



**SUNNYSIDE COAL PROJECT
ENVIRONMENTAL
MANAGEMENT SYSTEM**

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WHC_PLN_SUN_ENVIRONMENTAL MANAGEMENT STRATEGY

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ACRONYMS USED THROUGHOUT THIS DOCUMENT

AS	- Australian Standard
CCC	- Community Consultative Committee
CHPP	- Coal Handling and Preparation Plant
EPA	- Environment Protection Authority
EMS	- Environmental Management Strategy
ISO	- International Standards Organisation
NMPL	- Namoi Mining Pty Ltd
NZS	- New Zealand Standard
PA	- Project Approval



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1 INTRODUCTION

This Environmental Management Strategy (EMS) has been prepared in accordance with Condition 5(1) of Project Approval (PA) 06_0308 for the Sunnyside Coal Project (Sunnyside). Sunnyside is operated by Namoi Mining Pty Ltd (NMPL), a subsidiary company of Whitehaven Coal Limited. Mining operations at Sunnyside were suspended in late November 2012 and recommenced in late 2017. This document considers the area of land corresponding to the project site boundary for Sunnyside, referred to as the “mine site”.

As illustrated in Figure 1, Sunnyside is located approximately 15km west of Gunnedah. The project layout is shown in Figure 2.

This EMS describes the overall framework for environmental management. The Environmental Assessment 2008, including the Specialist Consultant Studies Compendiums, provide the detailed background information for the mine on which this EMS is based.



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LEGEND

- National Park
- Nature Reserve
- State Conservation Area
- Aboriginal Area
- NSW State Forest
- Local Government Area Boundary
- Mining Lease Boundary
- Mine Site
- Mine Project

Source: Geoscience Australia (2006), NSW Department of Premier and Cabinet, Office of Environment and Heritage (2011) and Minerals NSW (2012)

WHITEHAVEN COAL
SUNNYSIDE COAL MINE
 Regional Location

Figure 1 - Regional Location



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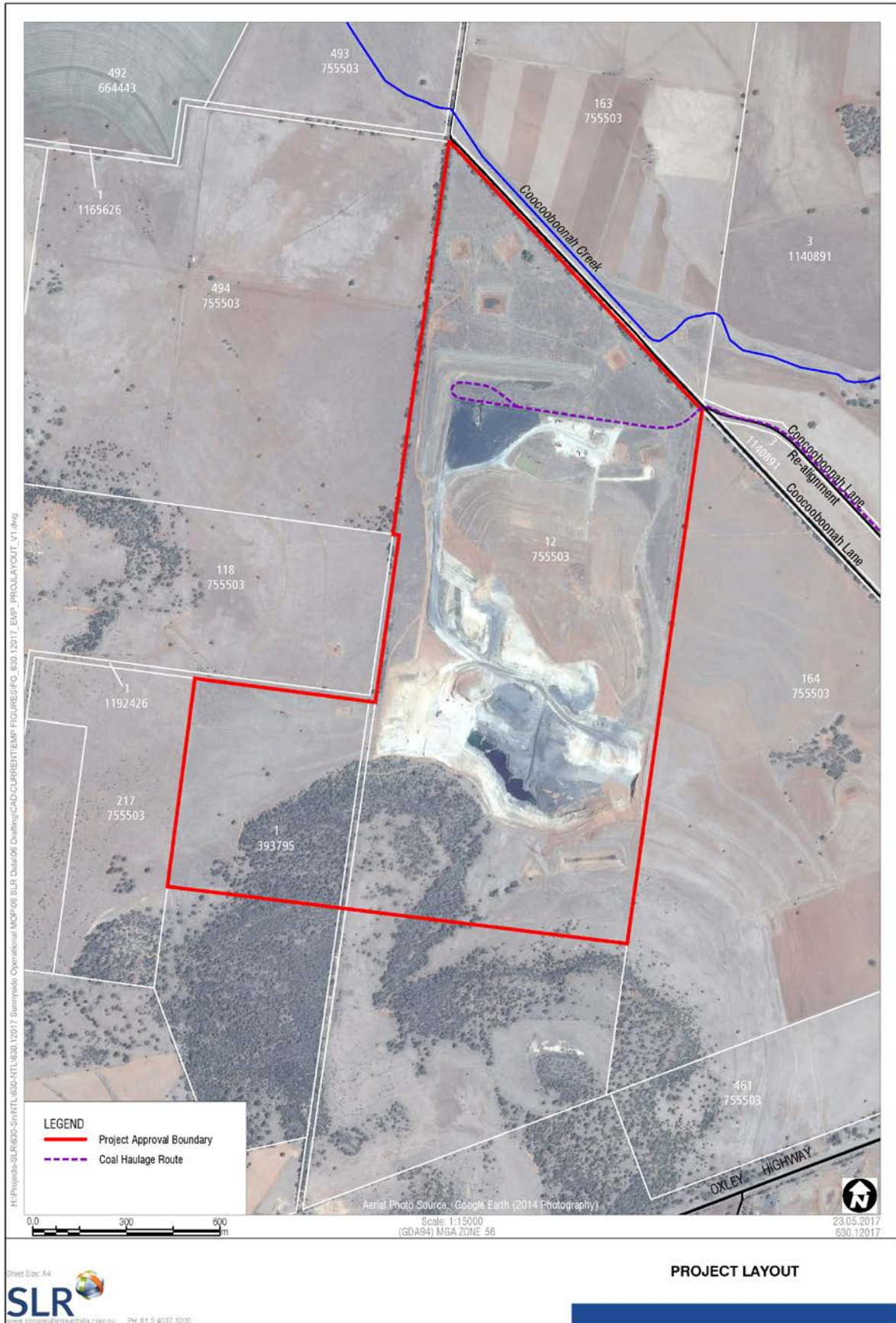


Figure 2 - Project Layout



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2 **STATUTORY REQUIREMENTS**

Statutory requirements include:

- Project Approval PA 06_0308
- EPL 12957
- ML 1624
- Water licences issued by DPI – Water
- Construction and occupation certificates issued by Gunnedah Shire Council
- The following environmental relevant Acts and their respective regulations:
 - *Mining Act 1992*
 - *Explosives Act 2003*
 - *Environmental Planning and Assessment Act 1979*
 - *Protection of the Environment Operations Act 1997*
 - *National Parks and Wildlife Act 1974*
 - *Water Act 1912*
 - *Water Management Act 2000*
 - *Fisheries Management Act 1994*
 - *Roads Act 1993*
 - *Local Government Act 1993*
 - *Contaminated Land Management Act 1997*
 - *Soil Conservation Act 1938*
 - *Threatened Species Conservation Act 1995*
 - *Waste Avoidance and Resource Recovery Act 2001*
 - *Protection of the Environment Operations (Waste) Regulation 2005*

3 **ENVIRONMENTAL PERFORMANCE – MANAGEMENT AND MONITORING**

3.1 **Environmental Management Plans**

The following environmental management plans and strategies are required by PA 06_0308:

- Aboriginal Cultural Heritage Management Plan;
- Air Quality Management Plan;
- Blast Management Plan;



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- Energy Savings Action Plan;
- Environmental Management Strategy;
- Environmental Monitoring Program;
- Hydrocarbon Management Plan;
- Koala Management Plan;
- Noise Management Plan;
- Rehabilitation and Landscape Management Plan (incorporated into the site Mining Operations Plan as directed by DRE);
- Spontaneous Combustion Monitoring Plan;
- Waste Management Plan; and
- Water Management Plan.

Condition 5(5A) of PA 06_0308 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. Where this review leads to revision of any plan then within 4 weeks of the review the revised document must be submitted to the Secretary and any other relevant agency for approval.

4 PROCEDURES TO BE IMPLEMENTED

4.1 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.

4.1.1 Community Consultative Committee

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. Whitehaven 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



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up by members of the community through the CCC representatives, or directly with the mine. The minutes of the CCC meetings, inclusive of Environmental Monitoring Reports, will be available on the Whitehaven website.

4.1.2 Annual Review

Each year, Whitehaven will prepare an Annual Review in accordance with the NSW Government Annual Review Guideline (October, 2014) and Condition 5(5) of PA 06_0308.

The Annual Review will be made available on Whitehaven's website.

4.1.3 Other Methods

Sunnyside will maintain contact with relevant government agencies.

Copies of management plans/strategies or monitoring programs, together with the results of independent audits undertaken in accordance with PA 06_0308 are publicly available on the Whitehaven website.

Whitehaven may also utilise other forms of communication, such as local press and newsletters, to disseminate information to the community.

4.2 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 Sunnyside. 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.
- 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 as soon as practicable.
- The cause of the complaint and any required remedial actions identified.



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- 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.

4.3 Incident Management

Incident reporting will be undertaken in accordance with Conditions 5(3) and 5(4) of PA 06_0308.

4.4 Dispute Resolution

Dispute resolution will be undertaken in accordance with Conditions 4(3) to 4(6) of PA 06_0308.

4.5 Response to Non-Compliances

Responses to non-compliances, in terms of corrective actions, will be determined on a case by case basis when the non-compliances are identified.

A review of the mine's compliance will be undertaken prior to (and included within) each Annual Review in accordance with the NSW Government Annual Review Guideline (October, 2014).

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.

4.6 Response to Emergencies

Response to emergency situations will incorporate three basic steps:



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1. Notification of the emergency (internal and/or external);
2. Protection of personnel and the public 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.

Incidents that cause (or may cause) material harm to the environment will be reported in accordance with Conditions 5(3) and 5(4) of PA 06_0308.

5 ENVIRONMENTAL MANAGEMENT RESPONSIBILITY

Table 1 outlines the roles and responsibilities for site management personnel, or their nominated delegates.

Table 1 - Roles and Responsibilities

Role	Responsibilities
Manager Mining Engineering/Operations Superintendent	<ul style="list-style-type: none"> • 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; • Ensure all operations are undertaken in accordance with relevant environmental legislation; • Workforce induction / training; and • Communication with statutory authorities and the community.
Environmental Officer	<ul style="list-style-type: none"> • Monitor environmental performance at the site; • Ensure all operations are undertaken in accordance with relevant environmental legislation and approvals; • Coordination/implementation of the various management plans; • Considering and advising on matters identified in the development consent and compliance with those conditions, and other environmental matters; • Environmental reporting; • Receipt and response to complaints; • Site rehabilitation; and • Keeping abreast of new applicable developments in environmental research and technology as it applies to environmental management on mine sites.
Supervisors	<ul style="list-style-type: none"> • Ensure activities under their control are undertaken in accordance with this EMS; • Bring to the attention of the Operations Superintendent or Environmental Officer all complaints at first available opportunity; and



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Role	Responsibilities
	<ul style="list-style-type: none">• Maintain an awareness of environmental issues and report any possible non conformances to the Operations Superintendent or Environmental Officer.
Employees and Contractors	<ul style="list-style-type: none">• Conduct all activities in accordance with this EMS;• Bring to the attention of their supervisor/manager all complaints at first available opportunity; and• Maintain an awareness of environmental issues and report any possible non conformances to their supervisor/manager.

6 DOCUMENT REVIEW

This document will be reviewed in accordance with the requirements of Condition 5(5A) of PA 06_0308.