhouse gas emissions;
- Establish an air quality monitoring system to assess the air quality impact;
- Provide a protocol to assess monitoring results against air quality impact assessment criteria to evaluate compliance;
- Maintain compliance with conditions of development consents, environmental protection licences and legislation relating to greenhouse gas management and energy use efficiency;
- Manage air quality-related community complaints in a timely and effective manner; and
- Detail the procedure for reporting air quality criteria exceedances to relevant stakeholders.

3.2.8 Noise Management

Noise management at MGO is undertaken in accordance with the *Noise Management Plan (NMP)* (in its most recent version). The NMP applies to all operational activities within MGO and addresses the relevant conditions of Development Consents as well as the conditions of the EPLs and *11.11 Noise Management* protocol (in its most recent version).

The objectives of the NMP are to:

- Describe the measures to be implemented to ensure compliance with relevant noise criteria;
- Describe the noise management system in detail; and
- Outline a monitoring program that:
 - Evaluates and reports on the effectiveness of the noise management system;
 - Assists to calibrate the real-time noise monitoring alarms to provide feedback to manage noise impacts from MGO;
 - Validates the measurements from the real-time monitoring system against observations during attended noise monitoring; and
 - Defines what constitutes a noise incident and a protocol for responding to such incidents.

Noise monitoring is undertaken in accordance with EPL and development consent conditions, which specify required methods of sampling, analysis and frequency of monitoring and applicable noise criteria for sensitive receptors. The noise monitoring program includes a combination of continuous and attended monitoring measures that are carried out in accordance with the relevant requirements set out in the *NSW Noise Policy for Industry* (EPA, 2017). Noise monitoring locations are shown in **Appendix A.3**.

3.2.9 Pipeline Management

Water pipelines across MGO are incorporated into the *Water Management Plan* (in its most recent version) required under SSD-5850 and DA 80/952.

Water is transferred around the complex using pump and pipeline infrastructure. Water is transferred between Glencore owned operations via the Greater Ravensworth Area Water and Tailings Strategy (GRAWTS). Pipelines are inspected regularly as per the GCAA Pipeline Policy *11.02 Pipeline Management* (in its most recent version) .

Inspection frequency is risk based depending on water quality being transferred and the environment in which the pipeline is located.

3.2.10 Tailings Management

Tailings at MGO is managed in accordance with the *Greater Ravensworth Water and Tailings Strategy Management Plan* (GRAWTSMP) (in its most recent version) .

The GRAWTSMP defines the requirements for the operation, maintenance, inspection, monitoring and reporting relating to the *Greater Ravensworth Area Water & Tailings Strategy* (GRAWTS). The GRAWTSMP is used for the management of water and tailings infrastructure (major water storages and transfer dams, pumps, interconnecting pipelines, flow monitoring equipment and electrical reticulation systems) required to facilitate the ongoing operational sustainability of GRAWTS.

3.2.11 Water Management

MGO has an extensive water management system, which includes mine dewatering systems, creek diversions, water storages, sediment dams, tailings ponds, drains and earthen bunding around stockpiles, hardstand areas, haul roads and refuelling areas.

SSD-5850 and DA 80/952 require a water management plan and includes all activities associated with the management of water across the complex. In addition to this, MGO is an integral part of the GRAWTS with the Integra Underground, Ravensworth Operations, and Liddell mining operations. The GRAWTS allows greater flexibility in mine water management by MGO and is managed in accordance with the GRAWTSMP.

The Water Management Plan adopts the *11.03 Water Management (GCAA-625378177-10320)* and *11.05 Dams and Diversions protocol (GCAA-625378177-10322)*.

The objectives of the *MGO Water Management Plan* (WMP) and functions of the site water management system are to:

- Satisfy regulatory requirements, including meeting required performance criteria;
- Divert clean water around mining operations to minimise capture of upslope runoff and separate clean water runoff from mining activities;
- Segregate mine impacted water and runoff from undisturbed and revegetated areas with better water quality to minimise the volume of mine impacted water that requires reuse;
- Reuse mine impacted water within the WMS and within the GRAWTS to reduce reliance on raw/clean water (that is, extraction from Glennies Creek); and
- Minimise adverse effects on downstream waterways (including hydraulic and water quality impacts).

The WMP should be read in conjunction with the following plans:

- Erosion and Sediment Control Plan;
- Surface Water Management and Monitoring Program;
- Groundwater Management and Monitoring Plan;
- Surface Water and Groundwater Response Plan;
- Swamp Creek Diversion Detailed Designs; and
- Bettys Creek Diversion Detailed Designs.

Water sampling and monitoring is undertaken on a monthly basis for key water storages, catchments and creek lines around MGO. Water monitoring locations are shown in **Appendix A.3**.

3.2.12 Erosion and Sediment

Erosion and sediment control is managed under the *MGO Erosion and Sediment Control Plan (ESCP)*, which was developed in line with the *11.06 Erosion and Sediment Control protocol* (in its most recent version). The MGO ESCP provides the overarching details for how erosion and sediment control is managed across the complex. Individual erosion and sediment control plans for site-specific disturbance activities are developed in accordance with this plan.

The objectives of the ESCP are to:

- Identify activities that could cause erosion and generate sediment or affect flooding, including activities on waterfront land;
- Describe the location, function and capacity of erosion and sediment controls structures required to minimise soil erosion and the potential for transport of sediment downstream;
- Ensure appropriate erosion and sediment control structures and programs of work are in place;
- Ensure that erosion and sediment control structures are appropriately sized and maintained;
- Fulfil the statutory conditions of relevant approvals and licences; and
- Meet the requirements of the Blue Book (*Managing Urban Stormwater: Soils and Construction Volumes 1 and 2E*) and GCAA.

3.2.13 Land and Property Management

Landholdings total approximately 10,500 hectares (ha) across MGO. This land covers the immediate and surrounding areas of MGO, excluding the Ravensworth State Forest (approximately 880 ha owned by the Forestry Corporation of NSW to the northeast of MGO). Land not actively used for mining purposes is managed for either grazing or biodiversity offset purposes.

MGO is required by GCAA to submit an annual rehabilitation and land management plan in accordance with the *11.15 Land and Property Management protocol* (in its most recent version). These plans include works on mine-owned land that is not subject to mining as well as mined areas.

3.2.14 Rehabilitation Management

Rehabilitation across MGO is conducted in line with the *MGO Rehabilitation Management Plan (RMP)*, which was prepared to meet the requirements of the Rehabilitation Management Plan specified in Schedule 3, Condition 45 of SSD-5850 and Schedule 3, condition 37D of DA80/952.

MGO is required by GCAA to submit an annual rehabilitation and land management plan in accordance with the *11.16 Rehabilitation Management protocol* (in its most recent version). These plans cover the areas planned to be disturbed and the areas planned to be rehabilitated during that year. The results are then reported in the MGO Annual Review required under SSD-5850 and DA 80/952.

MGO undertakes a rehabilitation monitoring program in accordance with this Glencore standard to provide direction and guidance to GCAA Operations in developing an operation-specific rehabilitation monitoring program that will aid in successfully meeting rehabilitation objectives and completion criteria. The main objectives of the monitoring program are to:

- Assess long term stability of re-established ecosystems on mine effected land;
- Assess rehabilitation performance against closure criteria; and
- Facilitate continuous improvement in rehabilitation practices.

The monitoring program will be continued within rehabilitated areas and non-mined areas until it can be demonstrated that rehabilitation has satisfied the closure criteria. Information from this monitoring program will also be used to refine closure criteria as required.

3.2.15 Mine Closure Planning

The *Mount Owen Operational Mine Closure Plan* and *Glendell Pre-feasibility Mine Closure Plan* have been prepared for MGO in accordance with Glencore protocol *11.17 Mine Closure Planning* (in its most recent version)

The primary objectives of closure, decommissioning and rehabilitation at MGO are to:

- Create a stable final landform with acceptable post-mining land capability;
- Return land affected by the operations to native forest and woodland and, in some areas, pasture;
- Provide for the long term protection and management of biodiversity offset areas; and
- Provide for the safety of employees and the public during and following the closure of the mining operations.

3.2.16 Biodiversity Management

The *Biodiversity and Offset Management Plan and Strategy* (BOMPS) has been prepared in accordance with Glencore's *11.18 Biodiversity Offset Management protocol* (in its most recent version). The BOMPS is implemented to guide the on-going management of biodiversity and biodiversity offset areas (BOAs) (including corridors) across MGO. The BOMPS provides a framework for the implementation of ecological management actions, regeneration and revegetation strategies, controls and monitoring programs. BOAs at MGO are secured under Conservation and Biodiversity Stewardship Agreements which define management obligations for these areas and form a key component of the BOMPS.

The objectives of the BOMPS are:

- Re-establish and maintain stable landforms, landscapes and fully functioning ecosystems;
- Maintain and, where practicable, enhance the biodiversity values of the area, including the genetic diversity of native fauna and flora species to ensure their long term viability;
- Maintain and enhance habitat for native fauna to improve the likelihood of their long term survival;
- Implement targeted strategies for the conservation and management of threatened species, populations and communities and their habitats;
- Control and, where practicable, eradicate threats to threatened species, populations and communities and their habitats;
- Implement monitoring requirements to provide information to assist management of threatened species, populations and communities, their habitats and ecosystems;
- Develop a woodland ecosystem resilient to threats that is self-sustaining in the long term;
- Facilitate the establishment of vegetation corridors, where possible, creating links to areas of remnant vegetation surrounding MGO;
- Guide the implementation of the MGO BOMPS;
- Develop objectives and identify mechanisms for the long term security of BOAs; and

- Identify and implement best practice biodiversity conservation, rehabilitation and reforestation measures.

The rehabilitation monitoring program is undertaken across MGO and will assist in developing management measures required to address rehabilitation risks and will assist MGO with relinquishment of rehabilitated areas across the operation.

3.2.17 Waste Management

Waste at MGO is managed under the *MGO Waste Management Plan* (in its most recent version)), which was developed in line with the *GCAA 11.08 Waste Management* (in its most recent version)) protocol. These documents provide instruction on the correct handling, storage and disposal of waste materials and encourages efficient resource use and recovery. It also assists sites to comply with relevant legislation, regulations, standards and consent/licence conditions, along with monitoring, reporting and auditing requirements.

3.2.18 Human Rights Management

The management of Human rights is undertaken in accordance with the *Human Rights Management Plan* (in its most recent version). The purpose of this plan is to guide the management of human rights risks for MGO to meet the requirements of the Glencore’s Human Rights Policy and *GCAA’s 9.0 Human Rights and Our People Standard*, and to review and continuously improve our human rights risk management approach.

The plan applies to all employees and contractors who work at or for MGO.

3.3 Communications

Effective communication between MGO management and employees/contractors and between MGO and external stakeholders is important for the successful on-going operation of the MGO. All communication is undertaken in accordance with the specific procedures outlined in the below sub-sections.

3.3.1 Internal Communications

Internal communications are conducted in accordance with the *GCAA 10.03 Internal Communication Standard* (in its most recent version)) that provides a protocol for achieving effective and timely internal communication and consultation between different levels of the organisation about company matters, performance, leading practices, sustainable development expectations, risks, and other issues.

The standard sets the expectation to ensure all personnel are required to report environmental incidents, non-conformances and complaints to their immediate supervisor.

Communication of complaints or incidents to the relevant managers will be undertaken as per the site incident reporting requirements with the details recorded in CMO.

The main streams of internal communication performed at MGO are described in **Table 3.3**.

Table 3.3 – Main Internal Communication streams

Communication	Frequency	Information
MGO Production	Daily	Planned activities for the day. Review of previous 24 hours.

Communication	Frequency	Information
NSW E&C Teleconference	Weekly or as needed	Report by all NSW sites on E&C aspects and incidents.
MGO E&C Planning Meeting	Weekly or as needed	Review of environmental performance, planned works, CMO actions and tracking against each E&C Work Schedule.
MGO Site Managers Meetings	Weekly or as needed	Report on E&C management by MGO E&C Manager to Senior Leadership Team.
GCOM Session	Monthly or as needed	Includes E&C aspects slides to staff and crews.
NSW E&C Meeting	Quarterly or as needed	Update by all sites and GCAA on performance.

3.3.2 External Communication

Regular external communications undertaken by MGO E&C staff are listed in **Table 3.4**.

Table 3.4 – Main External Communication streams

Communication	Frequency	Information
Environment Protection Authority (EPA) Monitoring	Monthly or as needed	Environmental monitoring required under the EPLs, updated on the external website.
Noise Monitoring	Quarterly or as needed	Noise monitoring required under the DAs, results are updated on the external website.
Newsletter	At least once a year	Review of community and environmental activities for the Greater Ravensworth Area.
CCC Meetings	Bi-annually	Update on MGO E&C performance and projects.
Annual Review	Annually	Review of the previous year’s environmental performance. Distributed to DPE, DPE-Resources Regulator (DPE RR), DPI Water, Singleton Council, Community Consultative Committee (CCC) and the external MGO website.
Face to face, email, phone or video conference	As needed or as specified in related Management Plans	Consultation, face to face meeting, video conference, email or phone calls as part of stakeholder engagement including with community members, non for-profit organisations, aboriginal parties/groups and/or regulatory agencies.
Other reporting requirements	Annually	Submission of Annual Returns, Annual Rehabilitation Reports, and EPBC Reports.

3.3.2.1 External Stakeholders

The stakeholder database 'Consultation Manager', stores a list of all identified external stakeholders. These include, but are not limited to:

- Neighbouring residences;
- Community groups;
- Regulatory agencies;
- Aboriginal groups; and
- Environmental groups.

Stakeholders are provided with regular updates through various communication channels detailed in the MGO Social Performance Management Plan (SPMP). The SPMP is developed in accordance with the *GCAA 10.0 - Community and Stakeholder Engagement Standard* (in its most recent version)).

3.3.2.2 Website Reporting

In accordance with consent and other regulatory requirements, MGO maintain a website (<https://www.glencore.com.au/operations-and-projects/coal/current-operations/mt-owen-glendell-open-cut>) that provides the wider community with access to the following MGO's information:

- Approvals and licences including future projects;
- Management plans;
- Monitoring programs;
- Monitoring results;
- Details of current activities;
- Scheduled blast times;
- Newsletters and community information sheets;
- A complaints register, which is updated monthly; and
- Minutes of CCC meetings.

From November 2019, consultation records for post approval documents can be found on the DPHI Major Projects website.

3.3.2.3 Media Communication

All media communications are undertaken in accordance with the *Glencore Media and Public Relations Protocol*.

3.3.2.4 Community Consultative Committee

Consultation with the local community occurs through the MGO Community Consultative Committee (CCC) in accordance with Schedule 5, Condition 8 of both SSD-5850 and Schedule 5, Condition 5 of DA 80/952. This CCC is operated in general accordance with the *CCC Guidelines State Significant Projects for Mining Projects* (Department of Planning, November 2016) or most recent version.

3.4 Complaints Management

3.4.1 Complaints Management

Complaints received by MGO are managed in accordance with the *GCAA 10.05 Community Complaints Protocol* (in its most recent version).

Complaints are documented and handled in accordance with consent/licence requirements and company policy.

Complaints are recorded in CMO and are reported in the Annual Review and at CCC meetings. Furthermore, complaints are reviewed as part of the stakeholder feedback during the annual review process.

A complaint register is uploaded on the company's website.

3.4.2 Dispute Resolution

In the event of a disagreement between MGO and a member of the community, the MGO E&C Manager will undertake the necessary liaison and communication to reach a resolution.

In relation to a dispute over acquisition of a property, if the matter cannot be resolved between the company and the landholder, the matter is to be referred to the Secretary of the DPHI for resolution in accordance with related condition of consents.

3.5 Document Control

Records will be kept in accordance with *MGO Document and Records Control procedure* ((in its most recent version)MGO utilise the intranet for the maintenance of the EMS, enabling access to:

- Plans;
- Standards;
- Procedures;
- Forms; and
- Policies

CMO is utilised for recording:

- Complaints and incidents;
- Approvals and associated commitments and actions;
- Audits; and
- Risk register templates.

3.6 Records and Information Management

Records are to be maintained in the appropriate location in a legible form for a minimum period of four years. This is in accordance with *MGO Document and Records Control procedure (MGOOC-1779562647-3330)*.

A master copy of the EMS and its components, including strategies, management plans, and procedures and supporting information, is held in the office of the MGO E&C Manager.

3.7 Emergency Response

The description and location of safety equipment are included in:

- *Principal Control Plan for Emergency Management* (in its most recent version); and
- *Pollution Incident Response Management Plan (PIRMP)* (in its most recent version).

These plans contain:

- Roles and accountabilities of key personnel at each operation in the event of an emergency;
- Contact details for appropriate emergency services;
- Designated evacuation points; and
- Procedures in the event of an emergency.

3.8 Environment and Community Training

Training is managed across the MGO in accordance with the *11.14 Environment and Community Training* (in its most recent version)..

All personnel at MGO undergo environmental induction training before being allowed to commence work on site. Environmental training is conducted for employees and contractors.

Role specific training needs are determined based on type of individual and group activities. These training needs form part of the *MGO Training Needs Analysis (TNA)*.

As per the requirements of the TNA the MGO E&C team is responsible for the coordination of environmental training. This includes developing training modules and toolbox talks for aspects of MGO operations that may potentially result in significant environmental impacts. Environmental training is incorporated into the broader training program for the site.

Training packages are published on 'SharePoint'. Completed assessment work is entered in the training management systems 'Scenario' (for employees) and 'Damstra' (for contractors).

Hard copies of completed assessments are filed in the training filing compactors on site. Training records include the results of competency assessment generally in accordance with the Glencore Training and Inductions Standard.

The effectiveness of training modules and sessions is periodically reviewed. Training modules are updated as required.

4. Measurement and Evaluation

4.1 Environmental Monitoring

Environmental monitoring provides a measure of the environmental performance of the MGO operation.

Monitoring requirements are outlined in individual management plans.

Monitoring is undertaken in accordance with relevant Australian Standards using standard monitoring techniques. Calibrated equipment is operated by trained personnel.

Monitoring results are stored in a database (eg EMD) and compared against criteria specified in the MGO licences and development consents. In the event of a non-conformance, an investigation will be undertaken into the cause, and corrective and/or preventative actions will be made.

Calibration of equipment is undertaken in accordance with the manufacturer's recommendations. Calibration records are maintained onsite. Records will be maintained with a contracting company where monitoring is outsourced, and relevant documentation supplied to MGO.

4.2 Environmental Inspections

Site Environmental inspections are conducted by MGO E&C personnel.

Environmental inspections at MGO are undertaken on a monthly, quarterly, bi-annual and annual basis. These inspections monitor, in conjunction with the environmental monitoring and incident/complaint reporting procedures, on-site compliance with the operation's EMS. Site inspections are conducted by the MGO E&C Manager, or delegate and the inspection results are recorded in CMO.

Non-conformances or issues, and opportunities for improvement, are recorded in CMO. Corrective action is recommended by the person undertaking the inspection. The effectiveness of the action undertaken is assessed at the next monthly site inspection. The MGO E&C Manager will report any significant non-conformances arising from site inspections to relevant Glencore's staff and if required, relevant regulatory agencies.

Table 4.1 provides a summary of the various environmental inspections undertaken.

Table 4.1 –Main Environmental Inspections

Type	Frequency	Responsibility	Requirement
E&C work authorisation	As required on a risk-based frequency	Task coordinators	GCAA internal
Ground Disturbance Permit	As required on a risk-based frequency	Permit Issuer E&C personnel	GCAA internal
Review of CMO approval document compliance	According to the CMO audit schedule	All E&C personnel	GCAA internal
Waste and spill response equipment	Weekly or as needed	Contractor	GCAA internal
Environmental housekeeping	Monthly or as needed	Scheduled by E&C personnel	GCAA internal
Hydrocarbon	Monthly	E&C personnel	GCAA internal
Rehabilitation and erosion and sediment control structures	Quarterly and annual	Contractor	Water Management Plan, RMP
Buffer land management	Bi-annual or as needed	Contractor	GCAA internal
Water Management	Quarterly or as needed	E&C Personnel	Water Management Plan
Stream / diversions health	Annual	E&C Personnel	Water Management Plan
Quarterly rehabilitation walkover	Quarterly	E&C Personnel	GCAA internal, Rehabilitation Strategy
Annual rehabilitation	Annual	Contractor	Development approvals, Rehabilitation Strategy
Annual flora and fauna	Annual	Contractor	Mining Operations Plan, Biodiversity and Offset Management Plan

Type	Frequency	Responsibility	Requirement
Heritage	Quarterly or as needed	Contractor and E&C Personnel	Aboriginal Cultural Heritage Management Plan.

4.3 Environmental Audits

4.3.1 Internal Audits

Internal audits will be undertaken generally in accordance with the *GCAA Auditing Standard* to assess whether the EMS has been properly implemented and maintained and conforms to the environmental policy, objectives and targets of MGO. **Table 4.2** provides a summary of the main internal audits undertaken at MGO.

Table 4.2 – Internal Audits

Type	Frequency	Description	Arranged by
Internal environmental compliance audit	Every three years, and six months prior to external compliance audits	Audit against development consent conditions and associated licences/approvals	GCAA
Other internal audits	As determined by the operation’s level of risk	Operations and projects conduct their own HSEC inspections and audits as appropriate to their level of HSEC risk	E&C or Operations Manager

Audit results are communicated to senior management and employees as required. Actions and recommendations from internal audits will be entered into CMO.

4.3.2 External Audits

Table 4.3 lists the external audits undertaken at the MGO.

Table 4.3 – External Audits

Type	Frequency	Description	Arranged by
External independent environmental compliance audit	Every three years	Compliance audit against environmental legislation, development consent conditions and related licence/approval	MGO E&C Manager

Type	Frequency	Description	Arranged by
		conditions (Refer to Glencore APP PRO 002)	
External EPBC approval audit	Upon the direction of the Minister	Compliance audit against EPBC 2013/6978 conditions	MGO Manager E&C
Other environmental audits	As determined government agencies	Targeted audits on focus areas e.g. waste management, etc.	MGO Manager E&C

4.4 Incidents and Corrective Action

MGO manages non-conformances or non-compliances in accordance with the *GCAA Communication and Engagement Standard, Incident Management Standard, Hazard Management Standard* and the *Monitoring and Review Standard*.

4.4.1 Incident Notification

MGO E&C staff will confirm an exceedance where site is made aware of an exceedance of the limits/performance criteria relating to the environmental performance of the complex. The DPHI and other relevant regulatory agencies will then be notified.

If an incident has occurred and has the potential to cause material harm, it will be managed and reported as per the requirements of the *Pollution Incident Response Management Plan (PIRMP)*. (in its most recent version) The plan includes contact details of the relevant agencies. **Table 4.4** lists the requirements and timing of notifications required.

Table 4.4 – Incident Notifications

Incident	Notification	Recipient	Approvals
Pollution incident that causes, or may lead to, material harm to the environment	Immediately	as per the PIRMP	EPL 4460 EPL 12840 SSD-5850 DA 80/952
Exceedance of the limits/performance criteria of Development Consent or EPBC 2013/6978	As per respective conditions of approvals	DPE, EPA, Department of Agriculture, Water and the Environment and any other relevant agencies. Written Report might be required as per conditions of certain approvals, cause of exceedance/incident, actions to date and	EPL 4460 EPL 12840 SSD-5850 DA 80/952 EPBC 2013/6978

Incident	Notification	Recipient	Approvals
		proposed measures to address the exceedance	
All H&S and E&C incidents on site	By the end of shift	GCAA H&S and E&C General Managers	GCAA HSEC Incident Notification and Reporting

4.5 Adaptive Management

Where an exceedance of the performance measures in either of the MGO Development Consents has occurred, at the earliest opportunity the site will respond in accordance with Schedule 5, Condition 1 of SSD-5850 and DA 80/952.

4.6 Reporting

MGO is required to periodically report on environmental management and compliance, including but not limited to:

- Annual Review in accordance with the Development Consents (external)
- Annual Returns in accordance with the EPLs (external)
- National Pollution Inventory (NPI) (external)
- National Greenhouse and Energy Reporting Scheme (NGERS) (external)
- Monthly EPL Compliance Reporting (external)
- HSEC reporting (internal)
- Monthly Status reporting (internal).

5. Accountabilities

Environmental management at MGO is the responsibility of all employees and contractors, with the Operations Manager and General Manager having overall responsibility for environmental management of the complex. Key personnel and their relevant E&C management roles and responsibilities are listed in **Table 5.1**.

More specific roles and responsibilities are contained in the environmental management plans, procedures and standards referred to in this Strategy, along with individual position descriptions.

No personnel are permitted to undertake a task unless they have undertaken the required training, are competent and confident that the task can be conducted in an environmentally safe manner, with minimal impact on the community.

Table 5.1 – Responsibility

Role	Responsibility
<p>Operations Manager and General Manager</p>	<ul style="list-style-type: none"> • Provide adequate resources for environmental management, including qualified personnel, adequate financial resources and training, as required for all employees; and • Ensure any proposed works associated with the operation that may have an impact on the environment or the community have the necessary legislative approval prior to the commencement of works.
<p>Department Managers and Supervisors</p>	<ul style="list-style-type: none"> • Maintain a working knowledge of the EMS, including this Strategy; • Be aware of the environmental legislative requirements and community responsibilities associated with their respective operation; • Ensure that the operations under his/her control are undertaken in accordance with the EMS and, in particular, in accordance with relevant environmental management plans, procedures and standards; • Provide resources for appropriate training to all site employees regarding their environmental and community roles and functions; • Implement corrective actions arising from environmental incidents and audits; • Allow adequate provision in the annual capital budget for undertaking required environmental capital works; • Involve their respective E&C Manager in the assessment of any proposed works associated with the operation that may have an impact on the environment; • Maintain a high level of environmental performance at the site; • Report any pollution control incidents and/or community complaints to E&C Manager and/or their respective E&C Coordinator as soon as practicable
<p>E&C Manager</p>	<ul style="list-style-type: none"> • Develop, implement and maintain the EMS, including this Strategy; • Liaise with government and community stakeholders regarding environment and community matters associated with MGO; • Facilitate the preparation of environmental compliance reports that cover MGO, including the Annual Review, NPI, National Greenhouse and Energy Reporting (NGER), and EPL Annual Return.

Role	Responsibility
	<ul style="list-style-type: none"> • Maintain a working knowledge of the EMS and be aware of all environmental legislative requirements associated with their respective operation; • Liaise with senior management personnel to promote awareness and delegate tasks associated with the management of environmental issues/commitments at their respective operation; • Prepare internal reports associated with the Glencore SD Management System and provide to the Glencore Group Environmental Manager; • Provide environmental risk assessment and develop management protocols for proposed works associated with existing operations and any new or altered works; • Provide environmental assistance and advice on legislative and approval requirements for any proposed works; • Implement corrective actions arising from environmental incidents and audits. • Oversee the implementation of the E&C work plans and monitor progress against the E&C annual schedule,
<p>Environmental Coordinators / Officers</p>	<ul style="list-style-type: none"> • Assist with the implementation of the EMS, including this Strategy; • Develop and deliver necessary environmental management or awareness training to all personnel at their respective operation; • Coordinate the activities of specialist sub-consultants and project personnel for environmental assessment/monitoring/auditing responsibilities; • Prepare statutory environmental reports in compliance with the approvals associated with their respective operation. • Provide input into the Annual Planning Process and E&C Scheduling Process
<p>All Employees and Contractors</p>	<ul style="list-style-type: none"> • Are aware of, and comply with, the conditions of the Development Consents relevant to activities they carry out in respect of the development; • Have a general awareness of the EMS and this Strategy; • Conduct work activities in accordance with the EMS and this Strategy; • Report all environmental incidents or complaints to the environmental personnel or immediate supervisor; and • Participate in relevant environmental training.

6. Review and Improvement

6.1 Review

This Strategy will be reviewed:

- Every three years or
- as per schedule 5, condition 6 of SSD5850 and DA80/952

The control of documentation associated with the Strategy is to be undertaken in accordance with the *Glencore Legal Compliance and Document Control Standard*. The document revision history of this Strategy is provided in *Section 8.2*.

7. Commitments

Management commitments from this Strategy are entered into CMO where they are actioned.

Records of documentation associated with the management commitments are also maintained within CMO.

8. Document Information

8.1 Reference Information

Reference information, listed in *Table 8.1* below, is information that is directly related to the development of this document or referenced from within this document.

Table 8.1– Reference information

Reference	Title
Approvals and Standards	
AS/NZS ISO 14001:2015	Environmental Management Systems – General guidelines on principles, systems and supporting techniques.
Umwelt 2007	Environmental Assessment for Modification of Glendell Mine Operations
Umwelt 2015a	Environmental Impact Statement, Mount Owen Continued Operations Project
Umwelt 2015b	Environmental Impact Statement, Mount Owen Continued Operations Project, Response to Submissions Report A
Umwelt 2016	Mount Owen Continued Operations Project, Response to Submissions to PAC Review Report

Reference	Title
Umwelt 2018	Statement of Environmental Effects for Mount Owen Continued Operations Project
Umwelt 2018b	Glendell Mine Modification 4 Statement of Environmental Effects
Umwelt 2020a	Mount Owen Continued Operations Project Modification Report Modification 5
Umwelt 2020b	Mount Owen Continued Operations Project Modification 6 Modification Report
Hansen Bailey 2016	Glendell Mine 132 Kv Powerline Relocation MOD 3 Environmental Assessment
Hansen Bailey 2017	Environmental Assessment for Modification to Mount Owen Continued Operations Project
SLR Consulting 2021	Mt Owen Glendell Mining Operations Plan
DP&E, 2016	Community Consultative Committee Guidelines State Significant Projects for Mining Projects
EPA, 2017	NSW Noise Policy for Industry
James Bailey and Associates, 2022	Greater Ravensworth Area Water and Tailings Scheme Modification – Modification Report (MOD 7).
MGO Management Plans	
MGOOC-1779562647-11176	MGO Social Performance Management Plan
MGOOC-1779562647-10892	Principal Control Plan for Emergency Management
MGOOC-1779562647-10978	Pollution Incident Response Management Plan
MGOOC-1779562647-4159	Aboriginal Cultural Heritage Management Plan
MGOOC-1779562647-10987	Document and Records Control procedure
MGOOC-1779562647-11183	Blast Management Plan
MGOOC-1779562647-3840	Mt Owen Complex Hydrocarbon Management Plan
MGOOC-1779562647-4392	Air Quality and Greenhouse Gas Management Plan
MGOOC-1779562647-10975	Noise Management Plan

Reference	Title
MGOOC-1779562647-72	Water Management Plan
MGOOC-1779562647-4225	Historical Heritage Management Plan
MGOOC-1779562647-3726	Mt Owen Complex Non-Mineral Waste Management Plan
GCAA Standards, Procedures and Protocols	
GCAA-625378177-9977	10.0 - Community and Stakeholder Engagement Standard.
GCAA-625379177-10330	10.03 Internal Communication Standard
GCAA-625378177-10296	10.05 Community Complaints Protocol
GCAA-625378177-2844	Risk Management
GCAA-625378177-10301	11.01 Environmental Compliance Management
GCAA-625378177-10248	11.02 Pipeline Management
GCAA-625378177-10320	11.03 Water Management
GCAA-625378177-819	11.04 Tailings Management
GCAA-625378177-10322	11.05 Dams and Diversions
GCAA-625378177-10323	11.06 Erosion and Sediment Control
GCAA-625378177-10243	11.07 Hydrocarbon Management
GCAA-625378177-10249	11.08 Waste Management
GCAA-625378177-10237	11.09 Exploration and Drilling
GCAA-625378177-10324	11.10 Air Quality Management
GCAA-625378177-10238	11.11 Noise Management
GCAA-625378177-9975	11.12 Blast Management
GCAA-625378177-10240	11.14 Environment and Community Training
GCAA-625378177-10242	11.15 Land and Property Management
GCAA-625378177-10241	11.16 Rehabilitation Management
GCAA-625378177-10325	11.17 Mine Closure Planning
GCAA-625378177-10326	11.18 Biodiversity Offset Management
(GCAA-625378177-10499	11.19 GIS Spatial Data Management

Reference	Title
GCAA-625378177-13514	11.20 Statutory Approval Management
GCAA-625378177-9978	11.20 Statutory Approvals NSW
GCAA-625378177-10266	11.21 Aboriginal Cultural Heritage NSW

8.2 Change Information

A summary of the document revision history is provided in **Table 8.2**.

Table 8.2- Document Revision History

Version	Date	Author/Owner	Description	DPE Approval
1	March 2018	MGO E&C Manager	Revised document to streamline information and reference applicable documents.	Not required
2	September 2018	MGO E&C Manager	Revised document to streamline information and reference applicable documents.	Not required
2.1	January 2020	MGO E&C Department	Review and Revision of document following approval of MOCO MOD 2.	Not Required
3	December 2020	MGO E&C Department	Review and Revision of document following approval of Glendell Mod 4 and subsequent Management Plans. Site was awaiting approval of AQGGMP. GCAA Template update.	Approved
4	August 2021	MGO E&C Department	Review and Revision of document following approval of MOCO MOD 5 and MOCO MOD 6 (refer Appendix A.4).	Approved
5	November 2021	MGO E&C Department	Approval of document by DPE with approval letter inserted.	Approved
6	April 2022	MGO E&C Department	Review and Revision of document following	Approved

Version	Date	Author/Owner	Description	DPE Approval
			2021 Annual Review submission.	
7	May 2022	MGO E&C Department	Document updated with DPE approval letter.	Approved
8	October 2023	MGO E&C Department	Document updated to include requirements of HSEC Standard Assurance Action Plan and details relating to MOD 7.	Approved
9	October 2024	MGO E&C Department	Documents updated following Glendell MOD5 (DA80'952) approved on 1 July 2024 and MCOC MOD 9 (SSD5850) approved in August 2024	

8.3 Definitions

A summary of definitions used in this document is provided in **Table 8.3**.

Table 8.3 - Definitions

Term	Definition
ACHMP	Aboriginal Cultural Heritage Management Plan
AL	Assessment Lease
AQGGMP	Air Quality and Greenhouse Gas Management Plan
BBRA	Broad Brush Risk Assessment
BNP	Bayswater North Pit
BOMP	Biodiversity and Offset Management Plan
CCL	Consolidated Coal Lease
CHPP	Coal Handling Preparation Plant
CL	Coal Lease
DPE	Department of Planning, and Environment

Term	Definition
DPE RR	Department of Planning, and Environment – Resources Regulator
EA	Environmental Advisor
EMS	Environmental Management System
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ESCP	Erosion and Sediment Control Plan
E&C	Environment & Community
GRAWTS	Greater Ravensworth Area Water and Tailings Scheme
Ha	Hectare
HVAS	High Volume Air Sampler
LOM	Life of Mine
MGO	Mt Owen Glendell Operations
ML	Mining Lease
MOCO	Mt Owen Continued Operations Project (SSD-5850)
MOP	Mining Operations Plan
MTO	Mt Owen Pty Ltd
NGER	National Greenhouse and Energy Reporting
NPI	National Pollutant Inventory
RMP	Rehabilitation Management Plan
SEPP	State Environmental Planning Policy
SPMP	Social Performance Management Plan
Strategy	Environmental Management Strategy
TEOM	Tapered Element Oscillating Microbalance
TNA	Training Needs Analysis

Appendix A - Mount Owen Complex Lease, Licences, Consents and Other Approvals

A summary of the statutory approvals maintained by the MGO is provided in **Table A-1**.

Table A-1 - MGO Statutory Approvals

Description	Approval Authority
Mt Owen and Ravensworth East	
SSD-5850 Mount Owen Continued Operations Project	DPE
Mt Owen Environmental Protection Licence 4460	NSW EPA
ML 1355	DPE RR
ML 1419	DPE RR
ML 1453	DPE RR
ML 1561	DPE RR
ML 1475	DPE RR
ML 1608	DPE RR
ML 1410	DPE RR
ML 1415	DPE RR
ML 1476	DPE RR
ML 1794	DPE RR
ML 1629	DPE RR
ML 1741	DPE RR
ML 1673	DPE RR
ML 1694	DPE RR
ML 1802	DPE RR
ML 1872	DPE RR
Consolidated Coal Lease (CCL) 715	DPE RR

Description	Approval Authority
Coal Lease (CL) 383	DPE RR
Exploration Authorisation (A) 423	DPE RR
Exploration Authorisation (A) 429	DPE RR
Exploration Authorisation (A) 268	DPE RR
Exploration Authorisation (EL) 6254	DPE RR
Exploration Authorisation (EL) 5824	DPE RR
Section 126 Emplacement Approval (Stages 1 and 2)	DPE RR
Section 126 Emplacement Approval (Stages 3 and 4)	DPE RR
Section 100 Emplacement Approval (Eastern Rail Pit and RW Pit)	DPE RR
Section 100 Emplacement Approval (West Pit)	DPE RR
Section 101 Approval to Discontinue Tailings Emplacement (Stage 1)	DPE RR
Water Licence (General Security) WAL613	DPE - Water
Water Licence (Domestic and Stock) WAL7823	DPE - Water
Water Licence (Domestic and Stock) WAL754	DPE - Water
Water Licence (Domestic and Stock) WAL7817	DPE - Water
Water Licence (Unregulated River) WAL18310	DPE - Water
Water Licence (Domestic and Stock) WAL13750	DPE - Water
Water License (High Security) WAL 7814	DPE - Water
Water Approval (Water Supply Works and Water Use) 20CA200390	DPE - Water
Works Approval (Diversion Works) WAL816 20WA200891	DPE - Water
Water Approval (Water Supply Works and Water Use) 20CA200779	DPE - Water
Water Approval (Water Supply Works) 20WA200723	DPE - Water
Water Approval (Water Supply Works) 20WA201677	DPE - Water
Water Approval (Water Supply Works) 20WA200727	DPE - Water
Water Approval (Water Supply Works) 20WA210993 – Swamp Creek Upper Diversion	DPE - Water

Description	Approval Authority
Water Approval (Water Supply Works) 20WA211425 – Swamp Creek Middle Diversion	DPE - Water
Water Approval (Water Supply Works) 20WA211429 – York’s Creek Upper Diversion	DPE - Water
Water Approval (Water Supply Works) 20WA212187 – Bettys Creek Upper Diversion	DPE - Water
Groundwater Licence 20BL168116 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL169332 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL169333 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL169334 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL169335 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL169336 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171536 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171537 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171538 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171539 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171538 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171544 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171546 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171547 – Monitoring Bore	DPE - Water
Groundwater Licence 20AL219002 – Groundwater Excavation	DPE - Water
Groundwater Licence 20BL169544 – Groundwater Excavation	DPE - Water
Groundwater Licence 20BL170294 – Groundwater Excavation	DPE - Water
Groundwater Licence 20BL170295 – Groundwater Excavation	DPE - Water
Groundwater Licence 20BL168209 – Groundwater Extraction	DPE - Water
Groundwater Licence 20BL169337 – Groundwater Extraction (converted to WAL 18326)	DPE - Water
Glendell	

Description	Approval Authority
DA 80/952	DPE
EPL 12840	NSW EPA
CL 358	DPE RR
Mining Purposes Lease (MPL) 343	DPE RR
ML 1629	DPE RR
ML 1475	DPE RR
ML 1476	DPE RR
CL 382 (sublease)	DPE RR
Exploration Authorisation (EL) 8184	DPE RR
Exploration Authorisation (EL) 6594	DPE RR
Exploration Licence Application (ELA) 5736	DPE RR
Water Licence (High Security) WAL704	DPE - Water
Water Licence (High Security) WAL1118	DPE - Water
Water Licence (High Security) WAL9521	DPE - Water
Water Licence (General Security) WAL912	DPE - Water
Water Licence (General Security) WAL637	DPE - Water
Water Licence (General Security) WAL705	DPE - Water
Water Licence (General Security) WAL1119	DPE - Water
Water Licence (General Security) WAL1215	DPE - Water
Water Licence (Supplementary Water) WAL1364	DPE - Water
Water Licence (Supplementary Water) WAL1420	DPE - Water
Water Licence (Domestic and Stock) WAL706	DPE - Water
Water Licence (Domestic and Stock) WAL1218	DPE - Water
Water Licence (Water Supply Works and Water Use) 20CA200608	DPE - Water
Water Licence (Water Supply Works and Water Use) 20CA201623	DPE - Water

Description	Approval Authority
Water Licence (Water Supply Works and Water Use) 20CA200382	DPE - Water
Water Licence (Water Supply Works and Water Use) 20CA200445	DPE - Water
Water Licence (Water Supply Works and Water Use) 20CA201862	DPE - Water
Water Approval (Water Supply Works) 20WA201228	DPE - Water
Water Approval (Water Supply Works) 20WA201868	DPE - Water
Water Approval (Water Supply Works) 20WA211430 – Swamp Creek Lower Diversion	DPE - Water
Water Approval (Water Supply Works) 20WA212660 – Bettys Creek Lower Diversion	DPE - Water
Groundwater Licence 20BL171534 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171535 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171540 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171541 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171542 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171543 – Monitoring Bore	DPE - Water
Groundwater Licence 20BL171545 – Monitoring Bore	DPE - Water

A.1 Statutory Requirements

Table A-2 - Relevant Development Consent Conditions

Mount Owen Mine (SSD-5850, Schedule 5)	Glendell Mine (DA80/952, Schedule 5)	Condition	Relevant Section
2	-	Environmental Management Strategy The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This Strategy must:	<i>This document</i>
-	2	Environmental Management Strategy If the secretary requires, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This Strategy must:	<i>This document</i>
2 (a)	2 (a)	be submitted to the Secretary for approval prior to the commencement of development under this consent, unless the Secretary agrees otherwise;	<i>Appendix A.4</i>
2 (b)	2 (b)	provide the strategic framework for the environmental management of the development;	<i>Sections 1 and 2</i>
2 (c)	2 (c)	identify the statutory approvals that apply to the development;	<i>Section 1.3, Appendix A.1 and Appendix A.2</i>
2 (d)	2 (d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	<i>Section 5.0</i>
2(e)	2(e)	describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the development; respond to any non-compliance; respond to emergencies; and	<i>Section 3.3</i> <i>Section 3.4.1</i> <i>Section 3.4.2</i> <i>Section 4.4</i>

Mount Owen Mine (SSD-5850, Schedule 5)	Glendell Mine (DA80/952, Schedule 5)	Condition	Relevant Section
			<i>Section 3.7</i>
2(f)	2(f)	include: copies of any strategies, plans and programs approved under the conditions of this consent; and a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.	<i>Section 8, Appendices 3 and 4</i> <i>Section 4.1 and Appendix A.3</i>
		The Applicant must implement the approved Environmental Management Strategy as approved from time to time by the Secretary.	<i>Appendix A.4</i>

Table A-3 - Relevant EPBC 2013/6978 Conditions

Mount Owen Mine EPBC (2013/6978)	Condition	Relevant Section
1 (a)	1. The person taking the action must: Implement administrative conditions 1, 2, 4, 6, 7 and 8 of schedule 2 of the state development consent to minimise the impacts of the action on protected matters.	Conditions maintained in the Compliance Management System CMO (refer to <i>Section 3.1.1</i>)
1 (d)	Notify the Department in writing of any proposed change to the conditions of the state development consent referred to in Conditions 1 a - 1 c, within 14 days of formally proposing a change or becoming aware of any other proposed change.	<i>Section 3.3,</i>
1 (e)	Notify the Department in writing of any change to conditions of the state development consent referred to in Conditions 1 a - 1 c, within 14 days of a change to conditions being finalised.	<i>Section 3.3</i>
4	Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all management plans and strategies required by conditions 26, 31, 43 and 45 of the state development consent on their website. Each management plan and strategy must be published on the website within 1 month of being approved by the Secretary.	<i>Section 3.3(refer Website reporting Section 3.3.2.2)</i>

Mount Owen Mine EPBC (2013/6978)	Condition	Relevant Section
5	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans and strategies required by conditions 26, 31, 43 and 45 of the state development consent, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval.	<i>Section 4</i>
6	Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans and strategies required by conditions 26, 31,43 and 45 of the state development consent, and provide documentary evidence providing proof of the date of publication and noncompliance with any of the conditions of this approval to the Department. The person taking the action must continue to publish the reports until such time as agreed in writing by the Minister.	<i>Section 4.3</i>
7	The person taking the action must notify the Department by email (to EPBCMonitoring@environment.gov.au or an email advised by the Department) of any actual or potential non-compliance with the conditions of this approval, including any management plan or strategy required by conditions 26, 27, 31, 43 and 45 of the state development consent, within 7 days of the person taking the action becoming aware of the actual or potential contravention.	<i>Sections 4.4, 4.6</i>
8	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	<i>Section 4.3.2</i>

A.2 Mount Owen EMS Documents

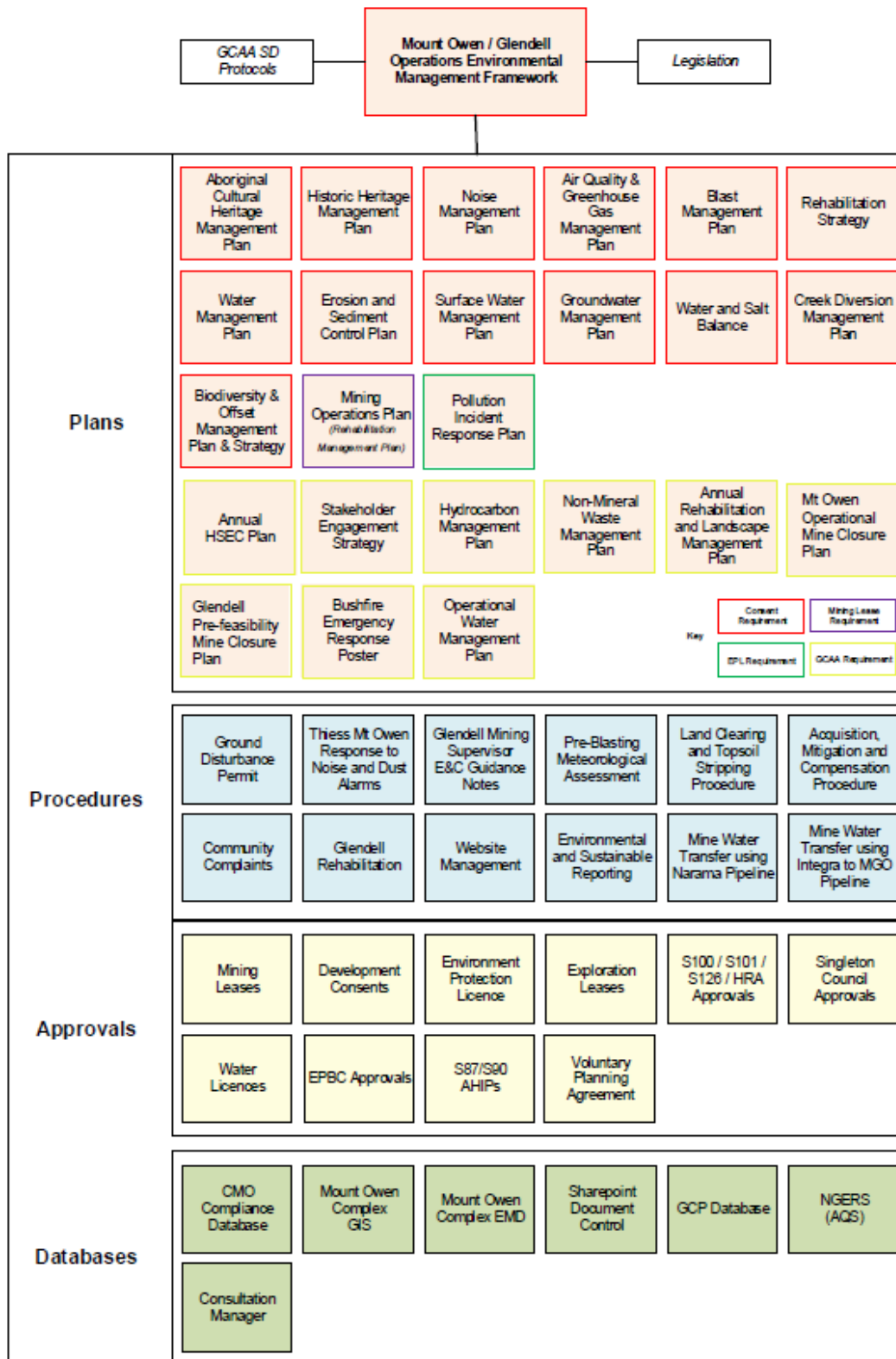
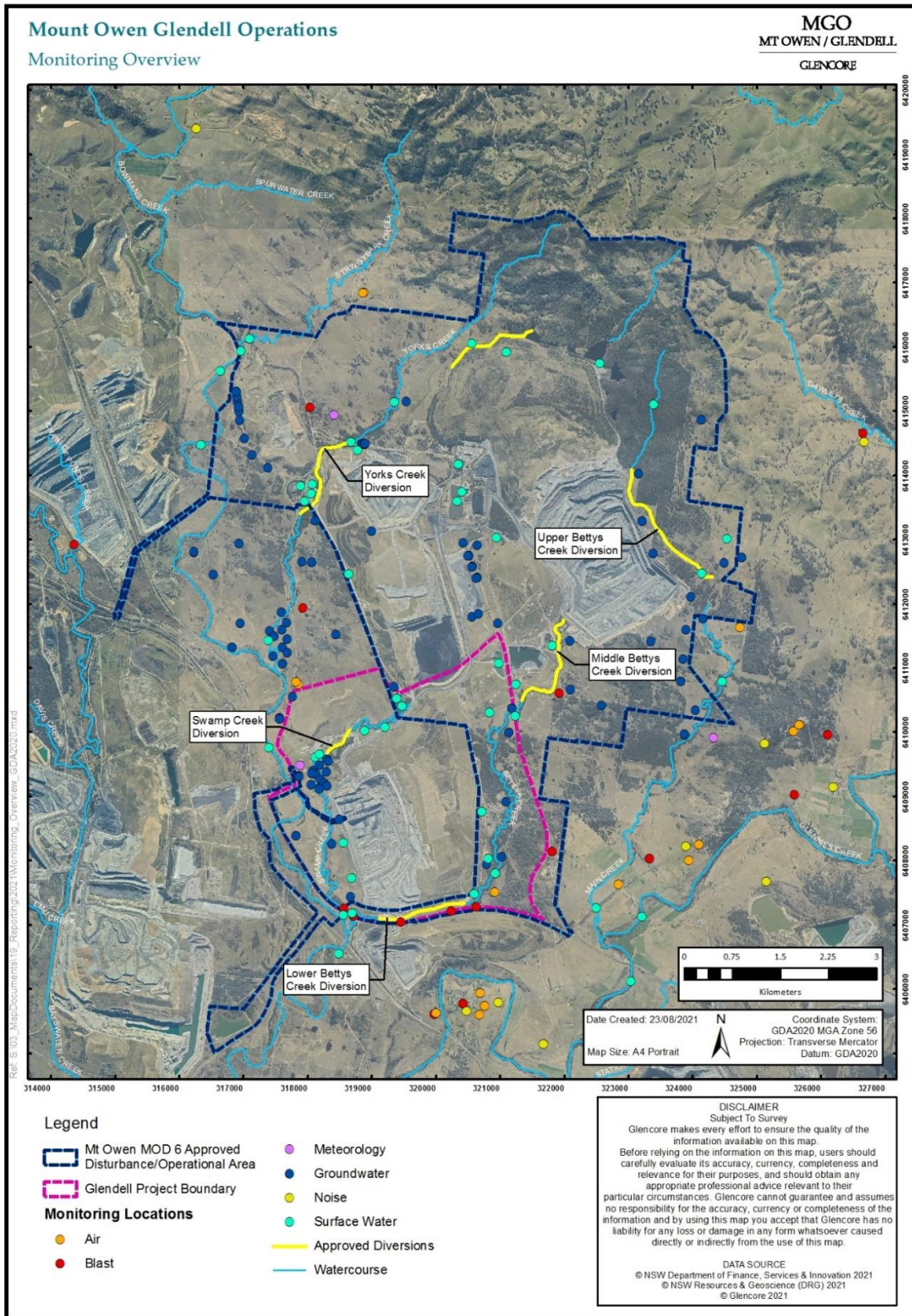


Figure A-1 Supporting documents relevant to this EMS

A.3 Mount Owen Complex Monitoring Sites



A.4 Environmental Management Strategy Approval