



TOMINGLEY
GOLD OPERATIONS PTY LTD
(A wholly owned subsidiary of Alkane Resources Ltd)

Tomingley Gold Operations

Environmental Management Strategy

Table of Revisions

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1. BACKGROUND AND INTRODUCTION TO THE PROJECT

This Environmental Management Strategy (EMS) has been updated in accordance with relevant guidelines as stipulated in Development Consent (SSD 9176045) which was granted in February 2023, for the development of the Tomingley Gold Extension Project (TGEP).

Tomingley Gold Operation (TGO) is a wholly owned subsidiary of Alkane, located immediately south of the village of Tomingley and approximately 38km south of Narromine in Central West New South Wales.

Initial Project Approval (PA) 09_0155 for TGO was granted in July 2012 with the mining lease issued in 2013. The Project includes a processing plant with associated residue storage facilities (RSF1 and RSF2).

The gold processing plant was commissioned in January 2014 and is designed to process up to 1.5 million tonnes per annum (Mtpa). The processing plant will be upgraded to process up to 1.75Mtpa following Development Consent SSD 9176045 approval.

The four existing open cut pits at TGO are Wyoming One (completed 2019), Wyoming Three (completed 2015), Caloma One (completed 2023) and Caloma Two (completed 2019).

Underground mining development commenced in 2019 from the base of Wyoming One open cut with underground mining taking place in the Wyoming and Coloma ore bodies.

TGEP consists of the San Antonio and Roswell deposits which will be mined via open cut and underground methods.

2. SCOPE OF THE ENVIRONMENTAL MANAGEMENT STRATEGY

This EMS forms part of the Integrated Management System for the project. It describes the strategic framework for environmental management and will be used by TGO personnel to ensure environmental impacts are minimised and legislative requirements are complied with during operation of the Tomingley Gold Mine and Tomingley Gold Extension Project (TGEP), hereby collectively referred to as Tomingley Gold Operations.

The EMS allows TGO personnel to identify, monitor and manage environmental aspects and impacts associated with the operation. It defines the roles and allocates responsibility to key TGO personnel with respect to Environmental Management.

The EMS is based on the philosophy of Plan-Control-Check-Act. It includes environmental aspect and impact investigation, objectives and targets, implementation of management measures, environmental monitoring, reporting, auditing, compliance management and community consultation. This EMS generally conforms to the requirements of ISO14001:2015.

This EMS references other strategies, procedures, and management plans within the TGO Integrated Management System which will be used in conjunction with the EMS to manage the project.

The EMS is supported by the Environmental Management Plans listed in **Table 1**.

Table 1 - Environmental Management Plans

Title
Noise Management Plan
Blast Management Plan
Air Quality & Greenhouse Gas Management Plan
Water Management Plan
Biodiversity Management Plan
Aboriginal Cultural Heritage Management Plan
Historic Heritage Management Plan
Hazardous Materials Management Plan
Traffic Management Plan
Rehabilitation Management Plan
Construction Environmental Management Plan (Stage 1a)

Copies of each plan are made publicly available on Alkanes website

<https://www.alkane.com.au/projects/tomingley-gold-project/tomingley-gold-operations/>

3. LEGISLATIVE REQUIREMENTS

3.1 PROJECT APPROVAL

Initial Project Approval (PA) 09_0155 for TGO was granted in July 2012 with the mining lease issued in 2013 and the existing site continues to operate under this Project Approval. Project Approval SSD 9176045 was granted in February 2023 for the development of the Tomingley Gold Extension Project (TGEP). Within 12 months of construction commencing under SSD9176045, Project Approval 09_0155 will be surrendered as required under Condition A7 of SSD 9176045.

TGO and TGEP will continue to be referred to as Tomingley Gold Operations. Mining operations may be carried out until 31 December 2032.

A copy of the current approval can be located on Alkane's webpage

(<https://www.alkane.com.au/projects/tomingley-gold-project/tomingley-gold-operations/>).

3.2 MINERAL AUTHORITIES

Mining leases ML 1684, 1821 and 1858 have been issued for TGO by the Department of Planning and Environment - Division of Resources and Geosciences (DRG) under the *Mining Act 1992*. The mining leases cover an area of 1,715.26 ha, which includes all existing and proposed TGO mining areas and facilities. Mining Lease grant dates and expiry, are summarised below in **Table 2**.

Table 2 – Mining and Exploration Leases

Number	Granted by	Grant Date	Expiry Date	Purpose
TGO Mine Site				
ML1648		11 Feb 2013	11 Feb 2034	

ML1821	Minister for Mineral Resources	19 Nov 2021	11 Feb 2034	Mining Activities at the Tomingley Gold Mine
ML1858		19 Jul 2023	19 July 2044	
EL5675		17 Jan 2000	17 Jan 2029	Exploration Activities
Adjacent to Mining Lease				
EL5830	Minister for Mineral Resources	05 Apr 2001	05 Apr 2028	Exploration Activities

3.3 ENVIRONMENT PROTECTION LICENCE

An Environment Protection Licence (EPL 20169) was issued by the NSW Environment Protection Agency (EPA) under section 47 of the *Protection of the Environment Operations Act 1997* for the project. The latest variation to this EPL was approved on 22 June 2023. TGO is licenced to conduct the following Scheduled Activities:

- Crushing, grinding or separating > 500,000 - 2,000,000 T annual processing capacity
- Mineral processing > 500,000 - 2,000,000 T annual processing capacity
- Mining for minerals > 500,000 - 2,000,000 T annual production capacity

The EPL conditions the management, discharge and monitoring of pollution from the TGO site, including water, noise, air quality, blasting and waste. Incident reporting and scheduled reporting are also conditional requirements under the EPL. A copy of the current EPL can be located on Alkane's webpage (<https://www.alkane.com.au/projects/tomingley-gold-project/tomingley-gold-operations/>).

3.4 OTHER LICENCES AND PERMITS

Other licences and permits issued for the Project are listed in **Table 3** below.

Table 3 - Licences and Permits

Issuing / Responsible Authority	Type	Consent/ Approval Number	Date of Issue	Expiry	Comments
Department of Planning and Environment (Water)	Flood works Approval	80FW723901	21 September 2015	2 January 2028	Approval for Gundong Creek levy
Department of Planning and Environment (Water)	Water Access Licence	WAL20270	20 August 2012	NA	Licence to extract groundwater up to 1,000ML/year from the water supply bore east of Narromine

Issuing / Responsible Authority	Type	Consent/ Approval Number	Date of Issue	Expiry	Comments
Department of Planning and Environment (Water)	Water Access Licence	WAL28643	13 August 2013	NA	Licence to extract groundwater up to 220ML/year from NSW Murray Darling Basin Fractured Rock Aquifer
Department of Planning and Environment (Water)	Water Access Licence	WAL29266	16 January 2012	N/A	Licence to extract groundwater up to 70ML/year from NSW Murray Darling Basin Fractured Rock Aquifer
Department of Planning and Environment (Water)	Bore Licences (Monitoring)	80BL245428 80BL245429 80BL245430 80BL245431 80BL245432	23 September 2009	Perpetuity	Groundwater monitoring bores
Transport for NSW	Works Authorisation Deed	5645525/2	12th May 2011	N/A	Authorisation to construct Newell Highway underpass
Department of Planning and Environment (Crown Lands)	S34A Crowns Lands Licence	RI517394	26 June 2013	Ongoing	Licence to permit construction of electricity infrastructure
Narromine Shire Council	On-Site Sewerage Approval	-	30 September 2013	Ongoing	Approval to operate sewage treatment facility within the Mine Site
Australian Communications and Media Authority	Radio Communications Licence	1964440 to 1964444	6 June 2013	5 June 2018 (renewed annually)	Approval to operate private frequency radio network
WorkCover NSW	Notification of Dangerous Goods on Premises	NDG200150	7 August 2017	(renewed annually)	Acknowledgement of storage of dangerous goods within the Mine Site
Dams Safety NSW	ML 1684 Annexure "D"		11 March 2014	N/A	Design and construction of the residue storage facilities

3.5 LEGISLATION APPLICABLE TO THE PROJECT

Full versions of the current Acts and their respective Regulations that apply to the TGO can be located at: <http://www.austlii.edu.au> and are listed below.

- *Environmental Planning and Assessment Act 1979*
- *Protection of the Environment Operations Act 1997*

- *Local Government Act 1993*
- *Work Health and Safety Act 2011*
- *Local Land Services Act 2013*
- *Biodiversity Conservation Act 2016*
- *Water Act 1912*
- *Water Management Act 2000*
- *Roads Act 1993*
- *National Parks and Wildlife Act 1974 (NPW Act)*
- *Mining Act 1992*

4. OBJECTIVES, TARGETS AND PERFORMANCE INDICATORS

The key environmental performance objectives of TGO are to:

- Ensure compliance with all applicable environmental laws, obligations and approvals;
- Minimise adverse environmental impacts;
- Minimise pollution and waste generation; and
- Enhance biodiversity across the mine site and on TGO owned land.

TGO has determined a number of Key Performance Indicators that will be collated monthly to provide information on the overall environmental performance of the operation. These are presented below and will be reviewed by the Environmental and Community Manager and Alkane Management.

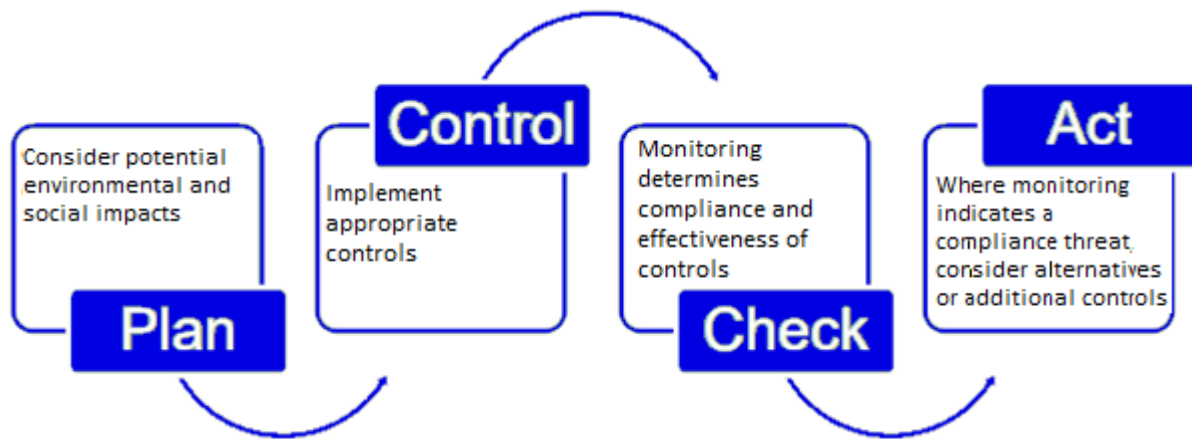
KEY PERFORMANCE INDICATOR

- Number of pollution incidents per month
- Number of community complaints
- Report results from required routine environmental impact monitoring
- Percentage of actions closed out by agreed time frame.

5. MANAGING WORKS

Environmental management strategies, plans, and programs for TGO have been developed to comply with legislative conditions. These strategies, plans and programs are subject to regular review and are used to provide site personnel and management with specific environmental management guidelines relative to the operation with which they are involved.

The TGO EMS is built on the “Plan, Control, Check, Act” model. This model endorses the concept of continual improvement. An EMS is a continual cycle of planning, implementing, reviewing, and improving the processes and actions that an organisation undertakes to meet its environmental obligations. Prior to undertaking a new task or as conditions change the following process will be followed:



A number of key measures to ensure environmental compliance have been implemented at TGO and are detailed in the sections below.

5.1 ENVIRONMENTAL PROCEDURES

In addition to the EMS and the EMP's, TGO has developed appropriate procedures, to control environmental risk associated with routine environmental control activities, such as monitoring, inspections, response, and reporting. These procedures provide instruction on specific environmental tasks to ensure consistency in approach and quality of results. The following procedures are stored in TGO's Document Control System and reviewed periodically:

- Environmental monitoring, including;
 - groundwater and surface water quality
 - dust control
 - biodiversity and rehabilitation progress and quality
- Land management (vegetation clearing and weed control and pest control)
- Sediment basin/erosion control inspection and testing
- RSF inspection and testing
- General site environmental inspections
- Environmental reporting
- Authorising drainage works in environmentally sensitive areas (Red Zones)

The following procedures are detailed in this EMS

- Access to Information
- Complaints Handling
- Dispute Resolution
- Environmental Incident and Non-compliance Notification
- Respond to Environmental Emergencies

5.2 RISK ASSESSMENT AND JOB HAZARD ANALYSIS

Risk Assessments are conducted during the planning phase for new projects and enterprises proposed for TGO. Risk assessments identify and rank potential risk according to the TGO Hazard & Risk Management Plan. This includes the estimation of environmental related risks, and determination of further management requirements. Job Hazard Analyses (JHA) are conducted by personnel prior to undertaking new, modified, or non-routine tasks, to ensure risks associated with those tasks are systematically assessed and appropriately controlled. The JHA process includes the identification and assessment of environmental hazards.

A project risk analysis was completed during preparation of the 2012 Environmental Assessment to identify potential environmental risks associated with the proposed Tomingley Gold Project. Section 3.5 of the 2012 Environmental Assessment presents the outcomes of that analysis.

An operation wide risk analysis was undertaken in 2014, facilitated by external risk consultants, to identify potential threats to operations at TGO. This analysis identified several environmental hazards including noise, air pollution, erosion, surface and groundwater pollution, flooding and weed infestation. Appropriate control actions were identified and allocated to specific TGO managers for implementation.

The most recent rehabilitation risk assessment was completed in 2022 as part of TGO's Rehabilitation Management Plan (RMP) preparation to identify potential risks to the successful completion of TGO's rehabilitation program. A summary of the rehabilitation risk assessment findings is presented in Section 3 of the RMP. A copy of TGO's RMP can be located on Alkane's webpage (<https://www.alkane.com.au/projects/tomingley-gold-project/tomingley-gold-operations/tgo-reports/management-plans/>)

5.3 ENVIRONMENTAL TRAINING AND AWARENESS

The requirement for environmental training at TGO has been derived from the project risk assessment conducted during the 2012 Environmental Assessment. The identified training requirements are met through the two main forms of training provided on site, being:

- Project induction;
- Environmental "Toolbox" communication and training.

Records of induction and training are kept on a database including the topic of the training carried out, dates, names, and trainer details.

5.3.1 PROJECT INDUCTION

Prior to working on site, all personnel and contractors will undertake a project induction. The inductions address several elements including occupational health and safety, quality, and environmental issues.

The environmental component of the induction, prepared by the Environment and Community Manager, addresses a range of environmental issues including, but not limited to:

- Legal requirements including due diligence and duty of care;
- Environmental responsibilities;
- Conditions of licences, permits and approvals;
- TGO Environment Policy;
- Significant environmental issues and sensitive areas within the site, including identification of boundaries and No-Go Zones, location of refuse bins, vehicle washing, refuelling and maintenance areas;

- Environmental management techniques for key environmental elements e.g., soil and water, waste and recycling, flora and fauna and heritage;
- Incident management and emergency plans;
- Protection and maintenance of environmental controls;
- Finding potential heritage items on site; and
- Minimisation of dust on site.

5.3.2 ENVIRONMENTAL AWARENESS TRAINING

TGO staff where required are provided with environmental training to achieve a level of awareness and competence appropriate to their assigned activities.

Targeted environmental awareness information will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with an increased risk of environmental impact.

This training will be reviewed by the Environment and Community Manager and delivered initially through the site induction process and ongoing via toolbox presentations and pre-shift meetings. The target groups and identified training topics are shown in **Table 4**.

Table 4 - Training during operations

Target Group	Topic
Mining and Processing Managers and Mine Engineers	Content and requirements of Project Approval and any licences issued to the project. Content and requirements of the EMS and EMP's. Key issues including noise and vibration control, erosion and sediment, dust management, hazardous materials management. Incident response.
Processing and Mining Superintendent	Content and requirements of Project Approval and any licences issued to the project. Content and requirements of the EMS and EMP's. Key issues including biodiversity protection and ground disturbance control, noise and vibration control, erosion and sediment, dust management, hazardous materials management. Selected Environmental Procedures. Incident response.
Emergency response crew	Location of muster area/s. The location and use of emergency response equipment. Internal notification procedures. Disposal of clean up materials.
Mining and Processing Operations Personnel	Dust control. Traffic control. Water management.

5.3.3 “Toolbox” TRAINING

“Toolbox” training helps ensure that relevant information is communicated to the workforce, and that feedback can be provided on issues of interest or concern. “Toolbox” training is delivered as needed in line with specific site activities, incidents and situations. Toolbox training is usually prepared and delivered by a member of the site leadership team.

5.4 HOURS OF OPERATION

As stipulated in the Development Consent, existing operations at TGO may be carried out 24 hours a day, 7 days a week. Hours of operation for construction activities associated with SSD 9176045 are identified in **Table 5**.

Table 5: Hours of Operation

Activity	Operating Hours
Additional lifts to the RSF1 and RFS2	7 am to 6 pm Monday to Saturday 8 am to 6 pm Sundays and Public Holidays
Construction of the SAR Mine	7 am to 10 pm Monday to Saturday At no time on Sundays or public holidays
Construction of the Newell Highway Realignment	as described in conditions B1 to B5
Blasting operations	as described in conditions B15 and B16
All other construction works, including the water supply pipeline	7 am to 6 pm, Monday to Friday, 8 am to 1 pm Saturdays and at no time on Sundays or Public Holidays in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009) (or its latest version)

6. ENVIRONMENTAL MONITORING

A number of environmental aspects will be monitored during TGO operations, to:

- assess environmental performance against internal objectives and targets;
- assist with the identification and rectification of environmental impacts; and
- ensure compliance with regulatory requirements.

Figure 1 indicates the location of where monitoring is undertaken for the project

Legend:

- ▬ TGO Mine Site Boundary
- ▬ SAR Mine Site Boundary
- Attended Monitoring Location
- Blast Monitor
- Dust Deposition Gauge
- Groundwater Bore
- Gundong Creek Diversion Monitor / Photo Point
- High Volume Air Sampler Location
- Piezometer (CD Monitoring)
- Piezometer (PWP Monitoring)
- Piezometer (RSF Monitoring)
- Real Time Air Quality Monitoring Station
- Rehabilitation Vegetation Monitoring Site
- Sediment Pond Discharge Location
- Surface Water
- Vegetation Monitoring Site

Scale: 0 500 1,000 1,500 m

A summary of monitoring requirements, as specified in the Development Consent and EPL, is presented in **Table 6**.

Specific monitoring requirements are also discussed in relevant EMPs. Any monitoring undertaken in addition to that required to meet regulatory requirements (i.e. to measure environmental performance against TGO's Environmental Objectives and Targets) will be included within each EMP.

Table 6 - Monitoring Requirements

Monitored Aspect	Condition Number	Type of Monitoring / Requirement	Relevant Management Plan	Comment
Meteorological Data	DC B37	Predictive meteorological forecasting	Noise Management Plan; Air Quality and Greenhouse Gas Management Plan	WeatherZone predictive system installed and operational on site.
	DC B37; EPL M5.1	Meteorological Monitoring – that complies with Approved Methods for Sampling of Air Pollutants in NSW guidelines	Noise Management Plan; Air Quality and Greenhouse Gas Management Plan	Met Station located approx. 1km nth of processing plant
Operational Noise	DC B10(d)(ii)	Combination of real time and supplementary attended noise monitoring measures to evaluate the performance	Noise Management Plan	2 x Real time noise monitors installed 1 x Tomingley 1x R60 Kyalite Rd
	EPL M4.1	Monthly attended monitoring at specified locations during day (1.5hr), evening (0.5hr) and night (1hr) periods for three consecutive operating days	Noise Management Plan	Attended monitoring conducted monthly
Blast Monitoring	DC B25(d)	Blast monitoring program to evaluate performance	Blast Monitoring Plan	Two blast overpressure/ ground vibration monitors located in Tomingley and two vibration only monitors located on Newell Highway and RSF
Air Quality	DC B33 (d)	(i) evaluate performance against criteria and guide day to day planning (ii) adequately supports the proactive and reactive air quality management system on site (iii) includes a protocol for distinguishing dust emissions of the development from neighbouring developments	Air Quality and Greenhouse Gas Management Plan	TEOM, HVAS, & met station, in conjunction with site Dust Control procedure

Monitored Aspect	Condition Number	Type of Monitoring / Requirement	Relevant Management Plan	Comment
Surface Water	DC B49 (iii)	Program to monitor and evaluate: - compliance with Table 4 of the Development Consent - potential leakage or spillage from pipelines - potential acid and metalliferous drainage Controlled and uncontrolled discharges and seepage/leachate from site - site water balance - effectiveness of the Erosion and Sediment Control Plan	Water Management Plan & the Erosion and Sediment Control Plan	Ongoing
	EPL M2.2	Monitor pollutant concentration of Gundong Creek Downstream (SW1) and Gundong Creek Upstream (SW2) during discharge	Water Management Plan	Ongoing.
	EPL M2.2	Monitor pollutant concentration of RSF and Wyoming Central Dam daily during discharge	Water Management Plan	Ongoing
	EPL M2.2	Monitor pollutant concentration of seven sediment basins during discharge	Water Management Plan	Ongoing.
Groundwater	DC B49 (iv)	Program to monitor and evaluate: - compliance with Table 4 of the Development Consent - groundwater inflows, outflows and storage columns, to inform the Site Water Balance - seepage/leachate underground voids, water storages, residue storage facilities, waste rock emplacements, infrastructure and processing areas, backfilled voids and final voids, including migration over the short and long term - the effectiveness of the groundwater management system	Water Management Plan	Ongoing with TARPS in place.
	EPL M2.2	Quarterly sampling for lab analysis of seven groundwater bores (WYMB01-WYMB04, WYMB06, WYMB10 & GDCMB01)	Water Management Plan	Ongoing
Biodiversity	DC B62 (f)	Seasonally based program to monitor and report on the effectiveness of biodiversity management measures and progress against performance and completion criteria, and identify improvements	Biodiversity Management Plan	LFA transects, floristics plots and photo points are in place. Biannual fauna monitoring program
Aboriginal Heritage	DC B73 (b)	Protect, monitor and manage any aboriginal heritage items onsite and within any offset area	Aboriginal Cultural Heritage Management Plan	Ongoing, noting all sites are outside the operational mining area.

Monitored Aspect	Condition Number	Type of Monitoring / Requirement	Relevant Management Plan	Comment
European Heritage	DC B76	Undertake photographic/archival recording of any items of heritage significance predicted to be impacted by the development, prior to disturbance Care, control, and storage of heritage relics salvaged from site	Historic Heritage Management Plan	Ongoing
Rehabilitation	DC B84 (I)	Include a program to report on the outcomes of the investigations required under this condition and review and update this strategy at least every five years	Rehabilitation Strategy	Annual monitoring program carried out by independent consultant.

7. EVALUATION OF COMPLIANCE AND REPORTING

7.1 ENVIRONMENTAL MONITORING COMPLIANCE

One of the purposes of the environmental monitoring programs discussed in Section 6 is to monitor TGO performance against internal objectives and targets, and regulatory requirements. Results from environmental monitoring are evaluated for compliance, immediately following receipt of the results, and entered into the monitoring database. Relevant regulatory criteria (as derived from DC SSD 9176054, EPL 20169, ML 1684, ML 1821 and ML 1858) are presented in respective EMPs.

In the event of exceeding environmental performance criteria, the appropriate response process as presented in Section 8 will be triggered.

The Environmental Audit process as discussed in Section 9 is also used to evaluate compliance.

Monitoring results are reported as indicated in **Table 7**.

Table 7 – Reporting of Monitoring Results

Report	Prepared By	Distribution
Monthly Environmental Monitoring Report	Environment Coordinator	TGO Senior Leadership Team Alkane Resources Senior Management Uploaded onto TGO Website
Annual Review	Environment Coordinator	TGO General Manager Alkane Resources NSW General Manager Alkane Resources Senior Management Uploaded onto TGO Website Narromine Shire Council, CCC and any interested persons upon request
Written Incident Report	Environment and Community Manager	NSW EPA and any other relevant government agencies
Annual Return	Environment Coordinator (signed by Alkane Directors)	NSW EPA
Annual Rehabilitation Report	Environment Coordinator	NSW Resources Regulator

7.2 CONDITIONS OF APPROVAL, STATEMENT OF COMMITMENTS, LICENCE AND PERMIT CONDITIONS

The compliance register is managed within TGO's site wide risk management system and covers compliance with the following approval documents:

- Development Consent
- Environmental Protection Licence
- Mining Lease
- Rehabilitation Management Plan

8. NON COMPLIANCE, CORRECTIVE AND PREVENTATIVE ACTION

Environmental incidents or non-compliances at TGO are identified through the following methods:

- Environmental monitoring results;
- Environmental auditing and inspections;
- Community or regulator contact (complaint or query); or
- Internal incident reporting.

The process for non-compliance/incident investigation, corrective action and reporting is presented below. Where an incident is determined to be a *Pollution Incident*, additional reporting requirements are to be observed – see Section 8.

Where an incident causes or threatens to cause material harm to the environment, additional reporting requirements are to be observed – Section 8.2.

1. Following initial event identification (community complaint, monitoring exceedance, spill report, etc.), a preliminary review will be undertaken to determine whether the event constitutes a:
 - a. procedural non-compliance to be managed internally;
 - b. regulatory non-compliance, or environmental incident, requiring reporting to EPA and other relevant authorities; or
 - c. *Pollution Incident* requiring reporting in accordance with the site Pollution Incident Response Management Plan – see Section 8.1.
2. If determined to be an Incident, the Planning Secretary will be notified in writing via the Major Projects website immediately. Subsequent notification requirements will be given, and reports submitted in accordance with the requirements set out in Appendix 8 of SSD 9176045 which have been reproduced in Section 8.3.
3. If determined to be a non-compliance, The Planning Secretary will be notified in writing via the Major Projects website within seven days after TGO becomes aware of any non-compliance.
4. Where possible, corrective actions should be initiated (if not already) to mitigate the impacts.
5. A copy of all correspondence will be stored in Noggin, TGOs electronic incident management system.
6. An investigation (commensurate with incident significance) will be completed.
7. Appropriate corrective and/or preventative actions (as determined by the investigation in accordance with relevant EMP response requirements) are assigned to relevant TGO personnel for implementation.

8.1 POLLUTION INCIDENTS

A pollution incident is defined as:

“A set of circumstances during which or as a consequence of which there is, or is likely to be a leak, spill, escape or deposit of a substance as a result of which pollution has occurred or is likely to occur. This does not include the emission of noise. “

Where there is an emission of noise that is beyond the noise limit criteria set for the project, this will be managed as a non-compliance.

TGO has developed a Pollution Incident Response Management Plan (PIRMP), based on the EPA Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA 2012).

This plan describes the likelihood of pollution incidents, pre-emptive action to be taken, inventory of pollutants, safety equipment needed, communication with neighbours and the community, minimising harm to persons on the premises action to be taken immediately following a pollution incident and the training of staff.

TGO has implemented, tested and reviewed the PIRMP, as per the requirements presented in the plan.

8.2 NOTIFICATION OF ENVIRONMENTAL HARM

In accordance with EPL 20169, notifications will be made by telephoning the Environment Line service on 131 555.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.

8.3 INCIDENT REPORTING

1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident.

2. Written notification of an incident must:

- a. identify the development and application number;
- b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- c. identify how the incident was detected;
- d. identify when the Applicant became aware of the incident;
- e. identify any actual or potential non-compliance with conditions of consent;

- f. describe what immediate steps were taken in relation to the incident;
 - g. identify further action(s) that will be taken in relation to the incident; and
 - h. identify a project contact for further communication regarding the incident.
3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4. The Incident Report must include:
- a. a summary of the incident;
 - b. outcomes of an incident investigation, including identification of the cause of the incident;
 - c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
 - d. details of any communication with other stakeholders regarding the incident.

9. AUDIT PROCESS

9.1 INDEPENDENT ENVIRONMENTAL AUDIT

As required under Part D, Section D12 of the Development Consent, every three years TGO must commission an Independent Environmental Audit following the initial audit in June 2015. Subsequent audits were completed in 2018, and 2021.

The audit will:

- (a) be prepared in accordance with the *Independent Audit Post Approval Requirements* (NSW Government 2020); and
- (b) be submitted, to the satisfaction of the Planning Secretary, within two months of undertaking the independent audit site inspection, unless otherwise agreed by the Planning Secretary.

In accordance with the specific requirements of the *Independent Audit Post Approval Requirements* (NSW Government 2020), TGO will:

- (a) review and respond to each Independent Audit Report prepared under condition D12 of this consent;
- (b) submit a response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations of the Independent Audit Report;
- (c) implement the recommendations to the satisfaction of the Planning Secretary; and
- (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary.

TGO's responsibilities as part of the Independent Environmental Audit requirements are coordinated by the TGO Environment and Community Manager.

10. REVIEW

10.1 ANNUAL REVIEW

By the end of September each year TGOs Annual Review will be submitted to the Department. This report reviews the environmental performance of the development, and must be complete to the satisfaction of the Planning Secretary. This review will

- describe development (including any rehabilitation) that was carried out in the previous financial year, and the development that is proposed to be carried out over the current financial year;
- include a comprehensive review of the monitoring results and complaints over the previous financial year, including a comparison of the results against the:
 - relevant statutory requirements, limits or performance measures/ criteria;
 - requirements of any plan or program required under TGOs consent
 - previous years' monitoring results
 - relevant EA predictions.
- Identify any non-compliance or incident which occurred over the previous financial year, and outline the associated corrective actions implemented to ensure compliance;
- identify any trends in the monitoring data over the life of the project;

- highlight discrepancies between EA predicted, and actual, project impacts; and analyse the potential cause of any significant discrepancies; and
- describe proposed environmental performance improvement measures for the next financial year.

The Annual Review will be prepared in accordance with the *Post-approval requirements for State significant mining developments. Annual Review Guideline* (DP&E, October 2015). Copies of the Annual Review are submitted to Council and made available to the CCC and any interested person upon request. The report is made publicly available on the TGO website within one month of being approved by the Planning Secretary.

10.2 REVISION OF STRATEGIES, PLANS AND PROGRAMS

The revision of strategies, plans and programs is undertaken in accordance with PA Part D Condition 6 and is as follows.

Revision of Strategies, Plans and Programs

Within three months of:

- a) the submission of an incident report under condition D8;
- b) the submission of an Annual Review under condition D10;
- c) the submission of an Independent Environmental Audit under condition D12; or
- d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise);
- e) notification of a change in development phase under condition A5; or
- f) a direction of the Secretary under condition A3,

the suitability of existing strategies, plans and programs required under this consent must be reviewed by TGO.

If necessary, to either improve the environmental performance of the development or cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.

Note: This is 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.

11. COMMUNITY CONSULTATION

There are two main medium via which TGO communicates with the community:

- The TGO website (<https://alkane.com.au/projects/tomingley-gold-project/>); and
- The Community Consultative Committee (CCC).

11.1 ACCESS TO INFORMATION

As stipulated in TGO's Development Consent the following information and documents will be publicly available on Alkanes website. (<https://alkane.com.au/projects/tomingley-gold-project/>)

- the document/s listed in condition A2(c);
- all current statutory approvals for the development;
- all approved strategies, plans and programs required under the conditions of this consent;
- minutes of CCC meetings;
- 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;
- 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;
- a summary of the current phase and progress of the development;
- contact details to enquire about the development or to make a complaint;
- a complaints register, updated monthly;
- the Annual Reviews of the development;
- audit reports prepared as part of any Independent Environmental Audit of the development and TGOs response to the recommendations in any audit report;

TGO Project Website, email address and Community Information Line Number is advertised in the following ways;

- In the local paper
- TGO information board within Tomingley Village
- TGO information board at the truck rest station on the Newell Highway at Tomingley
- TGO information board at the site entrance

The 24-hour TGO Complaints & Community Information Line Number is: **02 6865 6116**

The TGO email address is tomingleygold@alkane.com.au

This number and email address allow the public to gain access to information, make an enquiry or a complaint at any time.

11.2 COMMUNITY CONSULTATIVE COMMITTEE

TGO operates a Community Consultative Committee (CCC) in general accordance with the *Guidelines for State Significant Projects (NSW Government, 2019)*. The CCC acts as an advisory committee, is made up of representatives from TGO, Narromine Shire Council and the local community, and is facilitated by an independent chair.

11.3 NOTIFICATION OF EXCEEDANCES

As soon as practicable and no longer than 7 days after obtaining monitoring results showing an exceedance of any noise, blasting or air quality criteria in PART B of TGOs Consent, TGO will notify any affected landowners, tenants, and the CCC in writing, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria. For air quality exceedances, TGO will also send the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You".

12. COMPLAINTS AND DISPUTE RESOLUTION

12.1 COMPLAINTS HANDLING

TGO maintains a 24-hour 7 day, Community Complaints Number (02 6865 6116). The purpose of this complaints line is to receive complaints from members of the public in relation to activities conducted at the premises or by vehicle or mobile plant.

In addition to this, complaints can be lodged by email at tomingleygold@alkane.com.au or by visiting the site office.

EPL 20169 stipulates the conditions in which TGO records pollution complaints. In order to receive, record and respond to complaints in a timely manner, TGO has established the means of communication outlined in Section 13. TGO record all complaints made to TGO, any employee or agent of TGO in relation to pollution arising from any activity in which is covered in EPL 20169.

All complaints will be registered in a database and responded to verbally within 24 hours.

The following information will be recorded in the database and kept for a minimum of 4 years:

- the date and time of the complaint;
- the method by which the complaint was made;
- details of the person making the complaint;
- the nature of the complaint;
- action taken by TGO in relation to the complaint including any follow-up contact; and
- if no action, the reason why.

As appropriate, the initiation of monitoring or other investigations to verify the exceedance or non-compliance with approval or licence condition(s) will occur in a timely manner. If deemed appropriate TGO will initiate appropriate changes in operating practices or procedures. A follow up interview will be conducted with the complainant to determine their level of satisfaction with the response and the resultant outcome.

A copy of the complaint report sheet may be supplied to the complainant, if requested. The complaints database will be updated on the Alkane website monthly and a summary of the complaints received in each 12-month period will also be included in the Annual Return. The Environment and

Community Manager will be responsible for the recording of the complaint, response action requirements and updating of the database and website.

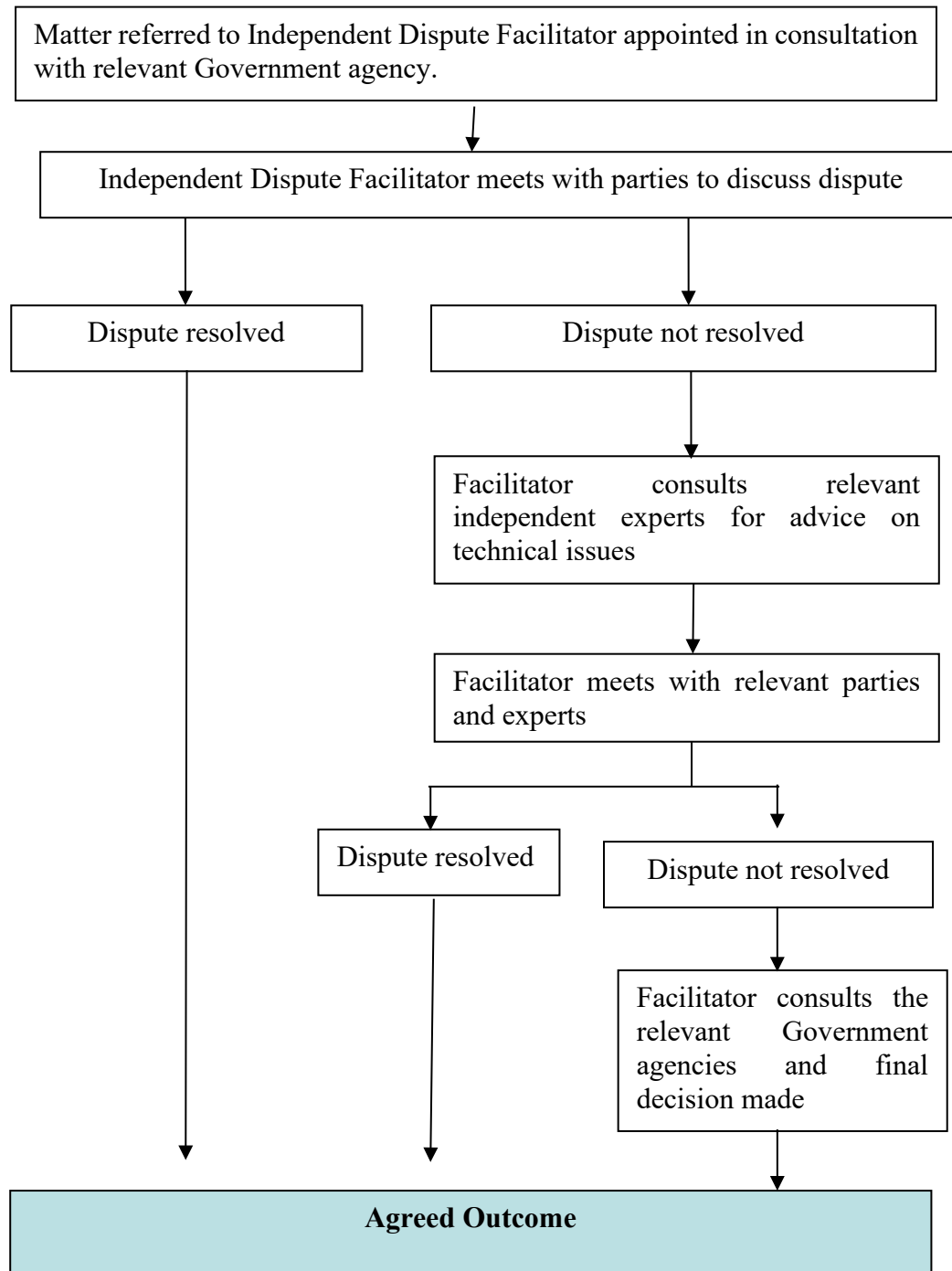
12.2 DISPUTE RESOLUTION

In the event that any complainant does not consider that the response adequately address their concerns, the following procedure will be adopted.

1. A meeting will be convened with the TGO General Manager, the Environment & Community Manager and other relevant senior Alkane personnel to seek resolution of the matter. The complainant will be provided with a written response, detailing the results of investigations undertaken and the agreed actions to be taken regarding the measures to be implemented.
2. On implementation of the nominated measures, a further meeting will be convened to seek feedback from the complainant on their level of satisfaction, or otherwise, regarding the outcomes.

If, after 21 days following Steps 1 and 2, the complainant believes the matter remains unresolved and no further agreement can be reached as to additional measures to be undertaken, the matter will be referred to an Independent Dispute Facilitator for independent review. This dispute resolution process is shown in **Figure 2**.

Figure 2 Independent Dispute Resolution Process



13. ROLES AND RESPONSIBILITY

All TGO personnel have a duty of care with respect to environmental protection. Duty not to cause pollution of the environment. Duty to notify relevant supervisor, Environment and Community Manager or Mining Manager of any situation they suspect could cause harm or is causing harm to the environment. Duty to follow instruction and procedures issued by TGO with respect to environmental management.

Table 8 outlines the responsibility of all key TGO personnel working on the Project with respect to environmental management.

Table 8 – Key Roles and Responsibilities

Key Role	Responsibilities
General Manager	Accountable for the overall environmental performance of the Project, including the outcomes of this EMS.
Environment and Community Manager	- Provide technical direction to the General Manager; - Liaison with external agencies, the community and stakeholders; - Plan and coordinate TGO environmental management; - Obtain the relevant licences, permits or approvals for the project; - Manage environmental sub-consultants; - Prepare and review environmental documentation; - Coordinate response to environmental incidents; - Implement EMS and EMPs - Report non-compliances and incidents externally and coordinate actions plans as required - Ensure relevant personnel receive adequate training in environmental awareness programs; - Report to senior management on the environmental performance of the project and present recommendations for improvements; - Operate a complaints management system and manage the investigation and resolution of complaints.
Environment Coordinator	- Implement EMS and EMPs, including monitoring, reporting of results, and identifying non-compliances with the trigger values - Prepare environmental documentation
Environment Field Technician	Implement Environmental Procedures including Pest Control, Weed Control, Water Monitoring, and Waste management
Underground Mine Manager & Opencut Mine Manager	- Be aware of the environmental requirements within the EMS, EMPs and all licences and permits. - Organise mining activities and consider environmental commitments during decision making to ensure compliance with requirements of these documents.
Mining Engineer	- Design blasts to ensure compliance with conditions of approval and EPL criteria. - Monitor each blast. Where non-compliance recorded, advise Environment and Community Manager and Mine Manager.
Mining Superintendent	Be aware of the environmental requirements within the EMS, EMPs and all licences and permits.

	▪ Organise activities to ensure compliance with requirements of these management documents. ▪ Ensure management controls (as presented in EMS/EMPs) are installed prior to operations and activities commence ▪ Inspect the site on a regular basis and ensure regular and adequate maintenance is undertaken to minimise potential for environmental impacts ▪ Ensure personnel are provided with appropriate environmental "Toolbox" training.
Processing Manager	▪ Be aware of the environmental requirements within the EMS, EMPs and all licences and permits. ▪ Organise activities to ensure compliance with requirements of these management documents. ▪ Ensure management controls (as presented in EMS/EMPs) are installed prior to operations and activities commence ▪ Act as Liaison Officer for Dams Safety NSW in regard to Declared dams on site ▪ Inspect the site on a regular basis and ensure regular and adequate maintenance is undertaken to minimise potential for environmental impacts ▪ Ensure personnel are provided with appropriate environmental "Toolbox" training.
Processing Superintendent	▪ Be aware of the environmental requirements within the EMS, EMPs and all licences and permits. ▪ Organise activities to ensure compliance with requirements of these management documents. ▪ Ensure management controls (as presented in EMS/EMPs) are installed prior to operations and activities commence ▪ Inspect the site on a regular basis and ensure regular and adequate maintenance is undertaken to minimise potential for environmental impacts ▪ Ensure personnel are provided with appropriate environmental "Toolbox" training.