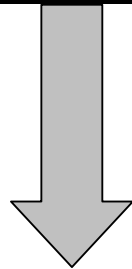




**Wambo Coal
Environmental
Management
System**



**Environmental
Management
Strategy**

Wambo Coal – Environmental Management Strategy

Document Control

Document No.	EMS001
Title	Environmental Management Strategy
General Description	The Environmental Strategy outlines the strategic context of environmental management at the mine as well as statutory obligations, the management of environmental performance, strategies to manage external relations and the accountabilities of key personnel.
Key Support Documents	Wambo Development Project Environmental Impact Statement Wambo Coal's Environmental Management Plans Wambo Coal's Development Consents Wambo Coal's Mining Operations Plans

Revisions

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0	10/12/04	Original Draft	JT	TS
1	04/04/05	Update for DA305-7-2003	Hansen Consulting	JT
2	Dec 05	Update due to changes in management structure	JT	JT
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The nominated Coordinator for this document is	Environment & Community Specialist
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1.0 INTRODUCTION

Wambo Coal Pty Limited (Wambo) was granted Development Consent (DA 305-7-2003) on 4 February 2004 which enabled the extension of current open cut and underground mining operations. The approved development extends mine life for a further 21 years and increases Run-of-mine (ROM) coal production to up to 14.7 Million tonnes per annum (Mtpa).

Wambo is located entirely within coal leases (CL365, CL374, CL397, CL743 and ML1402A). The predominating surrounding land uses include:

- natural woodland, including Wollemi National Park;
- agriculture;
- mining activities; and
- rural settlement.

This Environmental Management Strategy (EMS) aims to ensure that all activities at Wambo comply with relevant environmental regulatory guidelines and standards and that all activities are generally in accordance with:

- Wambo Development Project Environmental Impact Statement dated July 2003 prepared by Resource Strategies;
- Wambo Mining Operations Plan (Open Cut) prepared by Wambo;
- Wambo Mining Operations Plan (Underground) prepared by Wambo; and
- Conditions of the Development Consent for Wambo

1.1 PURPOSE AND SCOPE

The specific requirement for the Environmental Management Strategy is contained in development consent DA305-7-2003, Schedule 6, Condition 1, which states:

- "1. *Before carrying out the development, the Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Director-General. This strategy must:*
- a) provide the strategic context for environmental management of the development;*
 - b) identify the statutory requirements that apply to the development;*
 - c) describe in general how the environmental performance of the development would be monitored and managed during the development;*
 - d) describe the procedures that would be implemented to:*
 - keep the local community and relevant agencies informed about the operation and environmental performance of the development;*
 - receive, handle, respond to, and record complaints;*
 - resolve any disputes that may arise during the course of the development;*
 - respond to any non-compliance;*
 - manage cumulative impacts; and*
 - respond to emergencies; and*
 - e) describe the role, responsibility, authority and accountability of all the key personnel involved in environmental management of the development.*

2. *Within 14 days of the Director-General's approval, the Applicant shall:*
- a) *Send copies of the approved strategy to the relevant agencies, Council , and the CCC; and*
 - b) *Ensure the approved strategy is publicly available during the development”.*

Using the principles of ISO 14001, this strategy incorporates the following environmental management principles:

- commitment and policy;
 - top management commitment and leadership
 - initial environmental review
 - environmental policy
- planning;
 - environmental aspects and impacts
 - legal and other requirements
 - objectives and targets
 - environmental management programs
- implementation and operation;
 - structure and responsibility
 - training, awareness and competence
 - communication
 - EMS documentation
 - document control
 - operations control
 - emergency response
- monitoring and evaluation; and
 - monitoring and measurement
 - non-conformance and corrective and preventative action
 - records
 - EMS audit
- review and improvement.
 - management review of EMS

2.0 ENVIRONMENTAL VISION, POLICY AND COMMITMENT

The Wambo Environment & Community Policy has the support and commitment of senior management and will be reviewed at least once every two years. The Wambo Environment & Community Policy applies to the open cut and underground mines, the coal handling preparation plant and the rail line. The Environment & Community Policy will be displayed at prominent points around the operation, such that all employees, contractors and visitors have access to the policy. All employees and contractor's site inductions will include reference to the Wambo Environment & Community Policy.

3.0 PLANNING

The elements relating to planning include:

- identification of environmental aspects and evaluation of associated environmental impacts using a risk assessment process;
- legal requirements;
- environmental policy;
- internal performance criteria;
- environmental objectives and targets; and
- environmental plans and management programs.

3.1 ENVIRONMENTAL ASPECTS AND IMPACTS

An environmental aspect refers to an element of an organisation's activities, products or services that can have a beneficial or adverse impact on the environment. An environmental impact refers to the change that takes place in the environment as a result of the aspect. The identification of environmental aspects is an ongoing process that determines the past, current and potential impact of an organisation's activities on the environment (AS/NZS ISO 14004:2004 Environmental Management Systems – General guidelines on principles, systems and supporting techniques, 2004).

Wambo completed a review of the site's *Register of Environmental Aspects, Impacts and Risks* in May 2008. This risk register was produced to document the company's environmental risk assessment outcomes and used to develop an action plan to manage mining related impacts. The aspects and impacts pertained in the environmental risk register will be reviewed periodically to assist with setting objectives and targets for the following year. The Environment & Community Specialist (or delegate) will file records of environmental specific risk assessments.

3.2 LEGAL AND OTHER REQUIREMENTS

3.2.1 Regulatory Authorities and Requirements

To maintain regulatory compliance it is necessary to identify and understand regulatory requirements applicable to Wambo. The Environment & Community Specialist (or delegate) will assist management to attain and update the necessary awareness of legal and other requirements. A summary of legal and other requirements relevant to environmental management at Wambo Mine includes (but not limited to):

- Contaminated Land Management Act 1997;
- Dangerous Goods Act 1975;
- Environment Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- Environmental Protection and Biodiversity Conservation Act 1999;
- Fisheries Management Act 1994;
- Heritage Act 1977;
- Hunter Regional Environment Plan 1996;
- Local Government Act 1993;
- Mining Act 1992;
- National Parks and Wildlife Act 1974;

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- Native Title Act 1993;
- Noxious Weeds Act 1993;
- Pesticides Act 1999;
- Protection of the Environment Operations Act 1997;
- Relevant State Environmental Planning Policies;
- Rivers and Foreshores Improvement Act 1948;
- Roads Act 1993;
- Rural Fires Act 1997;
- Singleton Local Environment Plan 1996;
- Threatened Species Conservation Act 1995;
- Water Act 1912; and
- Water Management Act 2000.

The primary statutory authorities that are relevant to Wambo Mine are:

- Department of Environment, Water, Heritage and the Arts (DEWHA);
- Department of Primary Industries – Mineral Resources (DPI-MR);
- Department of Environment and Climate Change (DECC);
- Department of Planning (DoP);
- Singleton Shire Council (SSC);
- WorkCover New South Wales;
- Rail Access Corporation;
- NSW Heritage Office;
- Mine Subsidence Board; and
- Department of Water and Energy (DWE).

The Environment & Community Specialist (or delegate) will maintain a register of legal and other requirements (the Register) such that:

- all environmental legislative requirements are identified;
- all documents are easy to locate, retrieve and available when required; and
- all legislation is updated as required with obsolete documents removed from service and destroyed or retained on file, as appropriate.

This Register will include the following active documents, as a minimum:

- Development Consents;
- Mining Lease Conditions;
- Environment Protection Licence;
- NPWS Consent to Destroy Permits;
- Dangerous Goods Licence;
- Water Licences;
- Construction certificates; and
- any other relevant statutory approvals.

Wambo's Senior Management Team and the Environment & Community Specialist (or delegate) are responsible for ensuring that all personnel and contractors are aware of the relevant legal and other requirements that relate to their activities. The Environment & Community Specialist (or delegate) shall advise the Senior Management Team of changes in legislation, policy and guidelines. The Senior Management Team will maintain currency of knowledge by:

- being a member and participating in the Hunter Coal Environment Group;
- reviewing environmental publications as appropriate;
- liaising with government agencies;
- seeking legal opinion as required;
- gaining advice from environmental consultants; and
- participating in professional development seminars.

3.2.2 Other External Stakeholders

Other external stakeholders that have an interest in Wambo include:

- surrounding residents and landowners;
- the local Aboriginal community;
- Hunter/Central Rivers Catchment Management Authority;
- Rural Lands Protection Board;
- Wambo Coal Community Consultative Committee;
- downstream water users;
- neighbouring mining operations; and
- customers.

3.3 OBJECTIVES AND TARGETS

Objectives are overall goals for environmental performance and are established to meet the Environment & Community Policy, with targets being set to meet specified objectives.

At a minimum, objectives and targets need to be set for the following parameters:

- implementation of the EMS;
- training;
- prevention of pollution; and
- site-specific objectives and targets to address particular environmental risk areas.

Environmental targets and objectives should be:

- practical;
- achievable;
- measurable;
- realistic; and
- directly relevant to our mining operations.

When establishing environmental objectives and targets the mine should consider:

- significant environmental aspects (impacts to the environment from our activities);
- legal and other requirements (relevant environmental legislation);
- technological options;
- business, operational and financial considerations; and
- the views of our stakeholders.

Objectives and targets are to be progressively achieved through implementation of environmental management programs and procedures. Objectives and targets will be reviewed at least annually and updated in accordance with changing legislation, operational practices, industry standards and corporate directives.

3.4 ENVIRONMENTAL MANAGEMENT PLANS AND PROCEDURES

Environmental management plans and procedures are developed in order to meet various commitments and to improve the environmental performance of the organisation.

Environmental management plans and procedures have been developed by Wambo to address all environmental objectives and specifically to manage the environmental impacts of the operation. Environmental management plans and procedures will be dynamic and revised regularly to reflect changes in operational practices, legislative requirements and industry best practice.

All environmental management plans and procedures will include, but not limited to, the following components:

- identification of specific actions;
- designation of responsibility;
- resource allocation;
- time frame; and
- review.

A number of environmental management plans are required to be developed/reviewed as part of the development consent with all management plans having details of the review requirements outlined. The environmental management plans relevant to Wambo's environmental operations include:

- Site Water Management Plan (comprised of the predicted site water balance, the North Wambo Creek Diversion Plan, the Erosion and Sediment Control Plan, the Surface Water Monitoring Program, the Ground Water Monitoring Program, the Surface and Groundwater Response Plan and a strategy for decommissioning water management structures on the site);
- Flora and Fauna Management Plan;
- Bushfire Management Plan;
- Environmental Monitoring Programme;
- Subsidence Management Plan;
- Traffic Management Plan (when developed);
- Blast Monitoring Program;
- Final Void Management Plan (when developed);
- Conservation Management Plan for Wambo Homestead Complex;
- Construction Management Plan;
- Construction Noise Management Plan;
- Construction Environmental Management Plan;
- Operational Noise Management Plan; and
- Timber Management Plan.

4.0 IMPLEMENTATION AND OPERATION

The Environmental Management Strategy (EMS) has been progressively implemented since Wambo was granted Development Consent (DA 305-7-2003) on 4 February 2004, which enabled the extension of current open cut and underground mining operations.

The requirements relating to the implementation and operation of the EMS are discussed under the following sections:

- structure and responsibility;
- training, awareness and competence;
- communication;
- documentation and document control; and
- operational control, and emergency preparedness and response.

4.1 STRUCTURE AND RESPONSIBILITY

Environmental management is the responsibility of all employees and contractors on site. Where possible, Wambo has chosen to integrate environmental management with other areas of the business.

General environmental roles and responsibilities of all employees and contractors on site in relation to environmental management are outlined below:

General Manager

In relation to environmental management, the General Manager:

- will have a working knowledge of and be aware of the environmental legislative requirements associated with the operation;
- will comply with DECC, DoP, DPI, DWE, and SSC regulatory requirements on mine operations under their control;
- will conduct mine operations under their control in accordance with operational and environmental procedures;
- will include environmental issues in the budget planning process undertaken on an annual basis with the participation of other operation's and support managers;
- will be aware of the environmental legislative requirements associated with the operation and ensure appropriate training is provided to all employees regarding their responsibilities;
- will assign adequate resources to implement environmental management plans and procedures;
- will authorise environmental procedures to be implemented and include environmental management in auditing schedule; and
- will involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment.

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Open Cut Manager

In relation to environmental management, the Open Cut Manager:

- will have a working knowledge of and be aware of the environmental legislative requirements associated with the operation;
- will comply with DECC, DoP, DPI, DWE, and SSC regulatory requirements on mine operations under their control;
- will conduct mine operations under their control in accordance with operational and environmental procedures;
- will include environmental issues in the budget planning process undertaken on an annual basis with the participation of other operation's and support managers;
- will be aware of the environmental legislative requirements associated with the operation and ensure appropriate training is provided to all employees regarding their responsibilities;
- will assign adequate resources to implement environmental management plans and procedures;
- will authorise environmental procedures to be implemented and include environmental management in auditing schedule; and
- will involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment.

Underground Manager

In relation to environmental management, the Underground Manager:

- will have a working knowledge of and be aware of the environmental legislative requirements associated with the operation;
- will comply with DECC, DoP, DPI, DWE, and SSC regulatory controls on mine operations under their control;
- will conduct mine operations under their control in accordance with operational and environmental procedures;
- will include environmental issues in the budget planning process undertaken on an annual basis with the participation of other operation's and support managers;
- will be aware of the environmental legislative requirements associated with the operation and ensure appropriate training is provided to all employees regarding their responsibilities;
- will assign adequate resources to implement environmental management plans and procedures;
- will authorise environmental procedures to be implemented and include environmental management in auditing schedule; and
- will involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment.

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CHPP Manager

In relation to environmental management, the CHPP Manager:

- will have a working knowledge of and be aware of the environmental legislative requirements associated with the operation;
- will comply with DECC, DoP, DPI, and SSC regulatory controls on mine operations under their control;
- will conduct mine operations under their control in accordance with operational and environmental procedures;
- will include environmental issues in the budget planning process undertaken on an annual basis with the participation of other operation's and support managers;
- will be aware of the environmental legislative requirements associated with the operation and ensure appropriate training is provided to all employees regarding their responsibilities;
- will assign adequate resources to implement environmental management plans and procedures;
- will authorise environmental procedures to be implemented and include environmental management in auditing schedule; and
- will involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment.

Commercial Manager

In relation to environmental management, the Commercial Manager:

- will have a working knowledge of and be aware of the environmental legislative requirements associated with the operation;
- will comply with DECC, DoP, DPI, DWE, and SSC regulatory controls on mine operations under their control;
- will conduct activities under their control in accordance with operational and environmental procedures;
- will include environmental issues in the budget planning process undertaken on an annual basis with the participation of other operation's and support managers;
- will be aware of the environmental legislative requirements associated with the operation and ensure appropriate training is provided to all employees regarding their responsibilities;
- will assign adequate resources to implement environmental management plans and procedures;
- will authorise environmental procedures to be implemented and include environmental management in auditing schedule; and
- will involve the Environment & Community Manager in the assessment of any proposed or new works associated with the operation that may have an impact on the environment.

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Environment & Community Manager

The Environment and Community Manager has a pivotal role with respect to environmental management on site. This position coordinates the environmental activities of all areas with environmental aspects. The Environment and Community Manager (or delegate) is responsible for:

- Ensuring that all the obligatory environmental approvals are obtained and maintained;
- sustaining compliance with DECC, DoP, DPI, DWE and SSC regulatory controls on mine operations under their control;
- understanding and disseminating information concerning all pieces of environmental legislation which are relevant to the operation of the mine;
- auditing mine activities to ensure that they are conducted in accordance with operational and environmental procedures;
- ensuring that operational areas identify mandatory and desirable environmental projects and that they adequately budget for them;
- auditing the implementation of environmental management plans and procedures;
- personally assessing or overseeing the assessment by external experts, of novel activities associated with the operation, which may have an impact on the environment;
- ensuring that statutory reporting is completed and submitted in a timely manner;
- approving environmental training packages and ensuring that they are delivered; and
- driving compliance and beyond compliance environmental performance at the mine.

Environment & Community Specialist

Reporting to the Environment & Community Manager, the Environment & Community Specialist (or delegate) is responsible for:

- Developing, implementing and maintaining environmental management plans and procedures, which includes facilitating the commitments outlined in the Environment & Community Policy with the assistance of the Operations and Senior Management Team;
- maintaining a central environmental information file including the following:
 - environmental management policy and plans,
 - environmental procedures,
 - monitoring results,
 - statutory environmental reports, and
 - legislative requirements and documentation, including licences, permits, approvals, community liaison documentation, environmental incident register, authority liaison documentation.
- overseeing the preparation of annual statutory reports of compliance and related reports;
- in consultation with the Operations Managers, undertaking liaison with authorities and the community regarding routine matters;
- in association with the Operations Managers, developing and delivering necessary training including induction of all personnel with respect to environmental matters;
- liaising with United Collieries personnel on environmental matters common to both sites;
- co-ordinating monthly environmental monitoring and forwarding the results and any recommendations to the relevant site personnel to initiate remedial action where required;

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- co-ordinating monthly inspections and forwarding the results of the inspection and any recommendations to the relevant site personnel to initiate remedial action;
- reviewing and endorsing all corrective actions arising from environmental incidents;
- providing environmental assistance/advice as required; and
- preparing monthly environmental monitoring reports.

All Supervisors

In relation to environmental management, all Supervisors are responsible for:

- Conducting mine operations under their control in accordance with operational and environmental procedures;
- maintaining environmental control systems in a proper and efficient condition;
- assisting the Environment & Community Specialist (or delegate), as necessary, to develop and deliver appropriate environmental training programs for the site;
- assisting the Environment & Community Specialist (or delegate) in relevant environmental risk assessments conducted for a component of the operations and implementing measures identified to manage these risks;
- implementing relevant environmental procedures, as advised by the Environment & Community Specialist (or delegate);
- responding to and assisting with managing, reporting and investigating environmental incidents and community complaints;
- liaising with the Environment & Community Specialist (or delegate) regarding environmental controls necessary for any new work activities;
- having systems in place to check all equipment leaving the site is in a condition that will not contaminate the environment (e.g.: oil leakage from a machine);
- regularly auditing the adequacy of the emergency spill controls on site; and
- having systems to check that all supplies delivered to site are unloaded in an environmentally responsible manner.

All Employees and Contractors

In relation to environmental management all employees and contractors:

- are to be aware of Wambo's Environment & Community Policy, management plans and procedures and understand that they are responsible and accountable for the environmental impacts of work they perform;
- are to have a knowledge of environmental issues sufficient for them to complete their work in an efficient and environmentally responsible manner;
- are to request instruction from their immediate supervisor, if required;
- are to immediately report any environmental incident to their immediate supervisor; and
- are to undertake their work so as to conform to all required Environmental Procedures.

4.2 TRAINING, AWARENESS AND COMPETENCE

Training is the means by which personnel are informed of what their obligations and responsibilities are with regards to environmental management.

Environmental management requirements and responsibilities are contained within Wambo's Environment & Community Policy, the site induction program and supply contracts, to ensure that employee's and contractors are aware of their obligations before commencing work on site at Wambo. The site induction program at Wambo includes:

- the Environment & Community Policy;
- legislative and other requirements;
- overview of environmental management plans and procedures;
- incident response / reporting procedures and contacts; and
- key environmental management considerations for relevant working area/vicinity.

Training may include an assessment of competence of all personnel with regard to environmental awareness. Training programs will be revised regularly with refresher training for employees and contractors undertaken within appropriate timeframes.

As identified in Wambo's Environmental Awareness and Training Plan, specific environmental training will be conducted as required to address matters such as major legislation changes or other significant environmental issues.

The Environment & Community Specialist (or delegate) will maintain records of all environmental training undertaken at Wambo.

4.3 COMMUNICATION

Effective communication between all levels of mine management, including corporate management, business unit management, personnel, and stakeholders is important for the successful implementation and maintenance of the EMS.

4.3.1 Internal Reporting

The Environment & Community Manager (or delegate) reports on a weekly basis to the Senior Management Team detailing, amongst other things, the following:

- non-compliance with legal and other requirements;
- details of complaints;
- number and details of environmental incidents;
- details of any pending/upcoming approvals; and
- details of any other significant environmental issues.

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Wambo has various mediums for internal communication between the various levels and functions of the operation. They include:

- daily management meetings;
- displays on noticeboards, including display of the environmental policies;
- environmental awareness training;
- circulation of written reports/memos;
- toolbox talks; and
- newsletters.

4.3.2 External Reporting

Methods of external communication undertaken by Wambo include:

- Annual Environmental Management Report;
- National Pollutant Inventory;
- Hunter River Salinity Trading Scheme Return;
- Greenhouse Challenge Plus;
- Energy Efficiency Opportunities Program;
- Energy Savings Action Plan;
- Environmental Protection Licence Annual Return; and
- communication with the community such as newsletters and Community Consultative Committee presentations..

4.3.3 Incidents

All personnel (employees and contractors) will report any environmental incident to their immediate supervisor/site contact who will contact Wambo's Environmental Department. The Environment & Community Specialist (or delegate) will assist with completing the investigation and finalise an investigation report, which shall include recommendations for preventative and/or corrective action. All reportable incidents will be in accordance with the Wambo's Environmental Protection Licence (EPL) and will be carried out after consultation with the Senior Management Team.

All incidents will be recorded and reported by the Environment & Community Specialist (or delegate) in the weekly report. The Environment & Community Specialist (or delegate) will file all incident investigation forms and they will be kept for at least four years.

4.3.4 Complaints

It is critical the community complaints or enquiries are responded to in a professional manner. Wherever possible a proactive approach will be taken to engage the community in discussing proposed activities that may affect them.

Every attempt will be made to respond to complaints as soon as they are received. All community complaints received by telephone shall be responded to within 24hrs of the recorded complaint by either the Environment and Community Manager and/or the Environment and Community Specialist. This will involve an initial telephone call to acknowledge the received complaint and provide preliminary details, pending further investigations.

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In the event a community complaint is sent via email or through Australia Post, the complainant will be responded to at the next available working day.

Wherever possible, community complaints during business hours must be forwarded directly to the Environment and Community Manager and/or the Environment and Community Specialist.

A 24hr Complaint Hotline has been established for community complaints outside of normal business hours. The Community Complaint Hotline diverts calls received after hours to either the Environment and Community Manager or the Environment and Community Specialist.

In the absence of the Environment and Community Manager and/or the Environment and Community Specialist, a delegate will be nominated by the environmental department to manage community complaints.

All details of the community complaint must be entered into Wambo's *Environmental Complaint Form* immediately and recorded in Wambo's Community Complaint Register.

4.3.5 Dispute Resolution

Wambo will endeavour to resolve any issue raised with the community through open discussion in accordance with the complaints procedure as described in **Section 4.3.4**.

Where community issues cannot be resolved internally, the independent dispute resolution process will be initiated.

The independent dispute resolution process may include the following;

- Referral of the matter to an Independent Dispute Facilitator (IDF) appointed by DoP in consultation with SSC,
- IDF to meet with parties to resolve dispute.
- If dispute not resolved, IDF may consult relevant independent experts for advice on technical issues and report back to interested parties.
- If agreement can still not be reached, the IDF will consult with DoP and a final decision will be made.

4.4 DOCUMENTATION AND DOCUMENT CONTROL

The Environment & Community Specialist will maintain a central filing system for environmental documents. Documents will be stored for no less than four years. All documents will have a unique identifier and management plans and procedures will be posted on Wambo's Intranet. Documentation will be legible, dated and readily identifiable and maintained in an orderly manner.

The types of documents and records that will be retained include, but are not limited to:

- development consents, leases, licences and permits;
- environmental management plans;
- details of environmental incidents;
- details of complaints;

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- records of external correspondence;
- internal and external reports;
- site inspections;
- training records;
- calibration and servicing records for equipment;
- audit results; and
- monitoring results.

4.5 OPERATIONAL CONTROL

In order for Wambo's Environment & Community Policy and objectives and targets to be realised, the implementation of operational controls and procedures is necessary where activities are identified as having an environmental impact. In order that these activities are carried out in accordance with the objectives and targets of the EMS, the following will need to be undertaken:

- undertake risk assessment of activities where environmental impacts are predicted or known;
- investigate and, where possible, implement methods of eliminating risk;
- where risk can not be eliminated, investigate and implement physical controls/barriers to manage risk; and
- where it is not feasible or unjustified to implement physical controls, procedures should be developed to address the risk.

Documented procedures, stipulating operating criteria, will be established and maintained for activities where the absence of a procedure could lead to deviations from the policy, objectives and targets. In the absence of other appropriate controls, procedures will be developed to address high-risk activities. Procedures will also be established and maintained relating to identifiable significant environmental aspects of goods and services used by Wambo, and communication of these requirements to suppliers and contractors.

4.6 EMERGENCY PREPAREDNESS AND RESPONSE

Environmental emergency response has been incorporated into management plans and the Wambo Coal Environmental Handbook. Any changes to emergency procedures will be documented and communicated to all personnel.

5.0 CHECKING AND CORRECTIVE ACTION

5.1 ENVIRONMENTAL MONITORING

Environmental monitoring will be managed by the Environment & Community Specialist (or delegate) to determine conformance by Wambo to relevant licence and consent conditions. This will allow for a measure of the performance of the operation against Wambo's objectives, targets and performance criteria.

Suitably qualified and skilled personnel will conduct all Wambo's environmental monitoring. The monitoring, measurement and recording is undertaken in accordance with relevant Standards. The Environment & Community Specialist (or delegate) maintains all calibration records of the monitoring equipment used. Calibration will be undertaken in accordance with the equipment manufacturer's recommendations.

The Environment & Community Specialist (or delegate) will compare monitoring results against development consent, licence and permit conditions and will file all monitoring results. Any non-conformance will be recorded and the Environment & Community Specialist (or delegate) will investigate the cause of the non-conformance and recommend corrective and/or preventative action. The effectiveness of the corrective and/or preventative action will be assessed by the analysis of the next monitoring results or site inspections.

If any changes to work procedures are necessary as a result of the investigation of a non-conformance, they will be documented and communicated to site personnel.

5.2 CORRECTIVE AND PREVENTATIVE ACTION

Non-conformities may become evident as a result of the following:

- Environmental monitoring programs;
- community complaints;
- monthly environmental site inspections;
- internal communication;
- incident reports; and
- audit findings.

A periodic review of monitoring results, incident reports, details of complaints and audit findings will be undertaken and used to assess the environmental performance of the operation. Monthly reporting will facilitate this process. From this review, corrective and preventative actions arising from non-conformances and subsequent investigations will be implemented as required. The relevant supervisor will be notified of required actions with follow up assessment of the effectiveness of the requested action.

5.3 RECORDS

All records will be legible, readily retrievable, and protected against damage and will be retained for a minimum of four years.

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5.4 AUDITS AND INSPECTIONS

A summary of site inspections and audits for Wambo can be seen in **Table 1**.

Table 1: Audit Schedule

Audit	Audit Details	Frequency	Responsibility	Report to
Internal	Monthly Environmental Site Inspections	Monthly	Environment & Community Specialist	Environment & Community Manager and Senior Management Team
External	Compliance/ Operational Audit	At end of Year 1 and each 5 years thereafter	Environment & Community Manager	General Manager
	DPI Inspection	Annual	Environment & Community Manager	General Manager

5.4.1 Site Inspections

The Environment & Community Specialist (or delegate) undertakes monthly environmental site inspections of the Wambo operations. Operational personnel are active participants in these reviews to increase awareness and ownership of environmental issues. These inspections will assist in determining on-site compliance and will be used in conjunction with environmental monitoring and incident/complaint reporting procedures.

Any non-conformance will be recorded and the cause investigated. The Environment & Community Specialist (or delegate) will recommend corrective and/or preventative action and the effectiveness of this action will be assessed at the next site inspection. Results from inspections will be presented at the weekly Senior Management Team Meeting and in the monthly Managers report, such that positive performance is recognised and negative performance is identified and remedied.

5.4.2 Internal Audits

A program will be developed to routinely audit components of environmental management on site and will systematically work through management plans and procedures.

5.4.3 External Audits

An external compliance audit will be conducted at least every five years in accordance with the requirements of Wambo's development consent. The Environment & Community Manager will select external auditors based on their understanding of environmental management principles and mining operations. The endorsement of the independent auditor by the Director-General of DoP will also be sought and gained prior to the compliance audit's commencement. The results of external audits will be distributed in accordance with Wambo's development consent conditions as well as the Senior Management Team for review.

6.0 REVIEW AND IMPROVEMENT

6.1 MANAGEMENT REVIEW

The Senior Management Team will undertake periodic review and revision of environmental management at Wambo. This review will include:

- review of audit findings;
- achievement of objectives and targets;
- review of the Environment & Community Policy (at least every two years);
- relevance of objectives and targets to current and future conditions; and
- a review of any incidents or concerns raised by stakeholders.

Performance criteria will be used to evaluate environmental performance against the policy, objectives and targets. These reviews will be undertaken periodically. The outcomes of this management review will be documented and incorporated into the environmental management plans and procedures.

6.2 CONTINUAL IMPROVEMENT

Wambo maintains a Continuous Improvement Register. The register documents the status of initiatives to improve environmental performance that have been identified through risk assessments, by Wambo personnel, through audits, site inspections and community complaints.

Additionally, the Senior Management Team review will allow opportunities for environmental improvement to be identified. These improvements will then be incorporated into Wambo's Environment & Community Policy, objectives and targets, environmental management programs and procedures.

The outcomes of any continual improvement will be documented.