



Australian Strategic Materials (Holdings) Ltd

ABN 51 091 489 511

Dubbo Project

Pollution Incident Response Management Plan



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TABLE OF CONTENTS

1.	INTRODUCTION AND SCOPE	1
2.	LEGAL REQUIREMENTS	4
3.	PLAN MANAGEMENT AND KEY CONTACT DETAILS.....	6
4.	OBJECTIVES AND OUTCOMES.....	7
5.	POTENTIAL HAZARDS	8
5.1	INTRODUCTION	8
5.2	INVENTORY OF POTENTIAL POLLUTANTS	8
5.3	POLLUTION HAZARD IDENTIFICATION	10
5.4	POLLUTION HAZARD ASSESSMENT	10
5.5	PRE-EMPTIVE ACTIONS.....	11
5.6	SAFETY AND POLLUTION CONTROL EQUIPMENT AND MANAGEMENT	11
6.	POLLUTION INCIDENT MANAGEMENT	15
6.1	DEFINITION OF A POLLUTION INCIDENT.....	15
6.2	POLLUTION INCIDENT MANAGEMENT AND ACCOUNTABILITY.....	15
6.3	ENSURE PERSONNEL SAFETY.....	18
6.4	SAFETY DATA SHEETS (SDS)	19
6.5	INCIDENT NOTIFICATION.....	19
6.5.1	Obligations.....	19
6.5.2	Notification of Authorities	20
6.5.3	Notification of Neighbours and the Local Community	21
6.6	POLLUTION CONTROL AND CLEAN-UP PROCEDURES	23
6.6.1	General	24
6.6.2	Hydrocarbon Spill	24
6.6.3	Uncontrolled Discharge of Water.....	25
6.6.4	Dust Emissions	26
6.7	INCIDENT REVIEW AND FOLLOW-UP.....	26
7.	PLAN EVALUATION AND REVIEW	27
7.1	EVALUATION	27
7.2	CONTINUAL IMPROVEMENT	27
7.3	TESTING OF POLLUTION INCIDENT RESPONSE.....	27
7.4	COMPETENCY TRAINING	28
7.5	POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN REVIEW.....	28
8.	ACCESS TO THE PIRMP.....	29

TABLE OF CONTENTS Cont.

APPENDICES

Appendix 1	Incident Report – Template.....	30
Appendix 2	PIRMP Testing Register.....	32

FIGURES

Figure 1	Dubbo Project Construction and Site Establishment Phase.....	2
Figure 2	Project Site – Hazardous Materials Storage and Watercourses.....	8
Figure 3	Processing Plant and Administration Area – Hazardous Materials Storage and Watercourses	9
Figure 4	Sensitive Receivers.....	23

TABLES

Table 1	Requirements for a PIRMP	4
Table 2	Key Contact Details and Responsibilities	6
Table 3	Objectives and Key Performance Outcomes	7
Table 4	Inventory of Pollutants.....	10
Table 5	Qualitative Likelihood Rating.....	10
Table 6	Identified Pollution Hazards	12
Table 7	Key Management Responsibilities	15
Table 8	Government Agency Notification Protocol	20
Table 9	Contact Details of Neighbours surrounding the Project Site.....	21

1. INTRODUCTION AND SCOPE

This Pollution Incident Response Management Plan (PIRMP) was prepared by R.W. Corkery & Co. Pty Limited, in accordance with Section 153A of the *Protection of the Environment Operations Act 1997* (POEO Act), on behalf of Australian Strategic Materials Ltd (ASM) for the Dubbo Project.

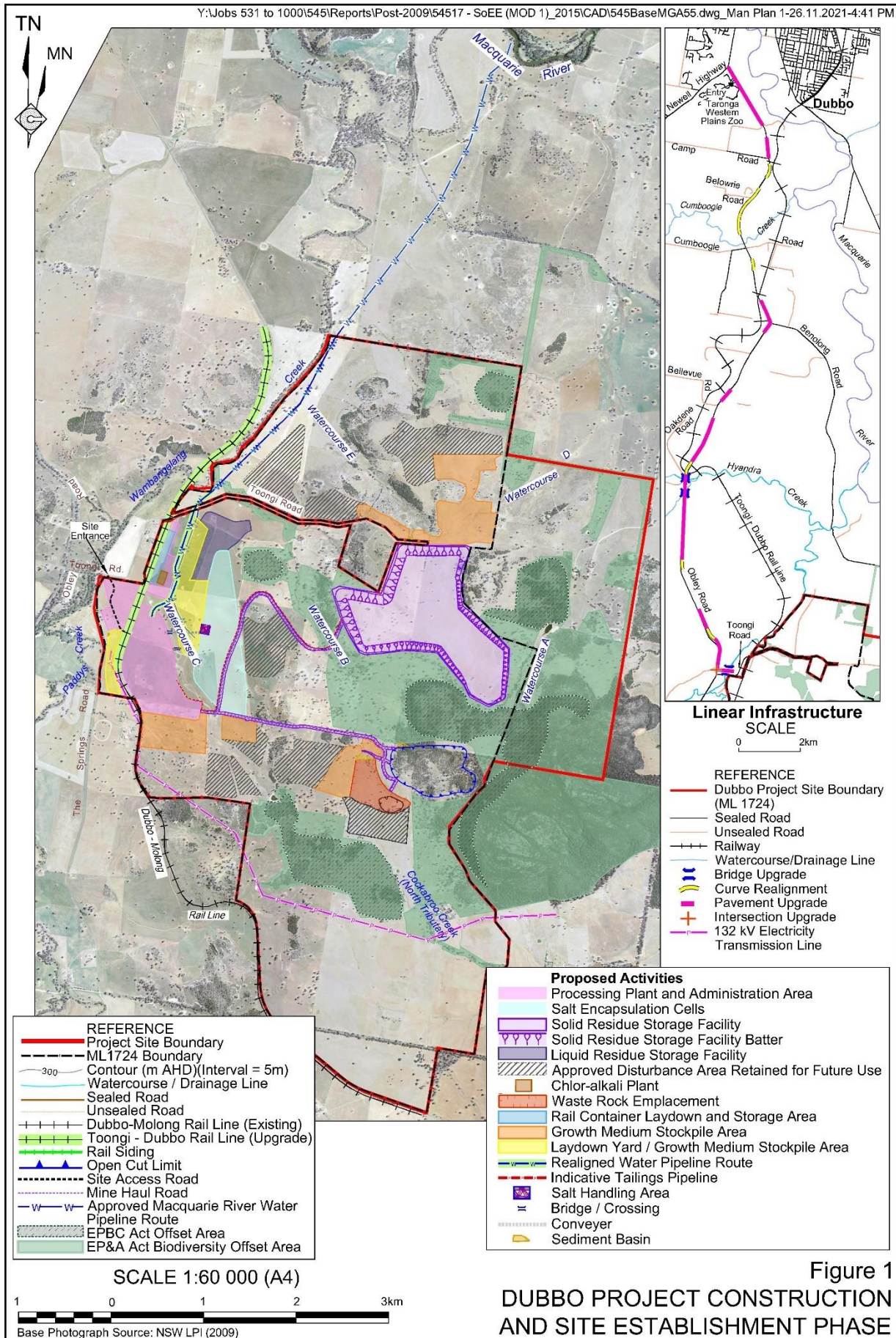
The Dubbo Project (the Project) is located approximately 25km south of Dubbo and 1km east of Obley Road at Toongi (**Figure 1**). Operated within Mining Lease (ML) 1724, the Project includes an open cut mine, haul road and internal roads, a waste rock emplacement, solid and liquid residue storage facilities, salt encapsulation cells, a chlor-alkali plant and a mineral processing facility. The processing facility is rated as a Major Hazard Facility (MHF), in accordance with the *Occupational Health and Safety (Safety Standards) Regulations 1994*, based on the quantity of chemical reagents to be contained on site. As an MHF, ASM has additional incident identification, management and planning obligations (to SafeWork Australia). These additional obligations relate to risks to health and safety and are distinct from pollution incidents which are addressed by this PIRMP.

This PIRMP has been prepared as a tool for the management of potential impacts to on site personnel, near neighbours and the broader community and environment in the event of pollution incidents. The PIRMP, including regular training of personnel in the implementation of the PIRMP, is intended to support the development of planned, practised responses to potential pollution incidents. It aims to minimise the risk of a pollution incident by firstly identifying risks, establishing measures to reduce the likelihood of incident occurrence, and finally planning and practising the response to a pollution incident.

Reflecting the extended construction phase of the Project, and initial issue of Environment Protection Licence (EPL) 20702 for Scheduled Development Work only, the PIRMP has been prepared for activities associated with the construction and site establishment phase of the Project which include the following (see **Figure 1**).

Project Site Construction

- Site Entrance, Site Access Road, internal roads and Mine Haul Roads.
- Processing Plant and Administration Area.
- Solid Residue Storage Facility.
- Liquid Residue Storage Facility.
- Salt Encapsulation Cells.
- Laydown Yards and Growth Medium Stockpile Areas.
- Rail Container Laydown and Storage Area.
- Chlor-alkali Plant.
- Other miscellaneous infrastructure (e.g. explosives magazine).



Linear Infrastructure Construction

- Macquarie River Water Pipeline and pump station.
- Natural Gas Pipeline.
- 132kV Electricity Transmission Line.
- Toongi Road Upgrades (including Wambangalang Creek Crossing).
- Obley Road Upgraders (including Hyandra and Twelve Mile Creek Crossings).
- Dubbo-Toongi Railway line refurbishment.

A future version of this PIRMP will be prepared prior to the commencement of mining operations, as defined by SSD-5251 as:

“the removal and emplacement of overburden and extraction, processing, handling, storage and transport of mineral ore / ore concentrate / refined ore products”.

2. LEGAL REQUIREMENTS

The *Protection of the Environment Legislation Amendment Act 2011* introduced changes designed to improve the way pollution incidents are reported and managed in NSW. Those changes apply to the holders of Environmental Protection Licences.

The requirements for PIRMPs are set out in Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2021* (POEO Reg). In summary, these provisions require that:

- all holders of an Environment Protection Licence prepare, implement and test a PIRMP;
- the plan includes the information detailed in the POEO Act (Section 153C) and POEO Reg (Section 131) (see **Table 1**); and
- the plan must be kept at the premises to which the Environment Protection Licence relates.

Table 1
Requirements for a PIRMP

Page 1 of 2

Requirement	Section
Section 153C POEO Act	
A pollution incident response management plan must be in the form required by the regulations and must include the following:	
(a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: <ul style="list-style-type: none"> (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates; (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution; and (iii) any persons or authorities required to be notified by Part 5.7. 	6.5.3 6.5.2 6.5.2
(b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution.	6.2 – 6.7
(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.	6.2 – 6.7
(d) any other matter required by the regulations.	

**Table 1 (Cont'd)
Requirements for a PIRMP**

Requirement	Section	
Clause 98C POEO Reg		
(1) The matters required under section 153C(d) of the Act to be included in a plan are as follows:		
(a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates (<i>the relevant activity</i>).	5.3
(b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	5.4
(c)	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.	5.5
(d)	An inventory of potential pollutants on the premises or used to carry out the relevant activity.	5.2
(e)	The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.	5.2
(f)	A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.	5.6
(g)	The names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> • Are responsible for activating the plan. • Are authorised to notify relevant Authorities under section 148 of the Act. • Are responsible for managing the response to the pollution incident. 	3
(h)	The contact details of each relevant authority referred to in section 148 of the Act.	6.5.2
(i)	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is being carried on.	6.5.3
(j)	The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.	5.5
(k)	A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, and the location of stormwater drains on the premises.	Figures 1 and 2
(l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately AFTER a pollution incident to reduce that risk.	5.5, 6.2-6.6
(m)	The nature and objectives of any staff training program in relation to the plan.	7.4
(n)	The dates on which the plan has been tested and the name of the person who carried out the test.	Table 10
(o)	The dates on which the plan is updated.	7.5
(p)	The manner in which the plan is to be tested and maintained.	7

3. PLAN MANAGEMENT AND KEY CONTACT DETAILS

Table 2 identifies the names, position titles and contact details of the key individuals who are responsible for activating the plans and managing the response, authorising the notification of relevant authorities, and managing the response to a pollution incident.

The key roles and responsibilities of the Site Manager and Environmental Officer in implementing the PIRMP are provided in Section 6.2.

Potential Incident Managers will be identified by the Site Manager at each construction zone / site, with the relative roles and responsibilities of an Incident Manager in implementing the PIRMP also provided in Section 6.2.

Table 2
Key Contact Details and Responsibilities

Accountable Position	Name	Position	Contact
Site Manager	Michael Sutherland	General Manager, NSW	(02) 6882 2886
Environmental Officer ²			0427 691 733
TPC Farm Manager ³	Fergus Job	TPC Farm Manager	0427 267 305
Note 1: A Construction Manager will be appointed prior to the commencement of construction activities. Note 2: The Site Manager retains all responsibilities of the Environmental Officer until such time as an Environmental Officer is appointed. Note 3: Toongi Pastoral Company Pty Ltd will manage the 3 500Ha of AZL-owned agricultural land and biodiversity offsets which surround the construction site.			

4. OBJECTIVES AND OUTCOMES

Table 3 presents the objectives and key performance outcomes nominated by the Licensee for the PIRMP.

Table 3
Objectives and Key Performance Outcomes

OBJECTIVES	KEY PERFORMANCE OUTCOMES
(a) Minimise and control the risk of a pollution incident at the Project Site by identifying hazards, calculating risks and the developing pre-emptive measures and action plans to minimise and manage those risks.	(i) All identified preventative, management and mitigation measures implemented.
(b) Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it.	(ii) All persons responsible for implementation of the Plan have been identified and understand relevant responsibilities.
(c) Ensure that the PIRMP is regularly tested for accuracy, currency and suitability.	(iii) Arrangements for the review, testing, evaluation and maintenance of the Plan are developed and implemented.
(d) Ensure comprehensive and timely communication about a pollution incident to staff at the facility, the Environment Protection Authority (EPA), other relevant authorities and people outside the Project Site who may be affected by the impacts of the pollution incident.	(iv) All warning systems for people at the facility, the relevant agencies and the public implemented in the event of a pollution incident identified in the Plan as requiring notification.

5. POTENTIAL HAZARDS

5.1 INTRODUCTION

A **hazard** is any source, situation or condition of potential damage, harm or adverse health effects on someone, something or the environment under certain conditions. A **pollution hazard** relates to the source, situation or condition in which spillage, leakage or emission of a hazardous material causes harm or adverse effects (to individuals as health effects, to organizations as property or equipment losses, or to the environment).

5.2 INVENTORY OF POTENTIAL POLLUTANTS

Table 4 provides an inventory of the potential pollutants that could result from the construction stage of the Project, as well as the storage location and maximum quantity of each chemical or potential pollutant. **Figure 2** and **Figure 3** identify the storage locations within the layout of the Project Site.

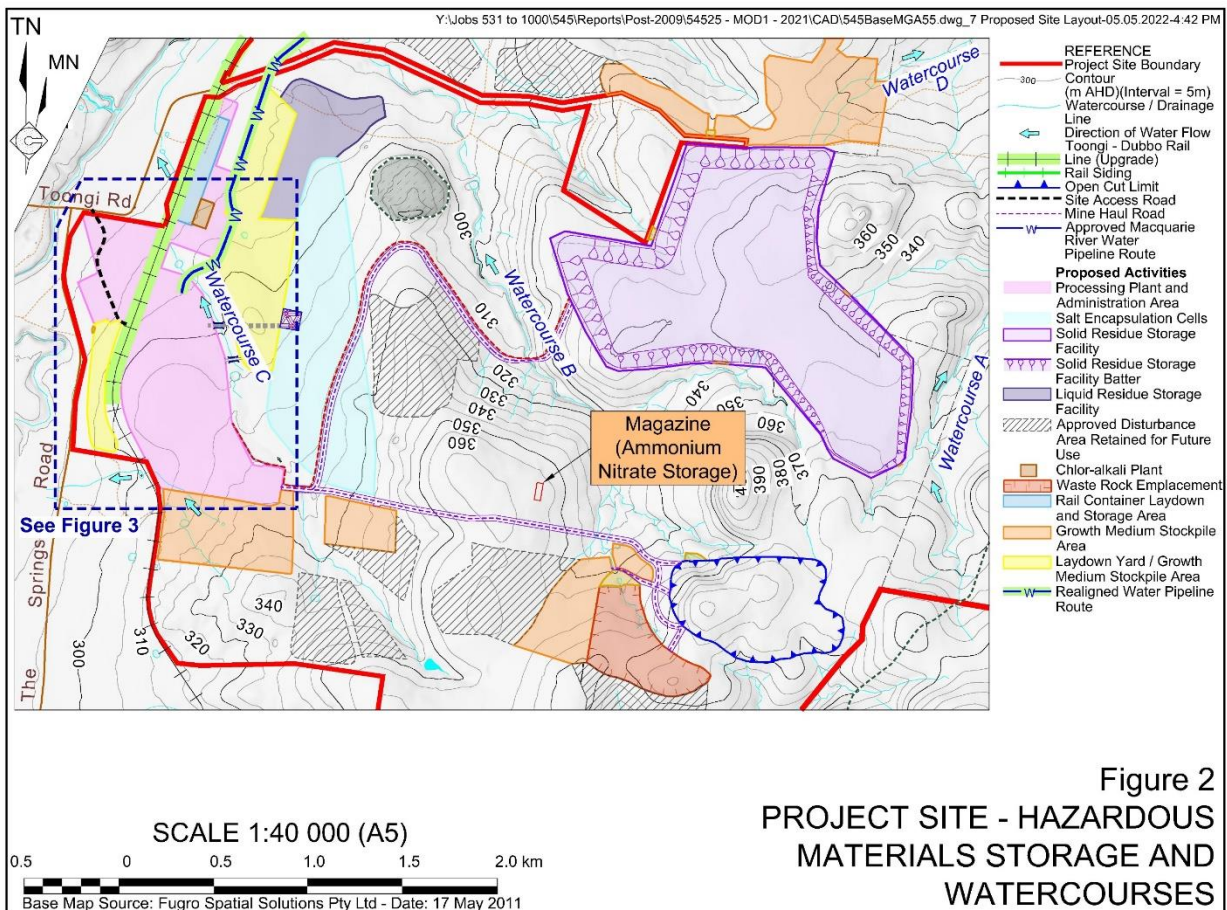


Figure 2
 PROJECT SITE - HAZARDOUS
 MATERIALS STORAGE AND
 WATERCOURSES

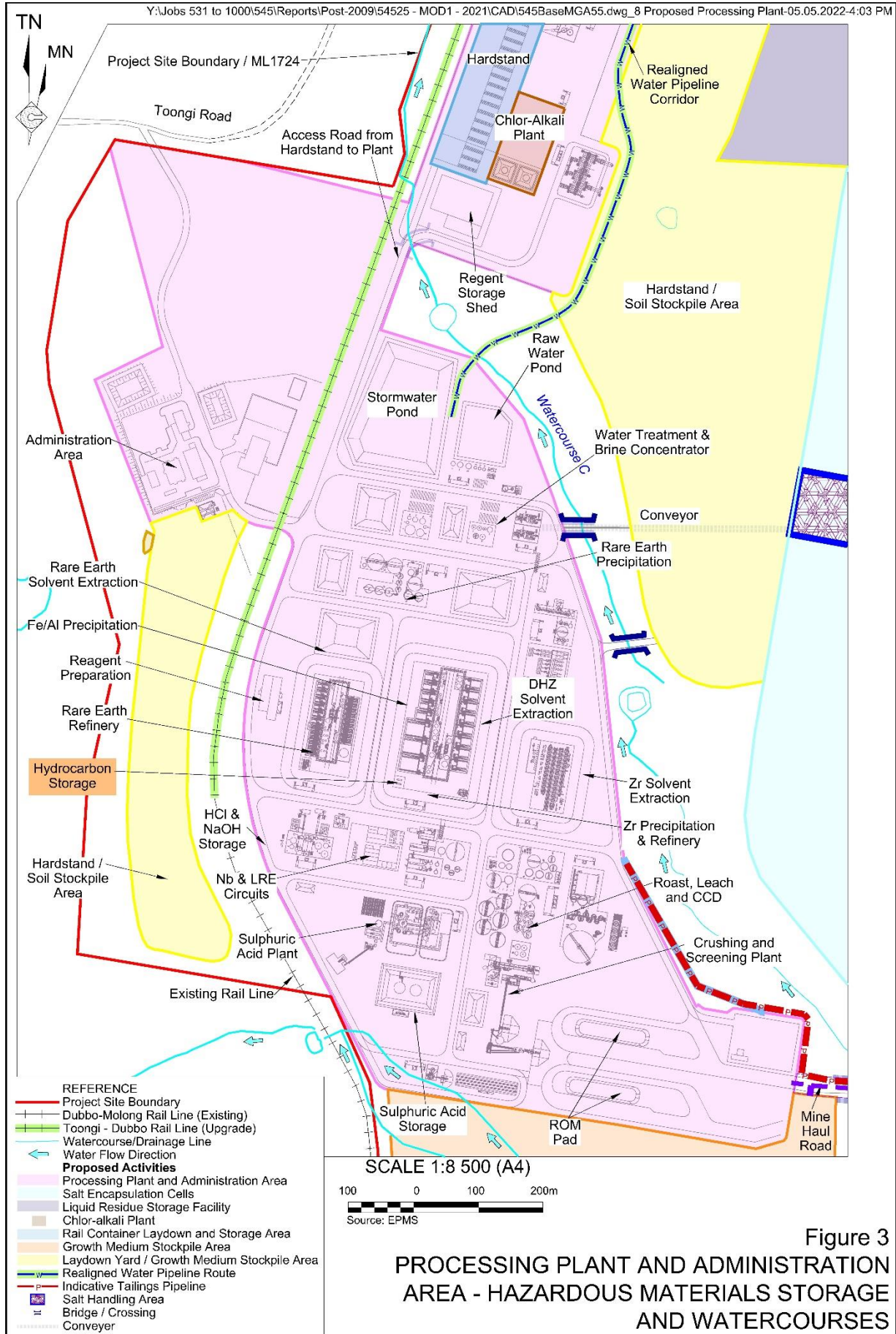


Table 4
Inventory of Pollutants

Product	Classification	Delivery Method	Storage Location ¹	Maximum Quantity
Hydraulic Oil	Dangerous Goods	Road – ad hoc	Laydown and Storage Area within self-bunded tanks, on bunded pallets or within bunded area complying with AS1940:2017.	2,000L
Lubricant	Dangerous Goods	Road – ad hoc		500L
Grease	Dangerous Goods	Road – ad hoc		2,000L
Diesel	Hazardous (3Y)	Road – under licence		20,000L
Ammonium Nitrate	Hazardous (1Z) DG Class 5.1	Road – under licence	Magazine	10,000L

Note 1: see **Figure 2**

5.3 POLLUTION HAZARD IDENTIFICATION

On the basis of the pollutant inventory and activities to be undertaken at the Project Site, the primary pollution hazards are as follows.

- Diesel Storage, Use and Transfer.
- Storage of Oils, Greases and Lubricants.
- Uncontrolled discharge of water from roads, construction areas or stockpiles which may contain elevated concentration of sediment or other contaminants.
- Dust emissions from haul roads and infrastructure construction.

5.4 POLLUTION HAZARD ASSESSMENT

In order to develop and implement pre-emptive actions for pollution hazards, the likelihood of occurrence and any circumstances in which the likelihood may be increased should be identified. **Table 5** provides the definitions used to classify the likelihood of a pollution hazard resulting in a pollution incident.

Table 5
Qualitative Likelihood Rating

Level	Descriptor	Description
A	Almost Certain	Is expected to occur in most circumstances
B	Likely	Will probably occur in most circumstances
C	Possible	Could occur
D	Unlikely	Could occur but not expected
E	Rare	Occurs only in exceptional circumstances

ASM has completed an assessment of the pollution hazards present during the construction stage of the Project, the relevant sources, situations or conditions that would result in pollution and the existing (pre-emptive) controls that are in place to reduce the likelihood of a pollution incident. **Table 6** presents the results of this assessment.

5.5 PRE-EMPTIVE ACTIONS

The pre-emptive mitigation and management measures that have been implemented to prevent the occurrence of, or minimise the impact of, pollution incidents are identified in **Table 6**.

5.6 SAFETY AND POLLUTION CONTROL EQUIPMENT AND MANAGEMENT

The following identifies the safety equipment and other management that are used to minimise risks to human health or the environment and to contain or control a pollution incident is required.

Safety and Pollution Control Equipment

- **Diesel and other Hydrocarbon Storage:** constructed and maintained in accordance with Australian Standards 1940:2017.
- **Personal Protective Equipment:** requirements are enforced and include the following standard PPE.
 - Hard hat.
 - Long sleeve shirt and trouser (with reflective strips) and/or safety vest.
 - Eyewear (safety glasses).
 - Gloves.
 - Shoes (Steel-capped and sturdy).
- **Spill kits:** containing spill socks, pads and pillows (for perimeter containment); coveralls, gloves, safety goggles and glasses (for safe work); and disposable bags (for removing waste). All personnel are provided with training in the correct use of these items.
- **Earth bunds:** will be constructed around construction sites adjacent to or within waterfront land to provide for initial collection of runoff and/or spills within these areas.
- **Erosion and Sediment Control Best Management Practices:** Diversion banks, roadside drains, sediment basins and other structures are constructed, operated and maintained in accordance with Erosion and Sediment Control Plans (ESCPs).
- **Sediment fencing (or equivalent):** In the absence of other BMPs, sediment fencing, straw bale protection or grass buffer strips will be installed downslope of disturbed land.
- **Vegetation:** Soil stockpiles and disturbed areas no longer required for construction activities will be immediately revegetated to stabilise the surface and prevent erosion.

Table 6
Identified Pollution Hazards

Page 1 of 2

Hazard	Source, Situation or Condition Resulting in Pollution	Potential Impacts	Likelihood	Pre-emptive Controls	Safety / Pollution Control Equipment
Diesel Storage, Use and Transfer	Spillage of diesel during transfer.	Spill could penetrate soil and contaminate groundwater.	C	<ul style="list-style-type: none"> Product stored according to Australian Standards 1940:2017. This includes provisions for fire prevention, barriers and bunds, ventilation considerations and appropriate signage. Transfer supervised by appropriately trained and qualified site personnel at all times. Hydrocarbon spill kits will be maintained at designated storage areas. All personnel will be instructed as to 3 phase spill response protocol. <ul style="list-style-type: none"> Phase 1 – Source Control. Phase 2 – Recovery. Phase 3 – Remediation. Inspections of the storage areas will be undertaken regularly. Any signs of facility degradation will be referred to the Site or Construction Manager immediately. 	<ul style="list-style-type: none"> PPE according to the SDS. Spill kits.
	Tank leak / rupture resulting in spillage.	Product floats on water and may affect oxygen transfer and damage organisms.	D		
	Leakage / spillage of diesel from vehicle.	As above. Spilled fuel could discharge to local creeks and tributaries when working within or adjacent to waterfront land ¹ .	C		
Storage of Oils, Greases and Lubricants	Tank leak / rupture resulting in spillage.	As above	D	<ul style="list-style-type: none"> Opened containers are stored within a bunded and, when available, roofed facility (e.g. workshop). Unopened drum containers are stored within bunded areas. 	<ul style="list-style-type: none"> PPE according to the SDS. Spill kits.
Storage of Ammonium Nitrate	Spillage during transfer	Acidification of runoff due to oxidising potential of ammonium nitrate	D	<ul style="list-style-type: none"> Delivered by road under licence in 1 sealed container. Transfer supervised by appropriately trained and qualified site personnel at all times. 	<ul style="list-style-type: none"> PPE according to the SDS. Spill kits.
	Leakage from vessels within magazine		E	<ul style="list-style-type: none"> Access to magazine restricted by security fencing. Magazine covered. 	

**Table 6 (Cont'd)
Identified Pollution Hazards**

Hazard	Source, Situation or Condition Resulting in Pollution	Potential Impacts	Likelihood	Pre-emptive Controls	Safety / Pollution Control Equipment
Uncontrolled discharge of water	<p>Construction of haul roads and infrastructure resulting in increased sediment loads.</p> <p>Rainfall runoff over disturbed ground may displace and carry elevated concentrations of solids to nearby watercourses.</p>	<p>Elevated sediment loads can reduce oxygen levels of watercourses, inhibit plant growth and cause impacts upon aquatic habitats.</p> <p>Resettled sediment may generate dust as a result of wind erosion.</p>	C	<ul style="list-style-type: none"> • Areas of clearing and surface disturbance immediately precede construction activities and are restricted to only that necessary for the works. • Access to and from construction areas restricted in accordance with the relevant Erosion and Sediment Control Plan (ESCP). • Construction and installation of erosion and sediment control Best Management Practices (BMPs) as nominated in the ESCPs. • Where diversion banks not required (by ESCP), sediment fencing or equivalent (e.g. grass buffer strips, straw bales) installed to reduce sediment load discharging to receiving land/waters. • Soil stockpiles and disturbed areas not required for periods exceeding 3 months are revegetated to stabilise the surfaces of these areas. • Other water management controls as described in the Water Management Plan. 	<ul style="list-style-type: none"> • BMPs as defined by ESCPs. • Sediment fencing (or equivalent).
Dust emissions	Construction of haul roads and infrastructure resulting in increased dust emissions.	Excessive dust emissions may impact air quality amenity of nearby residences.	B	<ul style="list-style-type: none"> • Procedural and engineering controls as described in the Air Quality Management Plan. 	<ul style="list-style-type: none"> • Water cart operated over all unsealed access roads, laydown areas and other trafficked areas.
<p>Note 1: Waterfront land defined by <i>Water Management Act 2000</i> as within 40m of the bed of any river, together with any land lying between the bed of the river and a line drawn parallel to, and the prescribed distance inland of, the highest bank of the river, where a river is defined as “any watercourse, whether perennial or intermittent and whether comprising a natural channel or a natural channel artificially improved”</p>					

Pollution Control Management

- **Training:** provided to ensure that all employees receive the education and training required to perform their tasks in a safe and productive manner. All relevant personnel will also be instructed in the 3 phase spill response protocol:
 - Phase 1 – Source Control: isolate the source of spill or leak and stop the leak either by maintenance or placing the leaking item within or over the fuel/oil storage area.
 - Phase 2 – Recovery: recover by pumping pooled hydrocarbon from the surface and excavating hydrocarbon-contaminated materials. Stockpile any contaminated materials under cover and on an impermeable surface (e.g. a HDPE sheet).
 - Phase 3 – Remediation: transport the contaminated material to a designated area (away from natural or created drainage) for on-site bio-remediation or to a facility licensed to accept and treat hydrocarbon contaminated material.

Training includes pollution incident response management training.

- **Inspections:** regular inspections of pollutant storage and transfer locations, and construction sites, will be undertaken by supervisory or managing personnel.
- **Inductions:** held for new employees and includes instructions as to safe work practices when using or managing hazardous chemicals and potential pollutants.
- **Safety Data Sheets (SDS):** are placed as laminated copies with the chemicals. Electronic copies are retained at the weighbridge.

6. POLLUTION INCIDENT MANAGEMENT

6.1 DEFINITION OF A POLLUTION INCIDENT

The POEO Act defines a pollution incident as:

“...an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill, or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

6.2 POLLUTION INCIDENT MANAGEMENT AND ACCOUNTABILITY

In the event of a pollution incident, the response will be managed in accordance with the following five phases.

1. **Alert Phase:** Monitor any incident with the potential to result in pollution.
2. **Stand By Phase:** Prepare to implement the appropriate pollution incident response procedure should the incident escalate and trigger as a notifiable pollution incident.
3. **Call Out Phase:** Activate the relevant notification (Section 6.5) and incident response procedures (Section 6.6).
4. **Clean Up Phase:** Clean-up any residual contamination / stabilisation of soil materials once the area is declared safe.
5. **Stand Down Phase:** Incident response completed. Implement a de-briefing and review of the implementation of the notification and incident response procedures (Section 6.7).

Table 7 presents the responsibilities of the key personnel in the implementation of the five phases of the PIRMP.

Table 7
Key Management Responsibilities

Page 1 of 4

Position	Phase	Responsibility
Site Manager	General	<ul style="list-style-type: none"> • Ensure personnel safety is the first priority (refer to Section 6.3). • Ensure adequate resources are available to enable implementation of the interim PIRMP. • Ensure managers or supervisors of the specific construction areas / sites are aware of their responsibilities as ‘incident managers’ in the event of a pollution incident. • Ensure appropriate personnel training and awareness programs are implemented. • Ensure that the PIRMP is reviewed and tested every 12 months. • Ensure a hard copy of the PIRMP is retained on site.

Table 7 (Cont'd)
Key Management Responsibilities

Page 2 of 4

Position	Phase	Responsibility
Site Manager (Cont'd)	Alert	<ul style="list-style-type: none"> Ensure resources are available to implement the PIRMP, e.g. mobile equipment, water supply, personnel. Identify and maintain communication with the manager or supervisor of the specific construction site where an incident is identified ("incident manager") to ensure progression between incident phases is appropriate.
	Stand By	<ul style="list-style-type: none"> Advise appropriate personnel of the incident (or ensure notification is undertaken by delegated personnel). Advise personnel to be on stand by for implementation of incident management (notification, response management and/or clean up procedures).
	Call Out	<ul style="list-style-type: none"> Approve the activation of the relevant notification and response procedures of the PIRMP. Maintain communication with the incident manager and coordinate activities and resources. Approve the implementation of additional or escalated response measures on advice from the incident manager.
	Clean Up	<ul style="list-style-type: none"> Ensure adequate resources are available to undertake clean-up. Inspect and provide confirmation that the affected area is safe.
	Stand Down	<ul style="list-style-type: none"> Ensure Incident Report Form completed and actioned. Give direction for a de-briefing and review of the notification, response management and evacuation procedures of the PIRMP.
Incident Manager As delegated by Site Manager	General	<ul style="list-style-type: none"> Ensure personnel safety is the first priority (refer to Section 6.3). Upon advice from the Site Manager assume or delegate responsibilities. Ensure that all personnel safety procedures are followed. Upon advice from the Site Manager ensure that all accidents, incidents and potential incidents are appropriately investigated.
	Alert	<ul style="list-style-type: none"> Inspect the site of potential pollution incident.
	Stand By	<ul style="list-style-type: none"> Monitor the identified incident. Identify and review the relevant Material Safety Data Sheet (SDS) (refer to Section 6.4). Advise appropriate site personnel of the incident and initiate incident notification.

Table 7 (Cont'd)
Key Management Responsibilities

Position	Phase	Responsibility
Incident Manager (Cont'd)	Call Out	<ul style="list-style-type: none"> • Under delegation by the Site Manager: <ul style="list-style-type: none"> – approve the activation of the relevant notification and response management procedures of the PIRMP; – ensure that perimeters are established and access to the site is controlled; – maintain communication with Site Manager and coordinate activities and resources; and – determine the priority of actions of employees until agencies and emergency services arrive. • Complete the appropriate notification (of emergency services, regulatory authority, other relevant authorities, near neighbours and the local community) (see Section 6.5). • Monitor the response to the incident and provide advice to the Site Manager on the escalation of response as required. • Provide owners and occupiers of land updates of any incidents affecting their land as required (see Section 6.5).
	Clean Up	<ul style="list-style-type: none"> • Direct the clean up of the incident and assess and identify when the affected area(s) is/are safe.
	Stand Down	<ul style="list-style-type: none"> • Review Incident Report Form and ensure completed correctly. • Coordinate and manage de-briefing and review as directed by the General Manager.
Environmental Officer / Delegate	General	<ul style="list-style-type: none"> • Ensure personnel safety is the first priority (refer to Section 6.3). • Advise site personnel on environmental matters, in particular pollution control matters. • In the absence of a nominated incident manager, or under delegation by the Site Manager, assume the function of the incident manager. • Ensure employees are competent in the implementation of the PIRMP through appropriate training and awareness programs. • Undertake regular inspections of locations where the potential for incident has been identified and advise on performance improvement measures. • Ensure visitors and contractors are inducted and aware of emergency management procedures. • Ensure that all accidents, incidents and potential incidents are appropriately investigated.
	Alert	<ul style="list-style-type: none"> • As soon as aware, advise the Site Manager of a pollution incident or potential pollution incident. • Monitor the reported incident.
	Stand By	<ul style="list-style-type: none"> • In the absence of an incident manager, or under delegation by the Site Manager, advise appropriate site personnel of the incident • Identify and review the relevant Material Safety Data Sheet (SDS) (refer to Section 6.4). • Ensure appropriate resources are available for the implementation of the incident response management measures.

Table 7 (Cont'd)
Key Management Responsibilities

Page 4 of 4

Position	Phase	Responsibility
Environmental Officer / Delegate (Cont'd)	Call Out	<ul style="list-style-type: none"> • In the absence of an incident manager, or under delegation by the Site Manager: <ul style="list-style-type: none"> – approve the activation of the relevant notification, response management and evacuation procedures of the PIRMP; – ensure that perimeters are established and access to the site is controlled; – maintain communication with Site Manager and coordinate activities and resources; and – determine the priority of actions of employees until agencies and emergency services arrive. • Complete the appropriate notification (of emergency services, regulatory authority, other relevant authorities and land owners) (see Section 6.5). • Monitor the response to the incident and provide advice to the Site Manager on the escalation of response as required. • Provide owners and occupiers of land updates of any incidents affecting their land as required (see Section 6.5).
	Clean Up	<ul style="list-style-type: none"> • Direct the incident clean up of the incident (following confirmation that the site is safe).
	Stand Down	<ul style="list-style-type: none"> • Coordinate and manage de-briefing and review as directed by the Mining Manager/Production Manager
All Personnel	General	<ul style="list-style-type: none"> • Ensure personnel safety is the first priority (refer to Section 6.3). • Ensure incident training is undertaken and responsibilities understood. • Follow personnel safety procedures as directed by Site Manager or incident manager.
	Alert	<ul style="list-style-type: none"> • As soon as aware, advise the Site Manager, immediate supervisor or Environmental Officer / Delegate of a pollution incident.
	Stand By	<ul style="list-style-type: none"> • Follow instructions provided by Site Manager or incident manager.
	Call Out	<ul style="list-style-type: none"> • Evacuate the site if instructed.
	Clean Up	<ul style="list-style-type: none"> • Undertake response under instruction from the Site Manager, incident manager or Environmental Officer / Delegate.
	Stand Down	<ul style="list-style-type: none"> • Complete and submit an Incident Report Form. • Attend incident de-briefing and review as directed by the General Manager or incident manager.

6.3 ENSURE PERSONNEL SAFETY

If a pollution incident occurs the first priority is to ensure personnel safety, visually assess the situation and, if there is significant risk to human health, undertake proceedings to evacuate.

If evacuation is not required, the area will be isolated and contained to prevent personnel coming into contact with the incident. Barriers are to be erected, and other isolation measures implemented where appropriate and feasible. The supervisor of the relevant area of the Project Site is to be informed immediately so that senior management can also be advised.

Two-way radios will be used for communication on site to alert personnel of the occurrence of a pollution incident.

6.4 SAFETY DATA SHEETS (SDS)

The Safety Data Sheet (SDS) for every fuel, reagent and chemical used will be maintained on a register available to all employees.

If the pollution incident involves the use of a product for which an SDS is available then, upon identification of a pollution incident, the SDS shall be consulted to obtain information to help in the management of the incident which may include recovering the product and performing the clean-up. In certain instances, specialised outside help may be needed. The SDS will also provide information on the appropriate PPE to be worn if it is determined that it is safe to approach the vicinity of the pollution incident.

6.5 INCIDENT NOTIFICATION

6.5.1 Obligations

The holder of an Environment Protection Licence is required to notify the relevant authorities of a pollution incident where in the course of an activity “*material harm to the environment is caused or threatened*”.

Section 147 of the POEO Act defines that harm to the environment is material if:

1. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
2. it results in actual or potential loss of property damage of an amount or amounts in aggregate exceeding \$10,000 (or such other amount as is prescribed by the regulations); and
3. 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.

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

In accordance with Section 147 of the POEO Act, ASM will report pollution incidents immediately (i.e. without delay) once identified to the appropriate regulatory authorities.

As nominated in Section 5.2 (**Table 7**), unless advised by the Site Manager, the Incident Manager is responsible for notifications. In the absence of the Incident Manager, the Environmental Officer or delegated environmental personnel is responsible for notifications.

Employees (including contract personnel) are required to immediately notify ASM supervisory personnel or management personnel of an incident. If no such personnel are available, the employee is required to notify the appropriate regulatory authority(ies).

Failure to notify in accordance with the POEO Act carries a maximum penalty of \$2 million. Increases to penalty notice amounts have been implemented through the *Protection of the Environment Operations (General) Amendment (Fees and Penalty Notices) Regulation 2014* which commenced on 29 August 2014.

6.5.2 Notification of Authorities

The Environment Protection Authority (EPA) will be notified following each incident. Other relevant authorities nominated by Section 148(8) of the POEO who, depending on the nature of the incident, will be notified are as follows.

- Fire and Rescue NSW: if the incident has, or has the potential to require emergency services involvement;
- NSW Health: if the incident has, or has the potential to impact on human health (either immediately or in the future);
- SafeWork NSW: if the incident has, or has the potential to impact on the health and safety of ASM personnel or contracted employees;
- Dubbo Regional Council: if the incident involves land or infrastructure, or has the potential to impact on land or infrastructure, for which the Council is the local authority; and
- Department of Planning and Environment: if the incident causes or threatens to cause material harm to the environment and/or breached or exceeds the limits or performance criteria specified under the development consent (SSD-5251).

Table 8 presents the notification protocol, developed with reference to “*Protocol for industry notification of pollution incidents*”¹, to be followed in the event that a notifiable pollution incident occurs.

Table 8
Government Agency Notification Protocol

Trigger	Agency	Timing	Contact Details
An incident that presents an immediate threat to human health or property.	Fire and Rescue NSW NSW Police NSW Ambulance Service	Immediately	Call 000
Any incident	Environment Protection Authority	Immediately	Environment Line 131 555
An incident that has or has the potential to impact on human health (either immediately or in the future).	NSW Health (Western NSW Local Health District)	As soon as possible following implementation of pollution response procedures	Environmental Health Services 1300 066 055
An incident that has or has the potential to impact on the health and safety of ASM personnel or contracted employees.	SafeWork NSW		13 10 50
An incident that has or has the potential to impact on land or infrastructure, for which the Council is the local authority.	Dubbo Regional Council		(02) 6801 4000 Murray Wood – CEO 02 6801 4000
Note: Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.			

¹ <http://www.environment.nsw.gov.au/pollution/index.htm>

The information that is required to be notified is as follows:

- The time, date, nature, duration and location of the incident.
- The location where pollution is occurring or likely to occur.
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known.
- The circumstances in which the incident occurred (including the cause of the incident).
- The action(s) taken and proposed to be taken to deal with the incident and any resulting pollution or threatening pollution, if known.
- Any other information prescribed by regulations.

Notification is required **immediately** (refer to Section 6.5.2 for hierarchical responsibility for notifications).

Any information required that is not known at the time of the incident will be notified when it becomes known.

6.5.3 Notification of Neighbours and the Local Community

Neighbours will be contacted directly via phone in the event of a pollution incident if there is risk of harm to their safety and/or property. Consideration will be given to the type of pollution incident, and neighbours will be provided with specific instructions related to the pollution incident, such as closing windows and doors and remaining inside in the case of air pollutants or avoiding the use of water in creeks or rivers affected by pollution discharge.

In determining the extent of community notification for potential air emissions, ASM will consider aspects such as the type of pollutant, prevailing winds, height and magnitude of an emission, the location of any on-site fallout or off-site impacts, and the likelihood of the pollutant reaching ground level. Any sensitive premises in close proximity, such as schools, pre-schools, nursing homes and hospitals, will also be notified.

Table 9 provides details of the closest neighbours surrounding the Project Site, including the distance of each neighbour from the Project Site, and the locations of each residence or sensitive receiver are shown on **Figure 4**.

Table 9
Contact Details of Neighbours surrounding the Project Site

Page 1 of 2

Neighbour	Residence ID ¹	Distance	Key Contact	Contact Details
Lots 1 & 2 Toongi village (ASM)	R55	800m northwest of plant	James & Myfanwy Hollier	0429158884
17L Toongi Road (McLennans) (ASM)	R58	Rail gate keeper's house. 1000m north of plant	Maree & Peter Finn	0409 267 003
12R Toongi Rd (Nalders) (ASM)	R54	700m north of plant	Heidi Riches	0422 494 264

Table 9 (Cont'd)
Contact Details of Neighbours surrounding the Project Site

Page 2 of 2

Neighbour	Residence ID ¹	Distance	Key Contact	Contact Details
20L Toongi Road "Toongi Valley" (ASM)	R51	1200m north of plant	Alisha Schultz	0403 719 904
"Wychitella" (ASM)	R1	600m west of plant	Ian & Jane Taylor	0427 701 954
"Pacific Hill" (ASM)	R2	200m south of plant	Nigel Lucca	0499 832 790
"Cockleshell Corner"	R7A	3000m south of plant	Megan & Michael Brennan	0407 994 281
"Cockleshell Corner" Cottage	R7B	South of Pacific Hill 2400m south of plant	Roslyn Gray	0477 063 383
"Karingle" cottage (ASM)	R3	1300m south of Open Cut	Esther Williamson & Justin Waddell	0447 739 904 0437 816 956
"Karingle" homestead	R3	1300m south of open cut	Jack & Debbie Riches	0427 877 201
"Karingle" leased land	No residence	Southern paddocks fronting Eulandool road	John Hyland	0429 207 560
"Glen Idol"	R4	2000m southeast of open cut	Anne Hyland	6887 7255 0407 877 256
"Leichardt"	R61	Eastern edge of Dowds Hill. House 4km southeast of open cut	Brett & Jayne Robinson	0427 887 256 6887 7256
"Pretty Valley"	R50	Centre of ML. 2000m northeast of plant	Bob Usher	0418 284 785
"Enmore"	No residence	Northeast corner of Dowds Hill joins Ugothery. No house	Rob Hudson	0438 190 380
"Ugothery" (ASM)	R49A	2500m northeast of Open Cut	Phil & Cherie Thompson	0477 064 455
"Grandale" (ASM)	R48	2700m north of Open Cut	Fergus Job	0427 267 305
"South Benolong"	R49B	"East of "Ugothery" Lives at "Guabinga" 3500m northeast of Open Cut	Matt and Kylie Weber	0418 639 234
"Mia Mia"	R36	6500m north of plant. Water pipeline easement to Macquarie River	Matt & Narelle Clatworthy	0427 873 738
Toongi Hall Trust	R12	700m west of plant	Rosemary McInerney	0458 725 638
Lot 1, DP834835 215R	R25	1200m northwest of plant	Adam Searle	0476 194 664
Lot 3 216R Obley Rd	R24	1150m west of plant	Shane Pigram	0437 625 162
Lot 4, 218R, Obley Rd	R23	1000m west of plant	Dennis and Sandra Read	0428 331 057 6887 7122
Lot 5, 220R Obley Rd	R22	1000m west of plant	Ken & Fiona Riley	6887 7197
"Wheelers Block" (ASM)	No residence	500m northwest of plant. No house	Fergus Job	0427 267 305
Other Key Neighbours				
Obley Road (Transport for NSW)		500m west of the extent of the Project Mining Leases	Paul Maloney, Traffic Operations Manager	6861 1686 0428 785 661
Wambangalang Creek (NSW Office of Water, Dubbo Office)		100m west of processing plant	Tim Baker, Senior Planning & Assessments Coordinator	6841 7403 0428 162 097
Note: See Figure 4				

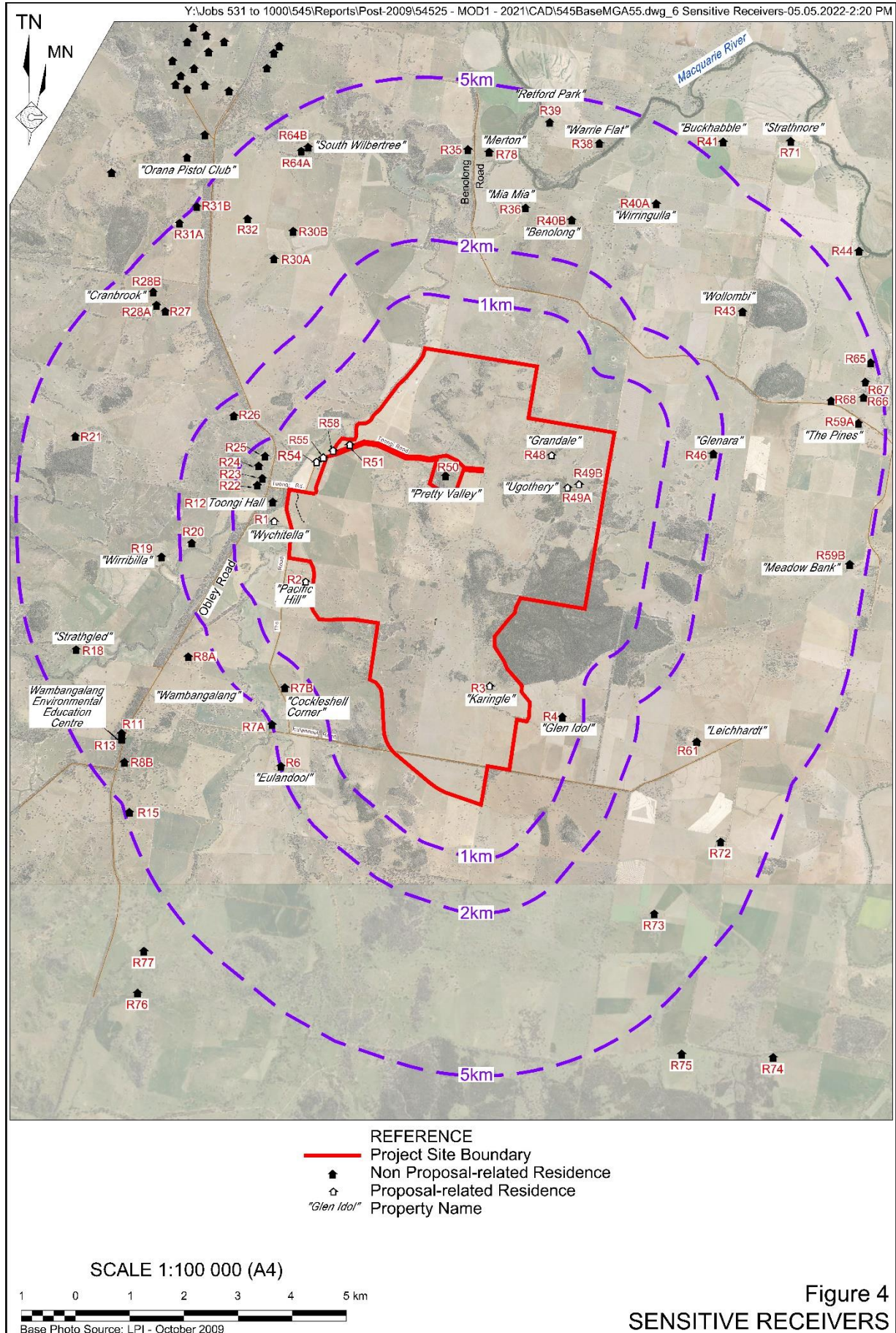


Figure 4
 SENSITIVE RECEIVERS

6.6 POLLUTION CONTROL AND CLEAN-UP PROCEDURES

6.6.1 General

Following a pollution incident, key personnel will develop a clean-up and recovery plan. It may be possible to undertake this using in-situ resources of the site or depending on the situation may require the engagement of emergency services or professional clean-up crews with breathing apparatus and sophisticated recovery plant.

Pollution control and clean-up procedures will be specific to each incident, however, the following provide general guidance as to the approach to managing incidents associated with the identified pollution hazards.

6.6.2 Hydrocarbon Spill

Step	Action	Responsible Personnel
Control and Containment Procedures		
1	Identify the source of the spill / leak and isolate or stabilise to prevent further spill or leak.	IM / EO
2	Construct temporary earthen bunds around the affected area(s) to prevent ingress of runoff and/or egress from the affected area.	IM
3	(If spilled material has already discharged) identify the receiving land and define the affected area (using flagging tape or equivalent markers).	EO
4	(Once the spill is controlled and contained) Determine whether the spill / leak represents 'material harm to the environment', i.e. is notification required?	EO/SM
5	Inspect the source of the spill / leak containment bund to confirm the spill is contained and controlled.	EO
6	(Once controlled and contained) Proceed immediately to Notification Stage.	All
Notification Procedures		
1	Contact the relevant emergency services (if not already completed).	IM/EO
2	Notify EPA and other relevant authorities.	IM/EO
3	Follow any subsequent instructions provided by the EPA.	All
4	(If spilled or leaking material has, or has the potential to enter land off the mine site) notify the relevant landowner immediately.	IM/EO
5	Proceed to Clean Up Stage.	All
Clean Up Procedures		
1	Excavate the area of spill (depth to be determined based on volume / time) and load to trucks.	IM/EO
2	Manage the excavated material either by: <ul style="list-style-type: none"> • Transfer to a licensed waste management facility; or • Placement within a 'land farming' zone of the mine site. Land farming zones are to be identified on mine plans and segregated from local drainage.	EO
3	(If the spill has discharged beyond the boundary of designated areas of disturbance) Flush the affected area with fresh water at least 10 times the volume of the spill to dilute contamination.	EO
All = All inducted personnel and visitors		IM = Incident Manager
EO = Environmental Officer / Delegate		SM = Site Manager

6.6.3 Uncontrolled Discharge of Water

Step	Action	Responsible Personnel
Control and Containment Procedures		
1	Identify the source of discharge or runoff and report to incident manager or Environmental Officer / Delegate. Provide the following. <ul style="list-style-type: none"> • site of the discharge; • time of identification; • source of the runoff; • volume or rate (approximate) of discharge; and • whether the discharge has ceased or is ongoing. 	All
2	Construct temporary earthen bunds to divert runoff towards existing water storages or contained areas of the mine site.	IM
3	Collect water sample and despatch to NATA accredited laboratory for analysis.	EO
4	Identify the receiving land and define the affected area (using flagging tape of equivalent markers).	IM/EO
5	(Once the discharge is controlled and contained) Determine whether the spill / leak represents 'material harm to the environment', i.e. is notification required?	EO/SM
6	Inspect the containment / diversion bund to confirm further discharge from the mine site is prevented.	IM/EO
7	(Once controlled and contained) Proceed immediately to Notification Stage.	All
Notification Procedures		
1	Contact the relevant emergency services (if not already completed).	IM/EO
2	Notify EPA and other relevant authorities.	IM/EO
3	Follow any subsequent instructions provided by the EPA.	All
4	(If the discharged water has, or has the potential to enter land off the mine site) notify the relevant landowner immediately.	IM/EO
5	Proceed to Clean Up Stage.	All
Clean Up Procedures		
1	Collect sample of soil from affected area and despatch to NATA accredited laboratory for analysis to confirm that there is no residual contamination.	EO/SM
2	Prevent access to affected area (unless impractical in which case control access) until potential for contamination determined (following water and soil sample analyses).	SM
3a	If no residual contamination, continue restricted access arrangements until land dries out.	SM
3b	If contamination present, either: <ul style="list-style-type: none"> • flush the affected area with clean water; or • excavate the affected material and either: <ul style="list-style-type: none"> – transfer to a licensed waste management facility; or – place within a 'land farming' zone of the mine site. Land farming zones are to be identified on mine plans and segregated from local drainage.	SM/EO
4	(If the discharged water has affected land off the mine site and contamination identified) follow steps for 3b.	SM/EO
All = All inducted personnel and visitors EO = Environmental Officer / Delegate		IM = Incident Manager SM = Site Manager

6.6.4 Dust Emissions

Step	Action	Responsible Personnel
Control and Containment Procedures		
1	Identify the source of dust emissions and implement management measures in accordance with the <i>Air Quality Management Plan</i> .	All
2	(Once controlled and contained) Proceed immediately to Notification Stage.	All
Notification Procedures		
1	Contact the relevant emergency services (if not already completed).	IM/EO
2	Notify EPA and other relevant authorities.	IM/EO
3	Follow any subsequent instructions provided by the EPA.	All
4	(If the dust emissions have, or have the potential to disperse off the mine site) notify the relevant landowner immediately.	IM/EO
5	Proceed to Clean Up Stage.	All
Clean Up Procedures		
1	Follow advice of EPA.	EO/SM/All
2	Liaise with affected land owners and implement clean-up measures as negotiated.	SM
All = All inducted personnel and visitors EO = Environmental Officer / Delegate		IM = Incident Manager SM = Site Manager

6.7 INCIDENT REVIEW AND FOLLOW-UP

Following a pollution incident, an Incident Report (template in **Appendix 1**) will be raised either by the Incident Manager, Environmental Officer or Site Manager. As corrective actions are identified they will be added to the report and signed off as completed.

A comprehensive investigation of the event will follow within 7 days of the completion of corrective actions and include the Site Manager (or delegate), Environmental Officer/Delegate, Incident Manager and any other relevant personnel. The investigation will aim to identify the root cause(s) of the incident and preventative actions. Preventative actions identified will be added to the Incident Report along with a date for completion and personnel responsible for implementation.

7. PLAN EVALUATION AND REVIEW

7.1 EVALUATION

During the “Stand Down” phase or within 14 days of the pollution incident response (including testing of the PIRMP) a de-briefing of all relevant personnel will be undertaken to determine the lessons learned from the operation.

- The de-briefing will include a meeting with the relevant personnel involved in the incident to collate any comments, issues and views on any changes that could be implemented to improve emergency and incident response procedures within the PIRMP.
- The Site Manager or a delegated supervisor (most likely the Environmental Officer / Delegate) will be responsible for the co-ordination of any de-briefing following a pollution response incidence.

7.2 CONTINUAL IMPROVEMENT

All information and comments compiled from the debriefing will be assessed and reviewed to determine the areas of improvement and the updating and implementation of new procedures to improve the outcomes of any pollution incident response.

- The delegated supervisor, if appointed, will be responsible for recommending improvements to the Site Manager.
- The Site Manager will be responsible for the approval of the recommended improvements and/or determining any required improvements.
- All personnel will be responsible for the implementation of the recommended improvement and continual improvement in performance.

7.3 TESTING OF POLLUTION INCIDENT RESPONSE

The Site Manager will be responsible for the testing of the PIRMP.

The PIRMP will be tested annually, and within one month of any pollution incidents occurring on site, to determine whether it is accurate, up-to-date and capable of being implemented in a workable and effective manner. Testing of the PIRMP will include the following.

- A desktop review to ensure that the information is accurate and up to date.
- A drill exercise to simulate one of the potential incidents identified as part of hazard identification and assessment of Section 5 (**Table 5**).

The PIRMP testing register is presented in **Appendix 2**.

7.4 COMPETENCY TRAINING

Training is to be provided to all personnel through Tool Box meetings. The training, which will provide information on the legal obligations, objectives and application of the PIRMP and implementation of incident response procedures, will include the following.

- Awareness of all hydrocarbons stored and used on site and how they impact the environment.
- Correct storage and handling of hydrocarbons.
- Refuelling procedures.
- Awareness of dust emission controls and the need for regular review of their effectiveness.
- Awareness of surface water controls and management measures including the operation and maintenance of these.
- Pollution incident management, including roles and responsibilities when responding to an incident.
- Evacuation procedures.
- Incident reporting requirements.

The Site Manager or their delegate will be responsible for ensuring the appropriate training is included in a site induction and revised every 12 months to ensure skills are updated.

7.5 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN REVIEW

The PIRMP will be reviewed:

- at the commencement of construction and operational activities;
- after each test or actual incident;
- in the event that deficiencies are identified;
- as roles and responsibilities of personnel change;
- following any modification to the Project Site or approved activities;
- in the event of legislative changes; and/or
- every 12 months.

The Site Manager will be responsible for the PIRMP review.

8. ACCESS TO THE PIRMP

A copy of the PIRMP will be kept at the Project site office. A digital copy will be available on the project server at:

<https://asmaustralia.sharepoint.com/sites/ASMDATA/Dubbo%20Project/Forms/AllItems.aspx?id=%2Fsites%2FASMDATA%2FDubbo%20Project%2F120%20%2D%20Environment%2FEP%202020702&viewid=10b7382f%2D51e4%2D4742%2Da904%2Daef6c62cab5f>

The PIRMP will be made available on the project website: www.asm-au.com

Appendix 1

Incident Report – Template

(Total No. of pages including blank pages = 2)



Australian Strategic Materials

Incident Report

Date Report Raised	26 October 2019		
Raised By	Fergus Job		
Date of Incident	25 October 2019		
Description of Incident	A dry lightning storm occurred in the Toongi district on 25 October 2019. The app – My Lightning Tracker – showed several spots on and beside the premises that had been struck by lightning. No signs of smoke.		
Corrective Action	Completed By	Due Date	
On the morning of 26 October, Christian Munge was deployed to check heavily timbered areas on the property and he located a tree that was indeed burning. A firebreak was created around the tree. Emmagool Bush Fire brigade truck attended and the risk was extinguished.	Christian Munge	26 October 2019	
Preventative action	Completed By	Due Date	
Lightning is an uncontrollable risk			
Farm Manager and Station Hand belong to two surrounding bush fire brigades and attend training days and manage the risk of fire where possible with fire breaks And safe work procedures.			
Incident Report Closed out By: Michael Sutherland	Signed by Issuer:		
Comments:	Date: 30 October 2019		

Appendix 2

PIRMP Testing Register

(Total No. of pages including blank pages = 2)

PIRMP Testing Register

Date of Test	People Involved	Comments/Outcomes
26-10-2019	Fergus Job (Benolong Bushfire Brigade), Christian Munge (Group Leader Orana South)	Lightning strikes initiated, in two separate locations, fires on land owned by ASM and adjacent to the premises. Active search using My Lightning Tracker app and involvement of local Bushfire brigade saw the fires under control before they created an uncontrolled hazard.
2-7-2021	Fergus Job, Christian Munge & Rural Fire Service	Aerial fire response training day across ASM's property. Spotter planes and fire-trucks on site.
6-3-2023	Fergus Job, Christian Munge, James Hollier & Rural Fire Service	ASM personnel had leadership roles with two rural brigades in controlling nearby Cranbrook bushfire (started by lightning)
19-07-23	Fergus Job, Christian Munge & Rural Fire Service	Aerial fire response training day across ASM's property. Spotter planes and TPC fire-fighter on site.