



**ROCGLLEN COAL MINE  
ENVIRONMENTAL  
MANAGEMENT SYSTEM**

Document Owner:	Operations Manager
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**WHC\_PLN\_ROC\_ENVIRONMENTAL MANAGEMENT STRATEGY**

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**ACRONYMS USED THROUGHOUT THIS DOCUMENT**

AR	-	Annual Review (incorporates former Annual Environmental Management Report)
AS	-	Australian Standard
CCC	-	Community Consultative Committee
CHPP	-	Coal Handling and Preparation Plant
DP&E	-	Department of Planning and Environment
DRG	-	Department of Planning and Environment – Division of Resources and Geoscience
EA	-	Environmental Assessment
EMS	-	Environmental Management Strategy
EPA	-	Environment Protection Authority
EPL	-	Environment Protection Licence
GSC	-	Gunnedah Shire Council
OEH	-	Office of Environment and Heritage
PA	-	Project Approval
RCM	-	Rocglen Coal Mine
WHC	-	Whitehaven Coal Pty Ltd



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**1 INTRODUCTION**

The Rocglen Coal Mine (RCM) is located approximately 28km north of Gunnedah, and 10km east of the Canyon Coal Mine (formerly Whitehaven) (Figure 1). The mine site covers an area of approximately 460 hectares..

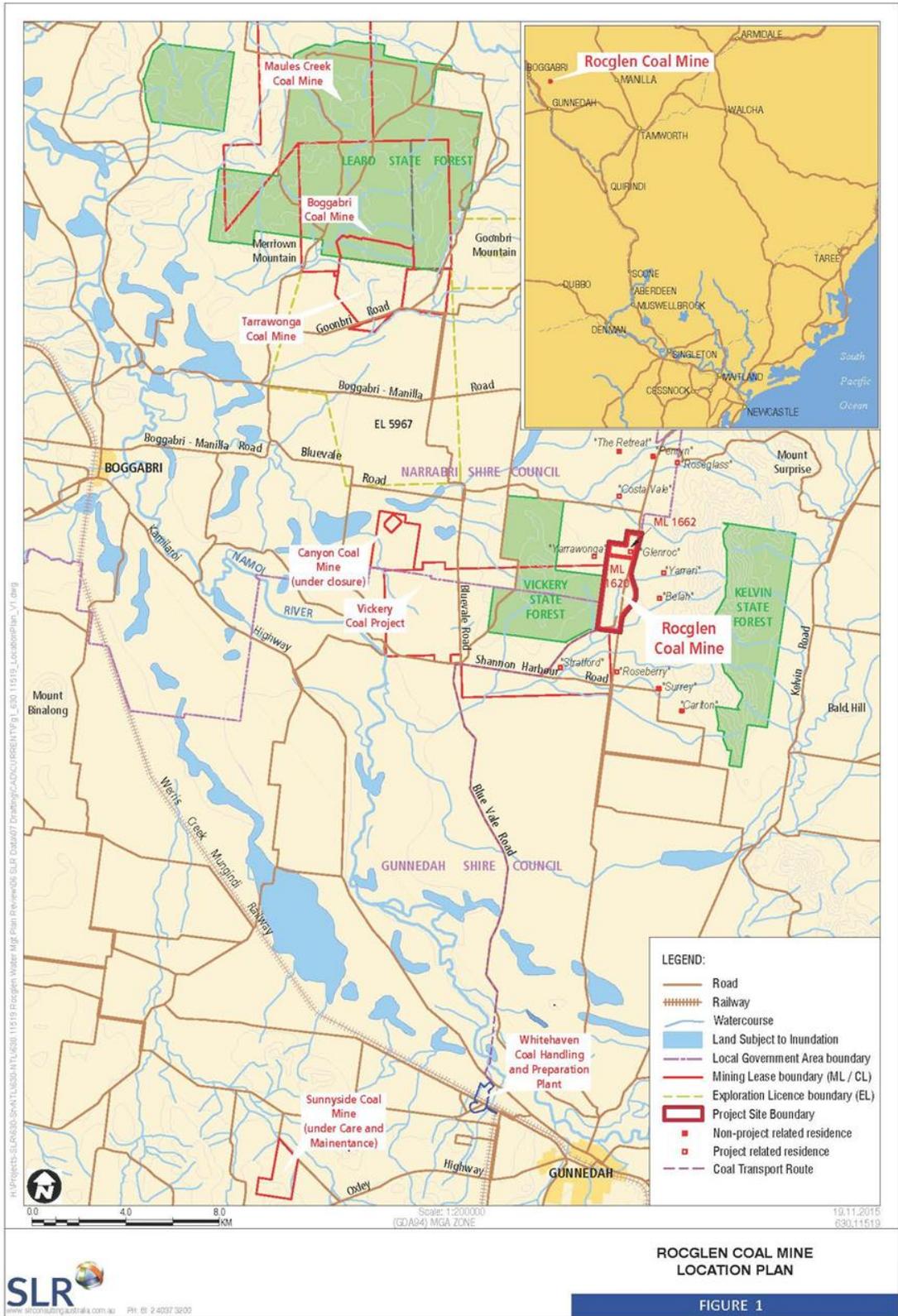
This Environmental Management Strategy (EMS), which forms part of the RCM's Environment Management System, describes the overall framework for environmental management on the mine site. The EMS also addresses the principal strategies to be adopted, including compliance management and monitoring, and the consultation/information dissemination processes.

The operations at the mine will be managed in an integrated manner:

- In accordance with PA 10\_0015, as modified, and any other relevant approvals; and

In a way which provides for the effective control of all aspects of the operation throughout the life of the mine, i.e. from planning, through the site development, construction and operational phases, and culminating in the mine's decommissioning, final rehabilitation and, ultimately, lease relinquishment and/or satisfaction of long-term performance objectives or obligations. The requirements of PA 10\_0015 with respect to the timing for submission and contents of the EMS are contained within Condition (1) (a) – (f) and Condition (2) (a) – (h) of Schedule 5. Table 1 outlines the relevant consent conditions and where they have been addressed in this document.

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**Figure 1 Rocgllen Coal Mine Location**



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**Table 1 Relevant Project Approval Conditions (PA 10\_0015 as modified)**

Project Approval Condition	Section of Document
<b>Environmental Management Strategy (Schedule 5, Condition 1)</b> The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:	This Document
(a) be submitted to the Secretary for approval by the end of December 2011;	N/A
(b) provide the strategic framework for environmental management of the project;	1.2
(c) identify the statutory approvals that apply to the project;	3
(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	4.1
(e) describe the procedures that would be implemented to:	
<ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> </ul>	4.7.1
<ul style="list-style-type: none"> <li>• receive, handle, respond to, and record complaints;</li> </ul>	4.7.2
<ul style="list-style-type: none"> <li>• resolve any disputes that may arise during the course of the project;</li> </ul>	4.7.4
<ul style="list-style-type: none"> <li>• respond to any non-compliance;</li> </ul>	4.8
<ul style="list-style-type: none"> <li>• respond to emergencies; and</li> </ul>	4.9
(f) include:	
<ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this approval; and</li> </ul>	WHC website
<ul style="list-style-type: none"> <li>• a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.</li> </ul>	Figure 2
<b>Management Plan Requirements (Schedule 5, Condition 2)</b> The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:	This Document
(a) detailed baseline data;	1.2
(b) a description of;	
<ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> </ul>	3
<ul style="list-style-type: none"> <li>• any relevant limits or performance measures/criteria;</li> </ul>	Individual Management Plans
<ul style="list-style-type: none"> <li>• 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;</li> </ul>	Individual Management Plans
(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	4
(d) a program to monitor and report on the:	
<ul style="list-style-type: none"> <li>• impacts and environmental performance of the project;</li> </ul>	4.4 & 5
<ul style="list-style-type: none"> <li>• effectiveness of any management measures (see (c) above);</li> </ul>	4.4 & 5



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Project Approval Condition	Section of Document
(e) a contingency plan to manage any unpredicted impacts and their consequences;	5.2
(f) a program to investigate and implement ways to improve the environmental performance of the project over time;	4.4 & 5
(g) a protocol for managing and reporting any:	
• incidents;	4.7.3
• complaints;	4.7.2
• non-compliances with statutory requirements; and	4.8
• exceedances of the impact assessment criteria and/or performance criteria; and	Individual Management Plans
(h) a protocol for periodic review of the plan.	4.4.2
<i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	

nb – Environmental Management Plans are located on the Whitehaven Coal website.

**1.1 Project Approval**

The mine was initially approved on the 15<sup>th</sup> April 2008 under PA 06\_0198 with a minor modification (PA 06\_0198 MOD 1) granted in May 2010 to address highwall stability issues. PA 06\_0198 allowed for the construction and operation of an open cut coal mine, in-pit and out-of-pit mine waste rock placement, coal crushing and screening on-site, and transportation of the crushed coal via road to Whitehaven’s CHPP on the outskirts of Gunnedah. At the Whitehaven CHPP, the coal is crushed and screened further, washed and then loaded onto trains for dispatch and sale to customers as a low ash, thermal and/or semi-soft coking coal.

Whitehaven submitted a Project Application, and accompanying Environmental Assessment, under Part 3A of the *Environmental Planning and Assessment Act 1979* in March 2010. PA 10\_0015 was issued on the 27<sup>th</sup> September 2011 and allows for additional extraction of up to 5 million tonnes of coal at a maximum recovery rate of 1.5 million tonnes per annum (ie. increased projected life of the operation for coal extraction by up to four years).

A minor modification was approved in November 2014 relating to Coal Transport, a second modification was approved in August 2015 allowing changes to coal reject haulage to the site, and a third modification was approved in February 2017 to allow increased coal haulage during calendar year 2017.

**1.2 Strategic Context and Background Information**

This EMS and the original and current Environmental Assessments provide the strategic context for environmental management of the RCM.

The EAs, including the Specialist Consultant Studies Compendiums, provide the detailed background information for the RCM on which this EMS is based.



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### 1.3 Objectives

RCM recognises that the success of the mine's development from a corporate, neighbour and broader community perspective will be enhanced through the achievement of the following objectives:

- The development of a sense of project ownership, community membership and environmental responsibility by all RCM and contracted personnel.
- A recognition and acceptance of the physical, biological and social sensitivities of the site by all RCM and contracted personnel.
- Developing a culture of environmental awareness as an integral part of all planning and day-to-day activities. The awareness will be achieved through workforce and, to a lesser extent, community education.
- Maintaining an honest and open relationship with the community members and ensuring expeditious responses to any issues which may arise.

To meet the objectives outlined above, this document outlines RCM's approach to environmental management at the site.

## 2 DESCRIPTION OF THE ROCGLLEN COAL MINE

The RCM lies within a 460ha area covered by Mining Lease ML 1620 and ML 1662 (the "mine site"). PA 10\_0015 approves the development and operation of the mine as a 1.5 Mtpa open cut operation until the end of December 2022.

Table 2 summarises the operating hours for the various activities onsite.

**Table 2 Approved Hours of Operation**

Activity	Hours of Operation
Mining operations	Any time Monday to Saturday <sup>#</sup>
Maintenance activities	Any time Monday to Sunday
Blasting	9am to 5pm Monday to Saturday inclusive <sup>#</sup>
Coal Transportation	7am to 9:15pm Monday to Friday <sup>#</sup> 7am to 5:15pm Saturday <sup>#</sup>
<sup>#</sup> excluding public holidays	

### 2.1 Environmental Management Plans

The management plans and monitoring programs required by PA10\_0015 are as follows:

- Air Quality and Greenhouse Gas Management Plan;
- Rehabilitation Management Plan;
- Noise Management Plan;
- Blast Management Plan;
- Water Management Plan;



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- Heritage Management Plan;
- Road Noise Management Plan; and
- Environmental Management Strategy.

Schedule 5 Condition 4 requires that within 3 months of:

- (a) The submission of an annual review,
- (b) The submission of an incident report,
- (c) The submission of an audit report, and
- (d) Any modification to the conditions of this approval (unless the conditions require otherwise),

the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.



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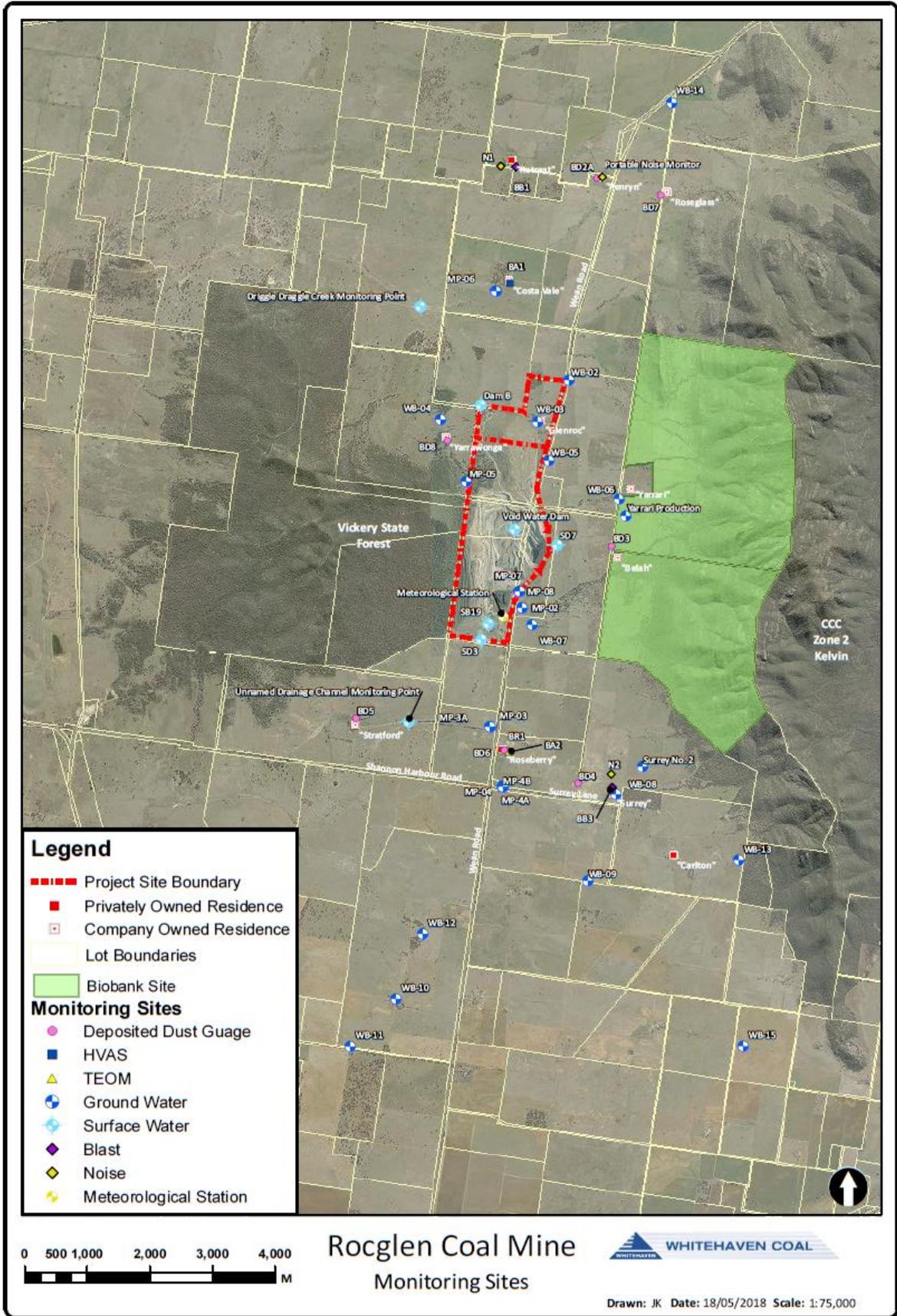


Figure 2 Current Monitoring Locations



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### 3 STATUTORY REQUIREMENTS

#### 3.1 Approvals, Licences, Permits and Leases

All activities at or in association with the mine have been/will be undertaken in accordance with the following approvals, licences, permits and leases which have been issued or have revisions pending:

- PA 10\_0015, granted by the Minister for Planning pursuant to Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).
- The prescribed conditions of ML 1620 issued by the Minister for Mineral Resources under the *Mining Act 1992* on the 10<sup>th</sup> June 2008 and ML 1662 issued on the 9<sup>th</sup> January 2012.
- The conditions of EPL 12870 issued under the *Protection of the Environment Operations Act 1997* (POEO Act).
- Water licences issued by the NSW Office of Water (formerly Department of Water and Energy) under the *Water Act 1912* and the *Water Management Act 2000*.
- Road construction permits issued by Gunnedah Shire Council under Section 138 of the *Roads Act 1993*.
- Construction and Occupation Certificates for building works issued by Gunnedah Shire Council under Part 4A of the *Environmental Planning and Assessment Act 1979*.

#### 3.2 Legislation

The key reference documents include the following Acts and their respective regulations:

- *Mining Act 1992*.
- *Explosives Act 2003*.
- *Work, Health and Safety (Mining) Act, 2013*.
- *Environmental Planning and Assessment Act 1979*.
- *Protection of the Environment Operations Act 1997*.
- *Environment Protection and Biodiversity Conservation Act 1999*.
- *National Parks and Wildlife Act 1974*.
- *Water Act 1912*.
- *Water Management Act 2000*.
- *Fisheries Management Act 1994*.
- *Roads Act 1993*.
- *Local Government Act 1993*.



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- *Contaminated Land Management Act 1997.*
- *Soil Conservation Act 1938.*
- *Threatened Species Conservation Act 1995.*
- *Waste Avoidance and Resource Recovery Act 2001.*
- *Protection of the Environment Operations (Waste) Regulation 2005.*

### 3.3 Policies and Guidelines for Mining

The following policies and guidelines, or their latest versions, issued by DRG are, or are potentially, of relevance to the integrated Mine Management System for the mine:

- EDP11 Rehabilitation Security Deposits Policy
- EDP10 Public Access to Environmental Information Policy
- ESG1 Rehabilitation Cost Estimate Guideline
- ESG2 Guideline for Review of Environmental Factors
- ESG3 Mining Operations Plan MOP Guidelines September 2013.
- ESG4 Environmental Compliance Reporting Guidelines for Coal and Mineral Prospecting Operations. Environmental Management Report and Environmental and Rehabilitation Report.
- ESB28 Environmental Incident Reporting Requirements
- EDG01 Borehole Sealing Requirements on Land: Coal Exploration.
- EDG10 Surface Disturbance Notice Guideline for Exploration Activities.
- EDG12 Format and Guideline for the Preparation of an Annual Environmental Management Report (AEMR)
- EDG13 Exploration Licence Rehabilitation and Relinquishment Report
- ESB26 Rehabilitation Cost Calculation Tool
- MDG1002 Environmental Management Plans and Guidelines for Annual Reporting for Coal Leases NSW.
- MDG1006 Spontaneous Combustion Management Code.
- MDG1010 Risk Management Handbook for the Mining Industry.
- NSW Government Annual Review Guideline
- NSW Government Independent Audit Guideline
- NSW Government Web Based Reporting Guideline



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Other State and Federal Government Policies and Guidelines, or their latest versions, considered include:

- Australian Minerals & Energy Environment Foundation (AMEEF) – Best Practice Environmental Management in Mining series;
- NSW Aquifer Interference Policy (2012),
- NSW EPA (2000) – Environmental Noise Management – NSW Industrial Noise Policy.
- NSW EPA (2011) – Road Noise Policy.
- NSW Minerals Council (1999) – Guidelines for Best Practice Community Consultation in the NSW Mining and Extractive Industries.
- Australian and New Zealand Environment Control Council and Agricultural and Resource Management Council of Australia and New Zealand (ANZECC & ARMCANZ) (2000) – Australian and New Zealand Guidelines for Fresh and Marine Water Quality.
- DECC (2004) – Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation.  
DECCW (2010) – Aboriginal Cultural Heritage Consultation Requirements for Proponents.
- DECCW (2009) – Waste Classification Guidelines.
- DEC (2004) – Environmental Guidelines: Use of Effluent by Irrigation.
- State Groundwater Dependant Ecosystem Policy (2002);
- Farm Dams Policy (1999);
- NSW Salinity Strategy (2000); and
- NSW Water Conservation Strategy (2000).

### 3.4 Standards, Approved Methods and Codes

#### 3.4.1 Standards

The following standards or their latest versions are, or are potentially, of relevance to the integrated Mine Management System for the mine. AS refers to an “Australian Standard, NZS refers to “New Zealand Standard” and ISO refers to the “International Organisation for Standardisation”:

- AS / NZS 3580.1.1:2007 – Methods for Sampling and Analysis of Ambient Air: Guide to Siting Air Monitoring Equipment.
- AS 3580.14-2014 – Methods for Sampling and Analysis of Ambient Air – Meteorological Monitoring for Ambient Air Quality Monitoring Applications.
- AS 2601:2001 – Demolition of Structures.



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- AS 3580.10.1:2003 (R2014) – Methods for Sampling and Analysis of Ambient Air: Determination of Particulate Matter – Deposited Matter – Gravimetric Method.
- AS 2187.2:2006 – Explosives: Storage and Use – Use of Explosives.
- AS 4282:1997 – Control of the Obtrusive Effects of Outdoor Lighting.
- AS 1940:2004 (incl. Amdt 1:2004; Amdt 2:2006) – The Storage and Handling of Flammable and Combustible Liquids.
- AS / NZS 3580.9.6:2003 (R2014) – Methods for Sampling and Analysis of Ambient Air: Determination of Suspended Particulate Matter, PM<sub>10</sub> High Volume Sampler with Size – Selective Inlet – Gravimetric Method.
- AS / NZS 3580.9.3:2015 – Methods for Sampling and Analysis of Ambient Air: Determination of Suspended Particulate Matter, Total Suspended Particulate Matter (TSP) High Volume Sampler – Gravimetric Method.
- AS / NZS / ISO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing.

### 3.4.2 Approved Methods and Codes

The following approved methods and codes, or their latest versions, are, or are potentially, of relevance to the integrated Mine Management System for the mine:

- NSW DEC (2006) – Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.
- NSW EPA (2005) – Approved Methods and Guidance for Modelling in Assessment of Air Pollutants in NSW.
- Department of Energy, Utilities and Sustainability (DEUS) (2005) – Guidelines for Energy Savings Action Plans.
- Landcom (2004) – Managing Urban Stormwater: Soils and Construction.
- Australian Explosives Industry and Safety Group Inc (2011) – Code of Good Practice Prevention and Management of Blast Generated NO<sub>x</sub> gasses in Surface Blasting.
- National Transport Commission (2010) – Australian Dangerous Goods Code 7<sup>th</sup> Edition.
- Australian and New Zealand Minerals and Energy Council (ANZMEC) (2000) – Strategic Framework for Mine Closure.
- NSW Minerals Council (2007) – Rehabilitation by Design, Practice Notes.
- EPA (2007) – Storing and Handling Liquids – Participants Manual.



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**4 SITE IMPLEMENTATION**

**4.1 Roles and Responsibilities**

Ultimate responsibility for the achievement of the objectives outlined in Section 1.3 rests with the mine’s Operations Manager, General Manager – Operations, General Manager Technical Services, and the Board of Directors. Overall site-based responsibility for all activities and all personnel on the mine site, including their compliance with all applicable laws, regulations, licences, approvals, the conditions of PA 10\_0015 and achievement of the desired environmental outcomes will be the responsibility of the Operations Manager.

Table 3 outlines the roles responsibilities for all site personnel.

**Table 3      Roles and Responsibilities**

Role	Responsibilities
Operations Manager	<ul style="list-style-type: none"> <li>• Ensure all contractors, sub-contractors and service-personnel are appropriately qualified and/or licenced to undertake the required work and have a good environmental performance record;</li> <li>• Ensure all operations are undertaken in accordance with relevant environmental legislation;</li> <li>• Workforce induction / training; and</li> <li>• Communication with statutory authorities and the community.</li> </ul>
Environmental Officer	<ul style="list-style-type: none"> <li>• Monitor environmental performance at the site;</li> <li>• Coordination/implementation of the various management plans;</li> <li>• Considering and advising on matters identified in the development consent and compliance with those conditions, and other environmental matters;</li> <li>• Environmental reporting;</li> <li>• Receipt and response to complaints;</li> <li>• Site rehabilitation;</li> <li>• Keeping abreast of new applicable developments in environmental research and technology as it applies to environmental management on mine sites; and</li> <li>• Post-induction education and contact with all site-based and contracted employees on environmental matters.</li> </ul>
Supervisors	<ul style="list-style-type: none"> <li>• Ensure activities under their control are undertaken in accordance with this EMS;</li> <li>• Bring to the attention of the Environmental Officer all complaints at first available opportunity; and</li> <li>• Maintain an awareness of environmental issues and report any possible non-conformances to the Environmental Officer.</li> </ul>
Employees and Contractors	<ul style="list-style-type: none"> <li>• Conduct all activities in accordance with this EMS;</li> <li>• Bring to the attention of their supervisor/manager all complaints at first available opportunity; and</li> <li>• Maintain an awareness of environmental issues and report any possible non-conformances to their supervisor/manager.</li> </ul>



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Though retaining the responsibilities identified above, the Operations Manager may, at their discretion, delegate specific tasks to suitably qualified and/or experienced operational personnel and/or consultants.

### 4.2 Training and Competencies

All training, competency assessment, and maintenance of training records in relation to this EMS will be conducted in line with Whitehaven training requirements.

### 4.3 Rocglen Coal Mine Internal Communication

Communication of information related to this EMS will be undertaken through site based forums such as toolbox talks. Evidence of such undertakings will be recorded and retained.

### 4.4 Retention of Records

The assigned persons will ensure this EMS and associated records are retained on file for a period of at least 5 years.

### 4.5 Information Dissemination, Complaints & Incident Management & Dispute Resolution

#### 4.5.1 Information Dissemination

Dissemination of information to the local community and relevant agencies regarding the mining operation, its progress and environmental management performance, will be achieved by both formal and informal means including the following.

#### *Community Consultative Committee (CCC)*

The CCC comprises an independent chair and appropriate representation from Whitehaven, Gunnedah Shire Council and the local community.

The committee acts as a local focal point for the provision of information to, and receipt of comments from, community members. RCM representatives will provide advice on the status of the mine's progress, environmental performance and monitoring results and complaints. The CCC meetings will also act as a forum for discussion of each of the above aspects or any other issue brought up by members of the community through the CCC representatives, or directly with the Rocglen Coal Mine.

The minutes of the CCC meetings will be available on the Whitehaven website.

Copies of all management plans/strategies or monitoring programs, together with the results of independent audits undertaken in accordance with PA 10\_0015 are publicly available on the Whitehaven website.

#### *Annual Review*

Each year, Whitehaven will prepare an Annual Review in accordance with NSW Government Annual Review Guideline (October, 2015) which will:



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- Describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next 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 performances measures/criteria;
  - the monitoring results of previous years; and
  - the relevant predictions in any EA of the development;
- 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 year to improve the environmental performance of the development.

The Annual Review will be provided to GSC, relevant agencies and to the CCC and also made available on Whitehaven's website.

### *Other Methods*

Visits by relevant government agencies, e.g. EPA, DRG and DP&E, to inspect the mine site and RCM's performance will be documented together with the provision of reports or information as requested.

RCM will maintain regular formal and informal contact with relevant government agencies.

RCM will provide reports to relevant government agencies in the event of a non-compliance or a potential non-compliance with respect to statutory criteria or guidelines.

In addition to the above, Whitehaven may also utilise the local press to present feature articles on the mine's progress. Other forms of communication with the community may include the provision of newsletters.

### 4.5.2 Complaints Management

A complaints management protocol has been developed to ensure an appropriate and consistent level of reporting, response and follow-up is adopted by RCM. At a minimum, the following complaints management protocol will be followed on all complaints received:

- A publicly advertised telephone complaints line will be in place to receive complaints during operating hours and record complaints at other times.



# ROCGLLEN COAL MINE ENVIRONMENTAL MANAGEMENT SYSTEM

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- Each complaint received will be recorded on a Complaints Register, which will include the following details:
  - The date and time of complaint.
  - Any personal details the complainant wishes to provide or if no such details are provided a note to that effect.
  - The nature of the complaint.
  - The action taken by Whitehaven in relation to the complaint, including any follow-up contact with the complainant.
  - If no action was taken by Whitehaven, the reason why no action was taken.
- The Environmental Officer will be responsible for ensuring that an initial response is provided within 24 hours of receipt of a complaint (except in the event of complaints recorded when the mine is not operational).
- The cause of the complaint and any required remedial actions identified.
- Additional measures will be undertaken as required to address the complaint. This may include visiting the complainant, or inviting the complainant to the mine site.
- Once the identified measures are undertaken, the Environmental Officer will sign off on the relevant complaint within the Complaints Register.
- If necessary, the Environmental Officer will follow-up to confirm the source of the complaint is adequately mitigated.
- A copy of the Complaints Register will be kept by Whitehaven and made available to the CCC and the complainant (on request). A summary of complaints received every 12 months will be provided in the Annual Review.

Based on the nature of individual complaints, specific contingency measures may be implemented to the (reasonable) satisfaction of the complainant. The Environmental Officer retains responsibility to ensure that complaints received are properly recorded and addressed appropriately.

### 4.5.3 Incident Management

As soon as practical after the Proponent becomes aware of any environmental incident associated with the Project, the Department and any other relevant agencies will be notified. Within 7 days of the date of the incident, a report detailing the will be provided to the Department and any other relevant agencies.

### 4.5.4 Dispute Resolution

Dispute resolution will be undertaken in accordance with Conditions 3 and 4, Schedule 4 of PA 10\_0015.



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### 4.6 Response to Non-Compliances

Compliance with all approvals, plans and procedures will be the responsibility of all personnel (staff and contractors) employed on or in association with the mine.

Operations and/or Environmental personnel will undertake regular inspections, including monthly environmental inspections and day to day observations on site. From these, directions will be initiated identifying any remediation/rectification work required, and areas of actual or potential non-compliance. Internal audits of compliance with primary approvals will be undertaken on at least an annual basis as part of preparation for the Annual Review.

A review of the mine's compliance will be undertaken in accordance with the requirements of NSW Government Annual Review Guideline (October, 2015).

Additionally, an independent environmental audit will be undertaken a minimum of once every three years and the report submitted to the Secretary and made available to the public on Whitehaven's website. The independent audit will be undertaken by an appropriately certified auditor in accordance with AS/NZS ISO 19011:2003 "Guidelines for Quality and/or Environmental Management Systems Auditing" or equivalent updated versions of these guidelines.

Any non-compliance with regulations, licences or approvals will be reported to the relevant authority, together with details of the corrective actions taken to avoid future occurrences as per **Section 4.5.3**.

### 4.7 Response to Emergencies

As part of routine mine operations, RCM will undertake risk assessments to identify the risk probability and consequences of the proposed activities and aspects of the operation, the adequacy of existing controls to contain the hazards and, where identified as deficient, propose additional controls to further manage or eliminate hazards.

The existing emergency management plan developed for the mine which, though primarily prepared in accordance with OH&S requirements, extends to environmental emergencies.

Although there are specific procedures for individual situations, all incorporate three basic steps:

1. Notification of the emergency (internal and/or external);
2. Protection of personnel as a first priority; and
3. Protection of the environment, plant and equipment.

Initially each of steps (2) and (3) would use internal resources, with assistance from external resources called upon as and when necessary.

Any emergency situations or incidents, which have, or could potentially have, caused environmental harm, will be reported to EPA via the PIRMP process.

Notification to the Department and any other relevant agencies regarding an environmental incident will be undertaken as per **Section 4.5.3**.



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### 5 ENVIRONMENTAL PERFORMANCE

The success of RCM's environmental performance will be assessed annually and by way of its satisfaction of the conditions of PA 10\_0015, Conditions of Authority appended to the MLs, and relevant conditions within other approvals. This, in turn, will be measured by way of achievement of key performance outcomes and satisfaction of RCM's objectives with respect to the management of:

- Aboriginal cultural heritage;
- Flora and fauna;
- Surface and groundwater;
- Soil resources;
- Bushfire;
- Air quality;
- Noise and blasting;
- Visibility;
- Waste;
- Rehabilitation; and
- Socio-economic issues.

The assessment of performance, which may be quantitative and/or qualitative, will be reported in each relevant Annual Review.

#### 5.1 Continuous Improvement

Whitehaven will investigate and implement ways to improve the environmental performance of the project over time by keeping abreast of best environmental management practices in the industry.