



TAHMOOR SOUTH CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN INTERSECTION UPGRADE Tahmoor Coal

Doc # TAH-HSEC-376 Version: 1.0

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1 Introduction

1.1 Background

Tahmoor Mine is located on of the foothills of the Southern Highlands of New South Wales. The mine surface operations are located south of the township of Tahmoor, which is within the greater Sydney Basin - approximately 80 km south west of Sydney. Tahmoor Mine is located within the Wollondilly Shire Council (WSC) Local Government Area (LGA). Underground workings extend north under the township of Tahmoor and Picton with two ventilation shafts being located on the outskirts of town. The location of Tahmoor Mine in the regional context is shown in **Figure 1**.

In December 2020, Tahmoor Coal received Development Application Approval (SSD 8445) for the Tahmoor South Coal Project, which involves use of the existing surface infrastructure and the expansion of underground longwall mining to the south of the existing workings. The Project now involves the extraction of up to 4 Mtpa of ROM coal, with a total of up to around 33 Mt of ROM coal proposed to be extracted over a 10-year period.

Existing surface infrastructure requires significant upgrading to allow for the continued use. Construction works associated with Development Approval SSD 8445 including an upgrade to the mine site entrance road intersection (Remembrance Drive intersection) and is the scope of works for this document.

1.2 Purpose

The purpose of this *Construction Environmental Management Plan (CEMP)* is to provide a framework for Tahmoor Coal (TC) personnel to ensure that compliance is achieved with relevant internal and external regulatory requirements related to construction of the intersection upgrade at Tahmoor Coal. The plan ensures that impacts on the community are minimised and managed within a structured framework.

The EIS commitment to implement a full Construction Noise and Vibration Management Plan (CNVMP) was to satisfy potential impacts from the construction of the vent shafts. This CEMP does not cover the construction of the vent shafts, and a separate CNVMP would be implemented prior to any works on the vent shafts.

1.3 Scope

This CEMP includes management measures and monitoring requirements relating to the following:

- a) Noise and Vibration
- b) Flora and Fauna
- c) Visual Amenity and Lighting
- d) Water
- e) Air
- f) Waste
- g) Hazardous Materials

The CEMP applies to all construction activities associated with the intersection upgrade.

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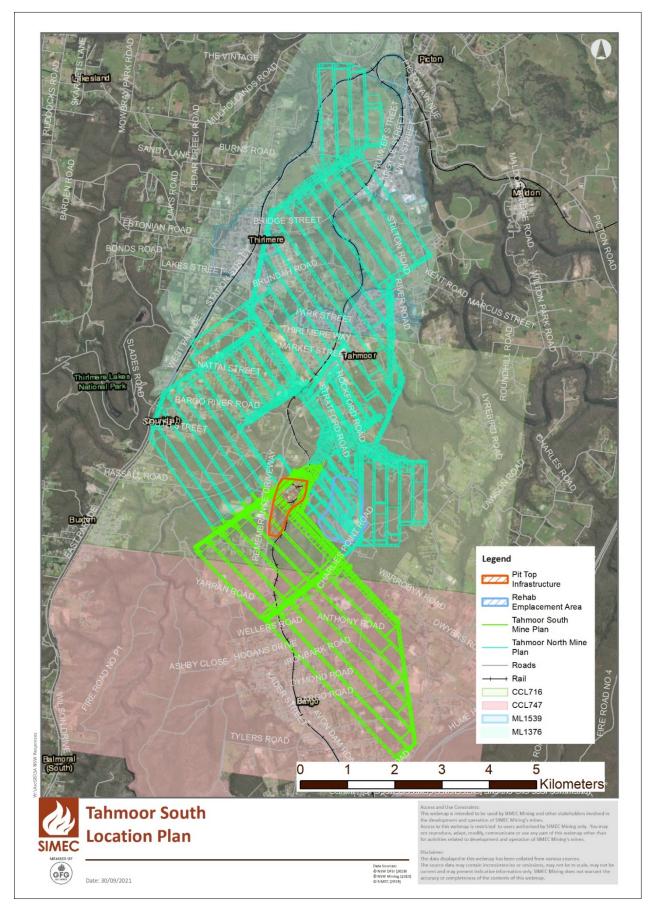


Figure 1 Tahmoor Coal Site Location

Planning 2

2.1 **Statutory Requirements and Legislation**

This CEMP has been developed to satisfy the requirements of the Guidelines for the Preparation of Environmental Management Plans (Dept. of Infrastructure of Planning and Natural Resources (DIPNR), 2004).

All development consents, leases, licences, and other relevant approvals are stored in the Cority Compliance Management database, which is administered by both site and Liberty GFG Corporate. A summary of the relevant mining leases is provided in Table 2. A summary of other approvals and licences is provided in

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Table 3.

Table 1 Development Consents

Consent Number	Consent Description	Date Granted	Expiry Date
SSD 8445	Tahmoor South Project	23/04/2021	December 2033, or until 10 years from the commencement of second workings.
DA 1975	Underground Mine	26/03/1975	No expiry
DA 1979 (as modified)	Coal Preparation Plant Stockpiles and Refuse Emplacement Area. Road haulage of trial coal shipments. Upgrades for Longwall Mining. Road haulage in Wollondilly Shire and when rail unavailable. Road haulage to Corrimal and Coal Cliff Coke Works.	23/08/1979	No expiry
DA 190/85	Surface Works for Gas Extraction.	16/12/1985	No expiry
DA 57/93 (as modified)	Tahmoor North Project. Modification for heritage approval condition.	7 /09/1994	No expiry
DA 67/98 (as modified)	Tahmoor North Extension Project. Additional areas to be subsided. Redbank Tunnel Subsidence Management. Redbank Tunnel Subdivision of Land. Expanded Subsidence Footprint.	25/02/1999	16/06/2024

Table 2 Mining Lease

Lease	Title	Granted	Expires
CCL 716	Original Tahmoor Leases	15/06/1990	13/03/2021
			(approval pending)
ML 1376	Tahmoor North Lease	28/08/1995	28/08/2016
			(approval pending)
ML 1308	Small Western lease to west of CCL716	02/03/1993	02/03/2035
ML 1539	Tahmoor North Extensions Lease	16/06/2003	16/06/2024

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Table 3 Approvals/Licences

Approval Title / Description	Date Granted	Expiry Date
Environmental Protection Licence 1389	01/05/2012	No Expiry
WAL36442 and WAL25777	6/12/2013	No Expiry

2.2 Development Consent and EIS Commitments

Development Consent and EIS commitments relevant to this management plan are outlined in Table 4.

Table 4 Commitments

Reference	Commitment	Where Addressed
EIS		
NV-1	Noise and Vibration Potential impact: Impacts of construction noise on sensitive receivers Management and mitigation measures: Develop and implement a Construction Noise and Vibration Management Plan.	Table 7 This plan covers the requirement for a CNVMP for the intersection upgrade. A specific CNVMP would be made for any works on the vent shafts prior to construction.
Developmer	nt Consent	
B1	Noise and Blasting Noise Criteria The Applicant must ensure that noise generated during construction activities at the ventilation shaft sites does not exceed the criteria in Table 1 at any receiver on privately-owned land. Table 1: Ventilation Shaft construction noise criteria dB(A) Refer to table in development consent for Noise Assessment Locations (NAL) - day, evening and night criteria at all 52 locations.	Not applicable to this Plan This plan covers the requirement for a CNVMP for the intersection upgrade. A specific CNVMP would be made for any works on the vent shafts prior to construction.
A12	Coal Extraction and Processing and Transport During construction activities at the ventilation shaft sites, truck movements at these sites must not exceed 16 movements per day.	Not applicable to this Plan
A16	Hours of Operation Except for drilling activities at the ventilation shaft sites, construction activities at the surface facilities site and ventilation shaft sites must only be undertaken between the hours of 7am to 6pm Monday to Friday, and 8am to 1pm Saturday, with no construction activities on Sundays or public holidays, unless the Planning Secretary agrees otherwise.	Table 5
A17	Hours of Operation Drilling activities at the ventilation shaft sites may be undertaken 24 hours a day, 7 days a week.	Not applicable to this Plan
B47	Visual Amenity and Lighting	Table 7

Reference	Commitment	Where Addressed
	The Applicant must: (a) take all reasonable steps to minimise the visual and off-site lighting impacts of the development;	
B47	Visual Visual Amenity and Lighting The Applicant must: (b) take all reasonable steps to shield views of mining operations and associated equipment from users of public roads and privately-owned residences;	Not applicable to this Plan
B47	Visual Visual Amenity and Lighting The Applicant must: (c) ensure no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure;	Not applicable to this Plan Table 7
B47	Visual Visual Amenity and Lighting The Applicant must: (d) ensure mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes);	Table 7
B47	Visual Visual Amenity and Lighting The Applicant must: (e) ensure that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 2019 - Control of Obtrusive Effects of Outdoor Lighting; and	Not applicable to this Plan
B47	Visual Visual Amenity and Lighting The Applicant must: (f) ensure that the visual appearance of any new buildings, structures, facilities or works (including paint colours and specifications) is aimed at blending as far as possible with the surrounding landscape.	Not applicable to this Plan
B55	Minor Surface Infrastructure Gas Drainage The Applicant must ensure that all gas drainage pipelines (other than connection points, monitoring points, dewatering facilities, regulation or isolation points) between gas drainage plants are buried, unless otherwise agreed with the relevant landowner or unless burial is inappropriate for safety or other reasons, to the satisfaction of the Planning Secretary.	Not applicable to this Plan
B63	Road Maintenance The Applicant must: (a) prepare a pre-dilapidation survey of the transport route/s prior to the commencement of any construction, road haulage or decommissioning works, or other timeframe agreed by the appropriate roads authority; (b) prepare a post-dilapidation survey of the transport route/s within 1 month of the completion of construction, road haulage or decommissioning works, or other timeframe agreed by the applicable roads authority; and (c) rehabilitate and/or make good any development-related damage identified in the post-dilapidation survey prepared under paragraph (b) within 2 months of completing the post-dilapidation survey, or other timing as may be agreed by the applicable roads authority, to the satisfaction of the applicable roads authority.	Road upgrade will improve the road condition, however a predilapidation survey of Remembrance Driveway intersection has been conducted prior to the upgrade.
B64	If the construction, road haulage and/or decommissioning of the development is to be staged, the obligations in condition B63 apply to each stage.	Not applicable to this plan
B66	Prior to the commencement of second workings, the Applicant must upgrade the intersections of Remembrance Driveway and the Mine Access Road and Remembrance Driveway and Olive Lane, to the satisfaction of the relevant roads authority.	Noted, this CEMP has been created

Reference	Commitment	Where Addressed
	Notes: • The road upgrade works identified above include all road furniture and safety requirements required to meet relevant road standards, to the satisfaction of the appropriate roads authorities.	to assist in the upgrade works.
	• If there is a dispute between the relevant parties about the implementation of this condition, then any party may refer the matter to the Planning Secretary for resolution.	

3 Project Description

3.1 **Project Location**

As part of the Tahmoor South Mine Project Consent Conditions, it is a requirement to upgrade the mine entrance at the Remembrance Drive intersection before the commencement of secondary extraction at Tahmoor South. The upgrade will vastly improve traffic movement for the community, Tahmoor Mine deliveries and Tahmoor staff. The upgrade work will provide improved clearance for traffic to pass on left of vehicles turning into the mine entrance and a deceleration lane to assist vehicles turning left into the mine entrance.

The Mine Intersection is located at 2975 Remembrance Driveway, Bargo NSW 2574.

The proposed Tahmoor Mine Main Intersection upgrade work is as per **Figure 2** below.

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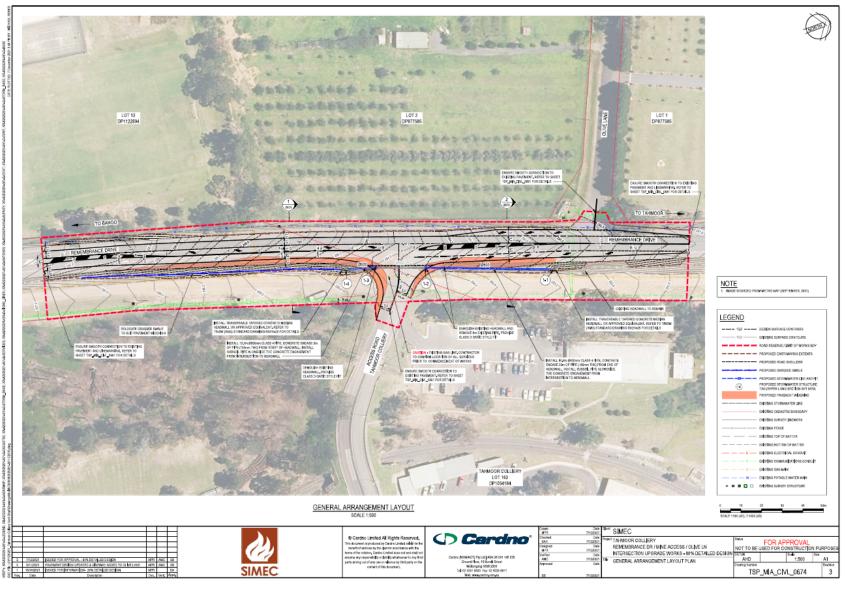


Figure 2 Construction Layout

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3.2 Key Characteristics

Table 5 Key Project Characteristics

Element	Description
Name of Project	Tahmoor Mine Main Intersection Upgrade
Life of Project	Four Months
Approval Date	23rd April 2021
Address	2975 Remembrance Driveway, Bargo NSW 2574
Landowner	Wollondilly Council
Statutory Requirements	A road occupancy licence (ROL) under Section 138 of the NSW Roads Act 1993 would be required prior to the start of the construction period to allow for road closures. No other approvals or licences are required for the proposal.
Commencement of Construction	April 2022
Estimated Completion Date	July 2022
Operating Hours & During Construction	Current Approval Condition - Construction activities at the surface facilities sites must only be undertaken between the hours of 7am to 6pm Monday to Friday, and 8am to 1pm Saturday, with no construction activities on Sundays or public holidays, unless the Planning Secretary agrees otherwise.
	Tahmoor Coal have sought an amendment to Condition A16 of Consent SSD 8445 to allow construction activities associated with the intersection upgrade to occur at night, to reduce any impacts to traffic in the area. Asphalt replacement work would then be conducted outside peak hours to minimise impact on Remembrance Drive traffic especially around school hours.
List of Major Project Components	Upgrading the Tahmoor Mine Main Intersection including Olive Lane intersection

3.3 Construction Activities and Program

Works will be conducted within the road corridor of Remembrance Driveway and into the mine site entrance owned by Tahmoor Coal. Wollondilly Council act as the landowner and roads authority for Remembrance Driveway. Approximately 10 nightshifts (weather dependant) over an 8 week construction period may be required for asphalting works to reduce traffic impacts.

The Tahmoor Mine main intersection construction activities and sequence of activities includes the following:

- a) Preparation of Management Plans and onboarding activities;
- b) Site establishment works (construction compound and delivery of equipment to site);
- c) Extending the 600mm culvert to accommodate the localised lane widening;
- d) Constructing the localised lane widening works to accommodate the new slip lanes;
- e) Conducting repairs to pavement localised areas via heavy patching works;
- f) Resheeting of the intertsection and access roadways with 50mm Asphaltic Concrete (AC);
- g) Installing new line marking and signage;
- h) Revegetating/ hydromulching the disturbed areas of the open drian; and

i) Demobilising form site (removal of site compound & equipment and restoration or area to previous condition).

3.4 Risk Assessment

In accordance with Tahmoor Coal's Health & Safety Management System, project and activity specific risk assessments are completed and include an assessment of Environment and Community (E&C) risks.

A construction specific Risk Assessment will be completed prior to commencement of construction and added to Appendix A of this CEMP. .

Tahmoor conducted a broad brushed Risk Assessment (BBRA) on the proposed upgrade in May 2021 prior to commencing the detailed design work in July 2021.

The BBBA covered the high-level risks associated with delivering the Tahmoor Mine Main Intersection Upgrade. There were a number of key main risks were identified and for each risk the project team devised the appropriate action to mitigation the risk. Form the BBRA the following key main risks (external to Tahmoor Operational risks) and mitigation measures were identified:

- a) Key Stakeholders constraints on Design delaying design process requiring early engagement with key stakeholders (WSC);
- b) Public Relations delaying design process requiring early engagement with key stakeholders (WSC and Wollondilly Anglican College);
- c) Level of Project Definition completed delaying design process requiring early commencement of detailed design process in consultation with approving authority WSC;
- d) Wants of end user not matching the defined scope requiring early engagement with key stakeholders (WSC);
- e) Interaction with services and unsuitable ground conditions requiring conducting the services background checks and geotechnical investigation prior to commencing detailed design work;
- f) Contamination of land, water or air requiring developing a sediment control plan, and
- g) Construction noise impact on surrounding receivers outside of approved working hours and monitoring noise during construction activities.

3.5 **Environmental Aspects**

Correct environmental management of area will include management to the following specific aspects and impacts where applicable;

- a) Flora/Fauna and Pests
- b) Soil and Erosion
- c) Water
- d) Dust and Air Quality Control
- e) Visual Amenity/Lighting
- f) Noise and Vibration
- g) Waste
- h) Storage and Handling of Hydrocarbons and Chemicals
- i) Contaminated Land
- j) Public Safety
- k) Heritage

Traffic

Table 7 further details all environmental management and monitoring requirements associated with the construction of the intersection upgrade.

4 Stakeholder Consultation

4.1 Internal Stakeholder Communication

Internal stakeholders include employees, contractors and visitors of Tahmoor Coal. *TAH-HSEC-00119-Communication and Engagement Procedure* has been developed to include the following:

- a) Methods of communication between internal stakeholders;
- b) Types of information that is communicated between internal stakeholders;
- c) Responsibilities for communication of information to internal stakeholders; and
- d) Review of communication methods, including the consideration of feedback to / from internal stakeholders.

4.2 External Stakeholder Communication

External stakeholders include neighbours and the local / regional community, local council, state and federal government agencies and regulators, and press / media. External stakeholders are identified in accordance with TAH-HSEC-00031- Community Development Plan and TAH-HSEC-00039 – Stakeholder Engagement Plan. External stakeholder communication is undertaken in accordance with TAH-HSEC-00039— Stakeholder Engagement Plan. This guideline has been used as a basis for developing a communication procedure TAH-HSEC-00119- Communication and Engagement.

Tahmoor Coal's procedure includes information on the following topics:

- a) Methods of communication to external stakeholders.
- b) Types of information that is communicated between external stakeholders.
- c) Responsibilities for communication of information to external stakeholders.
- d) Review of communication methods, including the consideration of feedback to / from external stakeholders.

A key objective of *TAH-HSEC-00119 - Communication and Engagement Procedure* is to maintain positive relationships established with the local community and other external stakeholders.

Residents and stakeholders in close proximity to the road works will be informed via door knocking or letter box drops at least 7 days prior to commencement of the intent to complete road works during night-time hours, if agreed by the Planning Secretary. Notification will include detailing work activities, dates and hours, impacts and mitigation measures, indication of work schedule over the night time period, and contact telephone number.

Information will also be posted on the Tahmoor Mine Website.

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4.3 Consultation to Date

Feedback provided by stakeholders is summarised within Table 6 below.

Table 6 Consultation to Date

Consulted Parties	Consultation Conducted	Outcomes of Consultation
Wollondilly Anglican College (WAC)	 Discussed proposed mine intersection upgrade and WAC revealed their plans for their proposed expansion 	 Agreed to continue discussion, share design information and progress respective projects to mitigate impact on each other
Wollondilly Shire Council	 Mandatory consultation and application of design for detailed design review and presentation of design (80% Detail Plans) for WSC Traffic Committee Approval for proposed Intersection Upgrade. 	Detailed design review and drawings submitted for WSC Traffic Committee meeting 1/02/2022 for consideration and Approval granted 1/03/2022
	WSC Approval of 100% Detail Plans	 Post WSC Traffic Committee Approval of 80% Plans – The plans are updated to 100% Detail. Plans are currently being updated as discussed with WSC and to be submitted end March 2022.

5 Environmental Management

5.1 Environmental Mitigation Measures and Monitoring

The following table outlines the environmental management and monitoring measures to be implemented the Contractor, Sub-Contractors and Project Team at Tahmoor Coal. Key risks and impacts to environmental aspects have been assessed as part of the Tahmoor South EIS and within the appropriate risk assessments and are summarised in **Table 7**.

Table 7 Management Measures

Aspect	Reference Information	Potential Impacts	Mitigation Measures	Responsibility
Flora/Fauna and Pests	Tahmoor South Biodiversity Management Plan NSW Biodiversity Conservation Act 2016 (BC Act) Act	 Stockpiling of equipment/materials has potential to affect vegetation if this occurs over structural root zones of trees. Risk of spills of hazardous materials from machinery or equipment could cause harm to biodiversity or waterways; Increased movement of dust and soil leading to disturbance of associated habitat. 	A Tahmoor South Biodiversity Management Plan (BMP) has been developed by a qualified environmental consultant to effectively detail and assess the main risks/potential impacts of fauna, flora and pest issues, as well as provide tailored mitigation measures and environmental controls to address these items. Specific controls to be implemented from the BMP include: No clearing of existing vegetation will be undertaken. Road base and excavation spoil will be removed from the area as soon as possible. If needed, stockpiled materials will only be placed within the road corridor. Temporary work sites, laydown areas, staging sites etc. will be located in disturbed / cleared areas or in areas with limited native vegetation. A water cart will be onsite for dust mitigation. A spill kit will be kept on site. The spill kit will be appropriately sized for the volume of substances at the work site. All staff are to be made aware of the location of the spill kit and trained in its use. Prior to construction commencing, all necessary mitigation measures from the BMP will be implemented.	Project Manager
Soil, Erosion and Stormwater	Tahmoor South Water Management Plan Tahmoor South Surface Water Management Plan Erosion and Sediment Control Plan Managing Urban Stormwater: Soils and construction-Volume 1 (the Blue Book).	 Stockpiling of equipment/materials has potential to affect water quality of the surrounding site. Surface disturbance has potential to increase erosion within the area. Surface disturbance has the potential to improperly divert stormwater. 	An Erosion and Sediment Control Plan (ESCP) has been developed in accordance with the Managing Urban Stormwater: Soils and construction-Volume 1 commonly known as the Blue Book. Construction would be planned, staged and carried out to avoid erosion and sedimentation of the site, surrounding country and waterways. Alongside the ESCP, the general ESC measures will be implemented and maintained are: • Design, install and maintain any required erosion and sediment controls in accordance with the guidance series Managing Urban Stormwater: Soils and Construction including Volume 1: Blue Book (Landcom, 2004), Volume 2A: Installation of Services (DECC, 2008), Volume 2C: Unsealed Roads (DECC, 2008), Volume 2D: Main Road Construction (DECC, 2008) and Volume 2E: Mines and Quarries (DECC, 2008) • Minimise the extent and duration of disturbance as far as practicable. • Prevent sediment moving off-site and sediment laden water entering any water course, drainage lines, or drain inlets. All drainage off-site must pass through a sediment control device. • ESCs are to be inspected and maintained on a weekly basis (including clearing of sediment from behind barriers). • ESC measures will remain in place until the works are complete and areas stabilised. • An inspection of the controls would be conducted after a rain event >10mm/24hrs. Prior to construction commencing, all necessary mitigation measures from the ESCP will be implemented.	Project Manager
Surface Water	Tahmoor South Water Management Plan Tahmoor South Surface Water Management Plan Erosion and Sediment Control Plan Pollution Incident Response Plan (PIRMP) (TAH-HSEC- 00155) Managing Urban Stormwater: Soils and construction-Volume 1 (the Blue Book).	 Stockpiling of equipment/materials has potential to affect water quality of the surrounding site. Surface disturbance has potential to affect water quality of the surrounding site. Risk of spills of hazardous materials from machinery or equipment could cause harm to waterways. 	A Tahmoor South Water Management Plan (WMP) has been developed by a qualified environmental consultant to effectively detail and assess the main risks/potential impacts of surface water, groundwater and erosion, as well as provide tailored mitigation measures and environmental controls to address these items. Specific controls to be implemented from the WMP include: • Any stockpiles would have sediment fences/the appropriate erosion and sediment controls in place to prevent transportation of material through surface water from the site • ESC's will be placed around drainage lines and/or waterways to reduce the flow of dirty water from site. • No concrete washout within 40 m of the top of bank of a waterway. • Pre-start checks of all plant and equipment to minimise the risk of fuel/oil leakage into waterways. • A spill kit will be kept on site. The spill kit will be appropriately sized for the volume of substances at the work site. All staff are to be made aware of the location of the spill kit and trained in its use. • If an incident (e.g. spill) occurs, the site Pollution Incident Response Plan (PIRMP) (TAH-HSEC-00155) is to be followed and the Tahmoor Coal Project Manager and Environment & Community Manager will be notified immediately. Prior to construction commencing, all necessary mitigation measures from the WMP and its associated sub plans will be implemented.	Project Manager
Dust and Air Quality Control	Tahmoor South Air Quality and Greenhouse Gas Management Plan	 Increased dust from construction and site disturbance. Increased GHG production during construction periods. 	An Tahmoor South Air Quality and Greenhouse Gas Management Plan (AQGMP) has been developed by a qualified environmental consultant to effectively detail and assess the main risks/potential impacts of dust and greenhouse gases, as well as provide tailored mitigation measures and environmental controls to address these items. Specific controls to be implemented from the AQGMP include: • All construction facilities erected on site will be designed and operated to minimise the emission of smoke, dust, cement dust and other substances into the atmosphere. • A water cart will be used for dust mitigation.	Project Manager

Aspect	Reference Information	Potential Impacts	Mitigation Measures	Responsibility
Visual Amenity/Lighting	Australian Standard AS4282 (INT) 2019 - Control of Obtrusive Effects of Outdoor Lighting	No known impacts from lighting predicted.	 All plant and equipment will be serviced to, as far as practicable, comply with the manufacture's emission standards Measures (including watering or covering exposed areas) are to be used to minimise or prevent windblown and wheel generated dust. Vehicles transporting spoil or other materials that may produce odours or dust are to be covered during transportation. Visual checks will be used to establish whether controls are adequate. If controls are not adequate, further measures will be implemented. Prior to construction commencing, all necessary mitigation measures from the AQGMP will be implemented. Tahmoor Coal will ensure any visual and off-site lighting impacts of the development are minimised by: Ensuring outdoor lights do not shine directly above the horizontal or above the building line or any illuminated structure. Ensuring mobile lighting rigs do not shine directly above the horizontal (except where required for emergency safety purposes). Ensuring that all external lighting associated with the development complies with relevant Australian Standards including the latest version of Australian Standard AS4282 (INT) 2019 - Control of Obtrusive Effects of Outdoor Lighting. 	Project Manager
Noise and Vibration	Tahmoor South Noise Management Plan (NMP) Noise Policy for Industry (NPfI) (EPA 2017)	 Noise and Vibration disturbance to local residents and business. Increased noise disturbance to local fauna. 	A Tahmoor South Noise Management Plan (NMP) has been developed by a qualified environmental consultant to effectively detail and assess the main risks/potential impacts of noise and vibration, as well as provide tailored mitigation measures and environmental controls to address these items. The following specific noise management measures will be implemented for the construction of the intersection upgrade: • Work generating high noise and/or vibration levels should be scheduled during less sensitive time periods. • Broadband sound emitting reverse alarms on all surface mobile equipment. • All surface plant, equipment and noise suppression devices will be inspected to ensure that it is in ideal running order, regularly maintained to the manufacturer's specification and free of defective components to minimise noise emissions. • Noise management and awareness will be included in employee and contractor inductions. • Noise management and awareness will adhere to the following practices, in accordance with the Transport Roads and Maritime Services 'Construction Noise and Vibration Guideline': • No swearing or unnecessary shouting or loud stereos/radios on site. • No dropping of materials from height, throwing of metal items and slamming of doors. • Locate compounds away from sensitive receivers and discourage access from local roads. • Plan traffic flow, parking and loading/unloading areas to minimise reversing movements within the site. • Where additional activities or plant may only result in a marginal noise increase and speed up works, consider limiting duration of impact by concentrating noisy activities at one location and move to another as quickly as possible. • Very noise activities should be scheduled for normal working hours. If the work cannot be undertaken during the day, it should be completed before 11:00pm. • Tahmoor Coal operates a 24-hour complaints line (1800 154 415) for receiving community complaints and other stakeholder communications in relation to noise. Community noise complai	Project Manager
Waste	Waste Management Plan (TAH-HSEC-00106)	 Increased waste production Potential waste pollution from construction works. 	A Waste Management Plan (TAH-HSEC-00106) has been developed for Tahmoor Mine and will be adhered to for any construction activities onsite. Generally, the following actions will be implemented: Use of a licensed chemical and waste transporter. Correct segregation and disposal of waste in accordance with the Tahmoor Coal Waste Management Plan.	Project Manager
Storage and Handling of Hydrocarbons and Chemicals	Pollution Incident Response Plan (PIRMP) (TAH-HSEC- 00155)	 The following fuels, oils, and other hazardous chemicals are predicted to be used on site: Concrete and concrete washout Diesel Petrol Hydraulic Oil Grease 	 A Pollution Incident Response Plan (PIRMP) (TAH-HSEC-00155) has been developed for Tahmoor Mine for the management of pollution events in accordance with EPA requirements. Generally, the following actions will be implemented: All chemicals are stored in accordance with the manufacturer's instructions and the SDS. Undertake hazardous storage in accordance with Australian Standards and EPA bunding guidelines. Undertake refuelling (where required) on site with spill kits in place. Maintain equipment to prevent spills or leaks. Implement spill and emergency response procedures, including adhering to the PIRMP. 	Project Manager

Aspect	Reference Information	Potential Impacts	Mitigation Measures	Responsibility
Contaminated Land	Contaminated Land Management Act 1997 Protection of the Environment Operations Act 1997	No known impacts predicted in relation to contaminated land.	In the unlikely event that contaminated soils are encountered, Tahmoor Coal will report the contamination to Wollondilly Council for action.	Environment and Community Manager
Heritage	Cultural Heritage Management Plan (TAH- HSEC-00011)	No impacts to known heritage predicted. Works are being conducted in previously disturbed road corridor.	In the event that suspected heritage items are encountered, Tahmoor Coal will immediately report the find to Wollondilly Council for action.	Environment and Community Manager
Traffic and Public Safety	Tahmoor South Traffic Management Plan (TMP) & S138 permit.	 Traffic impacts to Remembrance Drive from intersection upgrade. Increased truck and equipment movements around the mine and on public roads. 	A Tahmoor South Traffic Management Plan (TMP) has been developed by a qualified consultant to effectively detail and assess the main risks/potential impacts of transport impacts, as well as provide tailored mitigation measures and environmental controls to address these items. Specific controls to be implemented from the TMP include, but are not limited to: • Consulting with, preparing the necessary Traffic Management (control) Plans and obtaining the mandatory permits (S138) prior to construction with Wollondilly Shire Council regarding works on any road corridor. • Complete a pre and post-dilapidation survey of road conditions (notwithstanding the comments above with respect to the proposed upgrade of Remembrance Drive) • Implementing the Drivers Code of Conduct. • Heavy vehicle movements will be avoided or minimised during school drop off/ pick-up, school bus times, and peak traffic periods. • Construction activities will be staged to reduce traffic related impacts. • Tahmoor Coal will notify the local community about development-related traffic impacts prior to major disturbances in accordance with the TMP. • Temporary traffic controls, including detours and signage will be implemented where required. • Tahmoor Coal will respond to any emergency repair requirements or maintenance during construction and/or decommissioning, in accordance with the TMP. • Oversized and over-dimensional vehicle movements will be minimised during peak traffic hours. Prior to construction commencing, all necessary mitigation measures from the TMP will be implemented.	Project Manager

5.1.1 Monitoring and Reporting

Environmental inspection checks of the construction site work areas will be performed weekly by Tahmoor Coal employees and area supervisors as required and further outlined in Table 7.

Inspections/Environmental Audits will be completed for the following as a minimum:

- 1. Access Control
- 2. Laydown and Office areas
- 3. Bunding Inspections (Chemical Storage Management)
- 4. Waste Management
- 5. Dust management
- 6. Noise and Vibration management

Findings from the environmental inspections shall be reported to the Tahmoor Coal Project Manager.

5.2 Adaptive Management/Continuous Improvement

Roadworks are approved by Wollondilly Shire Council and will be conducted over a short duration. Some increase in noise and dust is to be expected and will be managed responsibly in accordance with Section 5.1.

In accordance with Condition E4 of the Consent, where any exceedance (outside of the approved roadworks) of the criteria or performance measures outlined within this document has occurred, Tahmoor Colliery will:

- 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;
- c) within 14 days of the exceedance occurring (or other timeframe agreed by the Planning Secretary), submit a report to the Planning Secretary describing these remediation options and any preferred remediation measures or other course of action; and
- d) implement reasonable remediation measures as directed by the Planning Secretary

Tahmoor Coal have adopted the "Plan-Do-Check-Act" model as shown in Figure 3. This model will be applied to all aspects of Tahmoor Coal's environmental management and is utilised to embed the continuous improvement process in all system documents.

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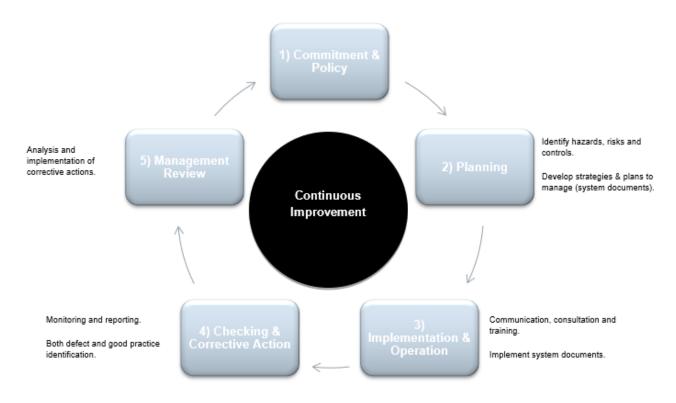


Figure 3: Continuous Improvement Model

6 Implementation and Reporting

6.1 Roles and Responsibilities

This section will provide an overview of the Project management structure which will be adopted for the CEMP.

Table 8 Roles and Responsibilities

Role	Responsibility	
Tahmoor Roles		
Project Manager	 ensure all works comply with relevant regulatory and Project requirements; liaise with Tahmoor EA Manager to ensure that communications are maintained with Wollondilly Shire Council, environmental staff and other government authorities as required; and ensure that all project personnel receive appropriate induction training, including details of the environmental and community requirements. Ensure that the auditing, monitoring and reporting program is in place for the project work 	
Environment & Community Manager	 Review environmental management plans and related documents prepared for the project; Be the principal point of advice in relation to the environmental performance of the project; 	

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	 Be consulted in responding to the community concerning the environmental performance of the project where the resolution of points of conflict between Tahmoor Coal and the community is required; Monitor the implementation of environmental management plans and monitoring programs required under the Project Approval; and Ensure that environmental auditing is undertaken in accordance with the requirements of the project's CEMP.
Environmental Specialist	 Monitor the environmental performance of the Project; and Evaluate and advise on compliance with this plan
Contract Roles	
Principal Contractor (Construction Management of Works)	 Plan construction works in a manner that avoids or minimises impact to environment; Ensure the requirements of this CEMP are fully implemented; Ensure construction personnel manage construction works in accordance with statutory and approval requirements; Ensure environmental management procedures and protection measures; Are implemented ensure all Project personnel attend an induction prior to commencing works; Stop work where required to address specific issues and/ or event as noted in this CEMP; and Liaise with Tahmoor's Project Manager to provide feedback on all responsibilities noted above.

6.2 Tahmoor Environmental Management System (EMS) Framework

The Tahmoor Environmental Management System (EMS) Framework provides the strategic context for the environmental management of Tahmoor Coal and forms part of the broader Health, Safety, Environment and Community (HSEC) management systems at Tahmoor Coal. The EMS outlines how Tahmoor Coal manages environment and community (E&C) aspects, impacts and performance. It provides a framework for the standards, plans and procedures implemented to ensure operations are managed in accordance with the ISO:14001 principles.

The objectives of the EMS are:

- a) To provide an overall framework for environmental management at Tahmoor utilising the principles of ISO:14001;
- b) To ensure compliance with all development consent, licences and approvals at Tahmoor Coal;
- c) To detail the relationship and interactions between various operational and environmental components at Tahmoor Coal;
- d) To provide effective mechanisms for external communications, maintaining a relationship with the local community; and
- e) To assist Tahmoor Coal employees and contractors in administering their responsibilities regarding environmental management.

This plan will be implemented in conjunction with the EMS framework.

6.3 Incidents

The Consent defines an incident 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'.

Material Harm is defined within the Consent as 'harm to the environment that:

- a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or results in actual or potential loss or property damage of an amount, or
- b) amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

This definition excludes "harm" that is authorised under either this consent or any other statutory approval.'

Tahmoor Coal manages and responds to incidents in accordance with the following plans:

- a) Emergency and Incident Manual (TAH-HSEC-232).
- b) Pollution Incident Response Management Plan (TAH-HSEC-00155)
- c) Notification of Environmental Pollution Incidents (TAH-HSEC-00224)

These plans have been developed to manage preparation, incident response and reporting requirements under the Protection of the Environment Operations Act 1997 (NSW).

The management plans provide roles and responsibilities, management strategies, action and response plans and record management protocols for incidents and emergencies.

A Written Incident Notification will be submitted to the Planning Secretary via the Major Projects website within seven days after Tahmoor Coal becomes aware of an incident.

Written Incident Notifications will include:

- a) the development and application number;
- b) details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- c) how the incident was detected;
- d) when Tahmoor Coal became aware of the incident;
- e) any actual or potential non-compliance with conditions of consent;
- f) describe what immediate steps were taken in relation to the incident;
- g) identify further action(s) that will be taken in relation to the incident; and
- h) identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, Tahmoor Coal will provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a Detailed Incident Report.

Detailed Incident Reports will include:

- a) a summary of the incident;
- b) outcomes of an incident investigation, including identification of the cause of the incident;
- c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- d) details of any communication with other stakeholders regarding the incident.

6.4 Non-Compliances

Roadworks are approved by Wollondilly Shire Council and will be conducted over a short duration. Some increase in noise and dust is to be expected and will be managed responsibly in accordance with Section 5.1.

The Consent defines a non-compliance as 'an occurrence, set of circumstances or development that is in breach of the consent'.

Non-compliances or system defects detected during monitoring, inspections and audits will be managed in accordance with the Tahmoor Coal Environmental Management Framework Document (TAH-HSEC-00173), with corrective action plans developed and implemented to rectify any issues.

The Planning Secretary will be notified in writing via the Major Projects website within seven days after Tahmoor Colliery becomes aware of any non-compliance.

If a non-compliance is detected, the following steps will be followed:

- a) Identify and confirm the non-compliance (i.e. review against approval criteria or condition and confirm that a non-compliance has occurred);
- b) Complete internal environmental incident reporting documentation including an investigation to capture all relevant information;
- In accordance with the relevant approval, determine what action (i.e. external reporting) is required. Specifically, determine if immediate reporting is required and to which stakeholders, or ensure that the event is captured for future reporting;
- d) Following the incident investigation, develop a corrective action plan aimed at preventing future re-occurrence; and
- e) Complete all required reporting and consult with relevant agencies on the corrective action plan to be implemented.

A non-compliance notification will identify the following:

- a) the development and the application number,
- b) the condition of consent that the development is non-compliant with
- c) the way in which it does not comply and the reasons for the non-compliance (if known); and
- d) any actions which have been, or will be, undertaken 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.

6.5 Exceedances

Roadworks are approved by Wollondilly Shire Council and will be conducted over a short duration. Some increase in noise and dust is to be expected and will be managed responsibly in accordance with Section 5.1.

Exceedances will be managed by Tahmoor Coal through the Contingency Plan and TARP process as outlined in within relevant management plans.

As soon as practicable and no longer than 7 days after obtaining monitoring results showing an exceedance of any noise or air quality criterion in PART B of the Consent, Tahmoor Coal will provide the details of the exceedance to any affected landowners, tenants and the CCC. NSW Government 36 Tahmoor South Coal Project Department of Planning, Industry and Environment (SSD 8445) D7.

For any exceedance of any air quality criterion in PART B of the Consent, Tahmoor Coal will also provide to any affected landowners and tenants a copy of the fact sheet entitled "Mine Dust and You" (NSW Health, 2017).

6.6 Complaints and Disputes

Community Complaints at Tahmoor Coal are managed in accordance with TAH-HSEC-00119-Communication and Engagement and TAH-HSEC-00120- Community Complaints & Enquiry Procedure. Tahmoor Coal operates a 24-hour complaints line (1800 154 415) for receiving community complaints and other stakeholder communications. The general process detailed in TAH-HSEC-00120- Community Complaints & Enquiry Procedure for responding to complaints is:

- a) Acknowledging all complaints and responding to the complainant within 24 hours where practicable;
- b) Registering all complaint details in Cority;
- Investigating complaints impartially considering the facts and the circumstances prevailing at the time;
- d) Implementing corrective actions if required; and
- e) Reporting to relevant stakeholders of investigation outcomes and corrective actions taken.

A record of all community complaints in relation to activities undertaken by the licensee must be kept in a legible form and be in accordance to Tahmoor Coal's Environmental Protection Licence 1389.

The following information will also be kept in the event of a community complaint; as required by Section M4 in Tahmoor Coal's EPL 1389:

- a) The date and time of the complaint;
- b) The method by which the complaint was made;
- c) Any personal details of the complainant which were provided by the complainant or a note to that effect;
- d) The nature of the complaint;
- e) The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- f) If no action was taken by the licensee, the reasons why no action was taken.

These records must be kept for at least 4 years after the complaint was made and be able to be produced to any authorised officer who asks to see them.

In the event of a dispute or conflict between Tahmoor Coal personnel and a member of the community, the Tahmoor Coal E&C Manager will facilitate communication between both parties to reach a resolution, which may include a meeting with the complainant to discuss the issue.

Where relevant, negotiations will be initiated in accordance with any relevant Consent conditions. This general process is documented in TAH-HSEC-00119- Communication and Engagement. If a dispute cannot be resolved, the matter will be escalated to involve the site Operations Manager or General Manager as required and may involve consultation with the relevant government agency to assist in reaching a determination on the matter.

6.7 Internal Audits & Reviews

In accordance with internal company requirements, Tahmoor Coal has implemented a system for the monitoring and review of E&C performance at the site. Tahmoor Coal is to provide ongoing monitoring and regular management review of E&C performance to:

- a) Confirm the adequacy and effectiveness of management plans, procedures and standards;
- b) Address any identified weaknesses;
- c) Share good performance and lessons learnt with other sites; and
- d) Ensure ongoing compliance with all leases, licences and approvals.

Process or area specific internal audits are also conducted periodically, generally administered by the General Manager E&C, focussing on the following areas:

- a) Air quality;
- b) Water management;
- c) Erosion and sediment control; and
- d) Statutory approvals.

These audits may be conducted by consultants on behalf of Tahmoor Coal, by Liberty GFG employees or may be self-assessments conducted by Tahmoor Coal personnel. Audit results and corrective actions are recorded in Cority and assigned to responsible personnel for completion within appropriate timeframes.

6.8 Independent Environmental Audit

Tahmoor Coal will complete Independent Environmental Audits in accordance with Conditions E15 – E20 of the Consent at the frequencies determined within DPIE's *Independent Audit Post Approval Requirements* (2020), and outlined below in **Table 9.**

Table 9 Independent Audit Frequencies

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure /Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.

The audit will review the adequacy of the following requirements under the relevant approvals:

- a) Strategies;
- b) Plans; and
- c) Programs

The audit will recommend appropriate measures and corrective actions to improve environmental performance at Tahmoor Coal. Audit results and corrective actions are recorded in Cority and assigned to responsible personnel for completion within appropriate timeframes.

6.9 **Environmental Training**

All employees / contractors working as part of the Project Team including Tahmoor Coal and the Contractor / Sub-Contractors will complete an onsite induction including environmental awareness. Contractors shall develop their own induction training packages which shall include elements of the CEMP Compliance requirements where appropriate.

All personnel are required to provide evidence of their successful completion of inductions when audited.

Additional environmental training may be required for specific tasks carried out by the workforce and shall be delivered as part of Toolbox meetings or site safety meetings and shall consider the Contractors CEMP Requirements.

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6.10 Site Specific Induction

As mandated in the WHS Regulation 2011, the principal Contractor must a system in place for providing the work force with the necessary site specific training prior to commencing work on site. A Site Specific Induction (SSI) is the mechanism used for providing Site specific training to all site personnel. The SSI provides the person commencing on site with not only the Health and Safety Conditions for work on the site but also the Environmental, Heritage and Community compliance requirements for working on the site. The SSI will cover the following specific aspects;

- a) Project (and clearing) limits
- b) hours of work
- c) erosion and sedimentation control plan
- d) noise mitigation
- e) dust control
- f) emergency and spill response,
- g) Project Communication and obligation to notify all events and/ or near misses
- h) housekeeping and waste.

6.11 Communication Plan

As mandated in the WHS Regulation 2011, the principal Contractor must have a system for communications with its workforce. The communication plan included conducting regular Tool Box Talks, Pre-start discussions, Pin boards etc sharing Safety and Environmental Events and/ or alerts.

6.11.1 Toolbox Talks

The toolbox talks will be used to ensure environmental awareness continues during construction period, reviewing work and/ or event over the last week and sharing new information as the work evolves.

6.11.2 Pre-Start Meeting

The pre-start meeting is a tool for informing the workforce of the day's site specific activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, interactions with other trades, hazards and other information that may be relevant to the day's work. The Principal Contractor will conduct a daily pre-start meeting for the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Pre-start meetings may be project-wide and/or held for specific work areas.

The Pre-start meeting will include an environmental component (as required) to address any environmental issues that could potentially be impacted by, or impact on, the day's activities.

7 Purpose

7.1 Plan Audit

Project works are intended to be completed within 8 weeks of commencement. Audits of this CEMP will be undertaken following any incidents or issues onsite to confirm compliance.

Audits of the CEMP would be conducted in consultation with the Plan owner and nominated individuals and shall focus on the content and implementation.

Audits on the content shall consist of a determination of understanding of the CEMP by the individual's allocated responsibility under this plan.

Audits on the implementation shall consist of reviews of the safe working procedures and risk assessments developed to ensure safe operation of this CEMP, they may also involve discussions with personnel involved in the management plan to determine understanding and compliance.

Should an audit of this CEMP determine that a deficiency is evident in the content or implementation; a corrective action must be developed and implemented. Actions will be assigned to a nominated individual and tracked in Cority.

The Tahmoor Coal Project Manager is responsible to verify that the nominated corrective action has been implemented by way of a follow up audit.

Any changes to this plan are to be managed and communicated to all personnel in line with the Change Management Process.

7.2 Plan Review

This CEMP will be reviewed, if required:

Event based:

in accordance with Condition E7 (a) of the Consent, a review will be required within 3 months of any incident, event or finding that identifies an inadequacy in the CEMP, risk assessment or associated documents to continue to effectively manage the identified hazard; a change to the workplace itself or any aspect of the work environment, a change to a system of work, a process or a procedure; or

If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, strategies, plans and programs will be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document will be submitted to the Planning Secretary for approval within six weeks of the review; or

Time based:

in the absence of regular event-based reviews and in accordance with Condition E7 (b-e) of the Consent, this plan will be reviewed within three months of:

- a) the submission of an Annual Review under Condition E13;
- b) the submission of an Independent Environmental Audit under Condition E15;
- c) (the approval of any modification of the conditions of this consent (unless the conditions require otherwise); or

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d) notification of a change in development phase under Condition A19;

If deemed appropriate, external service providers may be included in the review process. All reviews are to be documented.

8 Document Information

Relevant legislation, standards and other reference information will be regularly reviewed and monitored for updates and will be included in the site management system. Related documents and reference information in this section provides the linkage and source to develop and maintain site compliance information.

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8.1 Access to Information

Information pertaining to Tahmoor Coal's general environmental performance against internal targets and external approvals criteria is reported to the community via the mine website and Tahmoor Coal's Community Consultative Committee (TCCCC). Examples of reports to government agencies include:

- a) Environmental Protection Licence Annual Return (submitted to Environment Protection Authority);
- b) Annual Review (submitted to Department of Planning & Infrastructure, Council, TCCCC etc.); and
- c) Independent Environmental Audit (submitted to Department of Planning & Infrastructure).

These reports are prepared in accordance with relevant guidelines and *TAH-HSEC-00119- Communication* and *Engagement* and are published on Tahmoor Coal's website in accordance with *TAH-HSEC-00221-Website Management Procedure*.

8.2 Related Documents

Related documents, listed in the below table, are internal documents directly related to or referenced from this document.

Table 10 Related Documents

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Biodiversity Management Plan

Water Management Plan

Surface Water Management Plan

Erosion and Sediment Control Plan

Pollution Incident Response Plan (PIRMP) (TAH-HSEC-00155)

Air Quality and Greenhouse Gas Management Plan

Noise Management Plan (NMP)

Waste Management Plan (TAH-HSEC-00106)

Cultural Heritage Management Plan (TAH-HSEC-00011)

Traffic Management Plan (TMP)

8.3 Reference Information

Reference information, listed in the below table, is information that is directly related to the development of this document or referenced from within this document.

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Table 11 Reference Information

Title

NSW Biodiversity Conservation Act 2016 (BC Act) Act

Australian Standard AS4282 (INT) 2019 - Control of Obtrusive Effects of Outdoor Lighting

Noise Policy for Industry (NPfI) (EPA 2017)

Contaminated Land Management Act 1997

Protection of the Environment Operations Act 1997

Managing Urban Stormwater: Soils and construction-Volume 1 (the Blue Book).

9 Change Information

Table 12 Full details of the document history are recorded in the document control register, by version

Version	Date Reviewed	Review team (Consultation)	Change Summary
0.1	1 st March 2022	Zina Ainsworth, Lou Lingurovski, Charlie Wheatley	Draft CEMP
1.0	15 th March 2022	Zina Ainsworth, Lou Lingurovski, Allen Bond	Addition of night time works.

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