



NARRABRI

Document Owner:	Environment Super.
Document Approver:	General Manager
Revision Period:	3 yrs
Issue:	1.0
Last Revision Date:	07/11/2019

WHC-STD-NAR-ENVIRONMENTAL COMPLIANCE MANAGEMENT

NARRABRI COAL OPERATIONS

ENVIROMENTAL COMPLIANCE MANAGEMENT

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1 Purpose

This Environmental Compliance Management (ECM) Standard documents the systems and processes used by Narrabri Coal Operations (NCO) to ensure that compliance is maintained for all regulatory obligations contained within Project Approvals, Environmental Licences and other Management Plans.

2 Scope

The scope of this document is to provide an overview of the systems and processes used by Narrabri Coal Operations (NCO) and has not been designed with any other Whitehaven Group operations in mind. The Accountabilities section of the document is restricted to WHC employees working at NCO.

It includes the management of **all** process that ensure compliance with Project Approvals, (Environmental) Licences and Permits, Mining Operations Plan, Management Plans, related legislation guidelines and standards etc. This includes document control, approval (internal and external), training of NCO personnel, monitoring and review.

For the purpose of environmental compliance management the geographical boundaries of the site operations are considered to be the Mine Lease, Exploration Licence and adjacent properties (owned by NCO or private landholders).



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3 Objectives

NCO's Environmental Objectives are designed to ensure that at all times NCO's level of compliance is well understood and appropriate corrective actions can be actioned should non-compliance be measured.

Table 1: NCO Environmental KPI's

Objectives	Measurement	KPI
Increase our awareness and application of environmental management in all aspects of our operations	% People trained as per Training Matrix	75%
Continuously improve our environmental performance through the optimization and regular review of our activities	Sharepoint documents review date current.	100%
	INX Enviro. Actions closed out on time.	100%
	% CMO Actions closed	100%
Comply with legislative and statutory requirements at all times	Enforcement Actions	<3 (annual)
	Reportable Incidents	0
	Regulatory Investigations	0
Minimise our environmental footprint by actively reducing impacts to land, water, air and the social receiving environment.	Rehab completion is within permitted timeframe	120%
	Rehabilitation monitoring in accordance with Rehab Monitoring Procedure	100%

Definitions (Table 1)

- **% CMO Actions closed**
Number of CMO actions closed within reporting period divided by number of CMO actions raised within reporting period, as a percentage.
- **Enforcement Actions**
Non Compliance Recorded, Warning, Caution, Clean-up Notice, Penalty Notice, Suspension, Prosecution.
- **Reportable Incidents**
In accordance with relevant legislation eg POEO Act, Mining Act, EP&A Act.
- **Regulatory Investigations**
Formal investigations commenced under relevant legislation.



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4 Personnel Resources

3.1.1 Organisational Chart

The organisational chart for the Environment Dept. is shown below.



Figure 1: NCO Environmental Team structure



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3.1.2 Key Roles & Accountabilities

Key roles and accountabilities of NCO personnel relevant to this Standard are outlined in Table 2.

Table 2: NCO Roles and Accountabilities

Role	Accountability
General Manager	<ul style="list-style-type: none"> All personnel operate in accordance with the Environmental Vision, Mission and Objectives. Ensure adequate people and resources are allocated to enable this Standard to be effectively implemented. Routinely review Approval/Environment compliance metrics to ensure Standard targets are being met.
Environmental Superintendent	<ul style="list-style-type: none"> All personnel operate in accordance with the Environmental Vision, Mission and Objectives. Implement this Standard with support and guidance from the General Manager. Provide support and guidance to the Environmental team as required. Oversee all environmental approvals, plans, and procedures required for NCO. Communicate with the various regulators as required. Ensure all operations are undertaken in accordance with relevant environmental legislation and approvals. Environmental incident reporting. Ensure complaints are recorded and managed appropriately. Site rehabilitation is in accordance with requirements.
Environmental Compliance Officer	<ul style="list-style-type: none"> Administer the CMO compliance system. Ensure it is maintained up to date and non-compliances are reported to the Environment Superintendent immediately. Administer the Document Control system that includes Sharepoint, WHC Website and the NCO server. Advise the Environmental Superintendent of scheduled document reviews and assist as required. When Approvals and Management Plans are updated ensure the relevant NCO personnel are provided with information relevant to their duties (eg. Approval boundary shapefiles provided to Survey team).



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	<ul style="list-style-type: none"> • Ensure monitoring and other compliance records are maintained. • Prepare and maintain relevant training modules with the Safety and Training team to ensure content is appropriate. • Coordinate audits (internal and external) and assist with close-out of any corrective actions. • Provide monthly compliance monitoring and reporting. <p>Monthly compliance monitoring and reporting;</p>
Technical Services Manager	<ul style="list-style-type: none"> • Ensure activities under their control are undertaken in accordance with this Standard. • Ensure that people under their charge who are accountable for conforming to this Standard undergo specific training in order to be able to fulfil those duties. • Preparation of risk assessments and procedures of all activities under their jurisdiction in compliance with all environmental license conditions (eg. drilling, survey). • Maintain an awareness of environmental issues and report any possible non-conformances to the Environmental Superintendent.
Surface Operations Manager	<ul style="list-style-type: none"> • Ensure activities under their control are undertaken in accordance with this Standard. • Ensure that people under their charge who are accountable for conforming to this Standard undergo specific training in order to be able to fulfil those duties. • Preparation of risk assessments and procedures of all activities under their jurisdiction in compliance with all environmental license conditions (surface civil, water management, CHPP, electrical and mechanical maintenance). • Maintain an awareness of environmental issues and report any possible non-conformances to the Environmental Superintendent.
Supply Supervisor	<ul style="list-style-type: none"> • Ensure activities under their control are undertaken in accordance with this Standard. • Oversee the execution of the Waste Management Plan. • Oversee the updating and maintenance of the Chem-Alert system.



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<p>Gas & Ventilation Manager</p>	<ul style="list-style-type: none"> Preparation of risk assessments and procedures of all activities under their jurisdiction in compliance with all environmental license conditions (gas drainage infrastructure installation, maintenance and removal). Execute works in the field in line with environmental approval conditions.
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5 Document Management

A large number of documents have been developed for the approval of the mine, its operations and the management of environmental risk. These environmental management documents include;

- Regulatory Approvals and Licences.
- Management Plans (submitted to regulator under the Approvals).
- Whitehaven Coal plans, standards and procedures.
- Forms, Checklists and other compliance documentation.

A visual representation is displayed in Figure 2.

In order to remain in compliance with our approvals, it is essential that all approval conditions contained within these documents are subject to regular review and communicated to the NCO workforce where appropriate.

NCO has multiple systems to manage Document Control, record keeping and maintain environmental compliance. The Environment Compliance Officer is accountable to ensure all of these systems are maintained.

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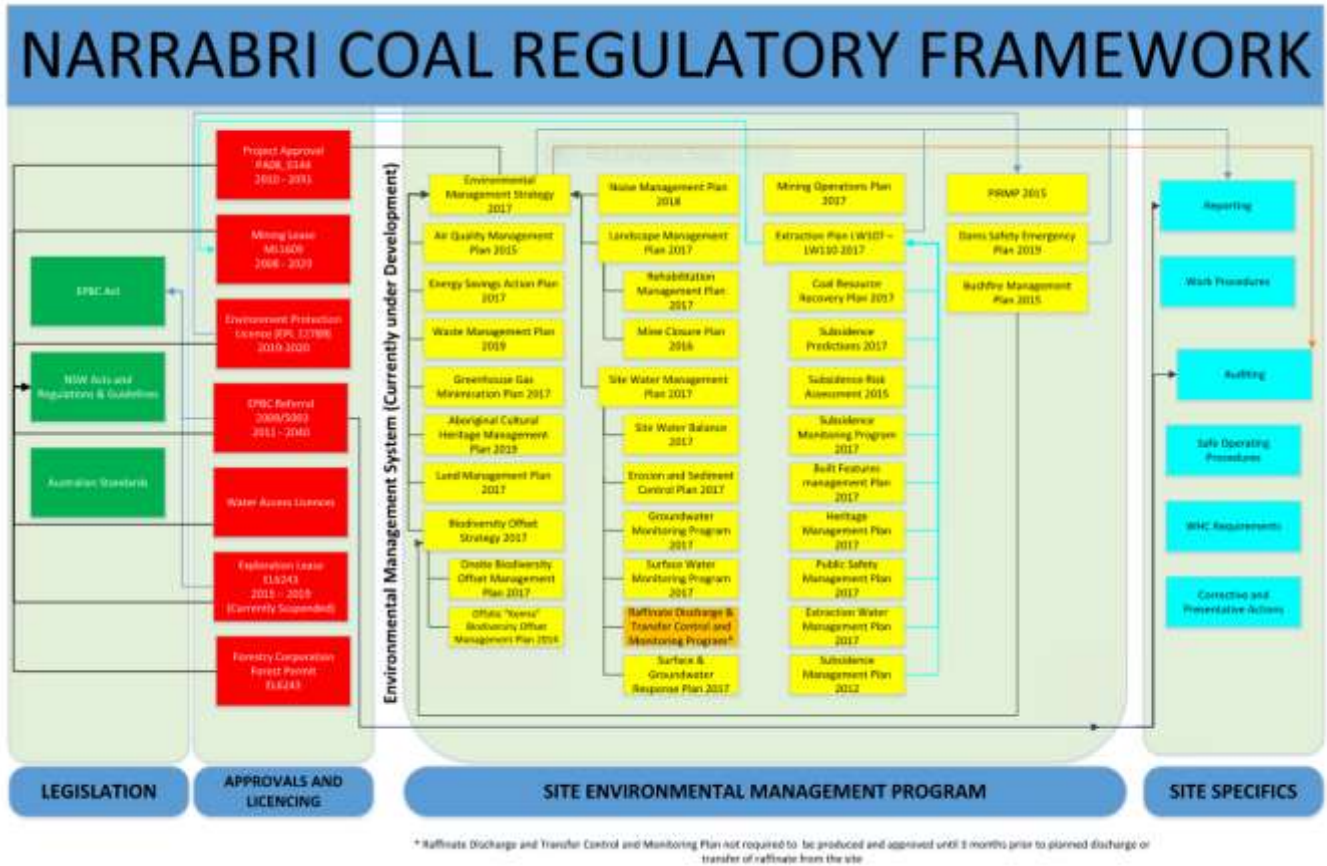


Figure 2: Map of NCO Environmental documents

3.2 Sharepoint

All controlled documents are to be maintained using this document management system (Figure 3). Document Management will be undertaken using WHC STD DOCUMENT CONTROL.

Sharepoint can generate reports that list the current status of review of each of these documents.



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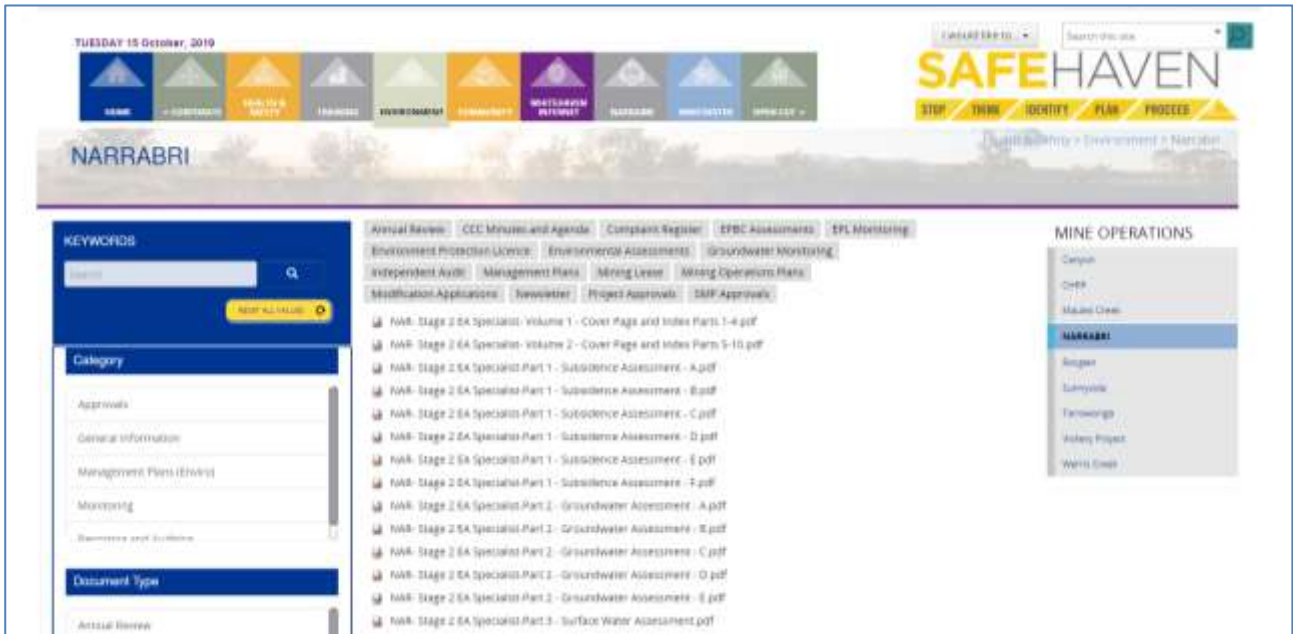


Figure 3: Screenshot of NCO Environmental documents in the Sharepoint online system.

3.3 Whitehaven Coal Website

Conditions of the Project Approval mandate that certain documents are maintained in the public domain. These will be a duplicate of the controlled document maintained on Sharepoint.

Any documents placed on the website require the approval of the NCO Environment Superintendent.

3.4 NCO Server

All remaining documents and compliance records shall be maintained on the NCO server. The current file structure for key approval documents is outlined below (Figure 4).

Access to the Environmental Compliance folder is limited such that all employees have read access and only Environmental team members have write access.



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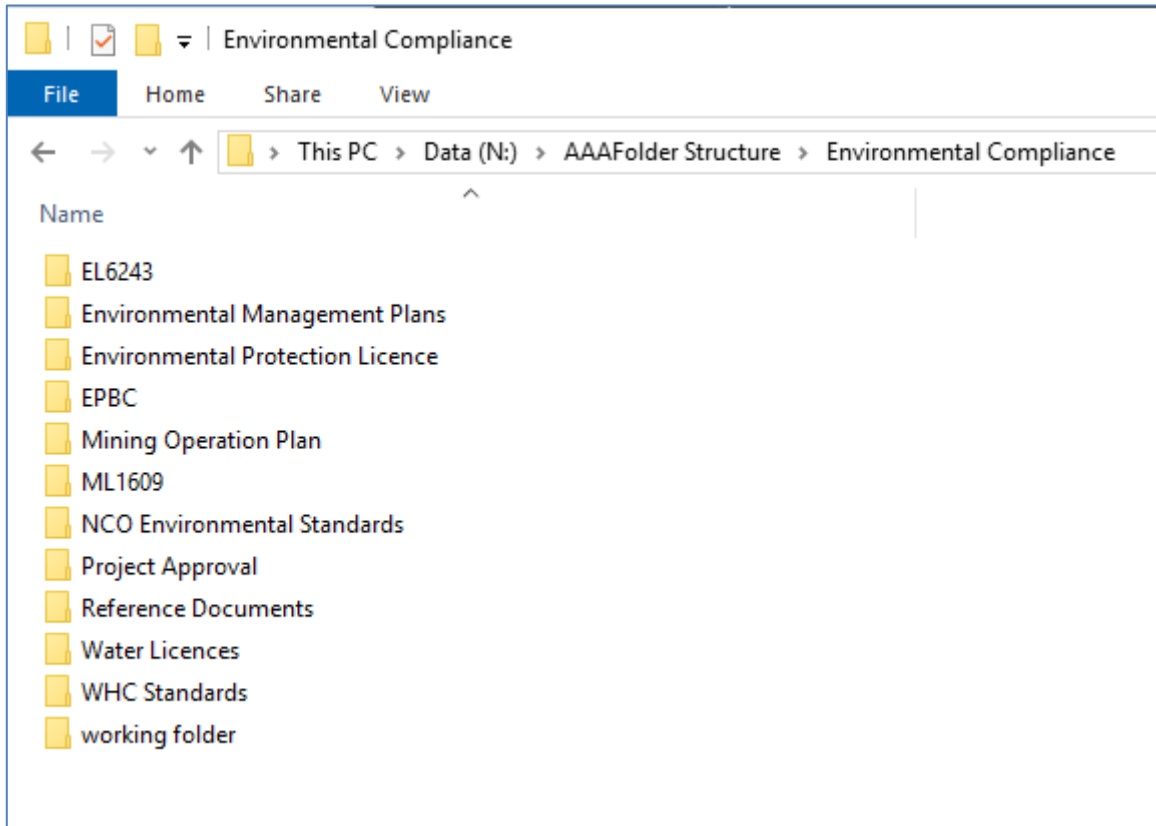


Figure 4: Screenshot of Environmental Compliance files on NCO server

6 Compliance Management

NCO utilise CMO online database for the management, monitoring, tracking and reporting of approval conditions and regulatory obligations. The Environmental Compliance Officer shall be responsible for maintaining the CMO database, assigning actions to relevant NCO personnel, and providing regular Compliance Status reports to the Environmental Superintendent and NCO management.

All approval documents shall have their obligations individually listed in CMO, and linked with evidence of compliance where appropriate.

A report on non-conformances and upcoming actions shall be maintained, and reviewed at the monthly Environment Team Meeting whereby actions to close out these items shall be determined, assigned and progress measured.



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7 Training & Onboarding

Training consists of the inductions and subject specific training programs developed by NCO in order to formally transfer information to new employees and/or visitors upon their arrival, or to remind existing employees of their obligations on a semi-regular basis.

Training at NCO is managed by Safety & Training Department. It is the responsibility of the Environmental Compliance Officer to ensure the NCO Training Matrix includes appropriate environmental topics and that the relevant training packages are provided for the Safety and Training team to deliver.

3.5 Job Role Personnel Change

As employees change job roles or new employees join, a formal handover process (WHC-PRO-NAR Personnel Change Duties Transfer) shall be undertaken to ensure all relevant knowledge and information is transferred to the incumbent. It is the responsibility of the role supervisor to ensure this is undertaken.

3.6 New Employee Induction

All new employees shall undergo generic induction. High level environmental training shall be undertaken including the following:-

- A statement that NCO expect 100% compliance with environmental approvals and licences;
- A statement that compliance with environmental approvals and licences is a condition of employment;
- Aboriginal Cultural Heritage management
- Hazardous Substances management;
- Hydrocarbon Management; and
- Waste Management.

3.7 Senior Management, Surface Supervisors and Employees.

All Senior Management and Surface Supervisors must undergo the following training and assessing:-

- Key compliance requirements of Project Approval, Mining Operations Plan, and Exploration Licence Activity Approvals (i.e. REF).
- Management Plans and operational procedures that are key to maintaining compliance with the above approvals (eg. Noise Management Plan, Erosion and Sediment Control Standard, Water Management Plan, Aboriginal Cultural Heritage Plan, Waste Management etc).

All Surface Employees must undergo training and assessment on environmental management relevant to their duties. This will be stated in the Training Matrix.

All Underground Employees must undergo training and assessment on environmental management relevant to their duties. This will be stated in the Training Matrix.



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3.8 New or Updated Compliance documents.

Whenever a new approval or change in conditions of approval occurs, retraining of relevant people must be undertaken. It is the responsibility of the Environmental Compliance Officer to ensure the relevant training packages are updated, and consult with the Safety and Training team to update the Training Matrix.

8 Communication

3.9 Internal Communication

Communication can be undertaken using the WHC-STD-Information and Communication.

Additionally, all relevant information such as a meeting minutes, KPI score card, regulator correspondence etc can be circulated using the “Narrabri Compliance” email group.

3.10 External Communication

External communication (i.e. to regulatory bodies, stakeholders, media groups, community members and other parties not belonging to NCO and Whitehaven Group) will be the responsibility of the Environment Superintendent.

Communications with all regulators must include the following:-

- All emails are filed in a specific directory on the NCO server (sent and received);
- All notices are filled in a specific directory on the NCO server;
- All action items from notices are to be immediately added to Environment Team meeting minutes. Including the due date of any responses required; and
- All responses to regulators must be reviewed by Group Environment team, to ensure consistency across WHC, prior to release.



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9 Environmental Operation

Execution of the approvals and associated environmental works is to be overseen by the Environmental Superintendent.

3.11 Project and Environment Approval documents

The Environment Superintendent shall coordinate the development, review, approval and submission of all regulatory documents.

The content must be clearly understood and constructed in a manner that enables execution of works in a manner whereby compliance is practically achievable.

All documents are to be provided to WHC Group Environment team, to ensure consistency across WHC. Prior to submission the WHC *Delegated Authority Approval Form* must be signed.

3.12 NCO Surface Operation Planning and Execution.

The Environment Superintendent is to participate in planning and operational meetings and make every effort to be informed of any planned operations on the surface at NCO. With this knowledge the role shall provide appropriate guidance regarding any compliance matters that require consideration.

3.13 Operational Procedures

Prior to any works commencing on the surface the following must be undertaken:-

- Operational Risk Assessment must be conducted on the activity. This may require an Environment staff person to be in attendance to ensure relevant compliance matters are tabled and considered in the Risk Assessment.
- NCO Procedures and Standards must include steps to appropriately manage environmental risk.
- Training and assessing of relevant employees conducting the activity.
- All these activities must be complete and actions closed out prior to works commencing.

3.14 Risk Management

Risk assessments are required to assess the environmental exposure of NCO and (as mentioned above) prior to execution of works and introduction of new equipment.

WHC-STD-Risk Management shall be applied in all cases.

Risk Assessment actions are to be entered into INX. The close out of actions must be complete prior to works commencing.

In the event that systems/equipment etc are altered relative to that previously approved, **WHC-STD-Change Management** must be followed.



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3.15 Environment Team Meetings

Monthly meetings held by the Environment Team members including the Technical Services Manager.

Primary focus areas of the meeting are:-

- Review Action List and CMO status reports;
- Review KPI's and set improvement action plans where targets are not been met;
- Regulator engagement;
- NCO operations (i.e. new planned work, execution of existing works etc); and
- Minutes are to be kept including accountability and delivery times.

3.16 Incident Management

All environmental incidents must be reported via the form **WHC-FRM-NAR-Incident Report** and managed through the INX system.

The Environmental Superintendent will review the incident against approval conditions and instigate external reporting as required.

3.17 Emergency Response

Environmental Emergencies are to be managed by **NCO - Pollution Incident Response Management Plan**.

10 Performance Evaluation

3.18 Measuring and Monitoring Performance against Objectives

The monthly Environment meeting will review the KPI's and list necessary actions to ensure compliance.

If compliance is not being met actions to be taken include:-

- Ceasing activity where non-compliance is occurring;
- Escalation to NCO's General Manager;
- Notifying WHC Group environment team;
- Notifying regulator where appropriate; and
- Adjusting management systems such as this Standard to ensure that framework exists that enables compliance going forward.



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3.19 Audits

Audits may be internal or external.

At a minimum annual internal audits will be undertaken to focus on the compliance of NCO with the various approval conditions. The audit should be focused on areas such as; identified high risk due to recent non-compliances and/or regulatory interactions, new implemented systems and approvals, areas of operational change.

External Audits are regulatory requirements such as the 3 yearly Project Approval audit.

Non compliances of all audits and corrective actions required are to be managed through the INX system, and where relevant CMO will be updated with new compliance evidence.

Revisions	Revision Description	Who Consulted	Date
1	Original Document	Brent Baker	19/11/19