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WHC PLN VCM ENVIRONMENTAL MANAGEMENT STRATEGY			

# WHC\_PLN\_VCM\_ENVIRONMENTAL MANAGEMENT STRATEGY

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## 1 INTRODUCTION

The Vickery Coal Mine (VCM) is located in the Gunnedah Coal Basin, approximately 25 kilometres (km) north of Gunnedah in New South Wales (NSW) (Figure 1-1). The VCM is operated by Vickery Coal Pty Limited (VCPL) (a wholly owned subsidiary of Whitehaven Coal Limited [WHC]).

Development Consent (SSD-7480) was granted to VCPL on 12 August 2020 by the NSW Independent Planning Commission as a delegate of the NSW Minister for Planning under Section 75J of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act). Development Consent allows for the development of an open cut mine and associated infrastructure with a 25 year mine life, extracting run-of-mine (ROM) coal at up to 10 million tonnes per annum (Mtpa) and processing the coal, as well as coal from WHC's Tarrawonga Mine, at an on-site coal handling and processing plant (CHPP) for off-site transport by rail.

### 1.1 PURPOSE AND SCOPE

WHC is required to prepare an Environmental Management Strategy (EMS) for the VCM in accordance with Condition E1, Schedule 2 of SSD-7480 to the satisfaction of the Secretary (Table 1).

**Table 1 - Specific EMS Requirements in SSD-7480**

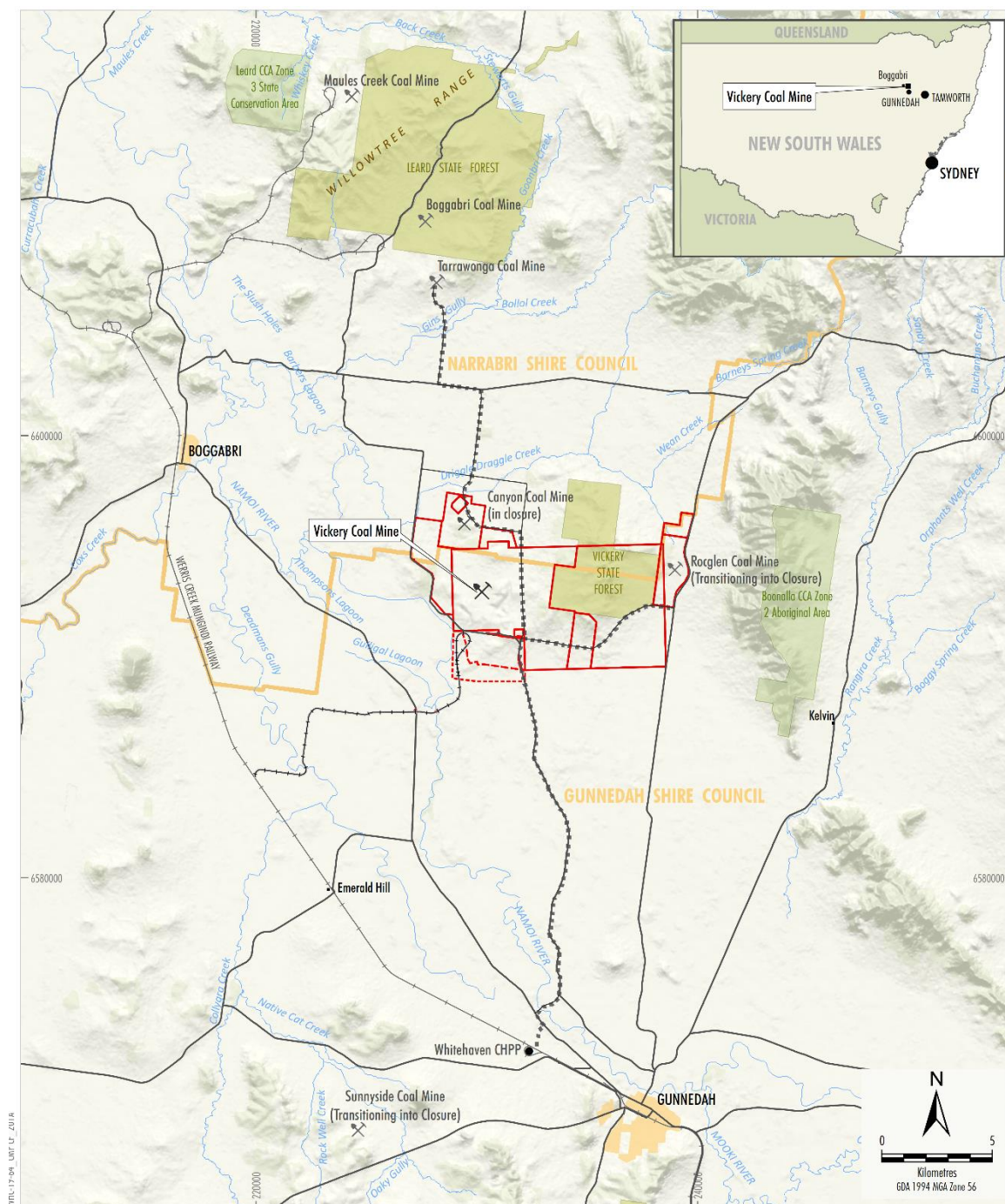
Requirement	EMS Reference
<b>Environmental Management Strategy</b>	
<i>E1. The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must</i>	This document
<i>a) be submitted to the Planning Secretary for approval prior to commencing construction under this consent;</i>	This version
<i>b) provide the strategic framework for environmental management of the development;</i>	Section 3
<i>c) identify the statutory approvals that apply to the development;</i>	Section 2
<i>d) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</i>	Section 4.2
<i>e) set out the procedures to be implemented to:</i>	-
<i>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</i>	Section 4.4
<i>(ii) receive, record, handle and respond to complaints;</i>	Section 4.4.1.2
<i>(iii) resolve any disputes that may arise during the course of the development;</i>	Section 4.4.2
<i>(iv) respond to any non-compliance and any incident; and</i>	Sections 5.3
<i>(v) respond to emergencies; and</i>	Section 5.4
<i>f) include:</i>	-
<i>(i) references to any strategies, plans and programs approved under the conditions of this consent; and</i>	Section 3.3
<i>(ii) a clear plan depicting all the sites where monitoring is to be carried out under the conditions of this consent.</i>	Section 5.1



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- LEGEND**
- Mining Tenement Boundary (MLCL and AUTH)
  - Exploration Licence Boundary (EL)
  - Mining Lease Application (MLA)
  - Local Government Boundary
  - State Forest
  - State Conservation Area, Aboriginal Area
  - Major Roads
  - Railway
  - Approved Road Transport Route
  - Indicative Project Rail Spur

Source: LPMA - Topographic Base (2010); NSW Department of Industry (2015)

**VICKERY COAL MINE**  
 Project Location

**Figure 1-1**

**Figure 1-1 Regional Location**

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On 11 December 2020 the Secretary approved the progressive submission of environmental management plans for the VCM in accordance with Condition A25(a), Schedule 2 of SSD-7480. The scope of this EMS is specifically related to the VCM construction and initial mining activities.

The construction and initial mining stage is anticipated to take approximately 30 months based on sequencing of the major construction activities, with the bulk of significant construction earthworks to occur within a 12 - 18 month period, and will include:

- construction of the CHPP;
- construction of the rail spur and loop and train load-out facility;
- construction of the mine industrial area (MIA);
- construction of ROM and product coal stockpile pads;
- initial development of the box cut;
- construction of temporary infrastructure facilities;
- construction of temporary ROM coal stockpiles;
- construction of workshops and offices;
- construction of water supply bores and Namoi River pump station and pipelines;
- construction of dams, sediment dams, up-catchment diversions, channels and other water management infrastructure;
- construction of soil stockpile areas;
- construction of access roads and internal roads;
- closure of a portion of Braymont Road;
- construction of connection to the existing 66 kilovolt powerline and construction of substations and power supply;
- construction of ancillary infrastructure including consumable storage areas, laydown areas, explosives storage facilities;
- ongoing exploration activities; and
- other associated minor infrastructure construction, use of other plant and other activities.

The general arrangement of the VCM is shown on Figures 1-2 and 1-3. The VCM layout at the end of the construction and initial mining stage is shown on Figure 1-4.

Earthworks associated with the development of the above infrastructure would include the excavation of waste rock, gravel and coal material from within the VCM open cut footprint. The earthworks would include the initial development of the box cut, with a small volume of ROM coal extracted for stockpile pad treatment, commissioning activities and transport to the Gunnedah CHPP. Additionally, a small volume of coal from WHC's other mines may be delivered to the VCM for stockpile pad treatment and CHPP commissioning activities.





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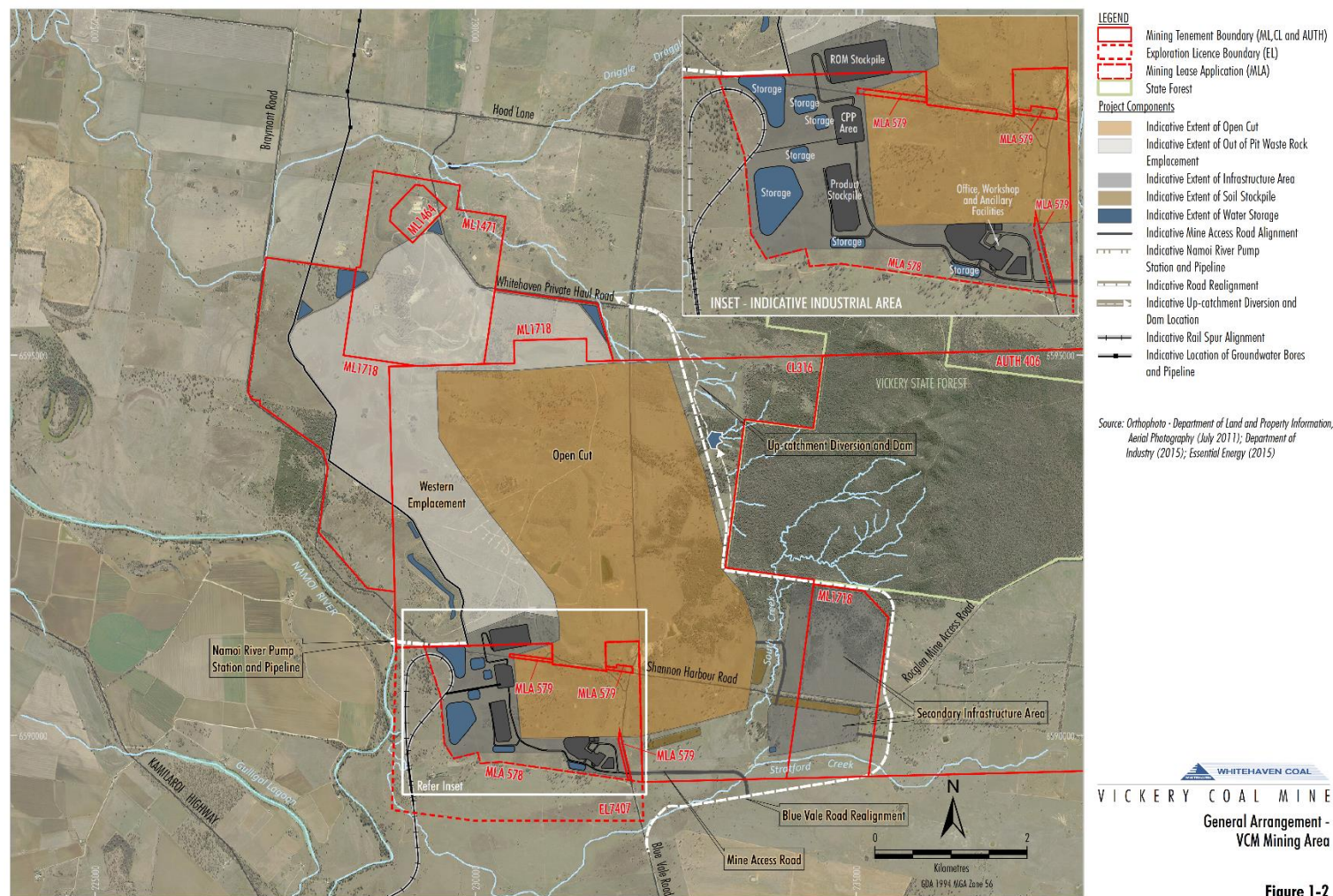


Figure 1-2 General Arrangement – VCM Mining Area





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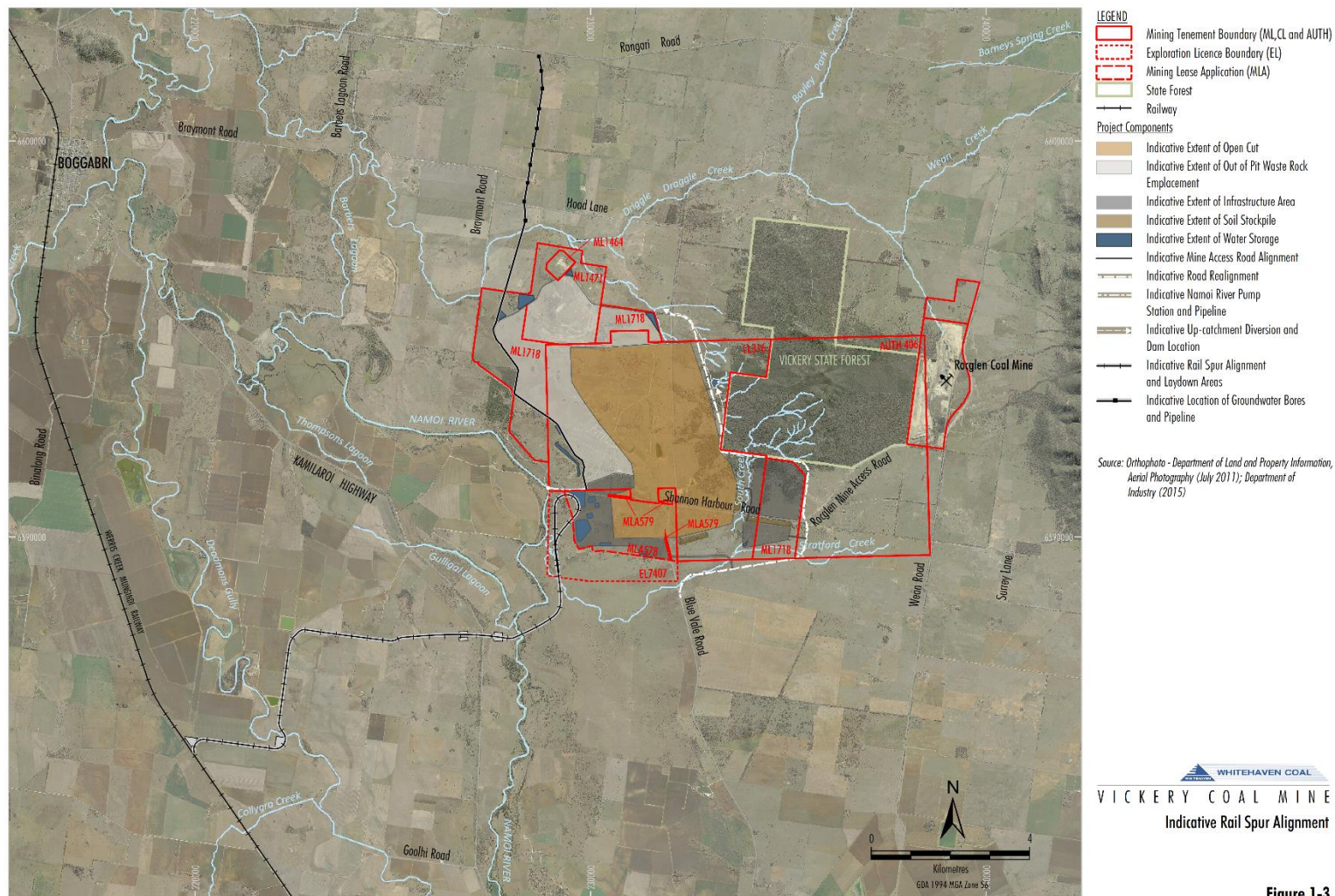


Figure 1-3

Figure 1-3 Indicative Rail Spur Alignment





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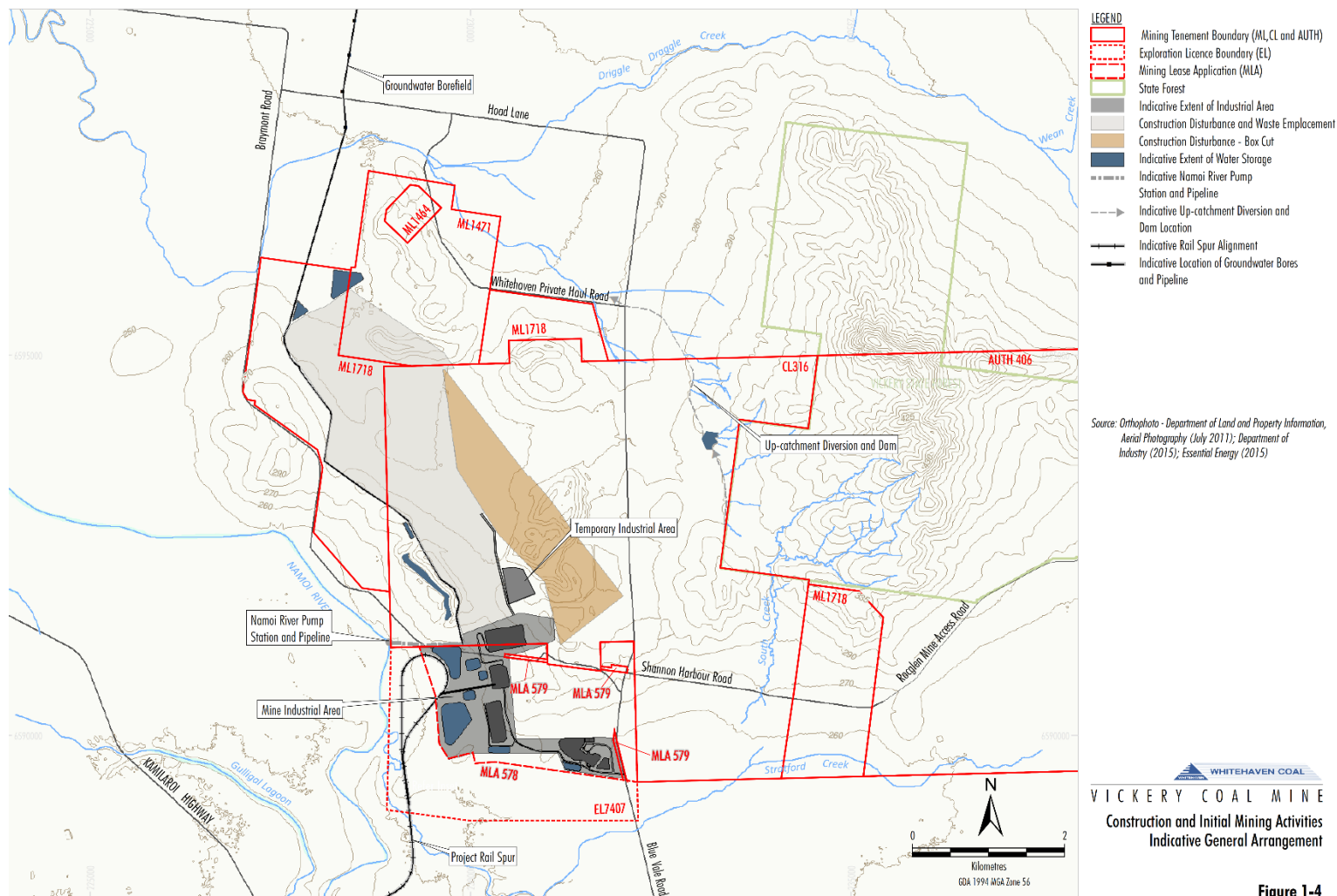



Figure 1-4


Figure 1-4 Construction and initial mining Activities General Arrangement

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## 1.2 **KEY OBJECTIVES**

This EMS has been developed to provide a framework for environmental management at the VCM and facilitate compliance with the conditions and commitments outlined in Assessment documents and SSD-7480. The objectives of this EMS are to:

- Prevent and/or minimise environmental impacts that may result from the construction, initial mining, operation or rehabilitation of the VCM;
- Ensure compliance with any relevant regulatory requirements and relevant management measures and commitments outlined in Assessment documents;
- Facilitate compliance with SSD-7480 and other relevant environmental licences or permits;
- Develop an overarching framework for environmental management;
- Detail monitoring to be undertaken in relation to the VCM;
- Outline roles, responsibilities and authorities for personnel;
- Guide development and focus of environmental awareness as an integral part of planning and day-to-day activities;
- Ensure activities are undertaken in accordance with the EMS;
- Describe complaints, non-compliance and dispute reporting and management; and
- Describe emergency response procedures.

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## 2 STATUTORY REQUIREMENTS

This EMS has been prepared to fulfil the requirements of SSD-7480, relevant licenses and permits (including conditions attached to mining leases) and other relevant legislation.

### 2.1 Development Consent (SSDSD-7480)

Condition E1, Schedule 2 of SSD-7480 requires the preparation of an EMS (refer to Table 1).

### 2.2 LICENSES, PERMITS AND LEASES

In addition to SSD-7480, activities associated with the VCM will be undertaken in accordance with the following licences, permits and leases:


- Coal Lease (CL) 316, Mining Leases (MLs) 1718, 1471, 1464 and MLA 578.
- The VCM Construction Mining Operations Plan.
- Environment Protection Licence (EPL) No. 21283.
- Mining and workplace health and safety related approvals.

### 2.3 Relevant Legislation

The key legislation relevant to the activities described in the approval and its supporting document include the following Acts and their respective regulations:

- Environmental Planning and Assessment Act, 1979;
- Environmental Protection and Biodiversity Conservation Act, 1999 (Commonwealth);
- Explosives Act, 2003;
- Mining Act, 1992;
- Heritage Act, 1977
- Work Health and Safety (Mines and Petroleum Sites) Act, 2013;
- Protection of the Environment Operations Act, 1997 (PoEO Act);
- National Parks and Wildlife Act, 1974;
- Water Act, 1912;
- Water Management Act, 2000;
- Fisheries Management Act, 1994;
- Roads Act, 1993;
- Local Government Act, 1993;
- Contaminated Land Management Act, 1997;
- Soil Conservation Act, 1938;



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- Crown Land Management Act, 2016;
- Biodiversity Conservation Act, 2016;
- Threatened Species Conservation Act, 1995; and
- Waste Avoidance and Resource Recovery Act, 2001.


## 2.4 **APPROVALS, LICENCES, PERMITS AND LEASES**

All activities at the VCM will be undertaken in accordance with the relevant approvals, licences, permits and leases (see Table 2).

WHC holds sufficient groundwater and surface water licenses for the VCM under the *Water Management Act, 2000* and in accordance with the relevant water sharing plans (refer to the VCM Water Management Plan).


**Table 2 - VCM Approvals, Leases and Licences Summary**

Approval	Reference
Development Consent	SSD-7480
Coal Lease	CL 316
Exploration Licence	EL 7407
Mining Lease	ML 1471
Mining Lease	ML1718
Mining Lease	ML 1464
Mining Lease Application	MLA 576
Mining Lease Application	MLA 577
Mining Lease Application	MLA 578
Mining Lease Application	MLA 579
Environment Protection Licence	21283
EPBC (Particular Manner)	2012/6263
EPBC (Controlled Action)	2016/7649
Water Access Licence – Gunnedah-Oxley Basin MDB groundwater source	WAL 36576
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12651
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12653
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12645
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL12724
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL12715
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12701
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12731
Water Access Licence – Lower Namoi Regulated River water source (High security river licence)	WAL 16034
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 14936

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Approval	Reference
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 13051
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 2682
Water Access Licence – Lower Namoi Regulated River water source (Supplementary river licence)	WAL 13052
Water Access Licence – Lower Namoi Regulated River water source (Supplementary river licence)	WAL 2683

\* Note: List of VCM approvals current at the time of revision.

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### 3 ENVIRONMENTAL MANAGEMENT SYSTEM

#### 3.1 Environmental Management Structure

The VCM Environmental Management System includes various site-specific Environmental Management Plans (EMPs). The relevant procedures, forms and registers will be developed in a staged approach to address construction, initial mining and operational activities as required.

The EMS functions as a strategic framework within the Environmental Management System to outline the relevant statutory requirements and facilitate the implementation, maintenance and management of environmental documentation.

Each EMP outlines the operational controls to be implemented to facilitate compliance with the relevant regulatory requirements and statutory approvals.

These documents will continue to be reviewed, revised or developed as necessary.

#### 3.2 WHC Health, Safety and Environmental Policy


The VCM will operate under WHC's Health, Safety, Environment & Communities Policy (HSEC Policy) which sets out the company's aims and values and is applicable to all employees and contractors. The HSEC Policy (Appendix A) has been endorsed by the Managing Director and CEO.

#### 3.3 EMS Documentation

WHC has prepared a number of EMPs (in accordance with SSD-7480) to manage potential environmental impacts associated with the VCM. The management plans are being prepared in a staged process and will be updated as the mine progresses. Table 3 lists the various EMPs required under the conditions of SSD-7480.


WHC have developed a set of internal Environmental Standards that are applicable across WHC's operations. The objective is to apply a standardised set of guidelines for environmental management that will assist in managing key environmental aspects across the WHC's operations. These will integrate, where possible, within the EMPs.



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**Table 3 - Management Plans required under SSD-7480**

Condition number	Plan / Program
B15	Noise Management Plan
B29	Blast Management Plan
B36	Air Quality and Greenhouse Gas Management Plan
B53	Water Management Plan
B63	Biodiversity Management Plan
B65	Koala Plan of Management
B70	Aboriginal Cultural Heritage Management Plan
B73 / B74	Historic Heritage Management Plan
B86	Traffic Management Plan
B95	Waste Management Plan
B99	Bushfire Management Plan
B104	Rehabilitation Strategy
B106	Rehabilitation Management Plan
B107	Social Impact Management Plan

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## 4 IMPLEMENTATION AND OPERATION

### 4.1 Risk Management

The WHC Risk Matrix is utilised together with inspections as specified in various EMPs. Risk assessments were completed for the VCP in 2014 and more recently for the VEP in 2018. These are available within the respective EISs.

The VCM and associated activities will utilise a risk based approach to minimise the potential impacts on the environment. Environmental improvement objectives are also included within the Annual Review. EMPs and procedures are developed and implemented in order to manage the relevant levels of risk associated with the VCM.


### 4.2 Roles and Responsibilities

All VCM employees, contractors and visitors have an overall responsibility to conduct all activities in compliance with the applicable legislation, regulations, licences and approvals detailed in Section 2.

Table 4 below outlines an overview of the roles and responsibilities for personnel at the VCM.

**Table 4 - Roles and Responsibilities**

Role*	Responsibility
General Manager (Executive and/or Site General Manager)	<ul style="list-style-type: none"> <li>Ensure adequate people and resources are allocated to enable this EMS to be effectively implemented.</li> <li>Perform in an overview role to provide strategic direction.</li> <li>Provide support for the development of strategies, systems and plans to address all legal requirements associated with the VCM.</li> </ul>
Environmental Manager	<ul style="list-style-type: none"> <li>Notify the Secretary and other Departments (where applicable) of all environmental incidents or complaints as soon as practicable.</li> <li>Maintain an awareness of environmental issues and report any possible non conformances.</li> <li>Responsible for commitment to implementing the Environmental Policy and promoting continual environmental improvement at VCM.</li> <li>Ensuring all operations are undertaken in accordance with relevant environmental legislation and applicable approvals.</li> </ul>
Environmental Superintendent	<ul style="list-style-type: none"> <li>Report all environmental incidents or complaints as soon as practicable.</li> <li>Maintain an awareness of environmental issues and report any possible non conformances.</li> <li>Responsible for commitment to implementing the Environmental Policy and promoting continual environmental improvement at VCM.</li> <li>Ensuring all operations are undertaken in accordance with relevant environmental legislation and applicable approvals.</li> <li>Communicate and provide details of environmental issues to all personnel and contractors as required.</li> </ul>

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Role*	Responsibility
Environmental Officer	<ul style="list-style-type: none"> <li>Report all environmental incidents or complaints as soon as practicable.</li> <li>Maintain an awareness of environmental issues and actively promote environmental understanding across the workforce.</li> <li>Assist in the control, review and revision of documents, forms and records.</li> <li>Assist in the preparation of any scheduled EMS reporting and incident investigations as required.</li> <li>Co-ordination of environmental monitoring and measurement.</li> <li>Evaluation of compliance with legal environmental requirements and other statutory approvals relevant to the EMS.</li> <li>Advise on appropriate co-ordination of corrective and preventive actions for environmental incidents. Maintenance of the pollution incident response procedure and management of testing the procedure.</li> </ul>
All general employees and contractors	<ul style="list-style-type: none"> <li>Conduct all activities in compliance with the applicable legislation, approvals, the WHC requirements, and associated health, safety and environment management systems.</li> <li>Immediately report all environmental incidents &amp; complaints as soon as practicable to a WHC representative.</li> </ul>

\* Or appropriate delegate

### 4.3 **Training and Competencies**

All contractors and personnel at the VCM will undergo a site-specific induction and generic induction level of training as a prerequisite to commencing work on site to promote general environmental awareness and an understanding of applicable responsibility.

The site-specific induction includes a summary of WHC/VCM requirements and associated health, safety, environment and community requirements.


### 4.4 **Communication and Consultation**

#### 4.4.1 **External Communication**

WHC will undertake external communications to ensure information on VCM activities, management systems and environmental performance are available to the public and relevant agencies. The WHC website will include the required current statutory approvals, monitoring results, reports and plans under condition E14 of SSD-7480, such as:

- all current statutory approvals for the development;
- all approved strategies, plans and programs required under the conditions of the consent;
- minutes of Community Consultative Committee (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;



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- a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of the consent, or any approved plans and programs;
- a summary of the current 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; and
- audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report.

Other methods of external communication will include; advertisements, the 24-hour community hotline and a provision on the WHC website which allows for community feedback.

#### **4.4.1.1 Community Consultative Committee**

WHC has established a Vickery CCC in accordance with Condition A23 of SSD-7480.

The Vickery CCC acts as an advisory body regarding VCM related matters, assist in addressing community concerns and enable dialogue between stakeholders. Meetings are held on a basis determined to be appropriate by the Vickery CCC. Currently, Vickery CCC meetings are held approximately every six months.

Vickery CCC meeting minutes are made available to the public on the WHC website.


#### **4.4.1.2 Community Complaints**

WHC will maintain a Community Complaints Line and online contact via the WHC Website ([www.whitehavencoal.com.au](http://www.whitehavencoal.com.au)) for the sole purpose of receiving community complaints, or enquiries. The Community Complaints Line number will be available on the website. The Community Complaints Line will be staffed 24 hours a day, seven days a week during construction and operations. WHC will respond to callers on the next business day.

Detailed records of each complaint are kept in WHC's record management systems.

In accordance with Condition E14(a)(ix), Schedule 2 of SSD-7480, a complaints register will be made available on the WHC website during the construction and operational stages of the VCM. The complaints register will include:


- the date and time of the complaint;
- the method by which engagement was made;
- any personal details provided or, if no such details were provided, a note to that effect;
- the nature of the complaint; and
- any actions (if any required) taken by WHC in relation to the complaint.

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Investigations into complaints will generally commence within 24 hours of receipt, or as soon as practical. The cause of the complaint will be analysed and actions to attempt to address the complaint taken as soon as reasonably possible. In complex cases where resolution will take more than 48 hours, WHC will commit to updating the community member.

#### **4.4.2 Dispute Resolution**

Conditions within SSD-7480 include mechanisms of resolution for stakeholders. These include options of contacting the Secretary in relation to acquisition processes (Condition D3) or mitigation options. WHC will address the various processes to enable resolution, as outlined in SSD-7480, as cases may arise.

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## 5 MONITORING, REPORTING & CORRECTIVE ACTIONS

The environmental monitoring, corrective actions and auditing procedures have been developed in order to monitor environmental performance and promote continuous review and improvement in accordance with the relevant regulatory requirements.

### 5.1 Environmental Monitoring Program

The VCM monitoring network will be progressively developed to address construction, initial mining and operational activities. The environmental monitoring program for the VCM will align with the required approvals. The VCM environmental monitoring network is described in Table 5 and shown on Figure 5-1.

Further detail on environmental monitoring and management for specific environmental impacts is included in the management plans required by SSD-7480 (see Section 3.3).


**Table 5 - VCM Environmental Monitoring Network**

Aspect	Environmental Monitoring	Frequency
Meteorology	<ul style="list-style-type: none"> <li>On-site meteorological stations and implementation of a meteorological forecasting system.</li> </ul>	<ul style="list-style-type: none"> <li>Continuous.</li> </ul>
Groundwater	<ul style="list-style-type: none"> <li><i>Groundwater levels</i> – monitoring bores installed within the Permian coal measures and alluvium.</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly.</li> </ul>
	<ul style="list-style-type: none"> <li><i>Groundwater quality</i> – monitoring bores installed within the Permian coal measures and alluvium</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annually.</li> </ul>
Surface Water	<ul style="list-style-type: none"> <li><i>Surface water quality</i> – monitoring sites on watercourses and drainage lines upstream and downstream of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Monthly if flow observed.</li> </ul>
	<ul style="list-style-type: none"> <li><i>Licensed discharge points</i> – Licensed release points.</li> </ul>	<ul style="list-style-type: none"> <li>During controlled and uncontrolled release.</li> </ul>
Noise	<ul style="list-style-type: none"> <li><i>Attended noise monitoring</i> – a residence to monitor construction noise and rail spur construction noise.</li> <li><i>Real-time</i> – monitoring and recording at neighbouring residences and other locations as required.</li> </ul>	<ul style="list-style-type: none"> <li>Monthly.</li> <li>Continuous.</li> </ul>
Blasting	<ul style="list-style-type: none"> <li><i>Blasting</i> – a residence, the Kurrumbede Homestead and the grinding groove site in the Namoi River.</li> </ul>	<ul style="list-style-type: none"> <li>Per blast.</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li><i>Real-time PM<sub>10</sub> and PM<sub>2.5</sub></i> – TEOM(s) within the vicinity of the Project. TSP calculated from PM<sub>10</sub> measured readings.</li> </ul>	<ul style="list-style-type: none"> <li>Continuous.</li> </ul>

\* Monitoring points and parameters may be subject to change as required. There will be periods of non-operation due to technicalities, calibration and routine & non-routine maintenance.

### 5.2 SCHEDULED REPORTING

WHC will undertake environmental monitoring reporting and publication of results as required by the relevant approvals and licences for the VCM.

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### 5.2.1 Annual Review

In accordance with Condition E9, Schedule 2 of SSD-7480, WHC will review the environmental performance of the VCM for the previous calendar year and report results within the Annual Review to the satisfaction of the Secretary.

In relation to noise management, the Annual Review will (where relevant):

- describe the development that was carried out in the relevant calendar year, and the development that is proposed to be carried out during the following calendar year;
- include a comprehensive review of the monitoring results and complaints records of the development over the past year, which includes a comparison of these results against the:
  - relevant statutory requirements, limits or performance measures/criteria;
  - monitoring results of previous years; and
  - relevant predictions in the EIS.
- identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;
- identify any trends in the monitoring data over the life of the development;
- identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
- describe what measures will be implemented over the next reporting year to improve the environmental performance of the development.

The Annual Review will be made publicly available on the WHC website in accordance with Condition E14, Schedule 2 of SSD-7480.



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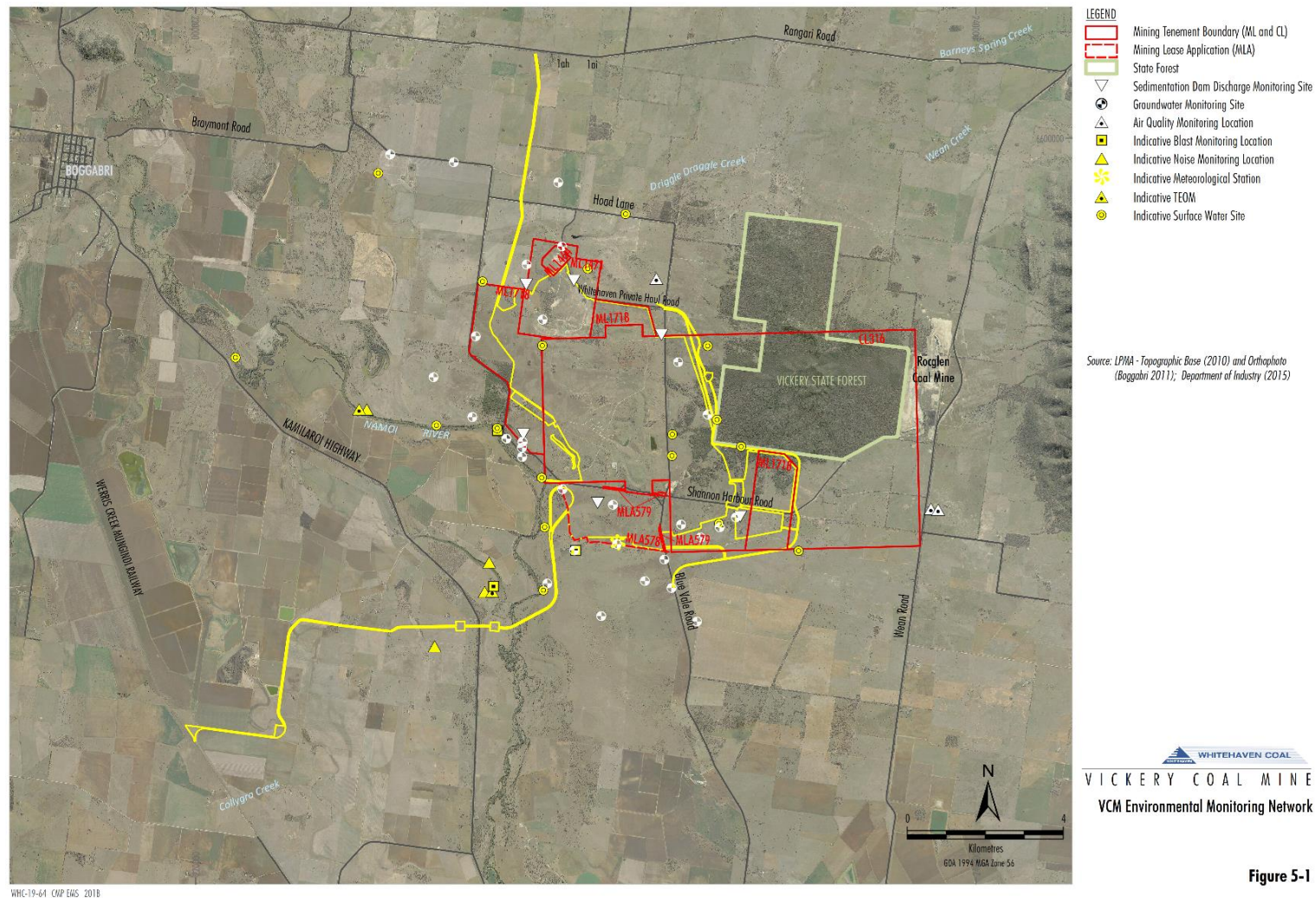



Figure 5-1 VCM Environment Monitoring Network



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### 5.2.2 Monthly Summary

WHC will prepare a monthly environmental monitoring summary for the VCM in alignment with the requirements of the Environment Protection Licence (EPL) 21283. The summary report will be published on the WHC website.

### 5.2.3 Complaints Register

As per Section 4.4.1.2.

### 5.2.4 EPL Annual Return

In accordance with the requirements of EPL 21283, WHC will submit an annual report to the Environment Protection Authority (EPA) in the form of an Annual Return template as specified by the EPA. This includes a statement of compliance against the conditions of the licence and a monitoring and complaints summary for the premises.

### 5.2.5 Independent Environmental Audit


In accordance with Condition E10, Schedule 2 of the SSD 7480, an Independent Environmental Audit (IEA) of the VCM will be conducted by a suitably qualified, experienced Auditor, whose appointment has been endorsed by the Secretary.

The IEA will assess the environmental performance of the VCM and review the adequacy of this EMS. If necessary, appropriate measures or actions to improve the environmental performance of the VCM will be recommended.

Within 1 year from the commencement of development and every 3 years thereafter, WHC shall commission an IEA of the VCM. The IEA and WHC's response to recommendations in the Audit, will be made publicly available on WHC's website as per Condition E14, Schedule 2 of SSD 7480.

## 5.3 CORRECTIVE ACTIONS

The WHC Environmental Department will be responsible for evaluating the appropriate response if an environmental incident or non-compliance is identified. An incident is defined as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. A non-compliance is defined as an occurrence, set of circumstances or development that is a breach of the condition of SSD-7480 (refer Section 5.5.2).

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### 5.3.1 Incident Reporting

In the event that an incident has occurred, the incident will be reported in accordance with Condition E7, Schedule 2 of SSD 7480, and relevant conditions of EPL 21283 and applicable Mining Leases and Exploration Licence. WHC will immediately notify the Department and any other relevant agencies.

The notification will be provided the Department in writing and will identify the VCM (including the development application number and name) and set out the location and nature of the incident. Dependent on the incident and potential environmental harm, further industry notification may be required under Part 5.7 of the NSW Protection of the Environment Operations Act, 1997.

Within seven days of the date of the incident, WHC will provide the Secretary and any other relevant agencies with a report on the incident. The report will include details required within the approval, including:

- describe the date, time and nature of the exceedance/incident;
- identify the cause (or likely cause) of the exceedance/incident;
- describe what action has been taken to date; and
- describe reasonable and feasible options to address the incident and identify the preferred option to address the incident.

### 5.3.2 Non-Compliance with Statutory Requirements


Compliance with all approvals, plans and procedures is the responsibility of all personnel (staff and contractors) employed on or in association with WHC and the VCM.

A VCM representative will undertake required inspections during the construction and initial mining period and initiate directions to address any actions identified, if required, and areas of actual or potential non-compliance.

WHC will report incidents in accordance with Condition E7, Schedule 2 of SSD-7480 and dependent on the incident and potential environmental harm, in accordance with the protocol for industry notification of pollution incidents under Part 5.7 of the PoEO Act.

WHC will notify the Secretary and any other relevant agencies immediately after the authorised person becomes aware of the incident which causes or threatens to cause material harm to the environment. Within seven days (or other specified or approved time period) of the date of confirmation of the incident, WHC will provide the Secretary and any other relevant agencies with a report on the incident and any subsequent information that may be requested.

A review of compliance with all conditions in SSD-7480 and all other applicable approvals and licences will be included within each Annual Review.

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Additionally, in accordance with Condition E10, Schedule 2 of SSD-7480, an IEA (Section 10.3) would be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary to assess whether WHC *is complying with the requirements in SSD-7480, and any other relevant approval and tenement conditions.*

#### **5.4 Emergency Response**

WHC has a PIRMP for the VCM as part of the requirements of EPL 21283 and the PoEO Act. The PIRMP provides emergency procedures for environmental incidents. Should an emergency occur the aim of any emergency procedure is to take immediate action to minimise environmental harm and to mitigate the environmental impact, followed by corrective action to avoid a recurrence.

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. In the case of an environmental incident if there is a risk of material harm to the environment or an immediate threat to human health or property, prior to any other action, WHC must notify the affected residence, Fire and Rescue NSW, NSW Police and NSW Ambulance Service if the incident represents an immediate threat to human health and/or property - phone 000. The other response and regulatory agencies must still be contacted after that to satisfy notification obligations.

WHC will review and, where necessary, revise its emergency preparedness and response procedures for the VCM consistent with specific conditions in EPL 21283.

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## 6 REVIEW AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

### 6.1 REVIEW

In accordance with Condition E5, Schedule 2 of SSD-7480, all EMPs, programs and strategies (including this EMS) will be reviewed, and if necessary revised (to the satisfaction of the Secretary), within three months of the submission of:

- an Annual Review (Condition E9, Schedule 2);
- an Independent Environmental Audit (Condition E10, Schedule 2);
- an incident report (Condition E7, Schedule 2); or
- any modification to the conditions of SSD-7480 (unless the conditions require otherwise).

The reviews would be undertaken to ensure all EMPs, programs and strategies are updated on a regular basis and to incorporate potential measures to improve the environmental performance of the VCM.

The revision status of all EMPs, programs and strategies are indicated on the final page of each copy. The approved EMPs, programs and strategies will be made publicly available on the WHC website, in accordance with Condition E14, Schedule 2 of SSD-7480.

Additionally, this EMS may be reviewed and revised in accordance with a requirement issued by the Secretary under Condition A3, Schedule 2 of SSD-7480.


### 6.2 DOCUMENT CONTROL

All EMS documentation will be subject to a review and revision process to ensure guidelines and internal policies managing environmental aspects meet any legislative requirements and remain specific to VCM.

### 6.3 CONTINUOUS IMPROVEMENT


WHC will investigate ways to improve environmental performance of the VCM. This will be achieved through:

- Stakeholder feedback and recommendations;
- Reporting on environmental performance annually in the Annual Reviews and associated measures proposed to be implemented to improve performance; and
- Implementation, maintenance and management of EMS documentation and continuous improvement.

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## Appendix A WHC Health, Safety, Environment & Communities Policy



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	<b>WHITEHAVEN GROUP</b>	Document Owner:	GM HSEC
		Document Authoriser:	Managing Director
		Revision Period:	3 Year
		Issue:	2.0
		Last Revision Date:	8/01/2020
<b>WHC-POLICY-HEALTH, SAFETY, ENVIRONMENT &amp; COMMUNITIES</b>			

Whitehaven Coal intends to conduct business in a way that maintains a safe and healthy workplace for its workers, visitors and the surrounding community, and protects the environmental, community and cultural heritage values of the area throughout all stages of exploration, development, operation, closure and associated activities.

Whitehaven Coal aims to:

- Achieve zero workplace injuries and illnesses.
- Achieve zero environmental incidents.
- Maintain mutually beneficial relationships with the communities which host our operations.

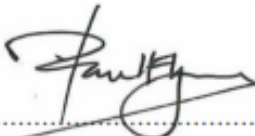
Whitehaven Coal will strive to achieve these goals by:

- Considering health, safety, environment and community (HSEC) matters when planning and undertaking work activities.
- Consulting and communicating HSEC matters in a fair and effective manner.
- Having processes in place for identifying and eliminating or minimising HSEC risks and impacts and sharing and applying learnings in a timely manner.
- Working to continuously improve HSEC performance.
- Providing an effective injury management and return to work program for workers.
- Complying with applicable HSEC legal and other requirements.
- Providing workers with necessary HSEC information, instruction, training and supervision to enable effective performance of their work.
- Utilising HSEC resources and processes to implement and maintain the requirements of this Policy and associated management systems.

Responsibilities of Workers:

- Workers have a responsibility to comply with applicable legislation, this policy and associated management systems. No work is to be undertaken without a clear understanding of a safe method that minimises the risk of injury or illness, plant or equipment damage, environmental, community or cultural harm.
- Workers must present for work in a fit and healthy state, take reasonable care for their own health and safety and have an obligation to take reasonable care for the health and safety of others.
- Workers must report any workplace incidents or injuries to their supervisors in a timely manner.
- Workers must also comply with any reasonable instruction given by Whitehaven Coal.

This policy applies to all workers and visitors at sites managed by Whitehaven Coal and its subsidiaries. Disciplinary action may be taken for a breach of this policy or associated management systems.

  
 Paul Flynn  
 Managing Director & CEO


Date: 8/01/2020

*"If it's not safe, don't do it."*

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REFER TO INTRANET FOR LATEST VERSION

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## Document History

Edition	Rev.	Comments	Date
1	0	Initial draft	29/01/21