



WAMBO COAL ENVIRONMENTAL MANAGEMENT STRATEGY

Document No. WA-ENV-MNP-501
March 2018

Document Control

Document No.	WA-ENV-MNP-501
Title	Environmental Management Strategy
General Description	Outlines the strategic context of environmental management at WCPL as well as statutory obligations, the management of environmental performance, strategies to manage external relations and the accountabilities of key personnel.
Document Owner	Environment & Community Manager

Revisions

Rev No	Date	Description	By	Checked	Signature
0	10/12/04	Original Draft	JT	TS	
1	04/04/05	Update for DA305-7-2003	Hansen Consulting	JT	
2	Dec 05	Update due to changes in management structure	JT	JT	
3	Jan 09	Review	SJB	SB	
4	July 17	Update	ND	SP	
5	March 18	Revised following DP&E comments	ND		

CONTENTS

1.0	INTRODUCTION.....	5
1.1	BACKGROUND	5
1.2	PURPOSE.....	7
1.3	STAKEHOLDER CONSULTATION	7
2.0	ENVIRONMENTAL VISION, POLICY AND COMMITMENT	8
3.0	ENVIRONMENTAL PLANNING	9
3.1	STATUTORY REQUIREMENTS	9
3.2	OBJECTIVES AND TARGETS	10
3.3	ENVIRONMENTAL MANAGEMENT AND CONTROLS.....	11
3.4	MANAGEMENT OF CUMULATIVE IMPACTS	11
4.0	IMPLEMENTATION AND OPERATION.....	12
4.1	STRUCTURE AND RESPONSIBILITY	12
4.2	TRAINING AWARENESS AND COMPETENCE	13
4.3	COMMUNICATION	14
4.3.1	Internal Reporting.....	14
4.3.2	External Reporting.....	15
4.3.3	Incidents	15
4.3.4	Complaints	16
4.3.5	Dispute Resolution	17
4.3.6	Website Updates	17
4.4	DOCUMENTATION AND DOCUMENT CONTROL	17
4.5	EMERGENCY PREPAREDNESS AND RESPONSE.....	17
5.0	MONITORING REVIEW AND CORRECTIVE ACTION.....	19
5.1	ENVIRONMENTAL MONITORING.....	19
5.2	AUDITS AND INSPECTIONS	19
5.2.1	Site Inspections	19
5.2.2	Internal Audits	20
5.2.3	External Audits	20
5.2.4	Regulator Inspections.....	20
5.3	CORRECTIVE AND PREVENTATIVE ACTION.....	20
5.4	RECORDS	20
5.5	ADAPTIVE MANAGEMENT.....	20
6.0	REVIEW AND IMPROVEMENT	22

TABLES

Table 1: Summary of the Approved Wambo Coal Mine	5
Table 2: EMS Documents	11
Table 3: Environmental Management Roles and Responsibilities	12
Table 4: Summary of External Reporting	15
Table 5: Audit and Inspection Schedule	19

FIGURES

Figure 1	Wambo Map Location	6
----------	--------------------	---

LIST OF APENDICES

Appendix A	Regulatory Correspondence
Appendix B	Environment and Community Policy
Appendix C	EMS Development Approval Conditions
Appendix D	EMS Document Map
Appendix E	Dispute Resolution Process

1.0 Introduction

1.1 Background

The Wambo Coal Mine (the Mine) is situated approximately 15 kilometres west of Singleton, near the village of Warkworth, New South Wales (NSW). Wambo is owned and operated by Wambo Coal Pty Limited (WCPL), a subsidiary of Peabody Energy Australia Pty Limited (Peabody Energy).

A range of open cut and underground mine operations have been conducted at WCPL since mining operations commenced in 1969. Mining under the current Development Consent (DA 305-7-2003, as modified) commenced in 2004 and permits both open cut, underground operations and associated activities to be conducted. The approved run-of-mine (ROM) coal production rate is 14.7 million tonnes per annum and all product coal is transported from WCPL by rail. DA 177-8-2004 (as modified) provides approval for the rail and train loading infrastructure. A summary of the approved Wambo Coal Mine is provided in **Table 1**.

Table 1: Summary of the Approved Wambo Coal Mine

Component	Approved Wambo ^{1,2}
Life of Mine	Wambo Coal may carry out mining operations at the Wambo Mining Complex until 31 December 2039, except for open cut coal extraction, which may only be undertaken until 31 December 2020.
Open Cut Mining	Open cut mining at a rate of up to 8 Mtpa of ROM coal from the Whybrow, Redbank Creek, Wambo and Whynot Seams
	An estimated total open cut ROM coal reserve of 98 Mt
	Open cut mining operations under current approved MOP
	Open cut mining operations up to 31 December 2020
Underground Mining	Underground mining of up to 9.75 Mtpa of ROM coal from the Whybrow, Wambo, Woodlands Hill and Arrowfield Seams. Underground ROM coal reserves are estimated at 143.3 Mt. Underground mining operations up to 31 December 2039
Subsidence commitments and management.	The subsidence performance measures listed in Conditions 22 and 22A of the Development Consent (DA305-7-2003).
ROM Coal Production Rate	Up to 14.7 Mtpa of ROM coal
Total ROM Coal Mined	259.1 Mt
Waste Rock Management	Waste rock deposited in open cut voids and in waste rock emplacements adjacent open cut operations
Total Waste Rock	640 million bank cubic metres (Mbcm)
Coal Washing	Coal handling and preparation plant (CHPP) capable of processing approximately 1,800 tonnes per hour (tph)
Rail and Train Loading Infrastructure	Construction and operation of a rail spur, rail loop, coal reclaim area, product coal conveyor and train load out bin to enable the transport of coal (DA 177-8-2004)
Product Coal	Production of up to 11.3 Mtpa of thermal coal predominantly for export
CHPP Reject Management	Approximately 40.3 Mt of coarse rejects and approximately 24.5 Mt of tailings Coarse rejects and tailings would be incorporated, encapsulated and/or capped within open cut voids in accordance with existing Wambo management practices
Total CHPP Rejects	Approximately 29.3 Mt of coarse rejects and approximately 19.4 Mt of tailings
Water Supply	Make-up water demand to be met from runoff recovered from tailings storage areas, operational areas, dewatering, licensed extraction from Wollombi Brook and Hunter River
Mining Tenements	Coal Lease (CL) 365, CL374, CL397, Consolidated Coal Lease (CCL) 743, Mining Lease (ML) 1402, ML1572, ML1594, Authorisation (A) 444, Exploration Licence (EL) 7211

Note: ¹ Development Consent DA305-7-2003 (as modified December 2017) ² Development Consent DA177-8-2004

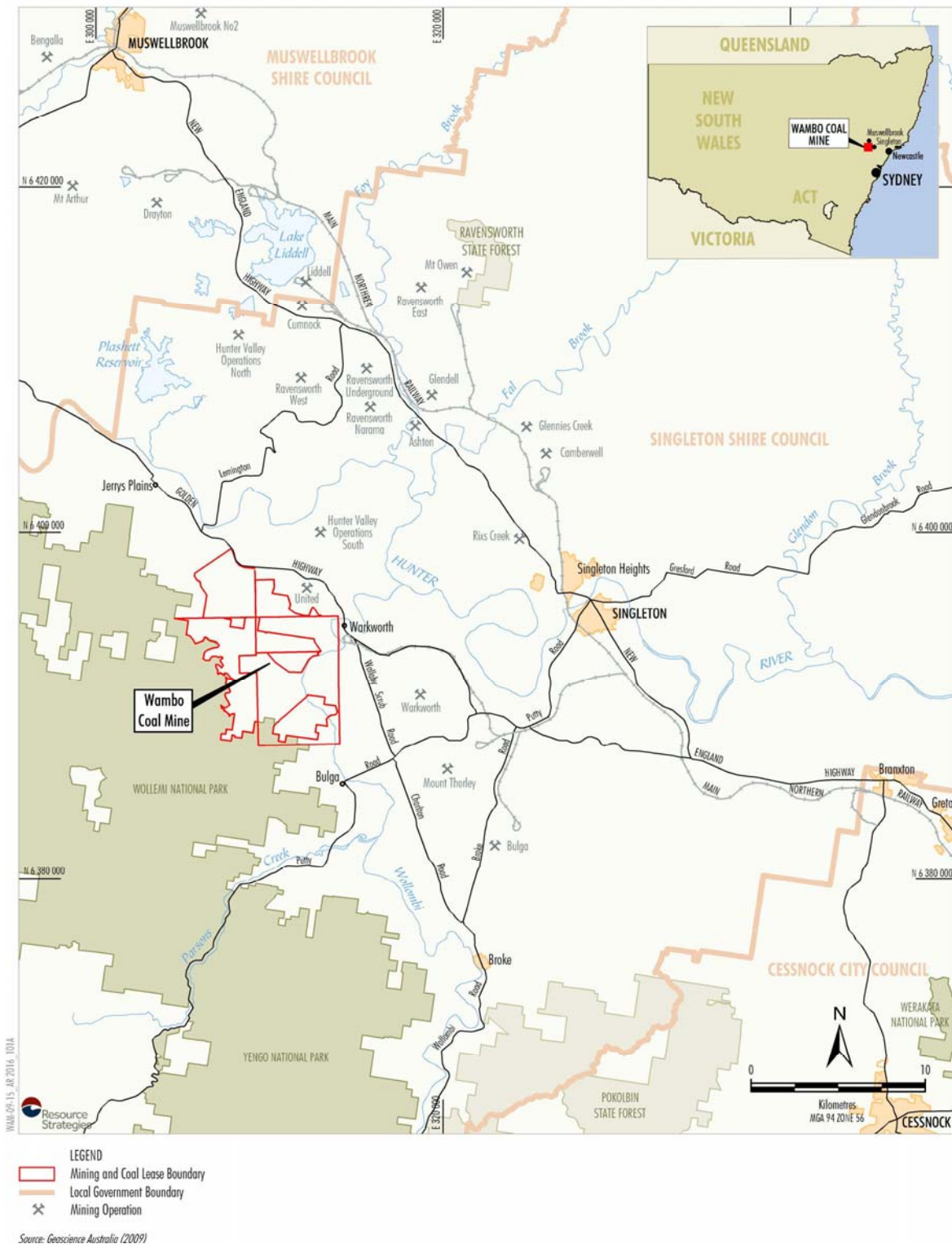


Figure 1 Wambo Map Location

1.2 Purpose

The purpose of this Environmental Management Strategy (EMS) is to:

- Provide the overall framework for environmental management for all mining and surface activities at WCPL;
- Identify the statutory requirements that apply;
- Identify the key environmental issues to be managed by WCPL;
- 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;
 - manage cumulative impacts; and
 - respond to emergencies;
- Describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management at WCPL: and
- Describe how review and continual improvement process.

1.3 Stakeholder Consultation

The EMS (Revision 3) was approved by the Department of Planning and Environment (DP&E) in January 2009. Revision 4 of the EMS included legislative changes, reference to recent consent modifications and a document map of management plans, procedures, forms and protocols. A copy of Revision 4 was provided to DP&E in July 2017.

Comments from DP&E were received in February 2018. The current revision (Revision 5) addresses these comments and was approved by DP&E 26 March 2018. A copy of the regulatory correspondence is presented in Appendix A.

Once approved, a copy of the EMS will be provided to relevant agencies, Singleton Council and the Community Consultative Committee (CCC), in accordance with DA 305-7-2003 (as modified).

2.0 Environmental Vision, Policy and Commitment

The Wambo Environment & Community Policy (see **Appendix B**) applies to the open cut and underground mines, the coal handling preparation plant and the rail line. The Policy is endorsed by the Peabody Energy President and Chief Executive Officer and has the support and commitment of senior management.

The Environment & Community Policy is displayed at prominent points around the operation, such that all employees, contractors and visitors have access to the Policy. The WCPL site induction includes reference to the Wambo Environment & Community Policy.

3.0 Environmental Planning

An environmental aspect refers to an element of an organisation's activities, products or services that can have a beneficial or adverse impact on the environment. An environmental impact refers to the change that takes place in the environment as a result of the aspect.

Wambo regularly reviews the site's Register of Environmental Aspects, Impacts and Risks (Risk Register). The Risk Register documents the company's environmental risk assessment outcomes and assists in developing action plans to manage mining related impacts.

In addition to the Risk Register, WCPL regularly reviews its environment and community performance. Reviews consider the following factors:

- The outcome from Risk Register updates;
- Outcomes from monitoring and review activities;
- The results of internal and external inspections, assessments and audit reports addressing: operational, specialist, functional, management system, legal compliance and stakeholder requirements; or other external commitments;
- Health, safety, environment and community incident reports and investigation findings;
- Performance data, trends and reports including the extent to which targets and objectives have been met;
- Inputs and views of external stakeholders, including complaints;
- Status of corrective and preventative actions; and
- Feedback from regulators and the community.

3.1 Statutory Requirements

This EMS has been prepared to address the relevant Development Approval (DA) conditions within DA 305-7-2003 (as modified) where they relate to the EMS (**Appendix C**), principles of ISO14001, relevant Australian Standards (AS) and all relevant legislation.

The key environmental legislation includes:

- Biosecurity Act 2015;
- Contaminated Land Management Act 1997;
- Dangerous Goods Act 1975;
- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Environmental Protection and Biodiversity Conservation Act 1999;
- Explosives Act 2003;
- Explosives Regulation 2013;
- Fisheries Management Act 1994;
- Heritage Act 1977;

- Hunter Regional Environment Plan 1996;
- Local Government Act 1993;
- Mining Act 1992;
- National Parks and Wildlife Act 1974;
- Native Vegetation Act 2003;
- Native Title Act 1993;
- NSW Work Health Safety Act 2011;
- NSW Work Health Safety Regulation 2011;
- Pesticides Act 1999;
- Protection of the Environment Operations Act 1997 (POEO Act);
- Relevant State Environmental Planning Policies;
- Rivers and Foreshores Improvement Act 1948;
- Rural Fires Act 1997;
- Singleton Local Environment Plan 1996;
- Threatened Species Conservation Act 1995;
- Water Act 1912;
- Water Management Act 2000; and
- Waste Avoidance and Recovery Act 2001.

A register of legal and other requirements is maintained as part of the EMS.

3.2 Objectives and Targets

As outlined in **Section 3.0**, WCPL undertakes regular review of environmental and community performance. When establishing environmental objectives and targets WCPL considers:

- Significant environmental aspects (impacts to the environment from our activities);
- Legal and other requirements (relevant environmental legislation);
- Technological improvements;
- Business, operational and financial considerations; and
- The views of our stakeholders.

Objectives and targets are progressively achieved through effective implementation of environmental management plans and environmental documentation as outlined in Appendix D. Objectives and targets are reviewed annually as a minimum standard and are updated in accordance with changing legislation, operational practices, industry standards and corporate directives.

Performance against objectives and targets is reported each year in the Annual Review (**Section 4.3.2**).

3.3 Environmental Management and Controls

Management plans, strategies, protocols and procedures are prepared as required by project approval conditions, the Risk Register and the outcome of site specific risk assessments. A description of the document types and their purpose within the EMS is outlined in **Table 2**. The documents listed are dynamic in nature and are revised regularly to reflect changes in operational practices, legislative requirements and industry best practice.

Table 2: EMS Documents

Document Type	Purpose
Policy	Expresses the overarching goals of the WCPL environmental management strategy
Strategy	Outlines the framework for environmental management at WCPL
Management Plans	Describe the objectives and means to achieve the desired outcome
Procedures / Protocols	Describe a sequence of steps, tasks and activities that when undertaken produces a desired outcome or objective
Monitoring Programs	Details the type of monitoring and frequency that monitoring will be undertaken and the relevant criteria that may apply
Other Documents	Provide additional tools in the form of checklists, registers, forms etc.

Some of the key management documents at WCPL include:

- Environmental Management Strategy;
- Pollution Incident Response Management Plan;
- Biodiversity Management Plan;
- Blast Management Plan;
- Air and Greenhouse Gas Management Plan;
- Water Management Plan;
- Conservation Management Plan; and
- Mining Operations Plan.

An EMS document map for environmental documentation at WCPL is included in **Appendix D**.

3.4 Management of Cumulative Impacts

WCPL recognises that nearby residents may not only be impacted by activities at Wambo Mine, but also as a result of activities at a number of other surrounding mines. This is known as cumulative impact.

WCPL coordinates blasting with neighbouring mines to minimise the cumulative impacts of blasting in the region. In addition, cumulative impact protocols are detailed in the Air Quality and Greenhouse Gas and Noise Management Plans.

4.0 Implementation and Operation

4.1 Structure and Responsibility

Environment and community management is regarded as part of the responsibilities of all employees and contractors WCPL. Employees and contractors are made aware of their responsibilities in the Site Induction. Specific accountabilities are dependent upon the nature of the work being undertaken.

Everyone is responsible for:

- Complying with relevant legislation;
- Complying with the EMS as it applies to their work; and
- Taking actions to mitigate environmental impacts.

More specific roles and responsibilities are outlined in environmental management plans, procedures, protocols and standards. Key personnel and their relevant environment and community management roles and responsibilities are outlined in **Table 3**.

Table 3: Environmental Management Roles and Responsibilities

Role	Responsibility
General Manager	<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; • Involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment; and • Ensure any proposed works associated with the operation, have the necessary approval, prior to the commencement of works.
Environment and Community Manager	<ul style="list-style-type: none"> • Develop, implement and maintain the WCPL EMS; • Liaise with government and community stakeholders regarding environment and community matters; • Disseminate information concerning environmental legislation relevant to the operation of the mine; • Conduct environmental risk assessments and develop management protocols for proposed works associated with existing operations and any new or altered works; • Facilitate the audit and inspection schedule as outlined in Table 5; • Overseeing the assessment by external experts for activities associated with the operation, which may have an impact on the environment; • Ensuring that statutory reporting is completed and submitted in a timely manner; • Approving environmental training packages, ensuring that they are delivered and that adequate records are kept; • Providing environmental assistance and advice on legislative and approval requirements for any proposed works; and • Implementing corrective actions arising from environmental incidents and audits.

<p>Environment and Community Advisors</p>	<ul style="list-style-type: none"> • Maintain a working knowledge of this EMS and be aware of all environmental legislative requirements and community responsibilities associated with their respective operation; • Develop and deliver necessary environmental management/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 so compliance with the approvals associated with their respective operation; • Developing, implementing and maintaining environmental management plans and procedures, which includes facilitating the commitments outlined in the Environment & Community Policy with the assistance of the Operations and Senior Management Team; • Maintaining central environmental information files; • Overseeing the preparation of annual statutory reports of compliance and related reports; • In association with the Operations Managers, developing and delivering necessary training including induction of all personnel with respect to environmental matters; • Liaising with neighbouring minesite personnel on environmental matters common to both sites; • Co-ordinating monthly environmental monitoring and forwarding the results and any recommendations to the relevant site personnel to initiate remedial action where required; • Co-ordinating monthly inspections and forwarding the results of the inspection and any recommendations to the relevant site personnel to initiate remedial action; • Reviewing and endorsing all corrective actions arising from environmental incidents; • Keep website up to date with required approvals, plans and monitoring information; and • Provide environmental assistance/advice as required.
<p>Technical Services Manager, Mining Manager, Maintenance Manager</p>	<ul style="list-style-type: none"> • Maintain a working knowledge of this EMS; • Be aware of the environmental legislative requirements and community responsibilities associated with their respective operation; • Facilitate that operations under his/her control are undertaken in accordance with this 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 the Environment and Community 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; and • Report any pollution control incidents and/or community complaints to the Environment and Community Department as soon as practicable.
<p>All employees and contractors</p>	<ul style="list-style-type: none"> • Undertake the site Induction and participate in relevant environmental training; • Undertake work activities in accordance with the requirements of the site induction and the relevant components of the EMS; and • Report all environmental incidents to the Environmental personnel or their immediate supervisor.

4.2 Training Awareness and Competence

Environmental management requirements and responsibilities are contained within Wambo's Environment & Community Policy, the site induction program and supply contracts, to

ensure that employee's and contractors are aware of their obligations before commencing work on site at Wambo.

The site induction program at Wambo includes an environmental management component as follows:

- The Environment & Community Policy (**Appendix B**);
- Legislative and other requirements;
- Overview of environmental management plans and procedures;
- Incident response / reporting procedures and contacts; and
- Key environmental management considerations for relevant working area/vicinity.

The Environment and Community Department also delivers targeted training packages and toolbox talks relating to specific environmental issues. Examples of targeted training include surface disturbance procedures in relation to exploration or spill response training. Training may include an assessment of competence with regard to environmental awareness.

4.3 Communication

4.3.1 Internal Reporting

A number of avenues are available to the Environment and Community team to provide effective communication of environmental information within the organisation. These include:

- Management meetings;
- Displays on noticeboards, including display of the Environmental Policy;
- Environmental awareness training;
- Circulation of written reports/memos;
- Toolbox talks; and
- Newsletters.

The Environment & Community Manager (or delegate) reports on a regular basis to the Senior Management Team detailing:

- Non-compliances with legal and / or other requirements;
- Complaints;
- Environmental incidents;
- Pending/upcoming approvals; and
- Other significant environmental issues.

4.3.2 External Reporting

A number of approvals and licences held by Wambo require external reporting. In addition, Wambo maintains active communication with the local and surrounding communities through newsletters and the CCC. Wambo provides monthly monitoring data, a summary of community complaints and key reports on the WCPL website.

A summary of external reporting is shown in **Table 4**.

Table 4: Summary of External Reporting

Report / Format	Requirement	Distribution
Annual Reviews (AR) (formerly Annual Environmental Management Reports)	DA305-7-2003 (as modified), DA 177-8-2004 (as modified) and Mining Leases	NSW Department of Planning and Environment (DP&E), NSW Division of Resources and Geosciences (DRG), Environment Protection Authority (EPA), Community Consultative Committee (CCC), and copies to other regulators as requested
National Pollutant Inventory (NPI)	National Environment Protection Measure	OEH
National Greenhouse and Energy Reporting (NGERS)	National Greenhouse and Energy Report Act 2007	DoEE
Hunter River Salinity Trading Scheme Return	EPL 529	EPA
EPL Annual Return and Statement of Compliance	EPL 529	EPA
Summary reports/ Specific briefings / Presentations / Newsletters	DA305-7-2003 (as modified) and DA 177-8-2004 (as modified)	CCC and the wider community
Monitoring Data and Reports	DA305-7-2003 (as modified) and DA 177-8-2004 (as modified)	Publicly accessible at - https://www.peabodyenergy.com/Operations/Australia-Mining/New-South-Wales-Mining/Wambo-Approvals,-Plans-Reports
EPBC Compliance Report	DA305-7-2003 (as modified)	DP&E, OEH and DoEE
End of Panel Subsidence Report	Each Longwall panel	DRG and DP&E

4.3.3 Incidents

All reportable incidents will be reported via the EPA's Environmental Line on **131 555** by the E&C Manager in accordance with WCPL's Pollution Incident Response Management Plan (PIRMP).

In accordance with the PIRMP, WCPL 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 POEO Act.

Within 7 days of the date of the incident, WCPL will provide the Secretary and any relevant agencies with a detailed report on the incident to include:

- The cause, time and duration of the event;
- Where possible the type, volume and concentration of every pollutant discharged as a result of the event;

- The name, address and business hours telephone number of employees or agents of the licensee who witnessed the event;
- The name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- Action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- Implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary;
- Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- Any other relevant matters.

For all other incidents (including non-compliances with consent or EPL conditions) that do not cause threatening material harm to the environment associated with the Project, WCPL will notify the Secretary and any other relevant agencies as soon as practicable after WCPL becomes aware of the incident.

4.3.4 Complaints

A 24 hour Complaint Hotline has been established for community complaints. Community complaints received by WCPL are recorded within the Community Complaints Register. The complaint will be investigated and where possible, the complainant will be contacted within 24 hours to discuss the complaint.

A review of the effectiveness of the corrective or preventative actions will be conducted within a month of the complaint and the relevant work procedures updated if required.

Preliminary investigations will commence as soon as practicable upon receipt of a complaint to establish if WCPL is responsible. All efforts will be made to determine the likely causes contributing to the complainants concerns using information such as the climatic conditions at the time of blast, the nature of activities taking place and recent monitoring results.

A record of the complaint will be kept which will include the following:

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

A register of community complaints is maintained on the WCPL website. WCPL will retain a copy of the Community Complaints Register for at least four years.

4.3.5 Dispute Resolution

Wambo will endeavour to resolve any issue raised with the community through open discussion in accordance with the complaints procedure as described in **Section 4.3.4**.

Where community issues cannot be resolved internally, the independent dispute resolution process will be initiated (as outlined in **Appendix E**) which includes:

- Referral of the matter to an Independent Dispute Facilitator (IDF) appointed by DP&E in consultation with Singleton Shire Council;
- IDF to meet with parties to resolve dispute;
- If dispute not resolved, IDF may consult relevant independent experts for advice on technical issues and report back to interested parties; and
- If agreement can still not be reached, the IDF will consult with DP&E and a final decision will be made.

4.3.6 Website Updates

A comprehensive summary of approvals, plans, monitoring results and complaints, as required by DA305-7-2003 (as modified) and DA177-8-2004 (as modified), is publicly available at WCPL website:

<https://www.peabodyenergy.com/Operations/Australia-Mining/New-South-Wales-Mining/Wambo-Approvals.-Plans-Reports>

4.4 Documentation and Document Control

WCPL will ensure that EMS documentation is maintained, up to date and readily available to all authorised personnel. The following procedures ensure document control:

- Copies of the EMS documents are kept on-site with WCPL electronic Controlled Documents, once printed the document is considered “uncontrolled”;
- The document will be reviewed, and if necessary revised, to ensure that it remains accurate and in accordance with all relevant standards;
- WCPL personnel will be notified of revision to the EMS; and
- The EMS will be clearly dated.

A copy of the current EMS is maintained on the WCPL website, located at:

<https://peassetstorage.blob.core.windows.net/assets/files/operations/australia/wambo/072015/ems001%20environmental%20management%20strategy%20final%20unsigned%20090109.pdf>

4.5 Emergency Preparedness and Response

A pollution incident, as defined by the POEO Act, means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

Environmental emergency and incident response has been incorporated into specific environmental management documents (**Appendix D**) and the WCPL Pollution Incident

Response Management Plan (PIRMP). Specifically, the PIRMP provides information regarding procedures for:

- The identification of a pollution incident;
- Notification of pollution incidents in certain circumstances;
- Responses to pollution incidents by WCPL including all of its employees and contractors;
- Training in the content of the PIRMP is conducted in accordance with the Wambo Coal Training and Competence Management Plan. Training records are kept in accordance with WCPL's training record management system; and
- Any changes to emergency procedures are documented and communicated to relevant personnel.

All personnel and contractors receive emergency preparedness and response training during the site induction. WCPL maintain dedicated emergency response teams.

5.0 Monitoring Review and Corrective Action

5.1 Environmental Monitoring

Environmental monitoring is undertaken to monitor the performance of the operation against licence and consent requirements. Records of environmental monitoring are maintained on the WCPL website, are regularly presented to the CCC and are reported in various internal and external reporting avenues as outlined in **Table 4**.

Regular monitoring is integral to the successful implementation of the EMS. The measurement and evaluation of monitoring results against relevant performance criteria and standards enables non-compliances to be identified and brings to attention areas that may require further attention.

The procedures for environmental monitoring are outlined in specific environmental management documents (**Appendix D**).

Suitably qualified and skilled personnel undertake Wambo's environmental monitoring using industry accepted techniques with equipment calibrated to relevant AS. Analysis of samples is undertaken at National Association of Testing Authorities (NATA) certified laboratories.

5.2 Audits and Inspections

Audits and inspections are conducted as outlined below in **Table 5**.

Table 5: Audit and Inspection Schedule

Detail	Audit / Inspection	Frequency	Responsibility	Report to
Internal	Site Inspections	As required	Environmental Advisor	Environment & Community Manager and Senior Management Team
	Peabody Compliance Audit	Annually (other than every third year)	Environment & Community Manager (or delegate)	Senior Management Team
External	Independent Environmental Audit	Every Three Years	Environment & Community Manager (or delegate)	WCPL General Manager, DP&E
	Regulator Inspections	Annually	Environment & Community Manager (or delegate)	WCPL General Manager
	EPBC Act Approval - Independent Compliance Audit	Every five years	Environment & Community Manager (or delegate)	WCPL General Manager, DP&E, DoEE

5.2.1 Site Inspections

Regular environmental site inspections are undertaken and include general housekeeping, biodiversity, subsidence and rehabilitation. Operational personnel are active participants in these inspections to increase awareness and ownership of environmental issues. The inspections assist in maintaining on-site compliance and are used in conjunction with environmental monitoring and incident/complaint reporting procedures.

Any non-conformance is recorded and the cause investigated. Corrective and/or preventative actions are recommended and the effectiveness of the action is assessed at the next site inspection.

5.2.2 Internal Audits

Environmental management on site is routinely audited, with management plans and procedures systematically worked through. Peabody Energy conducts an annual compliance audit, other than every third year when the Independent Environmental Audit is conducted (see **Section 5.2.3**).

5.2.3 External Audits

An external compliance audit is conducted every three years in accordance with conditions of DA 305-7-2003 (as modified) and DA177-8-2004 (as modified). The endorsement of the independent auditor and scope of the audit from the Secretary of DP&E will be sought prior to the audit's commencement.

The results of external audits are distributed in accordance with the consent requirements, which include publishing a copy of the audit on the WCPL website.

5.2.4 Regulator Inspections

Annual inspections are generally undertaken by the DRG, following submission of the Annual Review. The focus of the inspection is generally guided by the site's performance against the performance measures reported in the Annual Review, including rehabilitation. The DRG may be accompanied by representatives from DP&E.

Other regulator inspections may be conducted from time to time, or following specific issues identified at the operation.

5.3 Corrective and Preventative Action

Corrective and preventative actions resulting from monitoring or inspections and audits will be implemented through the development of an action plan, administered through the onsite database system. The plan will provide details on the action required, time frame and responsibilities for completing the action.

The implementation of the corrective and preventative actions will be reviewed internally and specific procedures developed for addressing non-conformances with the EMS or supporting documents.

5.4 Records

All records are legible, readily retrievable, and protected against damage and will be retained on site for a minimum of four years.

In accordance with the EPA's *Requirements for publishing pollution monitoring data* (EPA, 2013), monitoring data will remain on the WCPL website for a period of four years.

5.5 Adaptive Management

WCPL will assess and manage project-related risks to prevent exceedances of the criteria and/or relevant performance measures.

If an exceedance or breach of the criteria and/or performance measures occurs, WCPL will:

- Take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;

- Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the DP&E describing those options and any preferred remediation measures or other course of action; and
- Implement remediation measures as directed by the Secretary of DP&E.

In accordance with the requirements of DA 305-7-2003 (Condition 3, Schedule 6), specific management plans and environmental documentation (**Appendix D**) contains adaptive management procedures.

6.0 Review and Improvement

In accordance with DA 305-7-2003 (Condition 6, Schedule 5), the EMS will be reviewed, and if necessary revised, within 3 months of:

- The submission of an Annual Review;
- An independent environmental audit which requires EMS review;
- The submission of an incident report; or
- Any modification to the conditions consent that requires revision of the strategies, plans and programs.

Appendix A

Regulatory Correspondence

Mr Peter Jaeger
Environment and Community Manager
Wambo Coal Pty Ltd
PMB 1
Singleton NSW 2330

Dear Mr Jaeger

**Wambo Coal Mine (DA 305-7-2003 & DA 177-8-2004)
Erosion and Sediment Control Plan and Environmental Management Strategy**

The Department has reviewed the revised Environmental Management Strategy and Erosion and Sediment Control Plan for the Wambo Mining Complex which have been prepared in accordance with the Wambo Mine Development Consent (DA 305-07-2003) and Wambo Rail Development Consent (DA 177-8-2004).

The Department is satisfied that the Environmental Management Strategy (Revision 5) meets the requirements of condition 1 of Schedule 6 of DA 305-7-2003 and condition 2 of Schedule 6 of DA 177-8-2004. Consequently, the Secretary approves this strategy.

The Department considers that the Erosion and Sediment Control Plan (Revision 9) dated March 2018 does not adequately address the requirements of condition 32 of Schedule 4 of DA 305-7-2003 and condition 17(a) of Schedule 4 of DA 177-8-2004. The Department's comments are enclosed in **Attachment A**.

The Department requests that the Erosion and Sediment Control Plan is re-submitted once the comments have been addressed, by no later than **27 April 2018**.

If you wish to discuss this matter further, please contact Philip Nevill at the details listed above.

Yours sincerely


Howard Reed *26.3.18*
Director Resource Assessments
as the Secretary's nominee

Dobbins, Nicole

Subject: FW: Wambo Coal - Environmental Management Strategy Update

From: Philip Nevill [<mailto:Philip.Nevill@planning.nsw.gov.au>]
Sent: Thursday, 15 February 2018 11:21 AM
To: Jaeger, Peter F
Cc: Megan Dawson; Melanie Hollis
Subject: RE: Wambo Coal - Environmental Management Strategy Update

Hi Peter,

Apologies for the delay in providing a response to the earlier email (below).

The Department has reviewed the EMS (Revision 4) and provides its comments below:

<p>Wambo Coal Mine (DA 305-7-2003) - Environmental Management Strategy Condition 1, Schedule 6:</p> <p>a. identify the statutory requirements that apply to the development</p>	<p>The condition is partially satisfied in Section 3.1 of the EMS. Please review the referenced legislation and amend accordingly.</p> <p>Legislation to be included:</p> <ul style="list-style-type: none">• NSW Work Health Safety Act 2011• Work Health and Safety Regulation 2011• Explosives Act 2003• Explosives Regulation 2013
<p>General comment</p>	<p>The information in Table 1 requires updating e.g. the life of mine. Dates to differentiate the cessation of the open cut and underground operations should also be updated. Please check that all the information in Table 1 is up to date.</p>

Please review the EMS and make any changes as required.

The MOD 17 Management Plans are due in March 2018. Please confirm if the updated EMS will be resubmitted before March or at the same time as the other plans.

If you would like to discuss the matter further, please contact me on the details below.

Kind Regards

Philip Nevill
Environmental Assessment Officer
Resource Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 82751036 E philip.nevill@planning.nsw.gov.au



Appendix B

Wambo Environment and Community Policy



Environmental Policy

We are the world's largest private-sector coal company producing thermal and metallurgical coal. Throughout the lifecycle of our operations we take responsibility for the environment, benefit our communities and restore the land for generations that follow.

Globally, Peabody supports the current technology to deploy high efficiency, low emissions (HELE) power stations and investment in next generation carbon capture, use and storage (CCUS) technologies to transition to the ultimate goal of near-zero emissions from coal-fueled power.

The following governing principles apply to our employees, contractors, visitors and vendors at our sites, and support Peabody Energy's alignment with Sustainable Development practices:

- Management has the overall accountability for environmental management and for regular review of environmental performance;
- Progressively rehabilitate/reclaim, monitor and maintain areas disturbed by mining to ensure the post mine land use, landform and environmental outcomes are achieved;
- Identify, monitor and manage risks and opportunities during all mining life cycle phases and continuously improve environmental stewardship;
- Appropriate environmental objectives are developed, and applicable performance indicators are publically reported;
- Any employee has the authority to stop and challenge activities that could result in unauthorised environmental impact;
- Comply with applicable environmental standards, rules and procedures, relevant jurisdictional laws and regulations;
- Engage with interested and affected stakeholders;
- Efficient use and responsible procurement of resources is undertaken;
- Conservation of energy and reduction in greenhouse gas intensity at our operations through energy efficiency and other leading practices.

Appendix C

EMS Development Approval Conditions

Approval	Reference	Condition	Section
DA 305-7-2003	Schedule 6 Condition 1	Environmental Management Strategy Before carrying out the development, the Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary . This strategy must:	
		a) provide the strategic context for environmental management of the development;	1.2
		b) identify the statutory requirements that apply to the development;	3.1
		c) describe in general how the environmental performance of the development would be monitored and managed during the development;	3.0
		d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; 	4.3
		<ul style="list-style-type: none"> • receive, handle, respond to, and record complaints; 	4.3.4
		<ul style="list-style-type: none"> • resolve any disputes that may arise during the course of the development; 	4.3.5
		<ul style="list-style-type: none"> • respond to any non-compliance; 	4.3.3
		<ul style="list-style-type: none"> • manage cumulative impacts; and 	3.4
		<ul style="list-style-type: none"> • respond to emergencies; and 	4.5
		e) describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management of the development.	4.1
		f) The Applicant must implement the approved strategy as approved from time to time.	Noted
		Schedule 6 Condition 2	Within 14 days of the Secretary's approval, the Applicant shall:
	a) Send copies of the approved strategy to the relevant agencies, Council , and the CCC; and		
	b) Ensure the approved strategy is publicly available during the development.	WCPL Website	
Schedule 6 Condition 3	Adaptive Management The Applicant must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 4. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and	5.5	

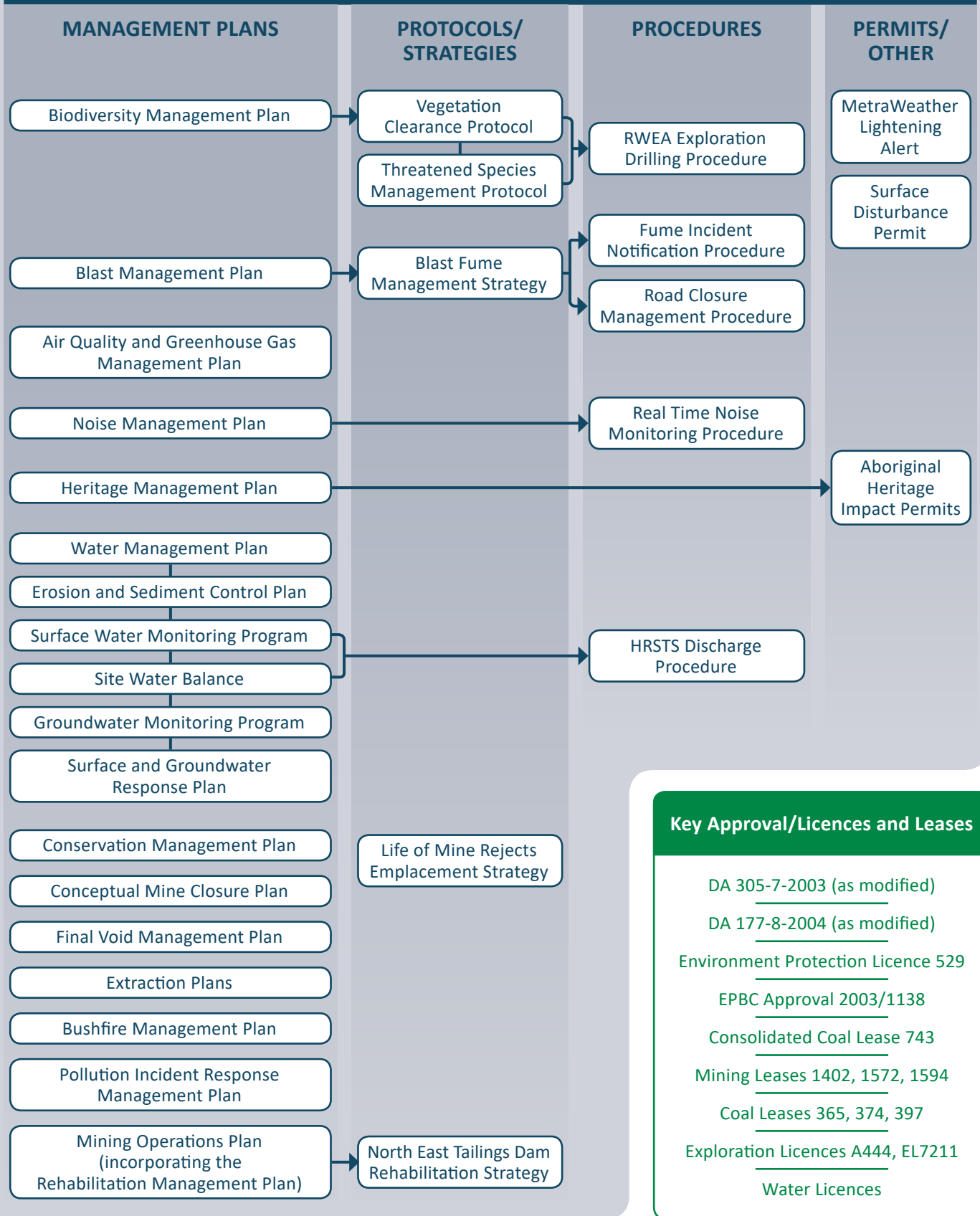
Approval	Reference	Condition	Section
	Schedule 6 Condition 4	<p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p> <p>Management Plan Requirements</p> <p>The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> - the relevant statutory requirements (including any relevant consent, licence or lease conditions); - any relevant limits or performance measures/criteria; - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; (c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/ criteria; (d) a program to monitor and report on the: <ul style="list-style-type: none"> - impacts and environmental performance of the Wambo Mining Complex; - effectiveness of any management measures (see c above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Wambo Mining Complex over time; (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> - incidents; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. 	Specific Management Plans as outlined in Appendix D

Appendix D

EMS Document Map

ENVIRONMENTAL MANAGEMENT STRATEGY

Environmental Policy



Key Approval/Licences and Leases

- DA 305-7-2003 (as modified)
- DA 177-8-2004 (as modified)
- Environment Protection Licence 529
- EPBC Approval 2003/1138
- Consolidated Coal Lease 743
- Mining Leases 1402, 1572, 1594
- Coal Leases 365, 374, 397
- Exploration Licences A444, EL7211
- Water Licences

Appendix E

Dispute Resolution Process

