

Vickery

Environmental Management Strategy

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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 *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.

Modification 1 to SSD-7480 was approved in August 2025 and included an update to the proposed final landform, approval to produce gravel for use outside of the development, pipelines to external water sources and an additional construction access route.

Modification 2 to SSD-7480 was approved in October 2025 and included a temporary uplift in cumulative haulage to 3.8Mtpa.

A full project description, including history of operations, current operating approach and mining methods are outlined within the Vickery Extension Project Environmental Impact Statement (Whitehaven Coal Limited, 2018), modification environmental assessments and previous Annual Reviews for the site. These documents can be found on the [Whitehaven](#) website.

1.2 Purpose

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

- provide the strategic framework for environmental management;
- describe the role, responsibility, authority, and accountability of all key personnel involved in environmental management;
- ensure compliance with operating conditions of all active approvals;
- minimise the impacts of mining activity on the environment and nearby residences;
- evaluate and report on the effectiveness of the Environmental Management System (EMS); and
- maintain an effective response mechanism to deal with exceedances, disputes, complaints and emergencies.

1.3 Scope

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

1.4 Management systems

VCM, as a Whitehaven operation, has well-established management systems that are generally aligned with the international management system standard ISO 14001. These management systems provide the framework to support the planning, implementation, monitoring, and review to achieve continual improvement in environmental management. To minimise the environmental impacts of these activities a risk-based approach has been established, which includes mechanisms for predictive forecasting and environmental monitoring, providing feedback on the effectiveness of controls and enabling adaptive environmental management.

2. Legislative requirements

The key legislation relevant to the activities described in the approval and its supporting document includes the following Acts and their respective regulations:

- *Biosecurity Act 2015* (NSW);
- EP&A Act (NSW);
- *Environmental Protection and Biodiversity Conservation Act 1999* (Commonwealth);
- *Mining Act 1992* (NSW);
- *Explosives Act 2003* (NSW);
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013* (NSW);
- *Protection of the Environment Operations Act 1997* (NSW) (POEO Act);
- *National Parks and Wildlife Act 1974* (NSW);
- *Water Act 1912* (NSW);
- *Water Management Act 2000* (NSW);
- *Fisheries Management Act 1994* (NSW);
- *Roads Act 1993* (NSW);
- *Local Government Act 1993* (NSW);
- *Contaminated Land Management Act 1997* (NSW);
- *National Greenhouse and Energy Reporting Act 2007* (Commonwealth);
- *Soil Conservation Act 1938* (NSW);
- *Threatened Species Conservation Act 1995* (NSW); and
- *Waste Avoidance and Resource Recovery Act 2001* (NSW).

Standards, guidelines and additional legislation relevant to the preparation of this Strategy and other VCM management plans are available in section 11. This EMS has been developed in accordance with the development consent and other relevant conditions, as provided in Appendix 1 (Table 5 and Table 6).

The VCM requirements and commitments are defined within the approvals, leases, licences, and permits outlined in Table 1. As required by Schedule 2, Condition E2 this EMS will be implemented by VCM.

Table 1 VCM approvals and licenses summary

Approval	Reference
Development Consent	SSD-7480
Coal Lease	CL 316
Exploration Licence	EL 7407
Mining Lease	ML 1471
Mining Lease	ML1718
Mining Lease	ML 1464
Mining Lease	ML 1838
Mining Lease	ML 1895
Environment Protection Licence	EPL 21283
EPBC (Particular Manner)	EPBC 2012/6263
EPBC (Controlled Action)	EPBC 2016/7649
Water Access Licence – Gunnedah-Oxley Basin MDB groundwater source	WAL 36576

Approval	Reference
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12651
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12653
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12645
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12724
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12715
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12701
Water Access Licence – Upper Namoi zone 4, Namoi Valley	WAL 12731
Water Access Licence – Lower Namoi Regulated River water source (High security river licence)	WAL 16034
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 14936
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 2577
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 13051
Water Access Licence – Lower Namoi Regulated River water source (General security river licence)	WAL 2682

* Note: List of VCM approvals current at the time of revision.

3. Consultation and communication

This EMS has been prepared in consultation with the NSW Department of Planning, Housing, and Infrastructure (DPHI) (Table 7). In addition, VCM has extensive consultation and communication processes, including but not limited to:

- a comprehensive community engagement program which includes a Community Consultative Committee (CCC);
- ongoing consultation with relevant government agencies including DPHI;
- a community response line (1800 942 836) that enables members of the community to contact environment and community staff directly to discuss concerns; and
- maintaining a project [website](#) that includes up to date information regarding the following:
 - current statutory approvals;
 - environmental impact assessments (listed in A2(c) of SSD-7480);
 - approved environmental management plans and strategies;
 - minutes of CCC meetings;
 - reporting on environmental performance in accordance with reporting requirements in management plans, EPL21283 and EPBC2016/7649;
 - monitoring results of the development in accordance with the requirements of the conditions of SSD-7480 and approved management plans;
 - a summary of the current progress of the development;
 - contact details of how to enquire about the development or make a complaint;
 - a complaints register, updated monthly;
 - Annual Reviews;
 - Audit reports prepared as part of any Independent Environmental Audit (IEA) and the response to the recommendations in the audit report; and
 - and other information required or requested by the Planning Secretary.

4. Risk management

VCM 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). Environmental management risks and their associated control measures are documented in the VCM Broadbrush Risk Assessment with the control measures summarised in the control measures section of their respective management plan. Operational and project related changes that have the potential to materially alter the environmental management profile are managed through the Whitehaven Management of Change Standard (WHC-STD-Management of Change).

5. Environmental management system

5.1 Environmental management structure

The VCM EMS includes various site-specific management plans, procedures, protocols, forms, and registers (Figure 1). Various documents have been developed to ensure VCM related activities are undertaken in a manner that minimises potential harm to the environment.

The Strategy is a strategic framework for environmental management of the project. It functions within the VCM EMS to outline the relevant statutory requirements and facilitates the implementation, maintenance, and management of any VCM environmental documentation. The VCM EMS sits within the wider Whitehaven health and safety management systems which include protocols for identifying hazards, implementing mitigating actions and reviewing performance to ensure continuous improvement is achieved.

Each management plan outlines the operational controls to be implemented to facilitate compliance with the relevant regulatory requirements and statutory approvals. Procedures, forms, and registers have been developed to assist with the implementation and recording of onsite activities. All documents relating to the EMS are available on either the Whitehaven website or the internal server for ease of access and use by VCM personnel. A register of these documents is kept by VCM environmental personnel.

These documents will continue to be reviewed, revised, or developed as necessary and in accordance with SSD-7480.

5.1.1 Environmental management strategy documentation

Table 2 lists the management plans required under SSD-7480 and EPL 21283.

Table 2 Management plan requirements

Requirement	Plan / Program
SSD-7480	
Condition B15	Noise Management Plan
Condition B29	Blast Management Plan
Condition B36	Air Quality and Greenhouse Gas Management Plan
Condition B53	Water Management Plan
Condition B53(v)	Groundwater Management Plan
Condition B63	Biodiversity Management Plan
Condition B65	Koala Plan of Management
Condition B70	Aboriginal Cultural Heritage Management Plan
Condition B73	Historic Heritage Management Plan
Condition B86	Traffic Management Plan
Condition B95	Waste Management Plan
Condition B100	Bushfire Management Plan
Condition B106	Rehabilitation Management Plan

Requirement	Plan / Program
Condition E1	Environmental Management Strategy (this document)
EPL 21283	
Condition O6.2	Pollution Incident Response Management Plan

5.2 Whitehaven Health, Safety and Environmental policy

VCM operates under Whitehaven's Health Safety and Environmental Policy (HSE Policy) that sets out the company's aims and values and is applicable to all employees and contractors. The HSE Policy has been endorsed by the Managing Director and CEO and is a commitment from top management to all of Whitehaven's employees.

6. Implementation and operation

6.1 Accountabilities

All mine employees, contractors and visitors on-site have an overall site-based responsibility to conduct all activities in compliance with the applicable laws, regulations, licences and approvals detailed in section 2.

Table 3 outlines the roles and responsibilities of staff at VCM.

Table 3 Roles and responsibilities

Role	Responsibility
General Manager	<ul style="list-style-type: none"> Ensure adequate people and resources are allocated to enable this EMS to be effectively implemented Perform in an overview role to provide strategic direction Provide support for the development of strategies, systems and plans to address all legal requirements associated with the VCM
Environment Manager/ Environmental Superintendent	<ul style="list-style-type: none"> Notify the Secretary and other Departments (where applicable) of all environmental incidents or complaints as soon as practicable Maintain an awareness of environmental issues and report any possible non-conformances Responsible for commitment to implementing the Environmental Policy and promoting continual environmental improvement at VCM Ensuring all operations are undertaken in accordance with relevant environmental legislation and applicable approvals Report all environmental incidents or complaints as soon as practicable Maintain an awareness of environmental issues and report any possible non-conformances Responsible for commitment to implementing the Environmental Policy and promoting continual environmental improvement at VCM Ensuring all operations are undertaken in accordance with relevant environmental legislation and applicable approvals Communicate and provide details of environmental issues to all personnel and contractors as required
Environmental Advisor	<ul style="list-style-type: none"> Report all environmental incidents or complaints as soon as practicable Maintain an awareness of environmental issues and actively promote environmental understanding across the workforce Assist in the control, review and revision of documents, forms and records Assist in the preparation of any scheduled EMS reporting and incident investigations as required Co-ordination of environmental monitoring and measurement Evaluation of compliance with legal environmental requirements and other statutory approvals relevant to the EMS Advise on appropriate co-ordination of corrective and preventive actions for environmental incidents. Maintenance of the pollution incident response procedure and management of testing the procedure
Employees and Contractors	<ul style="list-style-type: none"> Conduct all activities in compliance with the applicable legislation, approvals, the Whitehaven requirements, the VCM Policies and associated health, safety, and environment management systems Immediately bring to the attention of their Supervisor/Manager all Environmental incidents & complaints as soon as practicable Maintain an awareness of environmental issues and report any possible non-conformances to their supervisor/manager

6.2 Training competencies

VCM will implement a training program to promote general environmental awareness and an understanding of individual responsibility. All contractors and personnel will undergo a generic induction level of training as a prerequisite to commencing work on-site. The training program will aim to maintain an awareness of environmental issues and actively promote environmental understanding across the VCM workforce.

In addition to the induction course, environmental awareness and understanding will be maintained through additional training as needed to help refresh environmental awareness and notify VCM personnel of any new operational practices/requirements.

6.3 Internal communication

Information about the EMS will be communicated internally among all levels and functions of the VCM. The aim of the communication program will be to maintain and foster good working relations between operational departments and personnel. Relevant operational departments and personnel will be notified of any proposed changes to operations, environmental risks and required environmental remedial works. Environmental performance and any environmental issues will be reported to personnel and contractors using the following methods:

- environmental training and awareness during the induction program;
- updates using briefing notes or at toolbox talk sessions as required; and
- internal reports/memos/presentations/notice boards prepared by the Environment team as required.

6.4 External communication

Whitehaven will undertake external communications to ensure up to date information on VCM activities, management systems and environmental performance are readily available to the public. The Whitehaven website will include up to date copies of:

- environmental assessment documents;
- all current statutory approvals;
- approved strategies, plans and programs required under the conditions of the approval;
- a comprehensive summary of the monitoring results, which have been reported in accordance with the plans and programs approved under the conditions of the approval;
- a register of complaints;
- minutes of CCC meetings;
- independent environmental audit reports and VCM's response to the findings and recommendations;
- blast schedule notifications;
- any road closures as a result of the VCM's activities;
- any consultation materials released to the community (newsletters, fact sheets, etc.);
- the last five Annual Reviews of the environmental performance of the mine submitted to DPPI and other regulatory agencies;
- daily weather forecasts;
- proposed operational response to these weather forecasts;
- provision of EPL monthly monitoring data on the Whitehaven website;
- daily real-time noise and air quality monitoring data (subject to any necessary caveats);
- any operational responses that were triggered in response to the noise and air quality monitoring data; and
- any other information required by the DPPI or other regulatory agencies.

Other methods of external communication will include:

- advertisements;
- in person consultation at the Whitehaven Gunnedah office and at assorted community events;
- 24-hour Community Hotline: 1800 942 836 (1800 WHAVEN); and
- community feedback via email provided on the Whitehaven website.

6.5 Complaint handling

Whilst all endeavours will be made by VCM to avoid adverse impacts on local landowners / residents, it is acknowledged that impacts 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 per for an exceedance (section 6); 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 website. A summary of complaints received every 12 months will be included in the Annual Review.

6.5.1 Dispute resolution

The following dispute resolution process may be adopted where required:

- if possible, a meeting will be convened with the complainant, the General Manager and/or VCM representative to seek a resolution on the matter;
- where required, VCM will undertake reasonable additional measures to effectively resolve the issue and satisfy all parties involved;
- the complainant will be provided with a response from VCM detailing the outcomes of the complaint investigation if requested;
- if requested, the General Manager and/ or Environmental Superintendent will convene a follow-up meeting with the complainant; and
- the complainant may refer the matter to the Secretary of DPHI (the Secretary) consistent with the consent.

6.6 Incident response

The VCM Environment Department will be responsible for evaluating the appropriate response if an environmental incident is identified.

6.6.1 Response procedure

Should an environmental incident occur, VCM will action an appropriate response by:

1. initiate the Pollution Incident Response Management Plan (PIRMP) where required and taking measures to “control, contain and clean-up”;
2. immediately informing the Supervisor of the relevant work area of any incidents. The Supervisor or Operations Manager will inform the Environmental Department of any environmental incidents;
3. if there is “an immediate threat to human health or property” an Emergency Response will be required. Any potentially affected landholder, tenant or lessee will be notified about the incident immediately and informed as to any appropriate actions;
4. the supervisor will initiate any additional containment/control of the incident and coordinate required clean-up activities. The supervisor will continue to liaise with the Environmental Department to determine any relevant authorities that may need to be notified;
5. the Environmental Department will record any environmental incidents in an incident register including any action taken;
6. if the Environmental Department determines the incident is notifiable (i.e. caused or threatens to cause material harm to the environment or for any other relevant reason), then, in consultation with the Group Manager Environment, they will notify the relevant agencies immediately after becoming aware of the incident;
7. within 7 days of the incident occurring the VCM Environmental Department, in consultation with the Group Manager Environment, will provide reports to the relevant agencies relating to the cause, response and mitigation measures enacted to manage the pollution incident; and
8. following an incident report to the relevant agencies VCM will take preventative actions and review any applicable management plans. VCM will also continue to liaise with the relevant agencies to communicate any actions taken and provide information if requested.

6.6.2 Emergency response

Response to emergency situations will incorporate three basic steps:

1. notification of the emergency (internal and/or external);
2. protection of personnel as priority; and
3. protection of the environment, plants, and equipment.

Initially, both steps (2) and (3) would use internal resources, with help from external resources called upon when necessary.

VCM has developed a PIRMP as part of the requirements of EPL 21283 and the POEO Act. The PIRMP provides emergency procedures

for environmental incidents and includes a register of surrounding landholders, tenants and lessees.

Should an emergency occur the aim of any emergency procedure is to:

1. take immediate action to minimise environmental harm and to mitigate the environmental impact;
2. if there is a risk of material harm to the environment or an immediate threat to human health or property, prior to any other action, Whitehaven must notify, Fire and Rescue NSW, NSW Police and NSW Ambulance by calling 000 and any affected residents;
3. contact other response and regulatory agencies in accordance with Section 8; and
4. implement corrective action to avoid a recurrence.

Following an emergency incident, these procedures will be carefully reviewed to ensure the response is practical and appropriate in practice and to implement corrective actions accordingly.

7. Environmental monitoring program

The VCM monitoring network will be progressively developed to address construction, initial mining and operational activities. The environmental monitoring program for the VCM will align with the required approvals. The VCM environmental monitoring network is described in Table 4 and shown in Figure 2 and Figure 3.

Further detail on environmental monitoring and management for specific environmental impacts is included in the management plans required by SSD-7480.

Table 4 Environmental monitoring program

Aspect	Environmental Monitoring	Frequency	Responsibility
Meteorology	On-site meteorological stations and implementation of a meteorological forecasting system	Continuous	Environmental Advisor
Groundwater	Groundwater levels – monitoring bores installed within the Permian coal measures and alluvium	Quarterly	Environmental Advisor
	Groundwater quality – monitoring bores installed within the Permian coal measures and alluvium	Bi-annually	Environmental Advisor
Surface Water	Surface water quality – monitoring sites on watercourses and drainage lines upstream and downstream of the Project	Monthly if flow observed	Environmental Advisor
	Licensed discharge points – Licensed release points	During controlled and uncontrolled release	Environmental Advisor
Noise	Attended noise monitoring – a residence to monitor construction noise and rail spur construction noise	Monthly	Environmental Advisor
	Realtime – monitoring and recording at neighbouring residences and other locations as required	Continuous	
Blasting	Blasting – a residence, the Kurrumbede Homestead and the grinding groove site in the Namoi River	Per blast	Environmental Advisor
Air Quality	Real-time PM10 and PM2.5 – TEOM(s) within the vicinity of the Project. TSP calculated from PM10 measured readings	Continuous	Environmental Advisor

* Monitoring points and parameters may be subject to change as required. There will be periods of non-operation due to technicalities, calibration and routine & non-routine maintenance.

8. Compliance obligations

8.1 Response to non-compliances

The VCM Environmental Department will be responsible for evaluating the appropriate response if an environmental incident or non-compliance is identified. In the event a non-compliance is identified, the response procedure in section 6.6.1 will be implemented and notification provided in accordance with section 8.2.

8.2 Unforeseen Impacts

It is considered unlikely that the operation of the mine will result in any unpredicted or unforeseen environmental impacts. In the event that unpredicted impacts do occur, these will be managed in accordance with the measures outlined in Section 5 and 6 and assessed in accordance with the protocol in section 8 to determine if the impact constitutes any exceedance of any compliance criteria.

8.3 Non-compliance notification

A written report on a non-compliance with required contents 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.

8.4 Incident notification

In accordance with Condition E7, Schedule 2 of SSD-7480, VCM will immediately notify DPHI (via the major project's website) and representatives of all relevant regulatory agencies after becoming aware of an incident that has caused, or threatens to cause, material harm to the environment.

9. Reporting and review

9.1 Reporting

9.1.1 Regular monitoring reports on webpage

In accordance with the relevant approvals and licences for the VCM, all required reports are made available on the Whitehaven Website (section 6.4).

9.1.2 Compliance reporting

An overview of any non-compliances or incidents received during the reporting year are included in VCM's annual review and EPL Annual Return.

In accordance with the requirements of EPL 21283, Whitehaven submits an annual report to the EPA. The summary report includes:

- a statement of compliance against the conditions;
- monitoring and complaints summary for the reporting period;
- a Statement of Compliance - Licence Conditions;
- a Statement of Compliance - Load based Fee;
- a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan;
- a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
- a Statement of Compliance - Environmental Management Systems and Practices.

9.1.3 Annual review

By the end of March each year, Whitehaven will review the environmental performance of VCM [incorporating the VCP (SSD-5000) and Canyon Mine (DA 8-1-2005)] for the previous calendar year. The Environmental Management 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 DPHI for review and made publicly available on the Whitehaven website.

In accordance with Schedule 2, Condition E9 of SSD-7480 the Annual Review will:

- (a) describe the development (including any rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;
- (b) report on the progress of biodiversity credits retirements and the associated actual versus proposed surface disturbance for each stage;
- (c) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, including a comparison of these results against the:
 - (i) relevant statutory requirements, limits or performance measures/criteria;
 - (ii) requirements of any plan or program required under this consent;
 - (iii) monitoring results of previous years; and
 - (iv) relevant predictions in the document/s listed in condition A2(c);
- (d) identify any non-compliance or incident which occurred in the previous calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;
- (e) evaluate and report on:
 - (i) the effectiveness of the noise and air quality management systems; and
 - (ii) compliance with the performance measures, criteria and operating conditions of this consent;
- (f) identify any trends in the monitoring data over the life of the development;
- (g) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
- (h) describe what measures will be implemented over the next calendar year to improve the environmental performance of the development.

9.2 Review

This Strategy 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 Conditions E5 and E6, 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 Independent Environmental Audit (IEA); and
- d. any modifications to the conditions of the Approval.

If necessary, the Strategy will be revised to incorporate any recommended measures to improve the environmental performance of VCM resulting from audits, community complaints (section 6.5) and incident investigation findings (section 6.6). 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 environmental impacts.

9.3 Independent audit

In accordance with Condition E10, Schedule 2 of SSD-7480, an IEA of VCM was initially undertaken in 2023 and additional IEAs have been and will continue to be undertaken every three years. The IEA includes a review of the Strategy performance, assessment of compliance with the requirements in this Strategy, and implementation of EMS management measures.

10. References

Australian Standard (2016). *Australian/New Zealand Standard 14001:2016, Environmental management systems – Requirements with guidance for use.*

Department of Agriculture, Water and the Environment (2021). Approval, Vickery Extension Project (EPBC 2016/7649).

Department of Planning, Industry and Environment (2020). Approval SSD-7480 (including MOD 1).

Environment Protection Authority (2019). Environment Protection Licence 21283 (as varied).

Environment Protection Authority (2022). *NSW Environmental Management Systems Guidelines: Risk-based licensing.*

NSW Government (2015). *Annual Review Guideline: Post-approval requirements for State significant mining development.*

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

11. Version control

Revision	Description	Author	Authorised by	Date
1.0	First version	Whitehaven	Whitehaven	June 2021
2.0	New branding and review	Onward Consulting	Whitehaven	May 2025
2.1	Revised and updated following Modification 1 and 2	Whitehaven	Whitehaven	November 2025
2.2	Revised following consultation with DPHI	Whitehaven	Whitehaven	May 2026

Figure 1: VCM EMS

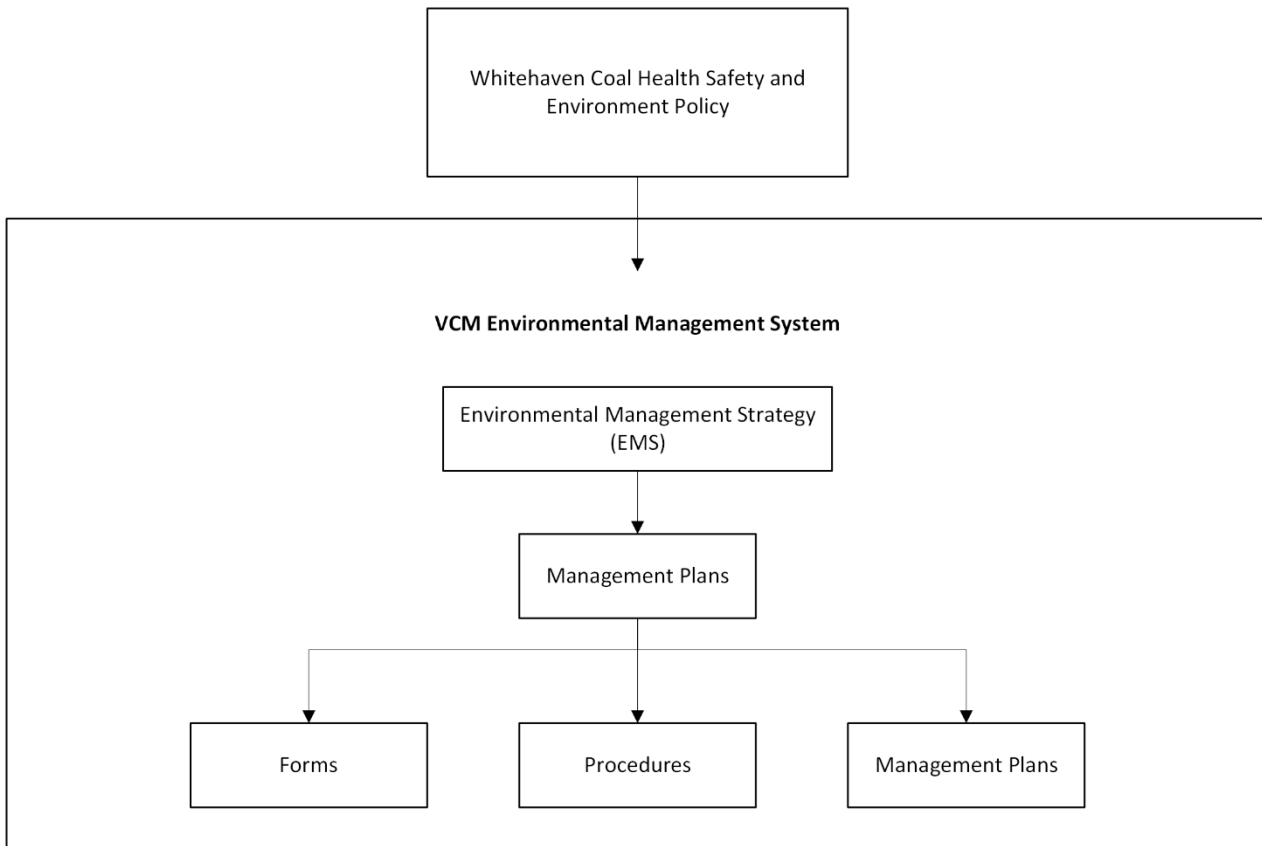
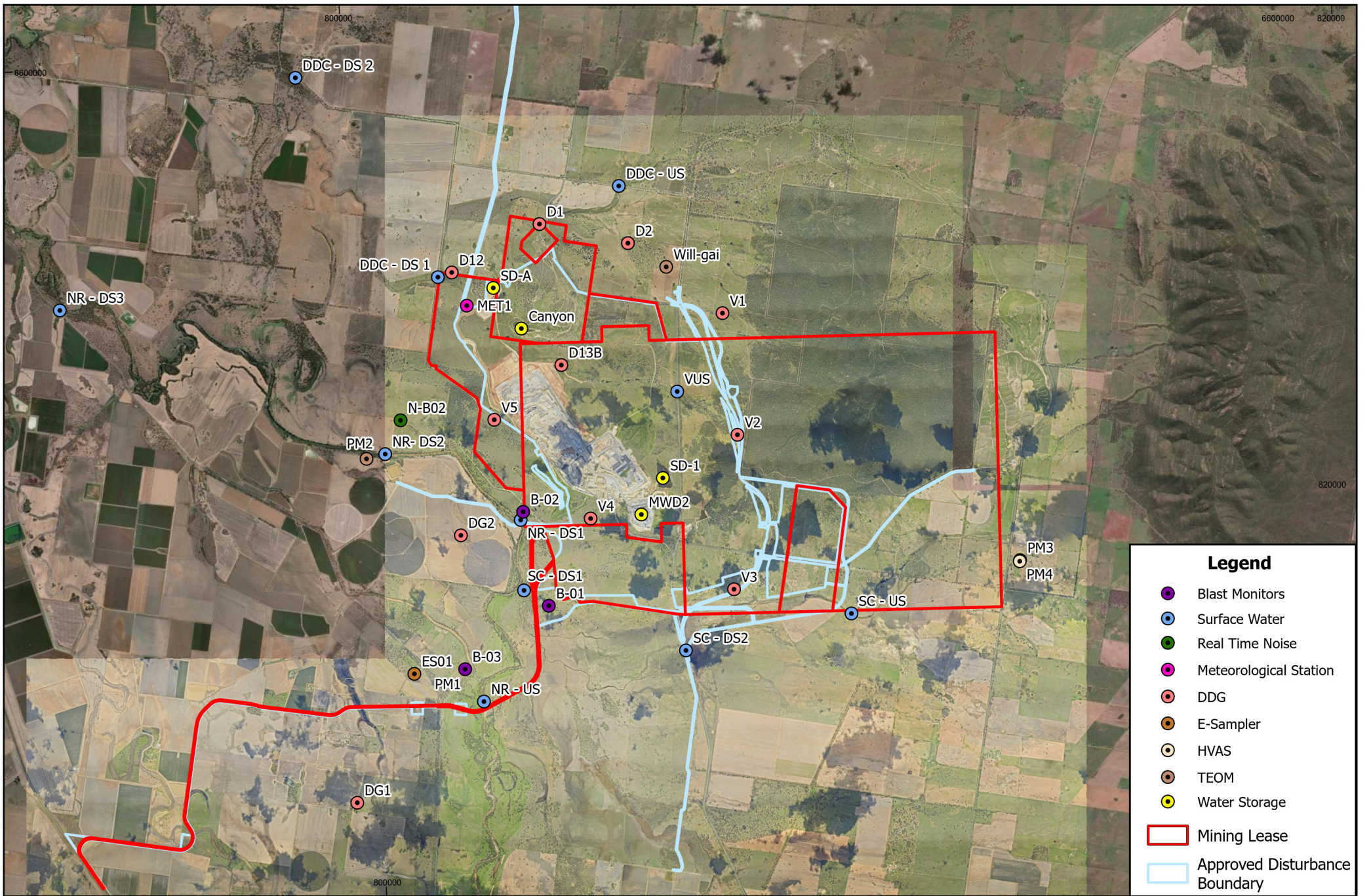


Figure 1 VCM EMS overview

Figure 2: Environmental monitoring





Legend

- Blast Monitors
- Surface Water
- Real Time Noise
- Meteorological Station
- DDG
- E-Sampler
- HVAS
- TEOM
- Water Storage
- Mining Lease
- Approved Disturbance Boundary



GIS Team
Brisbane

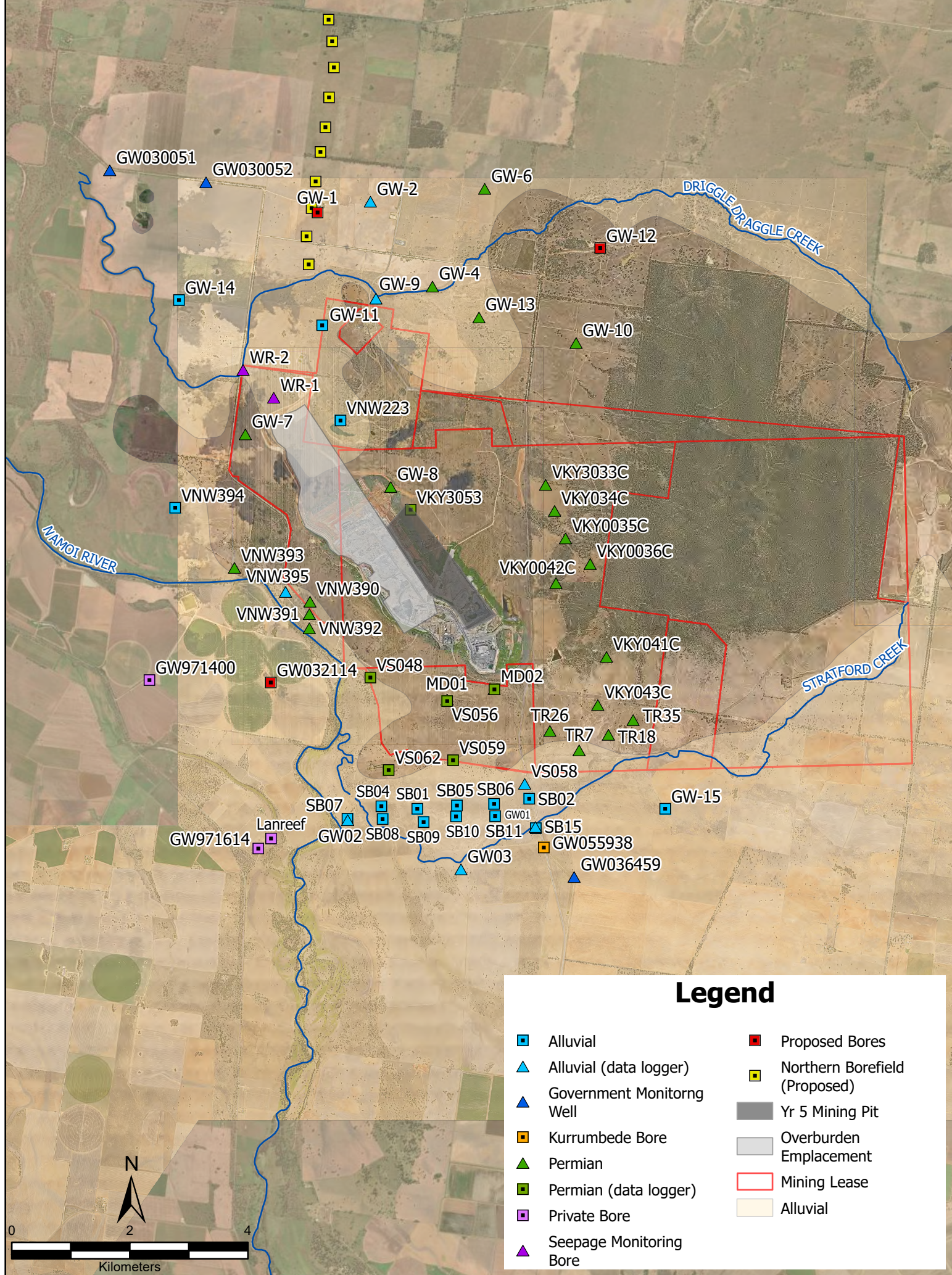


GDA2020 MGA Zone 56

Vickery Monitoring Points

Drawn: S. Poulsen	Date: 7/05/2026	Revision: 0	Figure: 2
Checked: M. Martin	Filename: 20260430-1.aprx		

Figure 3: Groundwater Monitoring Locations



Legend

- | | |
|----------------------------|-------------------------------|
| Alluvial | Proposed Bores |
| Alluvial (data logger) | Northern Borefield (Proposed) |
| Government Monitoring Well | Yr 5 Mining Pit |
| Kurrumbede Bore | Overburden Emplacement |
| Permian | Mining Lease |
| Permian (data logger) | Alluvial |
| Private Bore | |
| Seepage Monitoring Bore | |

Appendix 1: Project approval conditions

Table 5 Specific Management Plan Requirements

Approval Condition	Relevant Section of this EMP
Environmental Management Strategy	
Schedule 2, Condition E1	
The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	This EMS
a. be submitted to the Planning Secretary for approval prior to commencing construction under this consent;	Version 1.0 June 2021
b. provide the strategic framework for environmental management of the development;	Section 5
c. identify the statutory approvals that apply to the development;	Section 2
d. set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 6.1
e. set out the procedures to be implemented to:	-
(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 6.4
(ii) receive, record, handle and respond to complaints;	Section 6.5
(iii) resolve any disputes that may arise during the course of the development;	Section 6.5.1
(iv) respond to any non-compliance and any incident; and	Sections 6.6 and 8.1
(v) respond to emergencies; and	Section 6.6.2
f. include:	-
(i) references to any strategies, plans and programs approved under the conditions of this consent; and	Section 2
(ii) a clear plan depicting all the sites where monitoring is to be carried out under the conditions of this consent.	Section 7, Figure 2, Figure 3

Table 6 Project Approval General Requirements

Approval condition	Relevant Section of this Strategy
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 Strategy
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 and 9
(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;	Section 8
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 and 9
(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 3 and 9
j. a protocol for periodic review of the plan.	Section 9.2
Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	
Schedule 2 Condition E12	
E12. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit.	Section 9.1.3 Figures 2 and 3
For the purposes of this condition, as set out in the EP&A Act, "monitoring" means monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" means a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	
Schedule 2 Condition E13	Figure 2 and 3
E13. Noise, blast and/or air quality monitoring under this consent may be undertaken at suitable representative monitoring locations instead of at privately-owned residences or other locations listed in Part B, providing that these representative monitoring locations are set out in the respective management plan/s.	Noise Management Plan Blast Management Plan Air Quality and Greenhouse Gas Management Plan
Schedule 2 Condition E14	
E14. Within three months of the date of commencement of development under this consent, until the completion of all rehabilitation required under this consent, the Applicant must:	
a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) publicly available on its website:	Section 3
(i) the document/s listed in condition A2(c);	
(ii) all current statutory approvals for the development;	
(iii) all approved strategies, plans and programs required under the conditions of this consent;	
(iv) minutes of CCC meetings;	

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- (v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;
 - (vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
 - (vii) a summary of the current progress of the development;
 - (viii) contact details to enquire about the development or to make a complaint;
 - (ix) a complaints register, updated monthly;
 - (x) the Annual Reviews of the development;
 - (xi) audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; and
 - (xii) any other matter required by the Planning Secretary; and

b) keep such information up to date, to the satisfaction of the Planning Secretary.

Appendix 2: Consultation Log

Table 7 Consultation History

Date	Consultee	Comment
May 2021	Department of Planning, Industry and Environment (now DPHI)	Feedback on draft from DPIE
January 2026	Department of Planning, Housing and Infrastructure	Feedback on updated management plan

Tony Dwyer
Group Manager – Approvals and Biodiversity
Vickery Coal Pty Ltd
28/259 George Street
Sydney, NSW, 2000
21/05/2026

Vickery Coal – Environmental Management Strategy (EMS)

Dear Mr. Dwyer

Thank you for submitting the EMS in accordance with Condition E1, Schedule 2 of the consent for the Vickery Coal (SSD-7480). I also acknowledge your response to the Department's review comments and request for additional information.

I note the EMS contains the information required by the conditions of approval.

Accordingly, as nominee of the Planning Secretary, I approve the revised EMS (Rev 2.2, May 2026).

You are reminded that if there are any inconsistencies between the Strategy and the conditions of approval, the conditions prevail.

Please ensure you make the document publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Charissa Pillay on 02 99955944.

Yours sincerely



Stephen O'Donoghue
Director
Resource Assessments

As nominee of the Planning Secretary