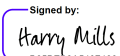





Vickery Bushfire Management Plan

Approval	Name	Position	Signed	Date
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1. Introduction

1.1 Overview of approved operations

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

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

A full project description, including history of operations, current operating approach and mining methods are outlined within the Vickery Extension Project Environmental Impact Assessment and previous Annual Reviews for the site. These documents can be found on the [Whitehaven](#) website.

1.2 Baseline data

The Vickery State Forest (VSF) is located to the East of the VCM and is used for forestry and limited recreational purposes. The VCM is located partially on land mapped as Bush Fire Prone by the NSW Rural Fire Service (RFS). The bushfire prone land corresponds with the VSF and a small parcel of land to the west of the western emplacement area (Figure 1).

The following are recognised as potential causes of bushfires at the VCM:

- on-site storage of hydrocarbons, oils, greases, explosives, chemicals and flammable material;
- on-site storage of run-of-mine coal;
- malfunction of on-site power reticulation;
- lighting strike;
- unmanaged fuel loads in uncleared vegetation on site;
- plant and equipment fires as a consequence of maintenance activities;
- hot works; and
- regional or localised bushfires originating from outside the VCM including hazard reduction burns.

1.3 Purpose

The purpose of this Bushfire Management Plan (BFMP) is to provide an overview of, and direction to the systems, processes and documentation that have been established to:

- ensure compliance with operating conditions of all active approvals;
- minimise the impact of potential bushfire triggers resulting from mining activity on the environment and nearby residences;
- evaluate and report on the effectiveness of the bushfire management system;
- maintain an effective response mechanism to deal with exceedances and complaints; and
- address the Bushfire Management Plan requirements of Condition B99, Schedule 2 of SSD-7480, other bushfire related conditions and general management plan related conditions.

1.4 Scope

The scope of this BFMP applies to all activities at the VCM including mining, handling, transport, and storage of coal that have the potential to impact on bushfire management, management measures and related activities with the potential to impact the immediate and surrounding receiving environment.

This BFMP for the VCM has been prepared in compliance with the NSW Rural Fires Act and Regulations, specifically s63 of the *Rural Fires Act 1997* (RF Act) that requires landowners to take practicable steps to prevent the occurrence of bushfires on, and to minimise the danger of the spread of bushfires from land under their management.



1.5 Management systems

VCM; as a Whitehaven Coal operation, has well-established management systems. These management systems provide the framework to support the planning, implementation, monitoring and review to achieve continual improvement in bushfire management. To minimise the potential of bushfire impacts of these activities a risk-based approach has been established, which includes mechanisms for predictive forecasting and bushfire risk monitoring, providing feedback on the effectiveness of controls and enabling adaptive bushfire management.

2. Legislative requirements

Requirements and commitments associated with bushfire management are defined within the following approvals:

- Development Consent (SSD-7480);
- s63 of the RF Act;
- Coal Lease (CL) 316, Exploration Licence (EL) 7407, Mining Leases (ML) 1718, 1471, 1464 and 1838;
- Environment Protection Licence (EPL) No. 21283;
- Forward Program and Rehabilitation Management Plan; and
- other mining and workplace health and safety related approvals.

Standards, guidelines and additional legislation relevant to the preparation this BFMP and the management of bushfire risks at VCM are available in section 11.

In accordance with SSD-7480, VCPL will comply with Conditions B98, B99 and B100, Schedule 2 of SSD-7480 as they relate to bushfires and bushfire management and VCPL is responsible to assist the NSW RFS, as required, to control bushfires in the local area. VCM will endeavour to prevent any bushfires from entering neighbouring properties.

This BFMP has been developed in accordance with the consent and other relevant conditions, as provided in Appendix 1.

3. Consultation and communication

This BFMP has been prepared in consultation with the Department of Planning, Housing and Infrastructure (DPHI). In addition, VCPL has extensive consultation and communication processes, including but not limited to:

- a comprehensive community engagement program which includes a Community Consultative Committee (CCC);
- periodic engagement with the NSW RFS;
- ongoing consultation with relevant government agencies;
- a community response line (1800 942 836) which enables members of the community to contact environment and community staff directly to discuss concerns with bushfire management; and
- publicly available project approvals, environmental and other related documentation (annual reports, complaints register, CCC minutes) via the Whitehaven website.

A consultation log is provided in Appendix 2.

4. Risk management

VCPL implements a comprehensive risk management system as documented in the Whitehaven HSE Risk Management Standard (WHC-STD-HSE Risk Management) and the Whitehaven HSE Risk Management Procedure (WHC-PRO-HSE Risk Management). Bushfire risks and their associated control measures are documented in the VCM Broadbrush Risk Assessment; the control measures are summarised in section 5 (Control measures) of this BFMP. Operational and project related changes that have the potential to materially alter the bushfire risk profile are managed through the Whitehaven Management of Change Standard (WHC-STD-Management of Change).



5. Control measures

5.1 Overview of operations controls

SSD-7480 requires VCPL to implement reasonable and foreseeable avoidance and mitigation measures' regarding bushfire management. Key operational control measures are included in Table 1.

Table 1 Key Control Measures

Risk	Source	Mitigation Measures	Responsibility	Timing
Insufficient training	Lack of training programs and relevant and up-to-date inductions	All personnel must complete the appropriate inductions that provide fire management awareness	All Staff	All Times
		Equipment and plant introduction to site process includes requirements for fire suppression equipment and regular inspection requirements	VCM Maintenance and Group Mechanical	All Equipment
Inability to suppress or control a fire on-site	Lack of suitable and well-maintained equipment	Regular inspection schedule for firefighting resources on the site	VCM Health and Safety / VCM ERT	6 Months
		Firefighting equipment located in appropriate locations	VCM Health and Safety / VCM ERT	6 Months
		Regularly scheduled plant maintenance	VCM Maintenance	All Times
		Access to on-site water storage	VCM Maintenance	All times
Trigger or propagation of a fire	Inappropriate storage of flammable and hazardous materials	The storage of flammable materials is in accordance with the relevant Australian Standards AS1940 (and where relevant, National Code of Practice for the Storage and Handling of Workplace Dangerous Goods [NOHSC:2017(2001)])	VCM Health and Safety / VCM ERT	6 Months (WHC360 Critical Control Monitoring [CCM])
		Clearing restrictions	VCM Environmental	During Clearing Campaigns
	Fire fuel load management	Where practicable, controlled grazing on Whitehaven controlled land surrounding the site	VCM Environmental / Group Community	All Times
		Implementation and management of fire breaks and management of fuel loads	VCM Environmental / Group Biodiversity	Annual, prior to summer
		Maintenance of asset protection zones (APZ)	VCM Environmental / Group Biodiversity	Annual, prior to summer
	Uncontrolled access	Restricted vehicle movements	VCM Production	All Times
	Flammable fuels in vehicles	The use of diesel vehicles	All site	All Times
	Fire starting activity	Prohibition of smoking on-site	All Site	All Times
	Inappropriate coal stockpile management	Coal stockpile management	VCM Production	All Times
	Poor fire suppression and control	Slow and inefficient	Rapid response to any outbreak of fire	VCM ERT
Poor communication		Maintain a contact point with RFS to enable assistance with control of offsite bushfires, as directed by RFS	VCM Health and Safety	3 Months (LEMC Meeting)
Difficult and limited access		Maintenance of entrance road, internal roads and tracks (including to water sources) and alternative access gates for emergency response purposes	VCM Production	All Times



5.2 Key operational control procedures

5.2.1 Bushfire Emergency Response Procedure

The Bushfire Emergency Response Procedure is provided in Appendix 3.

5.2.2 WHC-PRO-OC-VEP-Emergency Management

The WHC-PRO-OC-VEP-Emergency Management Procedure provides emergency and evacuation procedures in the event of a bushfire.

5.2.3 WHC-STD-OC-Hot Work

The Hot Work Standard identifies circumstances where hot works are or are not permitted along with what safety measures are to be implemented. As per the NSW Resources Regulator Technical Reference Guide – Hot Work at Mines and Petroleum Sites, a standard exemption to a total fire ban will not apply unless specifically referred to in the total fire ban order as made by the Minister or the Commissioner of the NSW RFS.

6. Monitoring program

Site monitoring of key APZs and infrastructure areas occurs monthly during the site Environmental Inspection. This ensures infrastructure areas are free from overgrown vegetation and APZs around infrastructure is being managed adequately. Performance of biodiversity offset areas bushfire management is reported in the Annual Review. An overview of the monitoring program is shown in Table 2.

Table 2 Monitoring program overview

Inspection	Responsibility	Timing
Annual APZ inspection	VCM Environmental	Annual (before end of September)
Annual fuel load monitoring – Biodiversity Offsets	Whitehaven Biodiversity	Annual (Spring)
Emergency Response and Equipment	VCM Health and Safety	Bi-annual (WHC360 CCM)
Fixed Plant, Design, Maintenance and Inspection	Whitehaven Mechanical Engineering	Bi-annual (WHC360 CCM)
Bushfire Management	VCM Environmental	4 Months (WHC360 CCM)
Hot Work Management	Whitehaven Mechanical Engineering	4 Months (WHC360 CCM)
Fire Detection and Suppression	Whitehaven Mechanical Engineering	4 Months (WHC360 CCM)
Mobile Equipment Design, Maintenance and Implementation	Whitehaven Mechanical Engineering	4 Months (WHC360 CCM)
Explosives APZ Inspection	VCM Environmental	Monthly
Infrastructure inspection	VCM Environmental	Monthly
Bushfire Hazard Sign Update	VCM Environmental	Daily

7. Accountabilities

Table 3 Roles and Responsibilities

Role	Responsibility
General Manager – Vickery Coal Mine	<ul style="list-style-type: none"> Ensure required resources and support to implement the BFMP
Operations Manager (or delegate)	<ul style="list-style-type: none"> Authorise the BFMP and future amendments Ensure induction and training relevant to the BFMP Management and maintenance of monitoring network Regulatory notification and engagement Reporting and data review System maintenance and development Specific management responsibilities outlined in Table 1
Environmental Superintendent, Officer (or delegate)	<ul style="list-style-type: none"> Maintenance and update of the BFMP Monitoring program implementation Implementation of operational controls listed in Table 1
Operations Manager and Technical Services Team	<ul style="list-style-type: none"> Implementation of operational controls listed in Table 1
All personnel	<ul style="list-style-type: none"> Adhere to the relevant requirements of this BFMP Modify activities to reduce bushfire risk Specific management responsibilities outlined in Table 1

8. Compliance obligations

8.1 Non-compliance notification

A written report on a non-compliance with consent conditions will be provided to the DPHI via the major projects website within 7 days of becoming aware of the non-compliance (or as otherwise directed by the DPHI) as per Condition E7, Schedule 2 of SSD-7480 and dependent on the incident and potential environmental harm, in accordance with the protocol for industry notification of pollution incidents under Part 5.7 of the POEO Act. The notification will set out the condition/s of SSD-7480 which the VCM is non-compliant with, why it is non-compliant and what actions have or will be taken to address the non-compliance. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

8.2 Incident notification

In accordance with Condition E7, Schedule 2 of SSD-7480 and under Section 148 of the POEO Act, the Secretary of DPHI and representatives of all relevant regulatory agencies will be informed of any incident that:

- has caused, or threatens to cause, material harm to the environment; and
- breaches or exceeds the limits or performance measures / criteria in this approval.

A notification will be provided to the DPHI and the EPA immediately after becoming aware of an incident via the major project portal and the EPA 'hub' email address/pollution phone line. Follow up reports will be submitted to the EPA and DPHI as required. If a non-compliance has been notified to the DPHI as an incident, it does not also need to be notified as a non-compliance. A fire that originates from the VCM will be reported as an incident.

8.3 Complaint handling

Whilst all endeavours will be made by VCM to avoid increasing bushfire risk, it is acknowledged that impacts and other bushfires may occur. In order to ensure an appropriate and consistent level of reporting, response and follow-up to any complaints is adopted by VCM, the following complaints management protocol will be followed:

- a publicly advertised telephone complaints line will be in place to receive complaints;
- initial response is provided where practical within 24 hours of receipt of a complaint;
- an investigation will be initiated (as detailed in the Vickery Environmental Management Strategy); and
- all details regarding the complaint including investigation outcomes and follow up actions will be documented in a complaints register.

A copy of the Complaints Register will be made available to the CCC and the complainant (on request) and updated monthly on the Whitehaven website. A summary of complaints received every 12 months will be included in the Annual Review.



9. Reporting and review

9.1 Reporting

9.1.1 Compliance reporting

An overview of any non-compliances or incidents received during the reporting year are included in the VCM Annual Review. Refer to section 9.1.3 for further detail on the Annual Review.

9.1.2 CCC reporting

A CCC has been established and will continue to be operated for the duration of operations on site. Regular briefings to the CCC will be provided at quarterly CCC meetings.

9.1.3 Annual review

By the end of March each year, Whitehaven will review the environmental performance of VCM for the previous calendar year. The bushfire component of the Annual Review includes the required detail as per the DPHI Annual Review Guideline (2015). The Annual Review will be sent to the relevant regulatory agencies for review and made publicly available on the Whitehaven website.

9.2 Review

This BFMP will be reviewed and evaluated to assess its adequacy and effectiveness, to the satisfaction of the Secretary (in consultation with relevant government agencies) in accordance with Condition E5, Schedule 2 of SSD-7480. This requires that this is undertaken within 3 months of:

- a. the submission of the annual review;
- b. the submission of an incident report;
- c. the submission of an audit; and
- d. any modifications to the conditions of the Approval.

If necessary, the BFMP will be revised to incorporate any recommended measures to improve the environmental performance of VCM resulting from audits, community complaints (section 8.3) and incident investigation findings (section 8.2). In addition, the review process will include ongoing evaluation of operational modifications, alternative methodologies and new technologies that become available for their potential to lessen fire impacts.

9.3 Independent audit

As per Condition E10, Schedule 2 of the SSD-7480, an Independent Environmental Audit (IEA) of VCM was initially undertaken in 2023 and additional IEAs will continue to be undertaken every three years. The IEA includes a review of the bushfire management performance of VCM, assess compliance with the requirements in this plan, and implementation of bushfire management measures.



10. References

Australian Standard (2010). *Australian Standard AS3745 Planning for Emergencies in Facilities.*

Australian Standard (2004). *Australian Standard 1940 The Storage and Handling of Flammable and Combustible Liquids.*

National Occupational Health & Safety Commission (2001). National Code of Practice for the Storage and Handling of Workplace Dangerous Goods.

NSW Resources Regulator Technical Reference Guide – Hot Work at Mines and Petroleum Sites.

Rural Fire Service (2014). *Development Planning: A Guide to Developing a Bushfire Emergency Management and Evacuation Plan.*

Rural Fire Service (2019). *Planning for Bushfire Protection* guideline.

Whitehaven Coal Limited (2018) Vickery Extension Project Environmental Impact Statement.

Whitehaven Hot Work Standard (WHC-STD-OC-Hot Work).

11. Version control

Revision	Description	Author	Authorised by	Date
1.0	Initial draft following consultation as first submitted	Whitehaven	Whitehaven	January 2021
1.1	Feedback incorporated from RFS and DPIE	Whitehaven	Whitehaven	May and August 2021
1.2	Update based in-line with operational phase and site construction updates – RFS Consultation	Whitehaven	Whitehaven	September 2024
2.0	Content revision and incorporation into a new template	Onward Consulting	Whitehaven	October 2025

Figure 1: Bushfire prone land

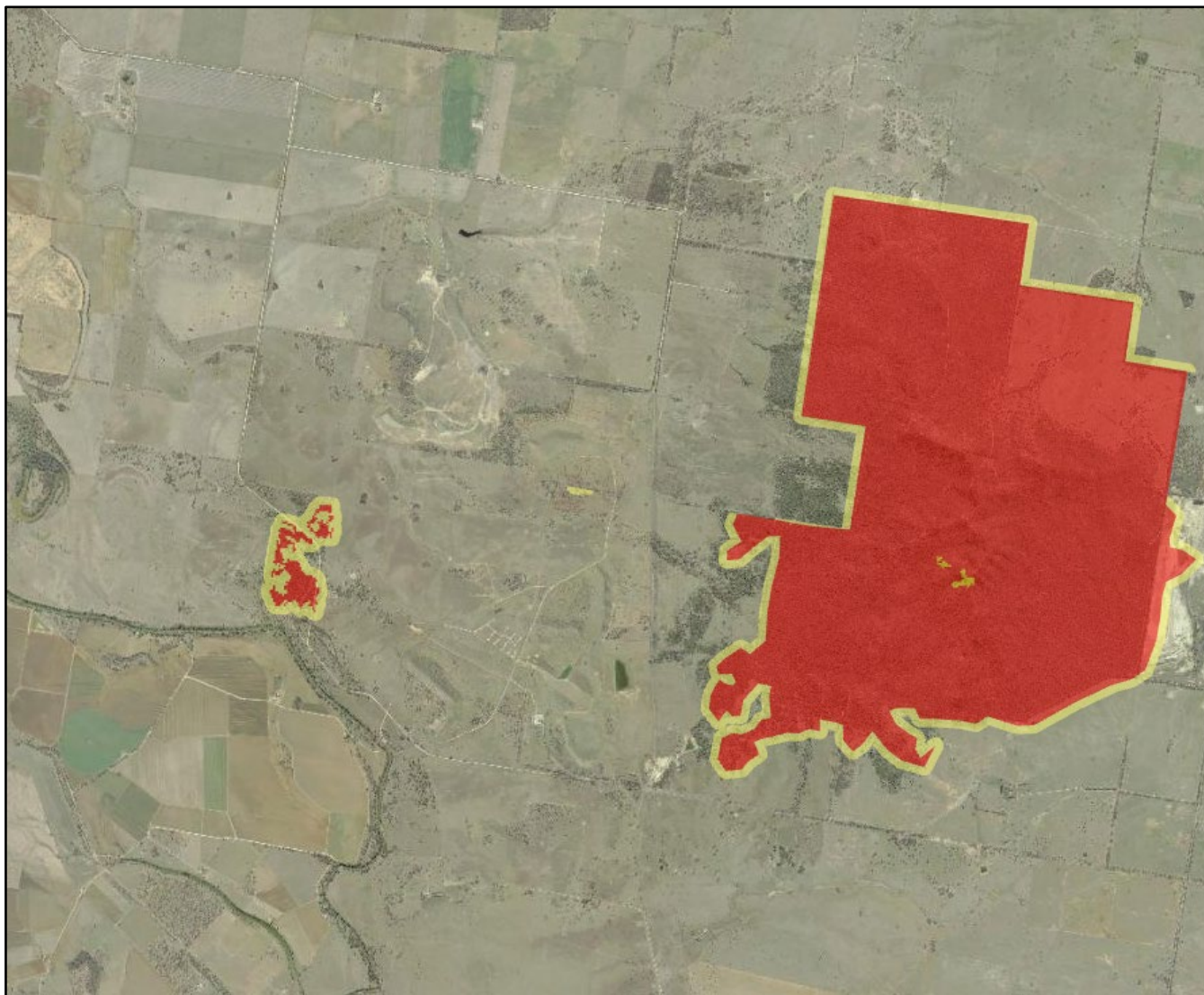


Figure 1. Bushfire prone land around VCM

Figure 2: Bushfire Management Plan

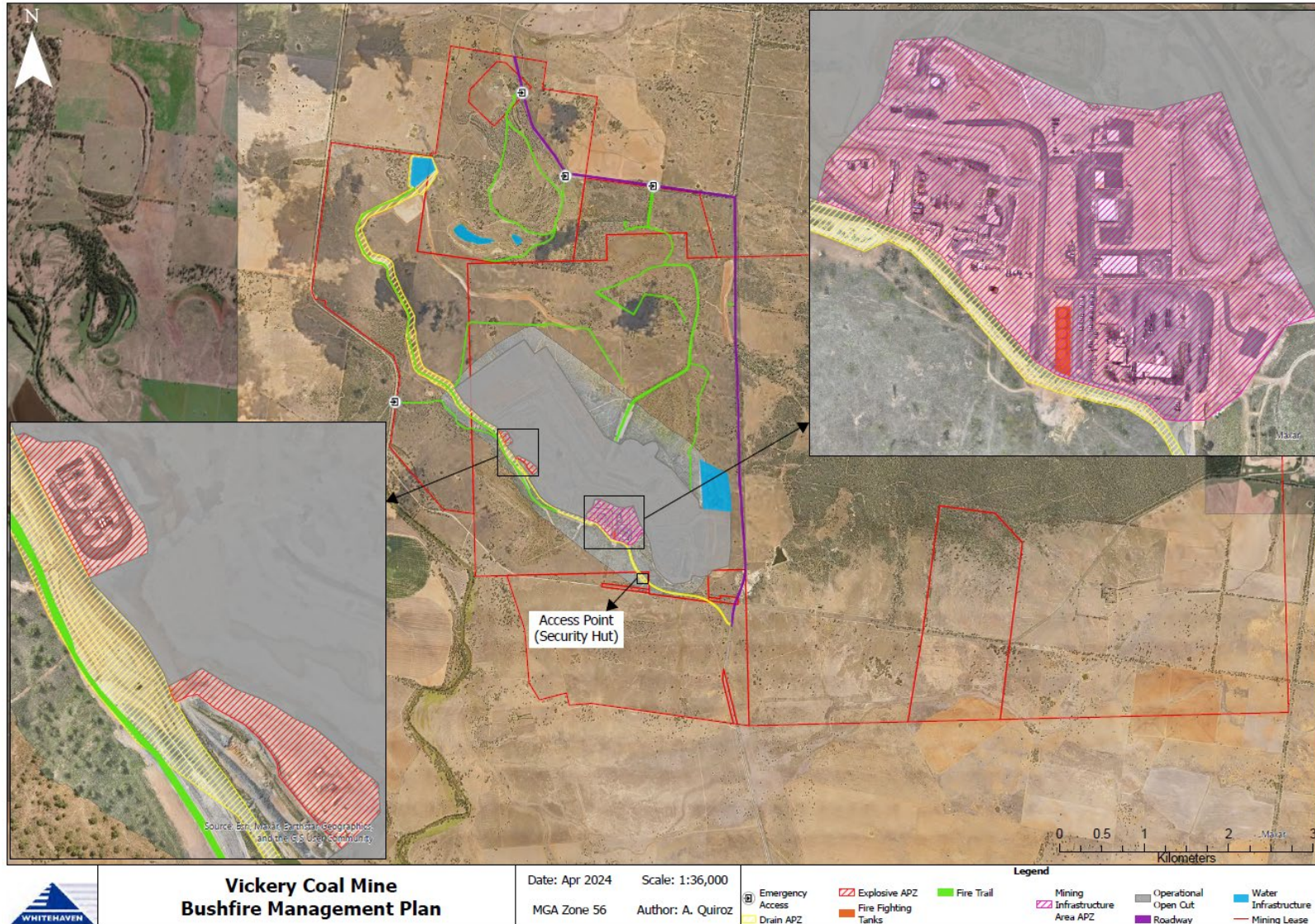


Figure 2. VCM Bushfire Management Plan



Appendix 1: Project approval conditions

Table 4 Specific Management Plan Requirements

Approval condition	Relevant section of this EMP
Bushfire Management	
Schedule 2 Condition 98	
The Applicant must:	
a. Ensure that the development:	
(i) Provides for asset protection in accordance with the relevant requirements in the Planning for Bush Fire Protection (RFS, 2019) guideline; and	Section 5
(ii) Ensure that there is suitable equipment to respond to any fires on the site; and	Section 5
b. Assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.	Section 5
Schedule 2 Condition 99	
Prior to commencing mining operations under this consent, the Applicant must prepare a Bushfire Management Plan for the development in consultation with RFS. This plan must include a:	
a. Contact person and 24 hour contact phone number;	Section
b. Schedule and description of proposed bushfire mitigation works, including:	Section 5
(i) location of managed and unmanaged vegetation within the site;	Section 5
(ii) location of water supply; and	Section 5
(iii) internal access roads;	Section 5
c. plan identifying the location and storage of bulk flammable liquids and materials;	Section 5
d. 'hot works' management plan, including:	Section 5
(i) circumstances when 'hot works' are limited or prohibited; and	Section 5
(ii) safety measures to be implemented when 'hot works' are being conducted; and	Section 5
e. emergency/evacuation plan in accordance with the Development Planning: A Guide to Developing a Bushfire Emergency Management and Evacuation Plan (RFS, 2014) and Australian Standard AS3745 Planning for Emergencies in Facilities.	Appendix 2
Schedule 2 Condition B100	
The Applicant must implement the Bushfire Management Plan in consultation with RFS.	
	This Bushfire Management Plan



Table 5 Project Approval General Requirements

Approval condition	Relevant Section of this Bushfire Management Plan
Management Plan Requirements	
Schedule 2 Condition E4	
Management plans required under this consent must be prepared in accordance with relevant guidelines, and include where relevant:	This Bushfire MP
a. summary of relevant background or baseline data;	Section 1
b. details of:	
(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	
(ii) any relevant limits or performance measures and criteria; and	Section 2
(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	
c. any relevant commitments or recommendations identified in the document/s listed in condition A2(c);	Section 5 and 6
d. a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 5 and 6
e. a program to monitor and report on the:	
(i) impacts and environmental performance of the development; and	Section 6
(ii) effectiveness of the management measures set out pursuant to paragraph (d);	
f. a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Appendix 2
g. a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 9
h. a protocol for managing and reporting any:	
(i) incident, non-compliance or exceedance of any impact assessment criterion or performance measure;	
(ii) complaint; or	Section 8
(iii) failure to comply with other statutory requirements;	
i. public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	Section 9
j. a protocol for periodic review of the plan.	Section 9
Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	

Appendix 2: Consultation log

Table 6 Consultation log

Date	Consultee	Comment
28 October 2020	Rural Fire Service	No comment.
May 2021	Rural Fire Service	Comment received May 2021 listing recommendations.
August 2021	Department of Planning, Industry and the Environment (now DPPI)	DPIE feedback received on draft document
2024	Rural Fire Service	RSF Liverpool Range District
2024	LPRD BFMC	Executive Officer, no major comments received (updated contact details)
2025	LPRD BFMC	No Feedback received during consultation period.



Appendix 3: Bushfire Emergency Response Procedure

In the event that a Bushfire is identified in the vicinity of, or encroaching on VCM, the following procedure is to be observed:

- ensure personal safety and the safety of any other people in the area.
- where a person assesses that the fire is capable of being extinguished by their own action and with the equipment available within the immediate vicinity, they should attempt to extinguish the fire from the upwind side.
- in the event where initial assessment indicates the fire can't be extinguished alone, the person will immediately retreat and declare an emergency over the site radio:
 - Emergency! Emergency! Emergency!
 - your name
 - your location
 - nature of emergency
 - type of assistance required
 - any potential hazards that exist.

In the event of a bushfire emergency at VCM, the RFS will be engaged by the Scene Controller by calling 000 for emergency services. Once engaged, the RFS have the lead role in emergency response for a bushfire at VCM.

The Emergency Management Plan will include details in relation to location of bulk flammable liquids and materials in accordance with NSW SafeWork requirements for storing manifest quantities.

In case of bushfire, the relevant 24-hour contact persons details are shown in Table 1.

Table 1 Emergency Bushfire Contacts

Contact – Role	Contact details
Site Supervisor (OCE)	0439 028 110
Operations Manager	0448 053 764
Health, Safety and Training Manager	0417 137 889
Environmental Superintendent	0448 086 827
Local RFS / RFS Liverpool Range District	02 6746 5800 / Duty Officer 24hr contact – 0429 401 100
Emergency	000