MALABAR

MAXWELL UNDERGROUND MINE

BUSHFIRE MANAGEMENT PLAN

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1 INTRODUCTION

1.1 Background

Maxwell Ventures (Management) Pty Ltd (Maxwell), a wholly owned subsidiary of Malabar Resources Limited (Malabar) owns and operates the Maxwell Underground Mine (the site). The site is located in the Upper Hunter Valley of New South Wales (NSW), east-southeast of Denman and south-southwest of Muswellbrook. The site is approved to extract a maximum of 8 million tonnes of run-of-mine coal per year over a period of 26 years. The site boundary is shown in **Figure 1**.

The site consists of the following areas:

- Underground area comprising the proposed area of underground mining operations and the mine entry area (MEA) to support underground mining and coal handling activities and provide for personnel and materials access;
- Maxwell Infrastructure (formerly Drayton mine) comprising previous open cut mining areas, existing coal handling and preparation plant (CHPP), train load-out facilities and rail loop, Antiene rail spur and other infrastructure and services; and
- Transport and services corridor between the underground area and Maxwell Infrastructure comprising the proposed site access road, covered overland conveyor, power supply and other ancillary infrastructure and services.

The area within and surrounding the site, which has previously been known as Mt Arthur South, Saddlers Creek and Drayton South, has long been identified as having a significant in-situ coal resource. Prospecting for coal commenced in the late 1940s, with exploration intensifying during the 1960s and 1970s. Open cut coal extraction and mining activities commenced at Maxwell Infrastructure in 1983 and ceased in October 2016. The previous open cut mining area is currently in the rehabilitation phase of the mine operations.

The development consent for State Significant Development 9526 (SSD 9526) was granted on 22 December 2020 under clause 8A of the *State Environmental Planning Policy* (State and Regional Development) 2011 and section 4.5(a) of the *Environmental Planning and Assessment (EP&A) Act 1979*. The development consent was modified on 19 November 2021 (Maxwell MOD1) to allow for the repositioning of infrastructure primarily at the MEA and realignment of a section of the site access road.

The development consent was further modified (Maxwell MOD2) on 19 October 2022 to allow for the following:

- Re-orientation of the longwall panels in the Woodlands Hill, Arrowfield and Bowfield Seams resulting in a minor increase in the approved underground mining extent.
- Reduction in the width of some of the longwall panels in the Woodlands Hill Seam.
- Repositioning of the upcast ventilation shaft site and associated infrastructure.
- Other minor works and ancillary infrastructure components (e.g. access road and ancillary water management infrastructure for the repositioned ventilation shaft site).

Another modification was made to the development consent (Maxwell MOD3) on 22 September 2025 to allow for the transfer of tailings from an existing Mt Arthur Coal Tailings Storage Facility (TSF) to the Maxwell UG Mine East Void, and tailings and coarse rejects from the Maxwell CHPP to the North Void.

The site also incorporates the development formerly authorised under the Maxwell Infrastructure Project Approval (PA) 06_0202. Development Consent DA 106-04-00 for the existing rail loop and Antiene Rail Spur was granted on 2 November 2000 under Section 76(A)9 and 80 of the EP&A Act. DA 106-04-00 was modified on 18 September 2023 (Antiene MOD1) to align with the approved operating life of the Maxwell Underground Mine (i.e. until 2047).

1.2 Purpose and Scope

The purpose of this Bushfire Management Plan (BFMP) is to detail statutory requirements and outline the controls to be implemented to manage bushfires on the site. This BFMP is one of a series of

Environmental Management Plans that together form the Environmental Management System for the site. In accordance with Schedule 2, Condition E6 of Development Consent SSD 9526, management plans prepared for the site will be consistent with Environment Protection Licence (EPL) 1323.

This BFMP applies to all activities within the SSD 9526 development application area and the Antiene Rail Spur Development Consent DA 106-04-00 boundary. Control measures that are implemented to prevent the occurrence and or propagation of fires or explosions in the area defined by the statutory mine plan are addressed in the *Fire or Explosion Principal Hazard Management Plan*. Site emergency procedures are covered in the *Emergency Management Plan* (EMP). Fire for biodiversity conservation purposes will be managed in accordance with the relevant *Biodiversity Management Plan*. Spontaneous combustion outbreaks will be managed in accordance with the *Spontaneous Combustion Management Plan*.

On 6 April 2022 Maxwell gave written notice to the then Department of Planning and Environment (DPE), now the Department of Planning, Housing and Infrastructure (DPHI) of its intention to commence permitted construction, in accordance with Condition A13(b), Schedule 2 of Development Consent SSD 9526. In accordance with Schedule 2, Condition B71 of Development Consent SSD 9526, Maxwell did not commence construction until the BFMP was prepared in consultation with NSW Rural Fire Service (RFS).In accordance with Schedule 2, Condition B72 of Development Consent SSD 9526, Maxwell is implementing this BMP in consultation with the RFS.

1.3 Objectives

The objectives of this BFMP are to:

- Detail all relevant statutory requirements;
- Describe and schedule bushfire mitigation works;
- Describe the site vegetation and the location of water storages and roads;
- Identify the location of bulk flammable liquids and materials;
- Provide details on the management of ‘hot works’;
- Provide 24-hour contact details for the site;
- Provide details on the site emergency response; and
- Manage complaints related to bushfire in a timely and effective manner.

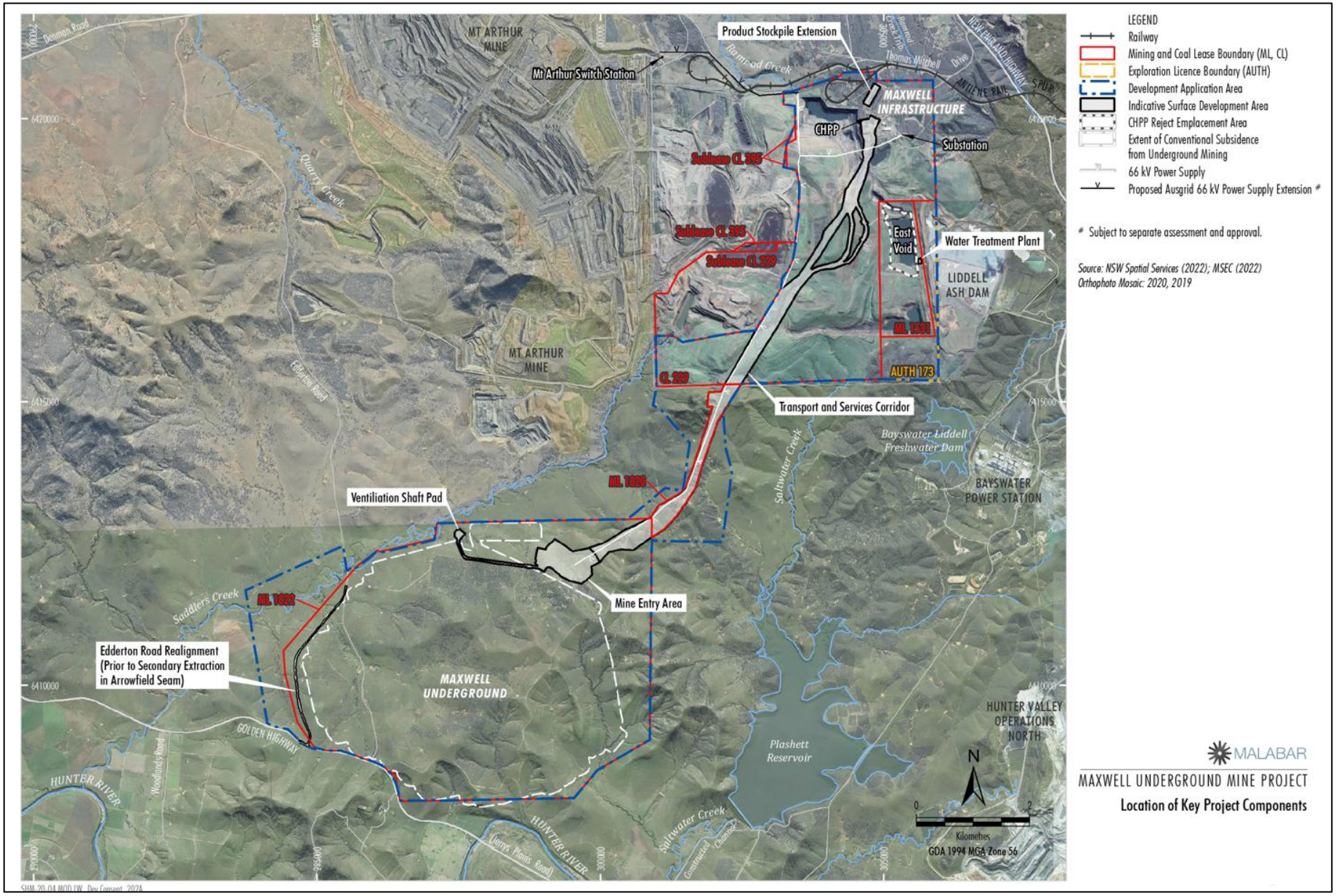

Figure 1. Maxwell Underground Mine

2 PLANNING

2.1 Regulatory Requirements

This BFMP describes the management of bushfires to meet relevant statutory requirements within Development Consent SSD 9526 and DA 106-04-00. The various conditions that relate to bushfire management and where they are addressed in this document are detailed in **Appendix 1**.

In addition, under Section 63 of the Rural Fires Act "*It is the duty of the owner or occupier of land to take notified steps (if any) and any other practical steps to prevent the occurrence of bush fires on, and to minimise the danger of the spread of bush fires on or from, that land*". This applies to all land that mines own/occupy including mine sites, residential/commercial land and offsets. This BFMP fulfils that requirement and has been prepared in accordance with the recommendations included within *NSW RFS Factsheet for Bush Fire Management Plans* (RFS, 2020).

2.2 Maxwell Project EIS and Supporting Document Commitments

Commitments in the Maxwell UG Project Environment Impact Statement (Maxwell EIS) (2019) and supporting documents that relate to the management of bushfires, and where they are addressed in this document are detailed in **Appendix 2**.

2.3 Preparation and Consultation

In accordance with Schedule 2, Condition B71 of Development Consent SSD 9526, this plan has been prepared in consultation with RFS. Outcomes of the consultation are presented in **Appendix 3**.

2.4 Site Details

2.4.1 Bushfire Season

The site is located in the jurisdiction of the Muswellbrook Bush Fire Management Committee (BFMC), which includes the Muswellbrook Local Government Area. The bushfire season in the Muswellbrook BFMC area is generally from September to March and coincides with the north-west to westerly winds accompanied by high daytime temperatures and low relative humidity. The major sources of fire ignition in the BFMC area include lightning strikes from summer storms, fire escape from private properties and accidental ignitions in the rural areas and along rail and road corridors (Muswellbrook BFMC, 2011).

2.4.2 Climate

Regional long-term rainfall data from the Bureau of Meteorology, indicates that the long-term mean annual rainfall ranges from 592 millimetres (mm) to 645 mm, with the driest month generally being August and the wettest month being January. The data also indicates that temperatures are warmest from December to February and coolest from June to August with the highest average daily temperatures occurring in January and the lowest in July.

2.4.3 Fire History

Major fire activity in the vicinity of the site has occurred on a number of occasions since 1939. The most recent uncontrolled bushfire events included a bushfire to the north of the Maxwell Infrastructure site in 1994 to 1995 and an uncontrolled bushfire event within the Maxwell Underground area in 2005 to 2006.

2.4.4 Vegetation and Topography

The underground area is predominantly cleared and used for grazing purposes. Vegetation includes derived native grasslands and various native woodland communities. The extant woodland vegetation habitat is fragmented due to past land clearance. Livestock grazing has effectively removed the shrub layer from much of the site and suppressed the ground-cover layer in areas of native vegetation (Hunter Eco 2019).

The Maxwell Infrastructure site consists of areas of previous open cut mining and rehabilitated overburden emplacements, with substantial infrastructure located in the north. Rehabilitation is predominantly exotic pasture with patches of woodland rehabilitation throughout. Some native woodland communities exist in the north and south of the site. The transport and services corridor will be mostly cleared for infrastructure to support the mine.

The topography in the general area comprises principally flat plains associated with the Hunter River, interspersed with low undulating to steeply sloped hills, ridges and crests over open farmland. The underground area comprises undulating foothills to moderately sloping hills over open paddock grazing land. Surface elevations vary from a low point of approximately 110 metres Australian Height Datum (mAHD) to a high point of approximately 240 mAHD along a north-east to south-west trending ridgeline. The mine entry area is in a natural valley behind this ridgeline. The Maxwell Infrastructure site includes overburden emplacement areas rising to over 260 mAHD.

2.4.5 Assets

For bushfire management purposes, an asset is defined as anything valued by the community including houses, crops, livestock, heritage buildings and places, infrastructure, the environment, businesses and forests, that may be at risk from bush fire (MBFMC, 2011). Some of the key assets on site include buildings, structures (including conveyors and stockpiles), mobile plant, CHPP, train loading facility and rail loop, operational pipelines, powerlines, sub-stations and transformers and biodiversity offset areas.

2.4.6 Bulk Flammable Liquids

Diesel to support mine operations is stored in an 860,000 litre tank located near the main workshop and in two 110,000 litres tanks located at the in-pit refuelling area. A diesel storage facility capable of storing up to approximately 50,000 litres will be established at the mine entry area. The location of the existing diesel storages are shown in **Figure 2** and **Figure 3**.

3 IMPLEMENTATION

3.1 Potential Causes

Activities on site that may cause a bushfire include (but not limited to):

- electrical fault
- lightning strike
- spontaneous combustion
- chemical reaction
- hot work
- friction
- combustible liquid contacting hot surfaces
- pyrolysis (in tyres)
- hot vehicle exhausts over grass
- discarded cigarettes (note that the site is a non-smoking site)

3.2 Emergency Initiation

All emergencies are initiated in accordance with the EMP.

3.3 External Emergency Services

If property or lives are at risk from a bushfire, a call to 000 should be made immediately in accordance with the EMP. The Hunter Valley RFS should also be notified and advised of the situation. They can be contacted by calling (02) 6575 1200. As a courtesy, all fires on site not requiring the response of the RFS should still be reported to the RFS so they are aware and can field enquiries by the public and to update their fire incidents database.

3.4 Site Contact

Contact can be made with the site by calling the Maxwell Control Room on (02) 6542 0222 or alternatively by calling the 24-hour community hotline on 1800 653 960.

3.5 Evacuation

At daily pre-start meetings, fire risk will be reviewed via the RFS and BOM websites and communicated accordingly to site personnel. This will also inform the risk assessment conducted prior to undertaking hot works during a declared Total Fire Ban as described in **Section 3.8**.

Evacuations will be managed in accordance with the EMP. The following items will be considered when determining whether an evacuation is required due to a bushfire:

- The proximity of the bushfire to the site.
- The direction the bushfire is travelling.
- The wind speed and direction.
- The determination of a safe location to evacuate to, considering:
    - speed and direction of approaching bushfire;
    - time and distance to reach safe location;
    - proposed evacuation route;
    - proposed travel method; and
    - number of people to evacuate.

If bushfire smoke is present at the surface, air containing smoke particulate matter and potentially increased levels of carbon monoxide can enter the underground mine via the vent shafts. The additional component of carbon monoxide may result in increased personnel exposure. The Maxwell UG Mine gas and ventilation monitoring Trigger Action Response Plan defines gas monitoring and evacuation procedures in the event of smoke from bushfires entering the underground workings.

3.6 Fire-Fighting Equipment

Fire-fighting equipment on site and available for use in the event of a bushfire includes the following:

- Fire trailer (towable by a light vehicle).
- Mine site water cart (dependent on works occurring on site at the time).
- Fire hose reels (with Storz couplings which are compatible with Fire and Rescue NSW equipment) and fire boxes located in infrastructure areas, including pumps along the ash dam wall.
- Fire extinguishers mounted on all mobile plant and light vehicles.
- Fire depots which contain additional firefighting equipment including hoses and fire extinguishers, located at:
    - the administration building (by the fire pumps);
    - adjacent to the CHPP tower; and
    - in a wheelie bin on the veranda of the bath house (adjacent to the helipad).

All equipment is maintained to respond to a bushfire. Suitable firefighting equipment in the form of fire extinguishers and fire hydrants, hoses and appropriate fittings and nozzles are located around each building (see **Figure 2**). Minimum requirements for firefighting equipment are outlined in the Fire or Explosion Principal Hazard Management Plan and the Fire Control Management Procedure. Maxwell shall assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.

3.7 Roads and Water Storages

Main access roads and water storages are shown in **Figures 2, 3 and 4**. Mine water storages and their capacity are shown in **Table 1**. Any new mine water storages will be added to this plan once constructed. In addition, there are at least 40 existing farm dams above and surrounding the underground mining area. These farm dams are approximately less than 1 megalitre in capacity.

Fire water is provided through a 100mm ring main system to three designated areas at the Maxwell Infrastructure site:

- the administration building;
- the bathhouse area; and
- the workshop and industrial areas.

Water storage tanks for fire-fighting and general mine raw water use have a capacity of approximately 700,000 litres.

Table 1. Mine water storages

Dam Name	Storage Capacity (ML)
East (ES) Void	23,730
North (NN) Void	17,390
South (SPE) Void	17,700
Industrial Dam	750
Access Road Dam	750
Rail Loop Dam	18
DC2 Dam	~2
Oil Pollution Control Dam	~2

3.8 Hot Works

Hot works includes electric welding and cutting, oxy/fuel/gas heating and cutting, gas soldering and brazing, disc grinding, angle grinding and friction cutting using a fixed saw. Hot works on site are managed in accordance with the *Hot Work Permit*. The *Hot Work Permit* requires consideration of the following controls prior to the hot works being approved:

- Hot work should be undertaken in designated hot work bays where possible.
- When working outside of hot work bays, areas within 15 metres of the hot work area must be kept clean and free of all combustible materials.
- Fire protection equipment must be kept within 10 metres of the hot work area.
- When working outside of hot work bays, a Fire Watch must be appointed to monitor the area after hot work is completed.
- Preparedness for an emergency in the event of fire ignition.

To reduce the risk of fires damaging or destroying life, property and the environment the NSW RFS Commissioner may declare a Total Fire Ban. During a Total Fire Ban no fire may be lit in the open and all fire permits are suspended. Exemptions are detailed in the NSW Government Gazette each time a Total Fire Ban is declared. In accordance with the *Rural Fires Act 1997*, an exemption is given to Mining Operations for fire lit, maintained or used in the open air in association with the cutting, welding and/or grinding apparatus which are being used for the purpose of the urgent and essential maintenance and repair of mining equipment provided that:

- the cutting, welding and/or grinding apparatus is used in a manner which will prevent the escape of fire, sparks or burning material from the site of the works; and
- adequate firefighting equipment is provided at the site of works to prevent the escape or spread of the fire.

The Hot Works Engineering Standard covers undertaking hot works during a declared Total Fire Ban.

3.9 Hazard Mitigation

3.9.1 Asset Protection Zones

An Asset Protection Zone (APZ) is a fuel-reduced area surrounding a building or structure which provides:

- a buffer zone between a bush fire hazard and an asset;
- an area of reduced bush fire fuel that allows for suppression of fire;
- an area from which backburning or hazard reduction can be conducted; and
- an area which allows emergency services access and provides a relatively safe area for firefighters to defend assets (RFS, 2019).

If designed and maintained correctly the APZ will reduce the risk of direct flame contact on the asset, and damage to the asset from intense radiant heat and ember attack (RFS 2019). In accordance with the guide *Planning for Bush Fire Protection* (RFS, 2019), where possible a minimum 10 m APZ will be provided around all key infrastructure associated with mining production. Where possible, a minimum 10 m APZ will also be maintained along boundary fences (within approved disturbance areas) and will act as a fire break. The vegetation in APZs will be limited to grass that is kept mown to no more than 100 mm in height.

APZs will be monitored annually in August (prior to the start of the fire season in September) to ensure the grass is mown and leaves and vegetation debris are removed.

3.9.2 Track and Gate Maintenance

Access tracks that can be used as fire trails will be monitored annually in August (or as amended) to assess if there are sufficient tracks for fire-fighting access and if tracks require maintenance. Gates that can be used to enter the site from external roads will also be checked regularly. Access tracks that can be used as fire trails are shown in **Figures 2, 3 and 4**. Primary site access points are shown in **Table 2**.

Table 2. Site entry gates

Gate Name	Rural Road Address/ description of location	Grid Reference (GDA94)
Maxwell Infrastructure main gate	952 Thomas Mitchell Drive, Muswellbrook NSW 2333	E305984, N6420608
Plashett property main gate (Gate number 5)	Lot 3 Deposited Plan 1004725. Gate located at northeast corner of Edderton Road and Golden Highway	E296132, N6408579
Plashett property Edderton Road gate (Gate number 2)	Lot 3 Deposited Plan 1004725. Gate located on east side of Edderton Road 130m south of Saddlers Creek.	E295556, N6411987

3.9.3 Fuel Management

Grassland areas around infrastructure will be mowed and or grazed to reduce fuel loads. Infrastructure and property boundaries will be slashed prior to the start of the fire season.

The three properties located on and adjacent to the Mine site (Plashett, Bowfield, and Llanillo) are leased to third-parties for grazing in accordance with property lease agreement conditions. Grazing is also undertaken on some pasture rehabilitation areas. Current grazing activities will continue throughout the life of the Mine.

Access to small areas for grazing may be restricted temporarily during active subsidence and any associated remediation activities, to ensure the safety of people and livestock. Grazing will generally not occur in surface infrastructure areas, woodland rehabilitation areas, biodiversity offsets and small areas

associated with monitoring and exploration. Strategic grazing of biodiversity offsets and woodland rehabilitation areas may be undertaken in accordance with the Biodiversity Management Plan and Rehabilitation Management Plan, based on advice from relevant experts. Grazing will also not occur in areas with restricted access to protect biodiversity, Aboriginal cultural heritage or historic heritage values.

3.10 Maintenance of Fire Equipment

Fire-fighting equipment shall be serviced and maintained in accordance with the relevant Australian Standards. Inspection and testing of fire equipment is performed by on site personnel or service providers according to the electrical and mechanical maintenance management plans. Hand-held fire extinguishers are inspected by on-site trained personnel and maintained by an external fire service provider.

4 MEASUREMENT AND EVALUATION

4.1 Incident and Non-Compliance Notification

An incident is defined in Development Consent SSD 9526 and DA 106-04-00 as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.

In accordance with Schedule 2, Part E, Condition E9 of SSD 9526 and Schedule 2, Part B, Condition C5 of DA 106-04-00, Maxwell must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including:

a) date, time and location;

b) a brief description of what occurred and why it has been classified as an incident;

c) a description of what immediate steps were taken in relation to the incident; and

d) identifying a contact person for further communication regarding the incident.

Maxwell shall provide the DPHI with a subsequent incident report in accordance with Appendix 7 of Development Consent SSD-9526.

A *Pollution and Incident Response Management Plan* (PIRMP) is maintained in accordance with the requirements of the Part 5.7A of the *Protection of the Environment Operations Act 1997* and Chapter 7, Part 3A of the *Protection of the Environment Operations* (General) Regulation 2009. Any pollution incident that causes actual or potential material harm will be reported to the relevant agencies immediately after it is identified, as described in the PIRMP. A copy of the PIRMP is located on Maxwell's website at https://malabarresources.com.au/corporate-governance/.

In accordance with Schedule 2, Condition E10 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C6 of DA 106-04-00, Maxwell shall notify DPHI within seven days of becoming aware of a non-compliance. The notification shall be in writing via the Department's Major Projects Website and identify the development (including the development application number and name), set out the condition of Development Consent SSD 9526 that the site is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken, and when, 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.

4.2 Adaptive Management and Contingency Plan

In accordance with Schedule 2, Condition E4 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C2 of DA 106-04-00, where any exceedance of performance measures has occurred (i.e.

firefighting equipment not maintained or available, *Hot Work Permit* not followed or fuel load not appropriately managed) Maxwell shall, at the earliest opportunity:

- take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur. Steps may include (where appropriate):
    - A review of the location of all firefighting equipment and water supply.
    - Additional measures such as mowing and or tree removal to reduce fuel loads.
    - Additional and or refresher training on bushfire management controls.
- consider all reasonable and feasible options for remediation (where relevant) and submit a report to DPHI describing those options and any preferred remediation measures or other course of action; and
- implement reasonable remediation measures as directed by the Planning Secretary.

In accordance with Schedule 2, Condition E5 (f) of Development Consent SSD 9526, the following contingency plan is used 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:

- Review the unpredicted impact with consideration of any relevant activities and monitoring data;
- Identify the most likely source of the unpredicted impact;
- Review the existing process and current bushfire management controls; and
- Implement appropriate mitigation measures.

4.3 Complaints Handling

The site maintains a 24-hour community hotline (1800 653 960) for any issues or enquiries. In addition to the community hotline, the site can also be contacted by emailing info@malabarresources.com.au.

If a complaint or enquiry is received regarding bushfire management, it is investigated as soon as reasonably practicable and managed in accordance with Maxwell's *Community Complaints and Enquiries Procedure*. Details such as complainant name, contact details, nature of concern, date, time and method of receival are recorded. While details of the enquiry vary depending on the nature and source of the enquiry, the following actions may 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.
- 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 an enquiries database. A summary of complaints is presented to the Community Consultative Committee (CCC) and included in the Annual Review and EPL Annual Return.

5 AUDIT, REVIEW AND IMPROVEMENT

5.1 Review Schedule

The suitability of this BFMP will be reviewed in accordance with Schedule 2, Condition E7 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C3 of DA 106-04-00, that is within three months of:

- The submission of an incident notification under condition E9/C5;
- the submission of an Annual Review under condition E11;
- the submission of an Independent Environmental Audit under condition E13/C7;
- the approval of any modification of the conditions for SSD 9526 or DA 106-04-00; or
- notification of a change in development phase under condition A13.

In accordance with Condition E8 and Schedule 2, Part C, Condition C4 of DA 106-04-00, if necessary, to improve the environmental performance of the site, cater for a modification or comply with a direction, this plan will be revised. In accordance with RFS recommendations (NSW RFS, 2020), this BFMP will be reviewed annually prior to the commencement of the Bush Fire Danger period and or after a bush fire incident.

5.2 Reporting

In accordance with Schedule 2, Condition E11 of Development Consent SSD 9526, by the end of March in each year after the commencement of the development, or other timeframe agreed by the Planning Secretary, an Annual Review report will be submitted to DPHI. The Annual Review will include the following:

- A description of the development that was carried out in the previous calendar year and the development proposed to be carried out over the current calendar year.
- A comprehensive review of any bushfire management related complaints over the previous calendar year.
- A description of non-compliances which occurred in the previous calendar year and actions that were (or are being) taken to rectify the non-compliance and avoid reoccurrence.
- Evaluation of the effectiveness of bushfire management measures.
- Trends in monitoring data and any discrepancies between predicted and actual impacts.
- Measures to be implemented over the next calendar year to improve the environmental performance of the development.

In accordance with Schedule 2, Condition E12 of Development Consent SSD 9526 copies of the Annual Review shall be submitted to Muswellbrook Shire Council and made available to the CCC and any interested person upon request.

In accordance with Schedule 2, Condition E17(a) of Development Consent SSD 9526, the Annual Review will be publicly available on Malabar's website at https://malabarresources.com.au/corporate-governance/.

5.3 Auditing

In accordance with Schedule 2, Condition E13 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C7 of DA 106-04-00, within one year of commencement of development under SSD 9526 and within one year of approval of Antiene MOD1, and every three years after, unless the Planning Secretary directs otherwise, Maxwell will commission and pay the full cost of an Independent Environmental Audit of the development. The audit shall:

a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary;

b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary;

c) be carried out in consultation with the relevant agencies and the CCC;

d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals);

e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent;

f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and

g) be conducted and reported to the satisfaction of the Planning Secretary.

In accordance with Schedule 2, Condition E14 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C8 of DA 106-04-00, within three months of commencing an Independent Environmental Audit, or other timeframe agreed by the Planning Secretary. Maxwell shall submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations shall be implemented to the satisfaction of the Planning Secretary.

5.4 Access to Information

In accordance with Schedule 2, Condition E17 of Development Consent SSD 9526 and Schedule 2, Part C, Condition C11 of DA 106-04-00, before the commencement of construction and within 3 months of the approval of Antiene MOD1 until the completion of all rehabilitation required under Development Consent SSD 9526 and DA 106-04-00, Maxwell will make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of Development Consent SSD 9526 and DA 106-04-00) that are relevant to this plan publicly available on Malabar's website (https://malabarresources.com.au/corporate-governance/):

- this BFMP;
- all current statutory approvals for the development;
- the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;
- minutes of CCC meetings;
- 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;
- 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;
- a summary of the current phase and progress of the development;
- contact details to enquire about the development or to make a complaint;
- a complaints register, updated monthly;
- the Annual Reviews of the development; and
- 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.

This information shall be kept up to date, to the satisfaction of the Planning Secretary.

5.5 Records Management

All data relating to bushfire management is maintained in accordance with the Environmental Management Strategy and maintained on the premise for a period of at least five years.

5.6 Continuous Improvement

Maxwell will continuously investigate and implement reasonable and feasible bushfire management measures on site. Feedback from incident investigations and any complaints will be used to assess impacts and determine where improvements or mitigation measures are required. Maxwell will maintain awareness of new technologies through participation in relevant industry groups.

Maxwell will engage with the community through the CCC and or individual stakeholder meetings, including with the Edinglassie Rural Fire Brigade, to discuss bushfire management measures. Bushfire management training as discussed in **Section 6.2** will also be provided to all employees and contractors with more detailed awareness training provided to personnel involved in supervisory roles. The above measures will be reviewed annually and any improvements will be reported on in the Annual Review.

5.7 Document Review History

A summary of the document history is outlined in **Table 3**.

Table 3. Document Revision Status

Issue	Issue Date	Review Team	Details of Change / Communication
1	September 2021	Robyn Skinner Alex Newton Donna McLaughlin	Document prepared following approval of Development Consent SSD 9526 for the Maxwell UG Project.
2	February 2022	Alex Newton Donna McLaughlin	Document updated following approval of Modification 1.
3	August 2022	Robyn Skinner	Document updated following AEMR submission (to meet Condition E7(b)) and Independent Environmental Audit submission (to meet Condition E7(c)) and notification of construction commencement ((to meet Condition E7(e)).
4	February 2023	Robyn Skinner Donna McLaughlin	Document updated following approval of Modification 2.
5	October 2023	Donna McLaughlin Alex Newton	Document updated following approval of Modification 1 of development consent DA 106-04-00 for the Drayton Rail Loop and Antiene Rail Spur.
6	September 2024	Alex Newton Mark O'Brien Dominic Brown	Amend Appendix 3 RFS consultation register, and Appendix 4 site plans to show fuel storage tank and magazine locations as per consultation request.
7	December 2025	Donna Tiananga Tas Willis	Updated following submission of Independent Environmental Audit report and approval of Maxwell MOD3.

6 INFORMATION, TRAINING AND INSTRUCTION

6.1 Competent persons

Suitably qualified, competent and experienced persons shall be involved in the design, planning and implementation of this plan and related procedures.

6.2 Training

Bushfire 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 this and any other relevant Management Plans.

To ensure the effective implementation of bushfire management controls, all site personnel involved in supervisory roles will undertake a more detailed awareness training package.

Training in the use of fire suppression equipment will be undertaken in accordance with the Training and Competence Standard and the Fire or Explosion Principal Hazard Management Plan. This requires that specialised training be provided to members of the emergency response teams and to other persons deemed necessary.

7 RESPONSIBILITIES

Responsibilities associated with this management plan are outlined **Table 4**.

Table 4. Responsibilities

Position	Responsibilities
General Manager	• Provide adequate resources for the implementation of this Plan.
Environment, Community and Approvals (EC&A) Manager	• Oversee the implementation of this Plan • Notify regulatory authorities and affected stakeholders of incidents in accordance with this Plan. • Coordinate periodic reviews of this Plan. • Ensure all personnel are trained in accordance with this Plan.
Land and Property Coordinator	• Assist the EC&A Manager as required in the implementation of this Plan. • Coordinate investigations of bushfire related incidents or complaints. • Coordinate the implementation of this Plan. • Coordinate the management of records and reporting of bushfire related data. • Manage bushfire related complaints in accordance with the complaints management procedure. • Provide training to all relevant personnel.
Production Supervisors	• Notify the Land and Property Coordinator of any incidents and exceedances involving bushfires. • Implement bushfire control measures as defined in this Plan. • Coordinate the on-site resources and response to a bushfire and assist RFS on gaining access to the site if required.
Surface Operations: **Infrastructure Manager**	• Ensure that all fire suppression and firefighting equipment is kept in a suitable working order. • Undertake an annual inspection to assess the adequacy of fire control measures. • Ensure electricity transmission easements are regularly inspected and vegetation is maintained. • Organise slashing of grass around key assets and infrastructure areas.
Underground Operations: **Underground Manager**	• Ensure that all fire suppression and firefighting equipment is kept in a suitable working order. • Undertake an annual inspection to assess the adequacy of fire control measures. • Ensure electricity transmission easements are regularly inspected and vegetation is maintained. • Organise slashing of grass around key assets and infrastructure areas.
Health and Safety Superintendent	• Coordinate the on-site resources and response to a bushfire and assist RFS on gaining access to the site if required.
All Personnel	• Undertake works in accordance with the objectives and principles of this Plan. • Report any incidents and exceedances involving bushfires.

8 DOCUMENT INFORMATION

8.1 References

Biodiversity Management Plan

Community Complaints and Enquiries Procedure

Emergency Response Management Plan

Environmental Management Strategy

Fire Control Management Procedure

Fire or Explosion Principal Hazard Management Plan

Hot Work Permit

Hunter Eco (2019). Maxwell Project Biodiversity Development Assessment Report.

Muswellbrook Bush Fire Management Committee (2011). Bush Fire Risk Management Plan.

RFS (2019). Planning for Bush Fire Protection. A guide for councils, planners, fire authorities and developers. NSW Rural Fire Service. November 2019. https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0005/130667/Planning-for-Bush-Fire-Protection-2019.pdf

RFS (2020). Mining Industry. Fact Sheet for Emergency Plans. December 2020. Hardcopy provided to Malabar Resources January 2021. NSW Rural Fire Service Hunter Valley District Office.

Spontaneous Combustion Management Plan

Training and Competence Standard

8.2 Definitions and Abbreviations

Term	Definition
Antiene MOD1	Drayton Rail Loop and Antiene Rail Spur (DA 106-04-00) Modification 1
APZ	Asset Protection Zone
BFMP	Bushfire Management Plan
CCC	Community Consultative Committee
CHPP	Coal Handling and Preparation Plant
DA	Development Approval
DPE	NSW Department of Planning and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure
DPIE	NSW Department of Planning, Industry and Environment (now NSW Department of Planning and Environment)
EPA	NSW Environment Protection Authority
EP&A	Environmental Planning and Assessment
EPL	Environment Protection Licence
Maxwell MOD1	Maxwell Underground Project (SSD 9526) Modification 1
Maxwell MOD2	Maxwell Underground Project (SSD 9526) Modification 2
Maxwell MOD3	Maxwell Underground Project (SSD 9526) Modification 3
MEA	Mine Entry Area
NSW	New South Wales

Term	Definition
PA	Project Approval
PIRMP	Pollution Incident Response Management Plan
RFS	NSW Rural Fire Service
SSD	State Significant Development
Toolbox Talk	A forum where information is presented to the crews

APPENDIX 1 – REGULATORY REQUIREMENTS

State Significant Development Consent 9526

Clause	Requirement	Section of Plan
B70	The Applicant must: (a) Ensure that the development: (i) provides for asset protection in accordance with the relevant requirements in the *Planning for Bushfire Protection* (RFS, 2019) guideline; and (ii) ensure that there is suitable equipment to respond to any fires on the site; and (b) Assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.	**3.9.1, 3.9.2** **3.6** **3.6**
B71	Prior to commencing construction 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; (b) schedule and description of proposed bushfire mitigation works, including: (i) location of managed and unmanaged vegetation within the site; (ii) location of water supply; and (iii) internal access roads; (c) plan identifying the location and storage of bulk flammable liquids and materials; (d) 'hot works' management plan, including: (i) circumstances when 'hot works' are limited or prohibited; and (ii) safety measures to be implemented when 'hot works' are being conducted; and (e) emergency/evacuation plan in accordance with *the Guidelines for the Preparation of Emergency/Evacuation Plans* (RFS) and *Australian Standard AS3745 Planning for Emergencies in Facilities*.	**3.4** **2.4.4, Figure 1** **3.7, Appendix 4** **3.7, Appendix 4** **Appendix 4** **3.8, Appendix 4** **3.8** **3.5**
B72	The Applicant must implement the Bushfire Management Plan in consultation with RFS.	**2.3**
E5	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) a summary of relevant background or baseline data; (b) details of: (iv) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (v) any relevant limits or performance measures and criteria; and (vi) 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);	**2.4** **2.1** **2.1** **4** **3**

Clause	Requirement	Section of Plan
	(d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	**3**
	(e) a program to monitor and report on the:	**4**
	(i) impacts and environmental performance of the development; and	
	(ii) effectiveness of the management measures set out pursuant to condition E5(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;	**4.2**
	(g) a program to investigate and implement ways to improve the environmental performance of the development over time;	**5.4**
	(h) a protocol for managing and reporting any:	
	(i) incident, non-compliance or exceedance of any impact assessment criterion or performance criterion);	**4.1**
	(ii) complaint; or	**4.3**
	(iii) failure to comply with other statutory requirements;	**4.3**
	(i) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	**5.2**
	(j) a protocol for periodic review of the plan.	**5.1**
	Note: *The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.*	
E7	Within three months of: (a) the submission of an incident report under condition E9; (b) the submission of an Annual Review under condition E11; (c) the submission of an Independent Environmental Audit under condition E13; (d) the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or (e) notification of a change in development phase under condition A13. The suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	**5.1**
E8	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. ***Note:*** *This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.*	**5.1**
E9	The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including: (a) date, time and location; (b) a brief description of what occurred and why it has been classified as an incident;	**4.1**

Clause	Requirement	Section of Plan
	(c) a description of what immediate steps were taken in relation to the incident; and (d) identifying a contact person for further communication regarding the incident.	
E9A	The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 7 (Incident Notification and Reporting Requirements).	**4.1**
E10	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non- compliance. The notification must be in writing to compliance@planning.nsw.gov.au and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. ***Note:*** *A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	**4.1**

Development Consent DA 106-04-00

Clause	Requirement	Section of Plan
B9	The Applicant must: (c) Ensure that the development: (iii) provides for asset protection in accordance with the relevant requirements in the *Planning for Bushfire Protection* (RFS, 2006) guideline; and (iv) ensure that there is suitable equipment to respond to any fires on the site; and Assist the RFS and emergency services to the extent practicable if there is a fire in the vicinity of the site.	**3.9.1, 3.9.2** **3.6** **3.6**
C2	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) Take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) Consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) Implement reasonable remediation measures as directed by the Planning Secretary.	**4.2**
C3	Within three months of: (a) the submission of an incident report under condition C5 or C6; (b) the submission of an Independent Environmental Audit under condition C7;	**5.1**

Clause	Requirement	Section of Plan
	(c) the approval of any modification of the conditions of this consent (unless the conditions require otherwise); the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.	
C4	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. ***Note:*** *This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.*	**5.1**
C5	The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident	**4.1**
C6	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non- compliance. The notification must be in writing via the Department's Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. ***Note:*** *A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	**4.1**
C7	Within one year of approval of Mod 1, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must: (a) be led by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Planning Secretary; (b) be conducted by a suitably qualified, experienced and independent team of experts (including any expert in field/s specified by the Planning Secretary) whose appointment has been endorsed by the Planning Secretary; (c) be carried out in consultation with the relevant agencies; (d) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent, water licences and mining leases for the development (including any assessment, strategy, plan or program required under these approvals); (e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals and this consent; (f) recommend appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required under the abovementioned approvals and this consent; and be conducted and reported to the satisfaction of the Planning Secretary.	**5.3**

Clause	Requirement	Section of Plan
C8	Within three months of commencing an Independent Environmental Audit the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.	**5.3**
C11	Within 3 months of the approval of Mod 1, 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: (i) the documents listed in condition A2(c) of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) a summary of the current phase and progress of the development; (v) contact details to enquire about the development or to make a complaint; (vi) a complaints register, updated monthly following the receipt of any complaints; (vii) 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; (viii) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary	**5.4**

APPENDIX 2 – MAXWELL PROJECT EIS AND SUPPORTING DOCUMENT COMMITMENTS

Clause	Requirement	Section of Plan
EIS Section 6.20.3	Malabar would continue to promote bushfire awareness through: • provision of fire safety training for all personnel and contractors undertaking work associated with the Project; and • provision of relevant information regarding bushfire management, where appropriate, via notice boards and during daily pre-start meetings.	**5.4, 6.2** **3.5**
EIS Section 6.20.3	Specific mitigation measures to reduce bushfire risk would include: • maintenance of non-operational, grassed areas to reduce fuel loads; • slashing infrastructure areas and property boundaries prior to the summer period; • establishment and maintenance of fire breaks and access tracks; • where practical, limiting all activities classed as 'hot work' to workshop and hardstand areas; • regular inspection of vegetation within power line easements to avoid interference with power lines; • limiting vehicular movements to existing access tracks where possible to reduce the potential for spark emissions; • prohibiting smoking in any restricted area, such as near fuel storage areas, inside vehicles or buildings, or within any area designated as a non-smoking area; and • prohibiting the lighting of fires or fireworks	**3.9** **3.9** **3.9** **3.8** **3.9** **3.9** **3.1** **3.8**
EIS Section 6.20.3	Further to the measures described above, fire-fighting equipment located on-site would continue to be regularly serviced and maintained in accordance with relevant Australian Standards. Fire-fighting equipment would continue to be provided around each building along with a trailer equipped for mobile fire-fighting on-site. The equipment on-site would include fire extinguishers, aqueous film-forming foam (that does not contain Per- or Poly-Fluoroalkyl Substances [PFAS]), fire hydrants, hoses, and appropriate fittings and nozzles. Malabar would continue to consult with the Edinglassie Rural Fire Brigade with regard to bushfire management on-site, and would report any bush or grass fires on-site to the Edinglassie Rural Fire Brigade. The Emergency Response Management Plan would outline the protocol to be followed in the event of a fire. If the Project is approved, Malabar would review and update the Bushfire Management Procedure to consider the additional surface infrastructure and activities required to support the Project.	**3.10** **3.6** **5.4** **5.4**

APPENDIX 3 – CONSULTATION WITH RFS

Raised By	Consultation Feedback	Outcome
Glenn Byrnes, NSW RFS via email of 13/1/21	Smoke Management procedures and how it will affect underground operations/ crews, through the shaft/ vents or fans.	Section 3.5 updated to include reference to potential impacts to personnel exposure and reference to the Maxwell UG Project gas and ventilation Trigger Action Response Plan which defines gas monitoring and evacuation procedures in the event of smoke from bushfires entering the underground workings.
	Fuel Management above ground, this may include grazing, slashing or hazard reduction burning. This should also be identified as part of any offset lands and how they are managed.	Section 3.9.3 provides a description of how non-operational grassed areas will be mowed or grazed to reduce fuel loads; infrastructure and property boundaries will be slashed prior to the start of the fire season.
	Identification of Fire Trails and Fire Breaks.	Section 3.9.1 describes how (where possible), a minimum 10m APZ will be maintained along boundary fences (within approved disturbance areas) and will act as a fire break. Section 3.9.2 states that access tracks that can be used as fire trails will be monitored annually in August (or as amended) to assess if there are sufficient tracks for fire-fighting access and if tracks require maintenance.
	Inclusion of Asset Protection Zones.	Section 3.9.1 provides detail on Asset Protection Zones to be established around all key infrastructure associated with mining production.
	The identification of gate(s) for entry either by a Rural Road Addressing or a 6 figure Grid Reference.	Section 3.9.2 refers to gates that can be used to enter the site from external roads. Table 2 lists the entry gates (Access Points). Figures 2, 3 and 4 show the location of Access Points to site.
	All Fires are reported via the Control Room to Triple Zero.	Section 3.3 requires that if property or lives are at risk from a bushfire, a call to 000 should be made immediately in accordance with the Emergency Management Plan. The Hunter Valley RFS should also be notified and advised of the situation. As a courtesy, all fires on site not requiring the response of the RFS should still be reported to the RFS so they are aware and can field enquiries by the public and to update their fire incidents database.
	I can supply any Rural Fire Service (Hunter Valley – Duty Officer Contact Number).	Section 3.3 External Emergency Services includes the Hunter Valley RFS phone number of (02) 6575 1200.

Raised By	Consultation Feedback	Outcome
Damian Honour, NSW RFS during meeting of 26/5/21	Cover page Bushfire Management Plan	
	Review period for the plan should be yearly for during the construction period; thereafter every 3 years.	Section 5.1 states that the BFMP will be reviewed within three months of an Annual Review under condition E11. No amendment required.
	Section 2.3.4 Site Vegetation	
	Need to quantify how the risk is deemed low.	Section 2.4.4 amended and describes how livestock grazing has removed the shrub layer from much of the site and suppressed the ground-cover layer in areas of native vegetation.
	Include commitment to monitor and assess fuel loads, with reference to guidance thresholds.	Reference made to Section 3.9 that provides thresholds relating to APZs and height of grass.
	Section 3.2 External Emergency Services	
	Amend Muswellbrook RFS to Hunter Valley RFS. Amend phone number from 02 6541 6900 to 02 6575 1200	Section 3.2 amended.
	Section 3.4 Evacuation	
	Include a process for the daily evaluation of risk, eg via review of fire danger ratings on RFS and BOM websites and for notifying site personnel.	Section 3.5 amended.
	Section 3.5 Fire-fighting equipment	
	Include specifications of equipment (refer to AS Standards)	Added reference in Section 3.6 to minimum requirements for fire-fighting equipment outlined in the Fire or Explosion PHMP.
	Section 3.8.2 Track and Gate Maintenance	
	Amend first sentence to read: Access tracks that can be used as fire trails will be monitored annually in August “or as needed”.	Section 3.9.2 amended.
	Section 6.2 Training	
	Identify the levels of training (e.g. TAFE), PPE required for personnel and for using the fire trailer (refer to AS Standards).	Added reference in Section 6.2 to the Training and Competence Standard and the Fire or Explosion PHMP training requirements.
	Section 8 Document Information	
	Review and add the RFS Act and Regulations.	Added reference in Section 2.1 to Section 63 of the Rural Fires Act.

Raised By	Consultation Feedback	Outcome
	Add RFS Fact Sheet.	RFS Fact Sheet for Bush Fire Management Plans added to Section 8.1.
	Unspecified Section	
	Add a commitment to an after-action review (AAR), ie post-event review and improvement.	Included within Section 5.1.
	Unspecified section	
	Add further detail on hazard reduction.	Hazard reduction is described in Section 3.9. No amendment required.
	Appendix 3 [figure showing] – Roads, Water Storages and Bulk Fuel Storage	
	Change from A4 to A3. Remove extraneous detail where possible. Add additional detail such as assets, symbols consistent with national mapping symbology (see reference below), ID of steep sections, high risk areas such as powerlines (risk to helicopters), high value/risk assets such as vents, pickup/access points (with signage) etc – refer to RFS Fact Sheets.	Figure has been amended, specifically split into three maps (now included within Appendix 4 Figures 2 to 4) to aid the user, plus additional road information and removal of some information deemed extraneous to RFS; future updates will include 'as constructed' items plus items such as pickup/access points. National mapping symbology for incidents has been incorporated. Figure 5 shows the entirety of the project site; a separate version will be issued to RFS configured to be printed as A3.
	General	
	Malabar to consider the following documents: NSW Government NSW Rural Fire Service (RFS). Mining Industry. Fact Sheet for Emergency Plans. December 2020. [Fact Sheet is for the Muswellbrook and Singleton LGA – not readily available on the RFS website] NSW Government NSW Rural Fire Service (RFS). Mining Industry. Fact Sheet for Bush Fire Management Plans. December 2020. [Fact Sheet is for the Muswellbrook and Singleton LGA – not readily available on the RFS website] NSW Government NSW Rural Fire Service (RFS). NSW RFS Fire Trail Standards. June 2019. https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0009/69552/Fire-Trail-Standards-V1.1.pdf NSW Government NSW Rural Fire Service (RFS). Development Planning. A guide to developing a Bush Fire Emergency Management and Evacuation Plan. 2014. https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0003/29271/DPP1079-Emergency-management-and-evacuation-plan-FORM.pdf Incident Management Procedures. 6.08.01 Bush Fire Mapping Symbols. IN: BUSH FIRE bulletin VOLUME 34 NO 2 – 2012//LIFT OUT. New	Documents have been considered and where relevant added to Section 8.1.

Raised By	Consultation Feedback	Outcome
	national Mapping Symbology for incidents. http://www.rfs.nsw.gov.au/__data/assets/pdf_file/0013/4126/New-National-Mapping-Symbology-Liftout.pdf & http://www.firecom.com.au/dloads/	
Glenn Brynes, NSW RFS, via email of 26/5/21	Mitigation – Use of stock to keep the majority of the fuel loads across the landscape under control. If burning is to be considered a rolling mosaic process could be used (7 sections over a 10-year period Land Management Zones). These could be considered as agricultural burns as burning for “green pick”.	As described in Section 3.9.3, non-operational grassed areas will be mowed or grazed to reduce fuel loads.
	The use of Fire Trails – Built or maintained to Rural Fire Service (RFS) standard (4 metres wide and passing bays etc). Consideration should be to both Strategic and Tactical trails, all strategic trails should be sign posted with road sign slides.	The extensive current access road and track network will be maintained to facilitate ongoing vehicular access. Note that there are constraints in certain aspects due to: • An extensive number of Aboriginal Cultural Heritage Sites, as shown in Figure 8 of the Development Consent for SSD 9526. • The project has been carefully designed to not be visible from the south; any additional infrastructure is not permitted by the current approval. • A requirement to minimise the amount of clearing and a limit to the location of any surface infrastructure to within the approved Surface Development Area (refer to the area shown in yellow on Figure 2 of the Development Consent).
	All external gates should have a numbering system as to allow easy access to an identified entry point for all emergency services. (100mm high with a Mine prefix and number for each point).	Signage will be implemented prior to construction.
	To assist with the ignition mitigation (road-side or natural) the use of boundary fire breaks (6 metres wide slashed or ploughed). This is to assist owners that they are able to show a property owner is trying to mitigate the risk of fire both impacting or escaping their property.	As described in Section 3.9.3, non-operational grassed areas will be mowed or grazed to reduce fuel loads.
	If the above details could be placed on a A3 sheet of paper with a Map showing the trails, entry points and accessible water points on one side and on the flip side would be the contact details for the mine like the control room phone number etc.	Figure 5 which has been prepared to include the requested information. A separate version that has been formatted and to be printed as A3 will be issued to RFS.
NSW RFS via site consultation 12/06/2024	Inclusion of magazine location in site map and bushfire MP and providing to emergency services and emergency manifest.	Amended MP, placed in emergency manifest and delivered via email 30/09/2024.

APPENDIX 4 – SITE PLANS

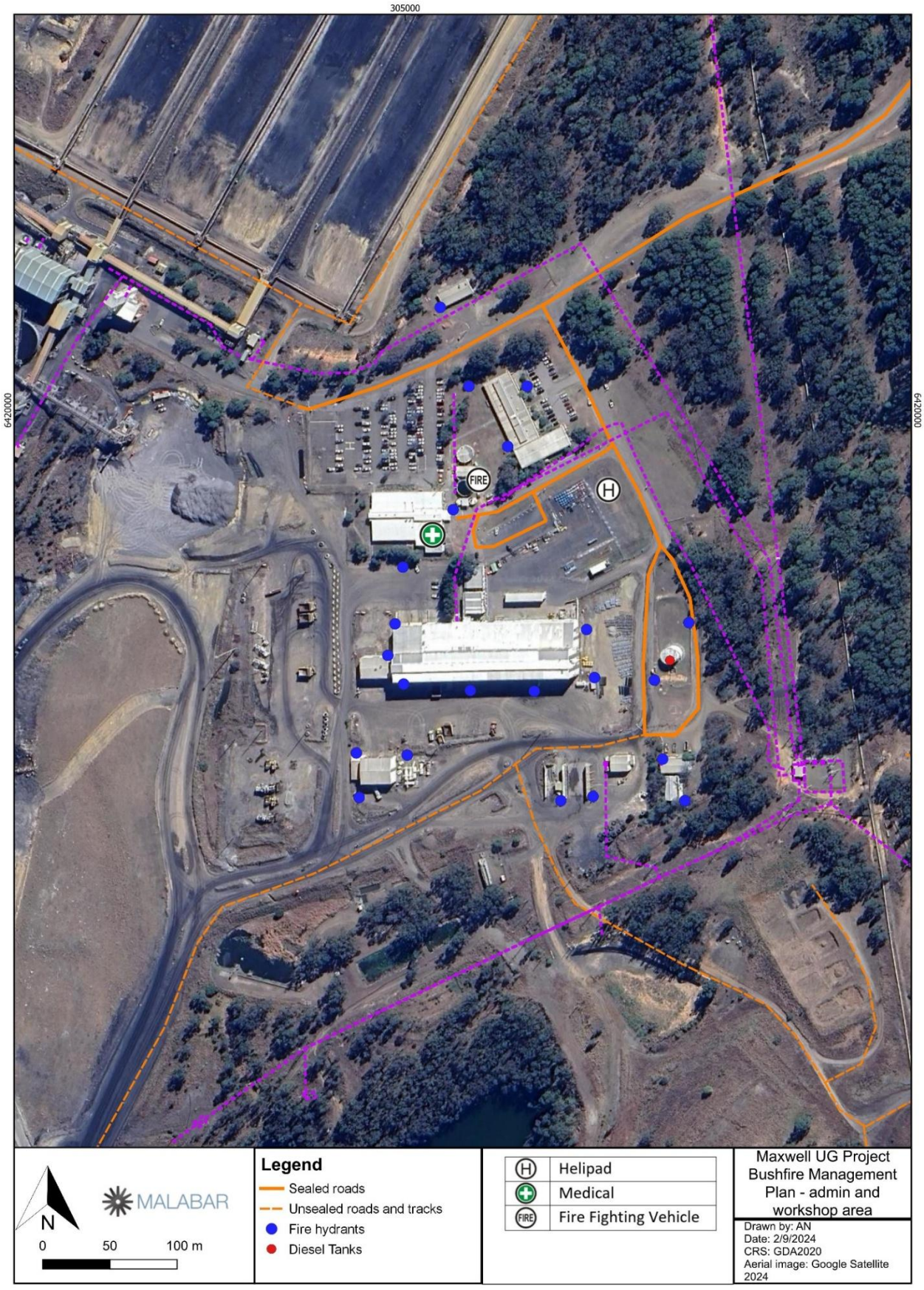

Figure 2. Maxwell UG Mine - administration and workshop area

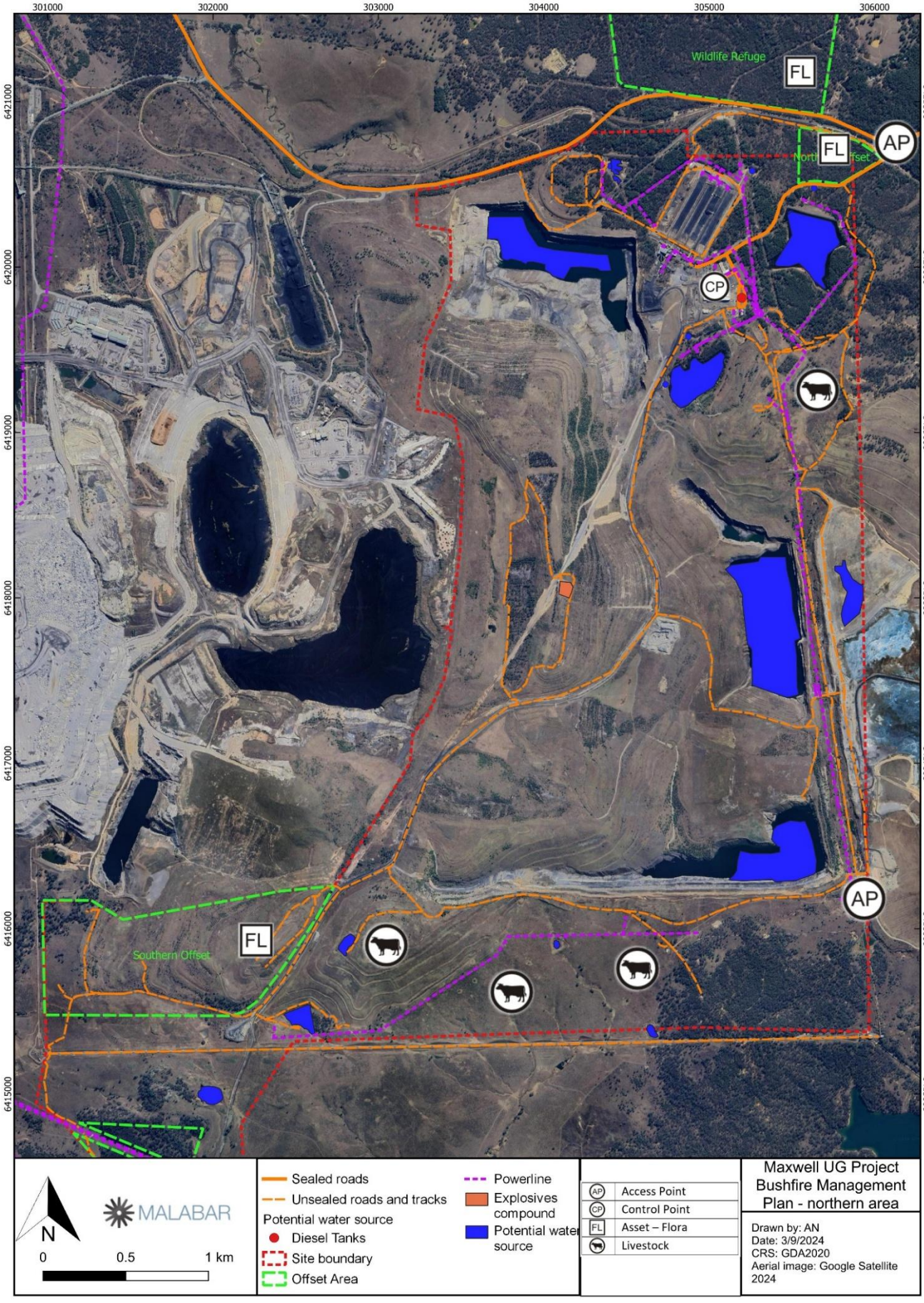

Figure 3. Maxwell UG Mine – northern area

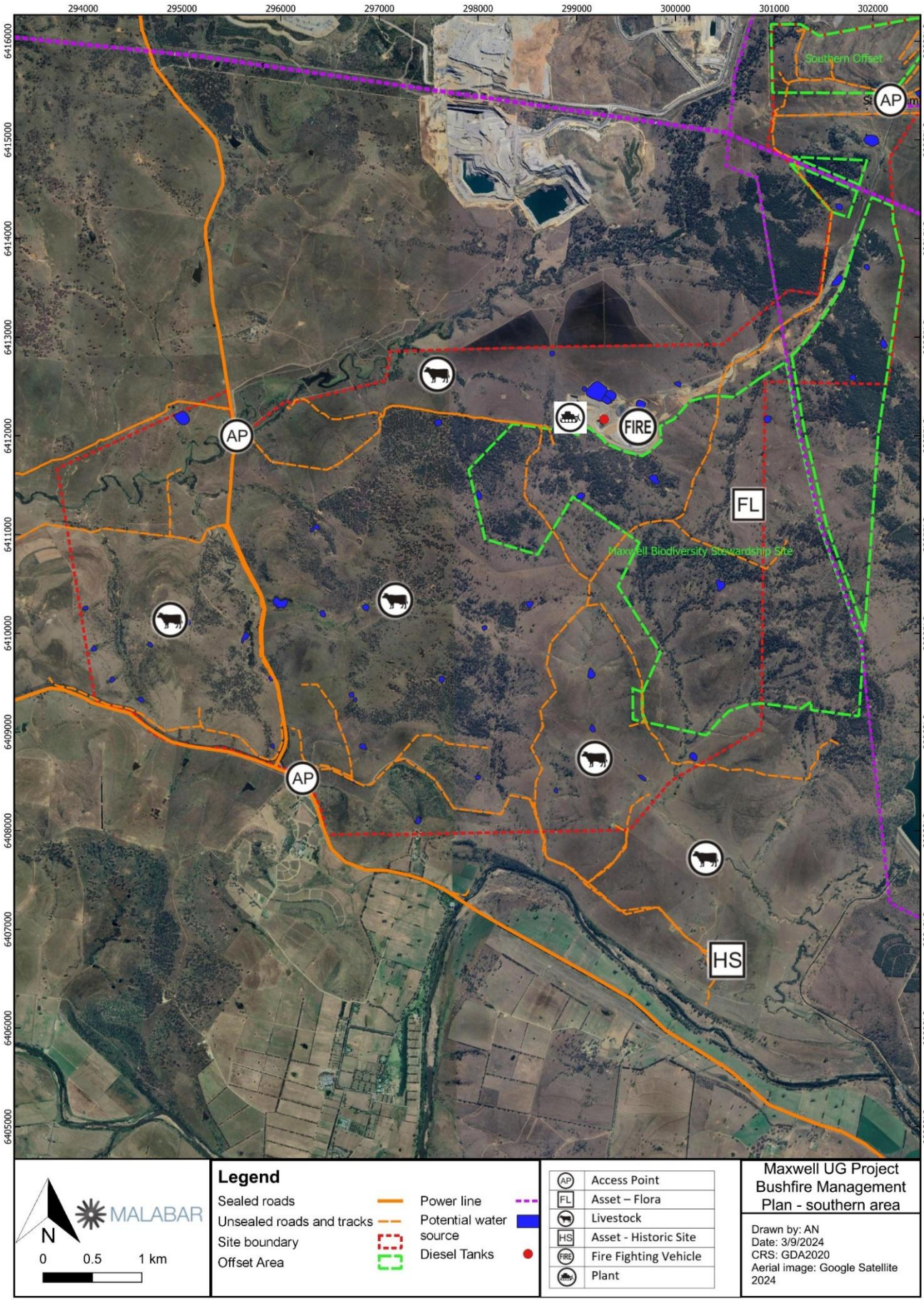

Figure 4. Maxwell UG Mine – southern area

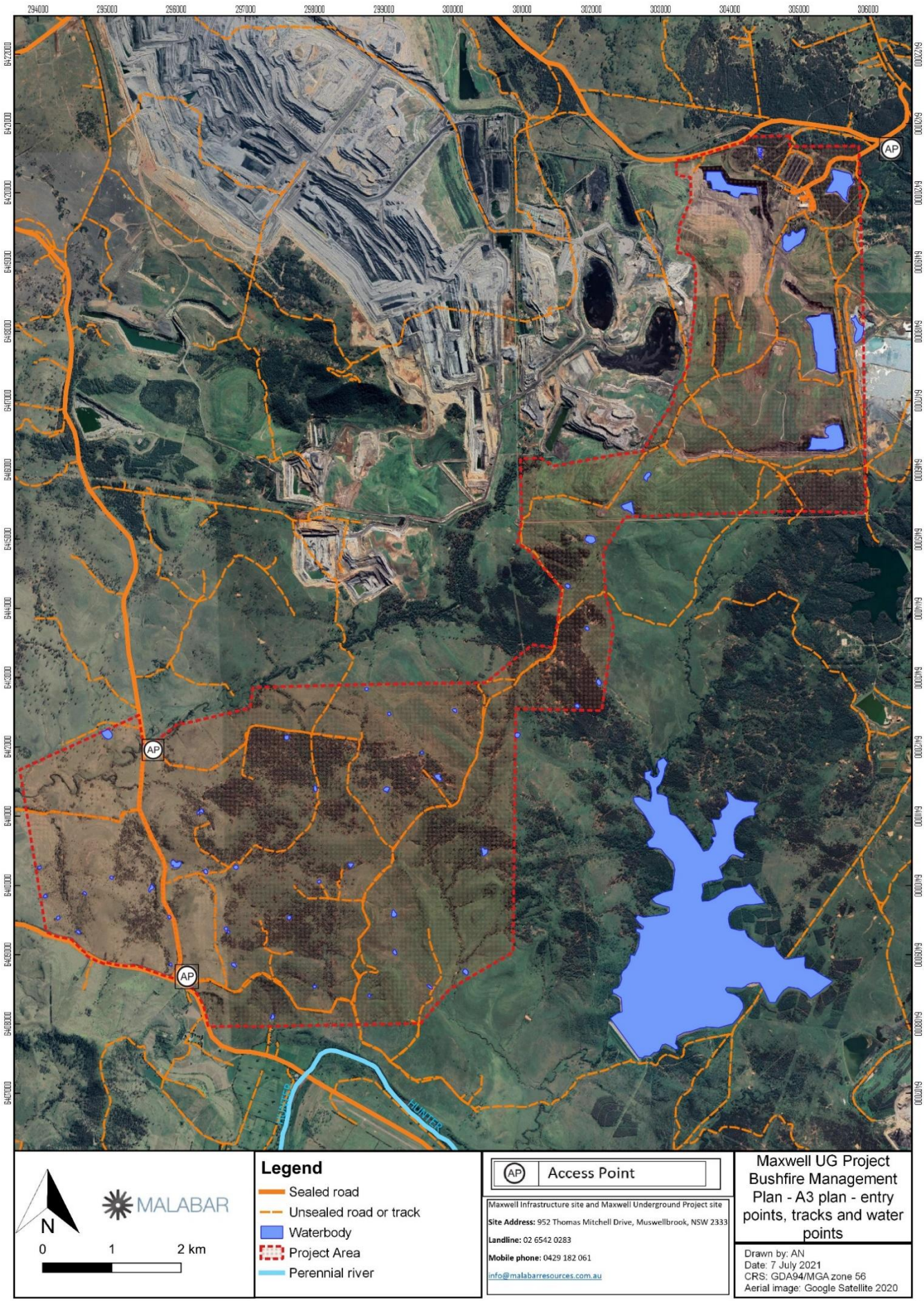

Figure 5. Maxwell UG Mine – site wide