



# ENVIRONMENTAL MANAGEMENT STRATEGY

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# Malabar Coal Management System Standard

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# 1 INTRODUCTION

## 1.1 Background

Maxwell Ventures (Management) Pty Ltd, a wholly owned subsidiary of Malabar Coal Ltd (Malabar), owns and operates the Maxwell Infrastructure site located on Thomas Mitchell Drive, Muswellbrook. The Maxwell Infrastructure site (formerly Drayton Mine) includes the open cut workings, rehabilitation, coal handling and preparation facilities and the Antiene rail spur and loop. The Maxwell Infrastructure site is bordered by Mt Arthur Coal to the west with AGL Macquarie's Bayswater Power Station adjoining the eastern and southern boundaries. The Antiene rural residential area exists to the north of the site.

Open cut coal extraction and mining activities commenced at the Maxwell Infrastructure site in 1983 and ceased in October 2016. The Maxwell Infrastructure site is currently in the closure phase of the operation with rehabilitation activities and some ancillary activities such as grading of roads and maintenance of equipment occurring.

## 1.2 Purpose

The purpose of this Environmental Management Strategy is to provide an overview of the Environmental Management System at Maxwell Infrastructure. This strategy, along with a series of Environmental Management Plans and associated documents, form the Environmental Management System for the Maxwell Infrastructure site.

## 1.3 Scope

This Strategy applies to all activities within the Maxwell Infrastructure site, as shown in **Figure 1**. It addresses the relevant conditions of the Maxwell Infrastructure Project Approval PA 06\_0202, Antiene Rail Spur Development Consent DA 106-04-00 and Environmental Protection Licence (EPL) 1323.

As per Schedule 2, Condition 5 of PA 06\_0202, no mining operations can take place on site after 31 December 2017. Mining operations includes all coal extraction, processing and transportation activities. As such, some conditions of DA 106-04-00 will not be applicable. However, the conditions associated with PA 06\_0202 are anticipated to address all relevant aspects of DA 106-04-00.

## 1.4 Objectives

The objectives of this Environmental Management Strategy are to:

- Provide the strategic framework for environmental management;
- Identify the statutory requirements that apply to Maxwell Infrastructure;
- Describe in general how environmental performance will be monitored and managed;
- Describe the key environmental processes implemented at the site; and
- Describe key roles, responsibilities, authorities and accountabilities involved in environmental management.

## 1.5 Statutory Requirements

Current statutory requirements are set out in PA 06\_0202, DA 106-04-00 and EPL 1323. The various conditions that relate to the Environmental Management Strategy and where they are referenced in this document are detailed in **Appendix 1**. There are no conditions specific to the Environmental Management Strategy in EPL 1323.

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**Figure 1. Maxwell Infrastructure site boundary**

## 2 PLANNING

### 2.1 Environmental Policy

The Malabar Coal Environmental Policy details Malabar Coal's commitment to minimising impacts and conserving ecological processes in the communities in which we operate, in an environmentally responsible manner. All people associated with Malabar Coal's sites, including those associated with Maxwell Infrastructure, are expected to uphold the commitments made in the Environmental Policy.

### 2.2 Environmental Management Objectives

As a closed open-cut coal mine, Maxwell Infrastructure's primary objective is to create a post-mining landscape that is compatible with its surroundings and capable of sustaining productive land use.

However, environmental aspects; such as air quality, water, noise, biodiversity and the local economy may be impacted by activities on site. For all relevant environmental aspects, Maxwell Infrastructure's objectives are to:

- Identify potential impacts;
- Implement controls to minimise potential impacts;
- Determine appropriate criteria to assess environmental performance;
- Monitor environmental performance;
- Manage community complaints in a timely and effective manner; and
- Ensure relevant statutory requirements are met.

These objectives and how they are to be achieved are detailed for individual environmental aspects in Maxwell Infrastructure's environmental management plans (EMPs).

### 2.3 Statutory Approvals

Statutory licences and approvals held by Maxwell Infrastructure are listed in Table 1.

Copies of planning approvals and the site's Environmental Protection Licence (EPL) are publicly available on the Malabar Coal website (<https://malabarcoal.com.au>).

**Table 1. Statutory approvals**

Statutory Approval Reference	Description
PA 06_0202	Project Approval issued in 2008 under Section 75J of the (now repealed) Part 3A of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) for the Drayton Mine Extension Project.
DA 106-04-00	Development Consent issued in 2000 under Section 76 (A), 9 and 80 of Part 4 of the EP&A Act for use of the existing Drayton Rail Loop and Antiene Rail Spur.
EPL1323	Environment Protection Licence issued in 2000 under Section 55 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) for mining for coal and coal works.
CL229	Coal Lease issued in 1992 under the <i>Mining Act 1973</i> .
CL395	Coal Lease issued in 1992 under the <i>Mining Act 1973</i> .
ML1531	Mining Lease issued in 2003 under the <i>Mining Act 1992</i> .
A173	Authorisation issued in 1998 under the <i>Mining Act 1973</i> .

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Statutory Approval Reference	Description
20BL171953	Bore licence issued under the <i>Water Act 1912</i> for a test bore.
20BL171954	Bore licence issued under the <i>Water Act 1912</i> for a test bore.
20BL171955	Bore licence issued under the <i>Water Act 1912</i> for a test bore.
20BL171956	Bore licence issued under the <i>Water Act 1912</i> for a test bore.
20BL171957	Bore licence issued under the <i>Water Act 1912</i> for a test bore.
WAL 41559	Water Access Licence issued under the <i>Water Management Act 2000</i> for aquifer water extraction.
WAL 41491	Water Access Licence issued under the <i>Water Management Act 2000</i> for aquifer water extraction

## 2.4 Consultation

The Environmental Management Strategy was prepared in consultation with the Maxwell Infrastructure Community Consultative Committee (CCC) and Joint Mt Arthur Coal and Maxwell Infrastructure Rail Loading Facility CCC (Joint CCC).

The Environmental Management Strategy has also been reviewed and approved by the Department of Planning and Environment (DPE). Evidence of this is provided in **Appendix 2**.

## 3 IMPLEMENTATION

### 3.1 Environmental Management Framework

To support Malabar Coal's Environmental Policy, Maxwell Infrastructure has developed environmental strategies and EMPs to identify potential environmental impacts and specify how they will be managed. Where appropriate, procedures or forms are also in place to support their implementation. Together, these documents form the environmental management system (EMS) which is published through the site's document control process. The framework of the EMS is shown in **Table 2**, with arrows leading to subordinate documents to show their relationship.

**Table 2. Environmental Management Framework**

		Strategies	EMPs		
		<b>Malabar Coal Environmental Policy</b>	<b>Environmental Management Strategy</b> Provides an overview of the EMS.	➔	<b>Pollution Incident Response Management Plan</b> Describes how pollution incidents are reported, managed and communicated.
➔	<b>Aboriginal Cultural Heritage Management Plan</b> Outlines controls for the management of Aboriginal cultural heritage.			➔	
➔	<b>Noise Management Plan</b> Outlines controls for the management of noise			➔	
➔	<b>Blast Management and Plan</b> Outlines controls for the management of blasting			➔	
➔	<b>Spontaneous Combustion Management Plan</b> Outlines controls for the management of spontaneous combustion			➔	
➔	<b>Air Quality and Greenhouse Gas Management Plan</b> Outlines controls for the management of air quality and greenhouse gases			➔	
➔	<b>Water Management Plan</b> Outlines controls for the management of water Incorporates the Erosion and Sediment Control Plan			➔	
<b>Offset Strategy</b> Explains the rationale for the proposed offsets and their locations			➔	<b>Rehabilitation and Offset Management Plan</b> Describes measures for rehabilitating the site and for managing remnant vegetation, tree screens and offsets.	➔
			➔	<b>Mining Operations Plan</b> Describes planned mining and rehabilitation activities. Incorporates the Mine Closure Plan and Final Void Management Plan	➔
			<b>Environmental Monitoring Programs</b> Describes environmental monitoring requirements.	<b>Procedures and Forms</b>	

### 3.2 Complaints Handling

Malabar Coal maintains a 24-hour community hotline for any complaints and enquiries related to the Maxwell Infrastructure site. The community hotline number is advertised in local newspapers and is available on the Malabar Coal website.

In the event that a complaint or enquiry is received regarding an environmental aspect, it is immediately investigated and managed in accordance with Malabar Coal’s Community Complaints and Enquiries procedure. Details such as complainant name, contact details, nature of concern, date, time and method of receipt are recorded. While details of the enquiry vary depending on the nature and source of the enquiry, the following actions will result:

- Confirmation of whether the complainant would like the matter raised as a complaint or an enquiry.
- Identify further details which may assist in determining the cause of the complaint.

- If relevant, carry out an inspection of the site or conduct an assessment of monitoring results to identify the source.
- Identify if there is an exceedance or non-compliance with any consent or licence condition.
- Identify, where necessary and practical, methods to manage the source of the complaint and minimise the chance of a recurrence or the potential to generate further complaints.

All enquiries and/or complaints are recorded in a database and are presented on a quarterly basis at the CCC meeting/s as well as on an annual basis in the Annual Environmental Management Report (AEMR).

### 3.3 Dispute Resolution

Maxwell Infrastructure will take all reasonable steps to resolve concerns raised by members of the community. However, in the instance that an issue raised by a community member cannot be resolved the matter will be referred by either party to the Director-General of NSW Department of Planning and Environment (Director-General) for resolution.

In this instance, the Director-General may require an independent review to be undertaken to determine if Maxwell Infrastructure is complying with impact assessment criteria at a landowner's property. Depending on the findings of the review, Maxwell Infrastructure may implement further reasonable and feasible measures, carry out further monitoring or secure a written agreement with the landowner.

If Maxwell Infrastructure or the landowner disagree with the findings of the independent review, the matter will be referred to the Director-General for resolution. If the matter cannot be resolved within 21 days, the Director-General shall refer the matter to an Independent Dispute Resolution Process.

### 3.4 Public Communications

Maxwell Infrastructure utilises the Malabar Coal website to inform the community of site operations and environmental performance. Documents available on the website include:

- Licences and approvals;
- Environmental management plans;
- AEMRs;
- Independent Environmental Audit reports and responses; and
- Environmental monitoring results.

Maxwell Infrastructure also operates a CCC for the site, which meets quarterly, and a Joint CCC with Mt Arthur Coal for the rail loop and Antiene rail spur, which meets twice a year. Information on site activities and environmental performance is provided to the CCCs and feedback and concerns raised are utilised by Maxwell Infrastructure to help assess impacts and improve environmental performance.

### 3.5 Response to Non-Compliances

Processes for evaluating compliance to regulatory requirements or other criteria are specified in Maxwell Infrastructure's EMPs. Responses to any non-compliances identified are also detailed, including requirements in relation to:

- Immediate operational response;
- Internal and external notification;
- Investigation; and
- Reporting.

All non-compliances that cause or may cause environmental harm or that are an exceedance of Project Approval limits or performance criteria will be reported to DPE and other relevant agencies in accordance with Schedule 5, conditions 3 and 4 of PA 06\_0202.

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### 3.6 Emergency Response

Maxwell Infrastructure maintains an Emergency Response Management Plan to direct a prompt and efficient response to any reasonably expected site emergency. A number of subordinate Trigger Action Response Plans (TARPs) are also in place for specific potential emergency incidents.

The response to pollution incidents that have or could cause material harm to the environment is also directed by the Pollution Incident Response Management Plan (PIRMP).

All incidents that cause or may cause environmental harm or that are an exceedance of Project Approval limits or performance criteria will be reported to DPE and other relevant agencies in accordance with Schedule 5, conditions 3 and 4 of PA 06\_0202.

### 3.7 Cumulative Impact Management

Details on the management of cumulative impacts are detailed in Maxwell Infrastructure's EMPs. This includes protocols for communications between neighbouring mines to allow cumulative impacts to be managed. Details are provided in:

- Section 4.4 of the Noise Management Plan
- Section 3.6 of the Blast Management Plan
- Section 4.5 of the Air Quality and Greenhouse Gas Management Plan

### 3.8 Training and Communication

Generic environmental management training is provided to all employees and contractors through the site familiarisation process. From time to time, workforce communication and toolbox talks allow for discussion of the objectives and requirements of the Environmental Management Strategy and environmental management plans.

To ensure the effective implementation of environmental management controls, all Maxwell Infrastructure personnel involved in supervisory and operator roles undertake a more detailed awareness training package.

## 4 MEASUREMENT AND EVALUATION

### 4.1 Monitoring Program

Maxwell Infrastructure implements a monitoring program to record environmental conditions, assess environmental performance and determine compliance to regulatory requirements on an on-going basis. Data from the monitoring program is also used for reporting purposes.

The method, frequency and other requirements of components of the monitoring program are detailed in EMPs and consolidated in the Environmental Monitoring Program. Where appropriate, components of the monitoring program are supported by procedures and/or forms.

A summary of environmental monitoring conducted is provided in **Table 3**.

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**Table 3. Environmental monitoring summary**

Aspect monitored	Purpose	Minimum Frequency of monitoring	Further details
Attended Noise	Compliance	Six-monthly	Section 4.1 of the Noise Management Plan
Real-time Noise	Management	Continuous	Section 4.1 of the Noise Management Plan
Blast vibration and overpressure	Compliance	Each blast	Section 4.1 of the Blast Management plan
Blast fume	Compliance	Each blast	Appendix 2 of the Blast Management Plan
Deposited dust	Compliance	Monthly	Section 4.1 of the Air Quality and Greenhouse Gas Management Plan
Particulate matter (TEOM)	Compliance	Continuous	Section 4.1 of the Air Quality and Greenhouse Gas Management Plan
Particulate matter (E-sampler)	Management	Continuous	Section 4.1 of the Air Quality and Greenhouse Gas Management Plan
Meteorology	Compliance	Continuous	Section 4.1 of the Air Quality and Greenhouse Gas Management Plan
Surface water quality	Compliance	Monthly	Section 7.4.2 of the Water Management Plan
Groundwater quality	Compliance	Six-monthly	Section 7.5.4 of the Water Management Plan
Groundwater levels	Compliance	Monthly	Section 7.5.4 of the Water Management Plan
Spontaneous Combustion	Compliance	Monthly	Section 4.17.3 of the Spontaneous Combustion Management Plan
Rehabilitation	Compliance	Annually	Section 4.14 of the Rehabilitation and Offset Management Plan

## 4.2 Inspections and Audits

Inspections and audits are utilised by Maxwell Infrastructure to assess the site's compliance to EMS and regulatory requirements. They are also used to identify improvement opportunities. Inspections and audits are carried out internally, or by external parties, such as regulators.

Every three years, an Independent Environmental Audit is carried out in accordance with conditions of PA 06\_0202 and DA 106-04-00. This audit is conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General. This team assesses the environmental performance and compliance status of the site and provides recommendations to address any compliance issues or improvement opportunities identified. The resulting audit report is provided to regulators and the CCC and published on the Malabar Coal website. Progress on actions arising from audit recommendations is also provided in the AEMR.

## 4.3 Annual Environmental Management Report

An internal review of the site's environmental performance is carried out at the end of each calendar year and published in the AEMR. The AEMR satisfies annual reporting requirements of planning approvals and mining leases and is used to assess and communicate the site's compliance to regulatory requirements. Improvements made to the EMS are also documented in the AEMR along with any improvements proposed for the following year.

The AEMR is submitted to the regulators, provided to the CCC and published on the Malabar Coal website. Progress on actions that arise from regulator feedback is reported in the AEMR the following year.

## 5 REVIEW AND IMPROVEMENT

### 5.1 Review Schedule

This Environmental Management Strategy will be reviewed:

- Every three years;
- Following an independent environmental audit, with findings relevant to this Strategy;
- Following an environmental incident or community complaint relevant to the control measures outlined in this Strategy; or
- Following relevant outcomes from a risk assessment or change management process.

If any significant modifications to the Environmental Management Strategy are required as an outcome of the review, relevant government agencies and CCCs will be consulted regarding the changes and the revised Strategy will be submitted to DPE for approval. Minor changes such as formatting edits will be made with version control on the Malabar Coal website [www.malabarcoal.com.au](http://www.malabarcoal.com.au).

Malabar Coal will provide copies of the approved Environmental Management Strategy to the NSW Environmental Protection Authority (EPA), Muswellbrook Shire Council (MSC), DMR (now DPE - Division of Resources and Geoscience) and the CCC within fourteen days of approval, or as otherwise agreed to by the Director-General.

### 5.2 Continuous Improvement

Maxwell Infrastructure will continuously investigate and implement reasonable and feasible environmental mitigation measures on site. As described in **Section 4**, relevant information from the monitoring program, inspections and audits, incidents and community complaints and feedback will be used to assess environmental impacts and determine where improvements or mitigation measures are required.

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## 6 REVISION STATUS

A summary of the document history is outlined below in **Table 4**.

**Table 4. Document revision status**

Issue	Issue Date	Review Team	Details of Change
1.0	Feb. 2003	P Simpson P Forbes T. Hulme	Original document
2.0	May 2010	P Simpson P. Forbes M. Heaton	Update to include the requirements of the conditions of PA 06_0202.
3.0	Nov. 2015	K Blaikie P. Forbes D. O'Rourke	Changes in this revision include: <ul style="list-style-type: none"> <li>• General review and inclusion of additional information pertinent to ISO14001:2004;</li> <li>• Update of Regulatory Authority names;</li> <li>• New environmental requirements under Development Consent Modifications 1 and 2;</li> <li>• Consideration of amendments to Environmental Protection License 1323; and</li> <li>• Variations to Drayton's Organisational Structure and personnel roles and responsibilities.</li> </ul>
4.0	June 2017	B. Yorke M. Lord D. Pisters	Changes in this revision include: <ul style="list-style-type: none"> <li>• Incident reporting procedures updated to refer to the immediate reporting requirements under the Protection of the Environment Operations Act 1997; and</li> <li>• Update of roles and responsibilities following the cessation of active mining in 2016</li> </ul>
5.0	Apr 2019	R. Harcus D. McLaughlin R. Hayes	Revised in response to the following <ul style="list-style-type: none"> <li>• Change of ownership of the site to Malabar Coal.</li> <li>• Change in responsibilities.</li> <li>• Change in operational aspects at the Maxwell Infrastructure site.</li> </ul>

## 7 RESPONSIBILITIES

Environmental management is the responsibility of all personnel at Maxwell Infrastructure, however, the Operations Manager is ultimately responsible and accountable for environmental performance.

**Table 5** outlines the key responsibilities associated with environmental management. Specific responsibilities are also defined within environmental management plans and procedures and within position descriptions or contracts.

**Table 5. Responsibilities**

Position	Responsibilities
<b>Operations Manager</b>	<ul style="list-style-type: none"> <li>Responsible for overall environmental performance of Maxwell Infrastructure</li> <li>Provide adequate resources for the implementation of this Environmental Management Strategy and Environmental Management Plans</li> </ul>
<b>Manager Environment and Community</b>	<ul style="list-style-type: none"> <li>Oversee the implementation of the Environmental Management Strategy and environmental management plans (EMPs).</li> <li>Coordinate monitoring in accordance with this EMPs.</li> <li>Notify regulatory authorities and affected landholders of any environmental exceedance or non-compliance with approval conditions and undertake the associated reporting.</li> <li>Coordinate periodic reviews of this Environmental Management Strategy and EMPs.</li> <li>Ensure all personnel are trained in accordance with this Environmental Management Strategy and EMPs.</li> <li>Fulfil the role of the Environmental Officer required by any licences or approvals</li> </ul>
<b>Environmental Coordinator</b>	<ul style="list-style-type: none"> <li>Assist the Manager Environment and Community as required in implementation of this Environmental Management Strategy.</li> <li>Assist the Manager Environment and Community with investigations of exceedances, incidents or complaints.</li> <li>Liaise with the Manager Environment and Community to maintain the environmental hotline.</li> <li>Coordinate the implementation of the monitoring programs in accordance with EMPs and the Environmental Monitoring Program.</li> <li>Coordinate the management of records and reporting of monitoring results in accordance with EMPs.</li> <li>Manage complaints in accordance with the Complaints Management Procedure.</li> <li>Provide training to all relevant personnel</li> </ul>
<b>Mining Supervisor / Open-Cut Examiner (OCE)</b>	<ul style="list-style-type: none"> <li>Respond to potential exceedances of approval criteria as identified by the continuous monitoring system.</li> <li>Assist the Environment and Community Coordinator with investigations into exceedances, incidents or complaints.</li> </ul>
<b>All Personnel</b>	<ul style="list-style-type: none"> <li>Perform tasks in an environmentally responsible manner.</li> <li>Comply with the requirements of this Environmental Management Strategy, EMPs and associated procedures.</li> <li>Report any environmental issues to the OCE.</li> <li>Participate in relevant environmental training.</li> </ul>

## 8 DEFINITIONS

Term	Definition
<b>AEMR</b>	Annual Environmental Management Report
<b>CCC</b>	Community Consultative Committee
<b>CHPP</b>	Coal Handling Preparation Plant
<b>DA</b>	Development Consent
<b>DPE</b>	NSW Department of Planning and Environment
<b>EMP</b>	Environmental Management Plan
<b>EMS</b>	Environmental Management System
<b>EPA</b>	NSW Environmental Protection Authority
<b>EPL</b>	Environment Protection Licence
<b>MSC</b>	Muswellbrook Shire Council
<b>PA</b>	Project Approval
<b>PIRMP</b>	Pollution Incident Response Management Plan
<b>TARP</b>	Trigger Action Response Plan
<b>Toolbox Talk</b>	A forum where information is presented to the crews

## 9 REFERENCES

- Project Approval 06-0202 – Drayton Mine Extension (inc Mod 1 and Mod 2)
- Development Consent 106-04-00 – Drayton Rail Loop and Antiene Rail Spur
- Drayton Mine Environmental Assessment 2007
- Drayton Mine Environmental Assessment Modification 1 (2009)
- Drayton Mine Environmental Assessment Modification 2 (2012)
- Environment Protection Licence 1323
- The Protection of the Environment Operations Act, 1997 (PoEO Act)
- Environmental Planning and Assessment Act, 1979 (EP&A Act)

## APPENDIX 1 - STATUTORY REQUIREMENTS

Table 6. Statutory requirements relevant to the Environmental Management Strategy

Condition	Details	Reference
<b>PA 06_0202</b>		
Schedule 5 Condition 1	<p>The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must be submitted to the Director-General within 6 months of this approval, and:</p> <p>(a) provide the strategic framework for environmental management of the project</p> <p>(b) identify the statutory requirements that apply to the project;</p> <p>(c) describe in general how the environmental performance of the project would be monitored and managed;</p> <p>(d) describe the procedures that would be implemented to:</p> <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> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance</li> <li>• manage cumulative impacts</li> <li>• respond to emergencies; and</li> </ul> <p>(e) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the project.</p>	<p><b>Appendix 2</b></p> <p><b>Section 3.1</b></p> <p><b>Section 2.3</b></p> <p><b>Section 3</b></p> <p><b>Section 3.4</b></p> <p><b>Section 3.2</b></p> <p><b>Section 3.3</b></p> <p><b>Section 3.5</b></p> <p><b>Section 3.7</b></p> <p><b>Section 3.6</b></p> <p><b>Section 7</b></p>
<b>DA 106-04-00</b>		
Schedule 2 Condition 2.2	<p>(a) The Applicant shall prepare an Environmental Management Strategy providing a strategic context for the environmental management plans [refer condition 2.2(d)]. The Environmental Management Strategy shall be prepared in consultation with the relevant authorities and the Community Consultative Committee (refer condition 9.1) and to the satisfaction of the Director-General, prior to commencement of operations. The Strategy shall be provided to the Director-General no later than the time the first Environmental Management Plan under sub clause (d) below is submitted.</p> <p>(b) The Environmental Management Strategy shall include, but not be limited to:</p>	<p>All</p> <p><b>Section 2.4</b></p> <p><b>Appendix 2</b></p>

Condition	Details	Reference
	<p>(i) statutory and other obligations which the Applicant is required to fulfil during operation, including all approvals and consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</p> <p>(ii) definition of the role, responsibility, authority, accountability and reporting of personnel relevant to environmental management, including the Environmental Officer;</p> <p>(iii) overall environmental management objectives and performance outcomes, during, operation and decommissioning of the rail loop and Antiene rail spur, for each of the key environmental elements for which management plans are required under this consent;</p> <p>(iv) overall ecological and community objectives for the project, and a strategy for the restoration and management of the areas affected by operations, including elements such as wetlands and other habitat areas, creek lines and drainage channels, within the context of those objectives;</p> <p>(v) identification of cumulative environmental impacts and procedures for dealing with these at each stage of the development;</p> <p>(vi) overall objectives and strategies to protect economic productivity within the area affected by the operations;</p> <p>(vii) steps to be taken to ensure that all approvals, plans, and procedures are being complied with;</p> <p>(viii) processes for complaint handling, investigation and resolution in relation to the environmental management of the project;</p> <p>(ix) documentation of the results of consultations undertaken in the development of the Environmental Management Strategy.</p> <p>(x) The Applicant shall make copies of the environmental management strategy available to MSC, EPA, DMR and the CCC within fourteen days of approval by the Director-General.</p>	<p><b>Section 2</b></p> <p><b>Section 7</b></p> <p><b>Section 2.2</b></p> <p><b>Section 2.2</b></p> <p><b>Section 2.2</b></p> <p><b>Section 2.2</b></p> <p><b>Section 2.4</b></p> <p>Not applicable</p>

## APPENDIX 2 - REGULATORY APPROVAL



Planning Services  
Resource Assessments  
Contact: Jack Murphy  
Phone: 8217 2016  
Email: [jack.murphy@planning.nsw.gov.au](mailto:jack.murphy@planning.nsw.gov.au)

Ms Rebecca Harcus  
Environmental Coordinator  
Malabar Coal Limited  
Thomas Mitchell Drive  
Muswellbrook NSW 2333

Email: [rharcus@malabarcoal.com.au](mailto:rharcus@malabarcoal.com.au)

Dear Ms Harcus,

**Maxwell Infrastructure (PA 06\_0202)  
Environmental Management Strategy**

I refer to your email dated 15 April 2019 submitting the revised Environmental Management Strategy for approval.

The Department has reviewed this document and considers that it meets condition 1 of Schedule 5 of PA 06\_0202. Consequently, the Secretary has approved this document.

Should you have any enquiries in relation to this matter, please contact Jack Murphy at the details above.

Yours sincerely,

A handwritten signature in blue ink that reads 'Howard Reed'.

Howard Reed  
Director  
Resource Assessments  
As nominee of the Secretary

16.1.19

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