CULLEN VALLEY MINE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Shoalhaven Coal Pty Limited (Castlereagh Coal)

October 2026

DOCUMENT REVIEW HISTORY

Issue	Date	Description
1.0	5/02/16	Initial document prepared to meet the PIRMP guidelines.
2.0	13/12/17	Publish of Final Document.
3.0	20/12/18	Updated of PIRMP.
4.0	20/12/19	Review & update PIRMP
5.0	2/12/20	Review and Update
6.0	13/12/21	Review and Update
7.0	August 2023	Review and Update
8.0	December 2023	Review and Minor Update
9.0	19/12/2024	Review of PIRMP
10.0	7/10/2025	Review and Update
11.0	14/10/2026	Review and Update

TESTING OF THE PLAN HISTORY

Date	Description
25 November 2016	Light vehicle incident at CVM
13 December 2017	Excavator fuel line breakage at Cullen Valley Mine during earthworks on erosion control structures
12 December 2018	Spillage of oil from an excavator at the Invincible Pit Top
27 November 2019	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop
2 December 2020	Bushfire at Invincible Colliery.
13 December 2021	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop.
August 2022	Discharge from Dam 3 (Licensed Discharge Point 1) following a pump valve failure – potential EPL Licence threshold exceedances
18 December 2023	The simulation involved an engine oil spill incident and was conducted on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.
19 December 2024	Simulation of Service Truck Rollover
19 September 2025	Water Cart Oil Spill
25 September 2026	IBC leakage

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1.0. INTRODUCTION

1.1. Background

The purpose of the Cullen Valley Mine Pollution Incident Response Management Plan (PIRMP) is to:

- Provide direction to Castlereagh Coal personnel in responding to pollution incidents at Cullen Valley Mine operations;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Lithgow City Council, the Department of Planning & Environment, NSW Ministry of Health, Safe Work NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimise and control the risk of a pollution incident at Invincible operations by identifying key risks and planned actions to minimise and manage those risks; and
- Detail the training requirements for this plan, identifying persons responsible for implementing it and ensuring that the plan is regularly tested for accuracy, currency and suitability.

This Plan has been prepared in accordance with the NSW EPA Environmental guidelines: Preparation of Pollution Incident Response Management Plans which sets out specific requirements regarding the preparing, keeping, testing and implementation of these plans.

Cullen Valley Mine has an Environmental Protection Licence (EPL 10341), which covers the premises. The EPL outlines specific conditions for environmental monitoring and reporting.

1.2. Ownership and Operations

Castlereagh Coal manages Cullen Valley Mine which is located approximately 125 kilometers (km) northwest of Sydney. Cullen Valley Mine is located to the north- west of the township of Cullen Bullen. The location of the site is within the regional locality are shown on Figure 1.

Cullen Valley Mine operates in accordance with Development Consent DA-200-5-2003 and EPL 10341.

Mining operations recommenced at Cullen Valley Mine in May 2023 following an extended period of care and maintenance. This PIRMP has been developed to ensure that the activities conducted at the Cullen Valley Mine do not result in adverse impacts on human health and the environment during mining operations.

1.3. Definition of a Pollution Incident

The Protection of the Environment Operations Act 1997 (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."

Section 147 of the POEO Act outlines the meaning of 'material harm to the environment' as:

"(a) Harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $50,000 (or such other amount as is prescribed by the regulations), and

(b) 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."

Under section 153F of the POEO Act, the relevant PIRMP must be implemented immediately if a pollution incident occurs in the course of an activity and causes or threatens to cause material harm to the environment.

Under section 148 of the POEO Act, pollution incidents that cause or threaten material harm to the environment must be notified immediately to the relevant authorities. Notification must not be delayed while awaiting completion of an internal investigation or a full assessment of the incident.

Where a pollution incident presents an immediate threat to human health or property, emergency services must be contacted by calling 000. Required regulatory notifications must also be completed.

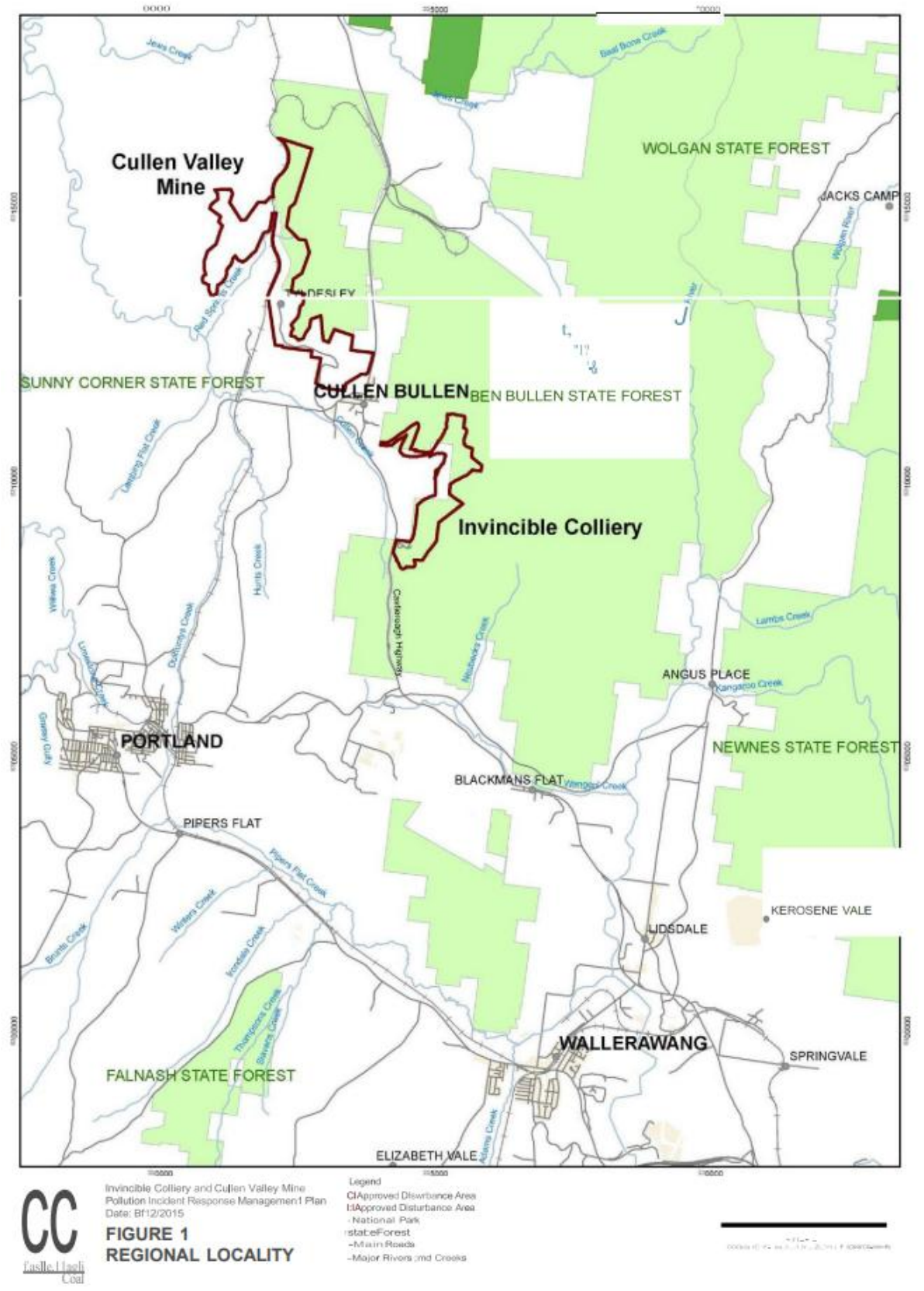


FIGURE 1: REGIONAL LOCALITY

1.4. Summary Of Commitments

The commitments made by Castlereagh Coal in relation to pollution incident response are summarised in **Table 1.**

TABLE 1: SUMMARY OF COMMITMENTS

No.	Commitment
1	Castlereagh Coal will immediately notify the relevant authorities of any pollution incident that causes or threatens material harm to human health or the environment, in accordance with the Protection of the Environment Operations Act 1997. Affected landowners, occupiers and the community will be notified as required.
2	All staff and contractors will receive information and instructions on the key requirements of the PIRMP, including incident escalation, emergency communications, access to response procedures and their responsibilities during a pollution incident.
3	The PIRMP will be tested on an annual basis and within one month after a reportable pollution incident
4	All staff and contractors will receive the necessary training identified following the findings and outcomes of a pollution incident investigation
5	The PIRMP will be made publicly available on the Castlereagh Coal website, in accordance with applicable NSW EPA requirements. The publicly available version will contain the required information while protecting personal information where appropriate.

2.0. Legislative Requirements

The legislative requirements for Pollution Incident Response Management Plans (PIRMPs) are set out in Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and Chapter 4 of the Protection of the Environment Operations (General) Regulation 2022 (POEO (General) Regulation).

2.1. Protection of the Environment Operations Act 1997

Part 5.7A of the POEO Act establishes the requirements for preparing, keeping, testing and implementing a PIRMP. In summary:

The holder of an environment protection licence must prepare a PIRMP in accordance with Section 153A for the activity to which the licence relates.

The PIRMP must be in the form prescribed by the regulations and include the information required under Section 153C and the relevant regulations.

The PIRMP must be kept at the premises to which the environment protection licence relates, in accordance with Section 153D.

The PIRMP must be tested in accordance with Section 153E and the relevant regulations.

If a pollution incident occurs that causes or threatens material harm to human health or the environment, the person carrying on the activity must immediately implement the PIRMP, in accordance with Section 153F.

2.2. Protection of the Environment Operations (General) Regulation 2022

Chapter 4 of the POEO (General) Regulation specifies additional requirements for PIRMPs. In summary:

Section 71 specifies the required form of a PIRMP.

Section 72 specifies additional matters to be included in PIRMPs for relevant licensed activities, including hazard information, pollutant inventories, emergency response procedures and communication arrangements.

Section 74 sets out requirements for the availability of the PIRMP, including access for authorised officers and persons responsible for implementing the plan, and public availability of the required portions.

Section 75 specifies the testing requirements. The PIRMP must be tested at least once every 12 months and within one month of a pollution incident that causes or threatens material harm to the environment.

This PIRMP has been prepared to address the applicable legislative requirements, as detailed in Section 3.1.

3.0. Pollution Incident Response Management Plan

3.1. Structure of the PIRMP

The structure of the PIRMP in accordance with the information requirements of the POEO Act and POEO (G) Reg is outlined in **Table 2**.

TABLE 2: INFORMATION REQUIREMENTS OF THE PIRMP

Section	Requirement	PIRMP Section
POEO Act		
Section 153C	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: 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, and 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	Section 3.7
	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,	Section 3.8
	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,	Section 3.8
	d) any other matter required by the regulations.	See below
POEO (G) Regulation		
Section 72	For the Act, section 153C(d), the following matters must be included in a PIRM plan -	
	a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the ***relevant activity***),	Section 3.2 and Appendix A
	b) the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,	Section 3.2 and Appendix A
	c) details of the pre-emptive action to be taken to minimise or prevent a risk of harm to human health or the environment arising out of the relevant activity,	Section 3.2 and Appendix A
	d) an **inventory of potential pollutants** on the premises or used in carrying out the relevant activity,	Section 3.3
	e) the maximum quantity of a pollutant likely to be stored or held at particular locations, including underground tanks, at or on the premises to which the licence relates,	Section 3.3
	f) a description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident	Section 3.4
	g) the names, positions and 24-hour contact details of individuals who— (i) are responsible for activating the PIRM plan, and (ii) are authorised to notify relevant authorities under the Act, section 148, and	Section 3.5

	(iii) are responsible for managing the response to a pollution incident,	
	For the Act, section 153c(d), the following matters must be included in a PIRM plan -	
Section 72	h) the contact details of each relevant authority referred to in the Act, section 148,	Section 3.6
	i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises near the premises to which the licence relates or where the scheduled activity is carried on,	Section 3.7 & 3.8
	j) the arrangements for minimising the risk of harm to persons who are on the premises or who are present where the scheduled activity is being carried on,	Section 3.8
	k) a detailed map, or set of maps, showing the location of the premises to which the licence relates, the surrounding area 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 2 & 3
	l) a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce the risk,	Section 3.8 & 3.9
	m) the nature and objectives of a staff training program in relation to the PIRM plan,	Section 3.10
	n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,	Section 5.0
	o) the dates on which the PIRM plan is updated,	Section 5.0
	p) the way in which the PIRM plan must be tested and maintained.	Section 5.0
Section 74(1)	A PIRM plan must be made readily available -	
	a) to an authorised officer on request, and b) to a person who is responsible for implementing the PIRM plan at the premises— (i) to which the relevant licence relates, or c) (ii) where the activity takes place.	Section 4.0
Section 74(2)	A PRMP plan must be made publicly available in the following way within 14 days after it is prepared -	
	a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan, b) if the person does not have a website—by providing a copy of the PIRM plan, without charge, to a person who makes a written request for a copy	Castlereagh Coal website and Section 4.0
Section 74(4)	Personal information, within the meaning of the Privacy and Personal Information Protection Act 1998, is not required to be included in a PIRM plan made available to a person other than an authorised officer.	Section 3.7
Section 75(1)	A PIRM plan must be tested— (a) routinely at least once every 12 months, and (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring	Section 5.0
Section 75(2)	The test must be carried out in a way to ensure the following— (a) the information included in the PIRM plan is accurate and up to date, (b) the PIRM plan is capable of being implemented in a workable and effective way.	Section 5.0
Section 75(3)	A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident	Section 5.0

3.2. Risk Assessment

A risk assessment has been undertaken in accordance with sections 72(a), 72(b) and 72(c) of the Protection of the Environment Operations (General) Regulation 2022 to:

Identify hazards to human health and the environment associated with activities at Invincible Colliery.

Assess the likelihood of identified hazards occurring, including circumstances or events that could increase their likelihood.

Identify pre-emptive actions to minimise or prevent risks of harm to human health and the environment.

A summary of the risk assessment is provided in Appendix A. The assessment must be reviewed at least annually and whenever material changes occur to site activities, infrastructure, pollutant inventories, environmental conditions or surrounding receptors. The review must consider relevant extreme weather and climate-related risks, including intense rainfall, flooding, drought and bushfire conditions.

The assessment and associated controls must be updated where reviews, incidents or PIRMP testing identify additional hazards or deficiencies.

3.3. Inventory of Potential Pollutants

An inventory of potential pollutants stored and handled on the sites as well as the maximum quantity of each pollutant is provided in **Table 3**.

TABLE 3: INVENTORY OF POTENTIAL POLLUTANTS

Pollutant	Storage Location	Maximum Quantity
Cullen Valley Mine		
None stored		

3.4. Inventory of Safety Equipment

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 are outlined in **Table 4**.

TABLE 4: INVENTORY OF SAFETY EQUIPMENT

Item	Storage Location	Calibration/maintenance requirements
Fire extinguishers / Water for fire fighting	Mobile plant	Inspections and calibration as per manufacturer requirements
Spill kits	1x Dam 4, 1x North Void, 3x Workshop	Monthly
Absorbent pads and booms	Spill kits	Monthly
Personal Protective Equipment	All personnel	Monthly
Material Safety Data Sheets	No chemicals stored on site	
First aid kits	All Light Vehicles	Monthly

Safety signage	Workshops	Monthly

3.5. Site Contacts and Responsibilities

The contact details and responsibilities of relevant site personnel involved in managing pollution incidents are provided in **Table 5.**

TABLE 5: SITE PERSONNEL CONTACT DETAILS

Name	Position	Responsibility	24 hr Contact Details
[redacted]	Mine Engineering Manager	Responsible for activating and implementing the PIRMP and managing the response to a pollution incident. Coordinates the immediate site response and ensures required notifications are made.	[redacted]
[redacted]	CEO	Alternate contact for Mine Manager if unavailable. Assumes the relevant PIRMP activation and incident management responsibilities as required.	[redacted]
[redacted]	Environmental Superintendent	Responsible for assessing environmental impacts, coordinating environmental containment and recovery actions, coordinating required notifications to relevant authorities, and maintaining environmental incident records.	[redacted]
[redacted]	General Manager – Environmental, Legal & Planning	Alternate contact for Environmental Superintendent if unavailable. Provides environmental and legal oversight and undertakes the assigned environmental response and notification responsibilities as required.	[redacted]

3.6. Regulatory Authority Contact Details

If a pollution incident presents an immediate threat to human health or property, emergency services must be contacted by calling 000.

Where a pollution incident causes or threatens material harm to human health or the environment, all relevant authorities listed in Table 6 must be notified immediately in accordance with Part 5.7 of the Protection of the Environment Operations Act 1997 (NSW).

The Appropriate Regulatory Authority (ARA) must be contacted first where practicable. However, this must not delay notification of any other relevant authority. Where emergency services are required due to an immediate threat to human health or property, 000 must be called first.

All notifications must be documented, including the time of notification, the authority contacted, the information provided and any instructions received. Contact details must be reviewed regularly to ensure they remain current.

TABLE 6: REGULARITY AUTHORITY CONTACT DETAILS

Regulatory Authority	Key Contact	Contact Details
Environmental Protection Authority	Environment Line	131 555
Safe Work NSW	Incident Notification Hotline	13 10 50
Local authority	Lithgow City Council	Phone: (02) 6354 9999
Fire and Rescue NSW	N/A	Emergency: 000 Wallerawang Fire Station: (02) 6355 1005

3.7. Nearby Owners and Occupiers of Premises

Nearby receptors in the vicinity of Cullen Valley Mine include:

- Residential properties located within 500m of the lease boundaries
- The township of Cullen Bullen
- The Cullen Bullen Public School
- The Centennial Coal Ivanhoe North Coal Mine (not operating)
- The Glencore Coal Bale Bone Colliery (not operating)
- The Mount Piper Power Station (Energy Australia).

In the event of a pollution incident at the Cullen Valley Mine, the following processes for contacting affected landowners and the community will be implemented:

- When an incident occurs, Castlereagh Coal personnel will immediately contact the ARA
- Castlereagh Coal will consult with the ARA to determine if the community is to be notified of the pollution incident
- Castlereagh Coal will liaise with the ARA regarding the most relevant communication strategy (e.g. Castlereagh Coal website, media release, direct contact with those potentially impacted)
- The results and findings of the investigation pollution incident from the Cullen Valley Mine will be put on the Castlereagh Coal website when available.

Contact details of nearby receptors cannot be provided in publicly available documents under the provisions of the Privacy and Personal Information Protection Act 1998. In the event of an emergency, Castlereagh Coal will contact relevant landholders as required.

3.8. Reducing Risk of Environmental Harm

An Environmental Risk Assessment has been prepared for the Cullen Valley Mine to ensure any potential environmental impacts are minimised. Appropriate environmental control measures have been identified commensurate with the potential impact of the activity. A summary of an

environmental risk assessment conducted in 2017 to address the risks associated with potential environmental impacts from pollution incidents is included in **Appendix A**. The risk assessment is reviewed annually or upon a trigger-based event.

All staff and contractors will be inducted before commencing any work on site. The induction covers procedures for minimising the chance of a pollution incident occurring, managing a pollution incident and actions to be taken following a pollution incident.

All employees and contractors are informed on muster location points through the site inductions, signage and ongoing training. Key aspects of the PIRMP will be provided to all staff and contractors at induction. Training records are maintained by Castlereagh Coal at the Invincible site office.

3.9. Actions to Minimise a Pollution Incident

The risk assessment contained in **Appendix A** identifies potential pollution incident scenarios at Cullen Valley Mine. For each potential pollution risk, there are a number of control measures outlined. Some general controls which are in place to reduce the likelihood of any pollution incident occurring include:

- Site Safety and Environmental Management Plans
- Regular site inspections and maintenance
- Environmental monitoring
- Correct storage and waste management
- Training and awareness.

Castlereagh Coal will endeavour to ensure pollution incidents do not occur, however in a situation where a pollution incident is imminent and may potentially cause adverse impacts to human health or the environment, Castlereagh Coal will contact the necessary stakeholders, including employees, contractors, neighbours, and the ARA, to provide as much warning as possible.

3.9.1. Actions During a Pollution Incident

Castlereagh Coal is required under Section 148 of the POEO Act to report pollution incidents immediately to the regulatory authorities listed in **Table 6** after becoming aware of an incident**.**

In the event of a pollution incident, the person who has identified the incident should immediately contact the Mine Manager or Environmental Superintendent to ensure the relevant regulatory authorities are contacted. The person reporting the pollution incident should provide the following key details:

- Their name and contact details
- Location of the pollution incident or emergency
- Nature of the pollution incident or emergency
- Details of any assistance required.

The details of any emergency call or incident reporting will be recorded on the Duty Card System included in Appendix D of the Site Emergency Management Plan.

General control measures for managing a pollution incident include:

- Visually assess the situation (nature of substance; volume of substance, potential risks to human health and environment)
- Notify the Mining Engineering Manager immediately on becoming aware of a pollution incident
- Immediately notify the regulatory authorities listed in **Table 6** if material harm to the environment is caused or threatened

- Undertake preliminary incident response to contain polluting substance and prevent further emissions, if safe to do so
- If safe and possible to do so, undertake clean-up measures to prevent further impacts from the pollution incident
- Take direction from regulatory authorities as required
- If required seek assistance from specialist consultants/contractors.

3.9.2. Actions Following a Pollution Incident

If a pollution incident occurs, there will be a detailed incident investigation and a report will be sent to all relevant regulatory authorities. An Incident Report Form will be completed. Within a month following a pollution incident, Castlereagh Coal will review and test the PIRMP. Castlereagh Coal will continue to liaise with the relevant regulatory authorities to reduce the likelihood of the pollution incident occurring.

All staff and contractors will receive the necessary training identified following the incident investigation and outcomes of the investigation. The key outcomes of the incident investigation will be communicated to all staff and contractors through toolbox talks and/or staff meetings.

3.9.3. Staff Training

The requirements of the PIRMP will be outlined in the site induction for all new employees and contractors. A toolbox talk outlining the key components on the PIRMP will be presented to all Castlereagh Coal staff and contractors. The objective of training will be to ensure all staff and contractors are aware of the key steps to manage a pollution incident. If a pollution incident occurs, refresher training will be delivered to staff and contractors.

4.0 Availability of PIRMP

A copy of this PIRMP (electronic and hard copy) is kept at Invincible Colliery until operations begin at Cullen Valley Mine. Castlereagh Coal will provide a copy to regulatory authorities upon request. The PIRMP is publicly available on the Castlereagh Coal website Castlereagh Coal – Information on Castlereagh Coal (ccoal.com.au)

5.0 Testing and Review of PIRMP

5.1. PIRMP Review

This PIRMP will be revised on an annual basis to ensure that the information included in the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner. The plan will also be tested within one month of any pollution incident. The revision status of the PIRMP since 2016 is included in **Table 7** below. It should be noted that the PIRMP was initially developed as a combined document for both Invincible Colliery and the Cullen Valley Mine. The document was separated into a PIRMP for each site in 2021 as mining at the Cullen Valley Mine and Invincible Colliery are separate sites with different risks.

TABLE 7: REVISION STATUS

Revision No.	Date	Description	Details of update
1.0	5/02/16	Development of PIRMP	Development of PIRMP for Cullen Valley Mine
2.0	13/12/17	Review of PIRMP	Update to PIRMP to update site contacts, complete annual review of PIRMP as required by legislation and include PIRMP test documents as **Appendix B**.
3.0	20/12/18	Review of PIRMP	Update to the PIRMP to include general review of site contact and also to include PIRMP simulation, included in **Appendix B**
4.0	20/12/19	Review of PIRMP	Review of general PIRMP content and inclusion of the PIRMP test in **Appendix B**.
5.0	2/12/20	Review of PIRMP	Review of general PIRMP content, update of regulatory authority contact details and inclusion of the PIRMP test in **Appendix B**.
6.0	13/12/21	Review of PIRMP	Review of PIRMP; separate combined Cullen Valley Mine and Invincible Colliery PIRMP into separate documents.
7.0	August 2023	Review of PIRMP	Conduct a review and update of Cullen Valley Mine PIRMP following water release complaint / incident 12 June 2022 and EPA written response dated July 2022.
8.0	December 2023	Review of PIRMP	Conducted a simulation involved an engine oil spill incident on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.

9.0	19/12/24	Review of PIRMP	A review and update of the PIRMP following the PIRMP test on 19 December 2024. Minor changes were made and the adding of appendix detail the PIRMP activation forms.
10.0	25/09/25	Review of PIRMP	A review and revision of legislation and the risk assessment along with minor changes to inventory and wording within the document.
11.0	25/09/2026	Review and update of PIRMP	Comprehensive review against the NSW EPA PIRMP Guideline and current POEO (General) Regulation 2022.

5.2. PIRMP Review Requirements

In accordance with legislative requirements, the PIRMP must be tested annually and within one month of a pollution incident in accordance with Section 98E. An overview of the PIRMP tests which have been undertaken previously in addition to the implementation of the PIRMP procedures in December 2023 and subsequent review and simulation are detailed in Table 8.

There have been no pollution incidents at the Cullen Valley Mine during the stand down period to date. However, the Castlereagh Coal PIRMP has been tested as required by a desktop simulation of a pollution incident and initiation of a response. The incident and response are reported in this PIRMP Test Report.

TABLE 8: PIRMP TESTS

Date	Description	Outcome of assessment
25 November 2016	Light vehicle incident at CVM	There were no deficiencies in procedures identified and no further review of the PIRMP was required
13 December 2017	Excavator fuel line breakage at Cullen Valley Mine during earthworks on erosion control structures	There were no deficiencies in procedures identified and no further review of the PIRMP was required. Site personnel and contractors demonstrated a good understanding of PIRMP requirements.

Date	Description	Outcome of assessment
12 December 2018	Spillage of oil from an excavator at the Invincible Pit Top	There were no deficiencies in procedures identified and no further review of the PIRMP was required in addition to the annual review of the PIRMP which was also undertaken in December 2018. A further review of the PIRMP is proposed to be undertaken prior to the commencement of mining operations at Invincible Colliery.
27 November 2019	Spillage of fuel from dump truck adjacent to Invincible Colliery Workshop.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulators authorities was also undertaken during the review with regulatory authority numbers in the PIRMP confirmed as being correct.
2 December 2020	Bushfire at Invincible Colliery.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulatory authorities was also undertaken during the review with regulatory authority numbers in the PIRMP updated, including Safework NSW and Wallerawang Fire Station.
13 December 2021	Oil Spill due to equipment failure - Cullen Valley Mine Haul Road	There were no deficiencies in procedures identified and no further review of the PIRMP was required. Site personnel and contractors demonstrated a good understanding of PIRMP requirements.
August 2022	Discharge from Dam 3 (Licensed Discharge Point 1) following a pump valve failure – potential EPL Licence threshold exceedances	Post incident the Company reviewed its application of the PIRMP procedures and subsequent incident investigation and response to the NSW EPA. Personnel were found to have demonstrated an excellent understanding of PIRMP requirements and the application of related tools.
December 2023	The simulation involved an engine oil spill incident and was conducted on 18 December 2023. The location of the simulation was on the Cullen Valley Mine internal haul road to the north of Dam 4 within ML1488.	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulators authorities was also undertaken during the review with regulatory authority numbers in the PIRMP confirmed as being correct.

Date	Description	Outcome of assessment
19 December 2024	Simulation of Service Truck Rollover	There were no deficiencies in procedures identified and a minor revision of the PIRMP was required. Personnel demonstrated a good understanding of PIRMP requirements. Personnel demonstrated a good understanding of PIRMP requirements including reporting of incident, site communications systems and general pollution incident response. There were some improvement actions assigned for continual improvement.
19 September 2025	Water Cart Oil Spill	There were no deficiencies in procedures identified and a minor revision of the PIRMP was required. Personnel demonstrated a good understanding of PIRMP requirements including reporting of the incident, site communications systems and general pollution incident response. There were some improvement actions assigned to various personnel for continual improvement.
25 September 2026	Desktop exercise: machine backing into a full IBC of diesel engine oil.	Improvement actions identified: ensure PIRMP and duty cards are readily accessible; obtain and maintain current SDS; map spill kits; clarify radio channel, escalation and incident location reporting; reinforce statutory notification and incident documentation. Record action owners and close-out evidence in the site action register.

APPENDIX A

Pollution Incident Risk Assessment

Issue / Hazard	Potential Impact	Control Measures	Consequence	Likelihood	Risk Rating
Dirty water runoff	Sediment entering waterways or unauthorised water discharge.	Inspect dams and drains, monitor water levels and maintain erosion and sediment controls.	Moderate	Possible	Medium
Sediment dam overflow or failure	Uncontrolled water release and downstream pollution.	Inspect dams, pumps and pipelines. Monitor water levels and rainfall and maintain equipment.	Major	Unlikely	Medium
Diesel spill or leak	Soil and water contamination and potential fire.	Maintain fuel storage and transfer equipment, inspect for leaks and keep spill kits available.	Major	Possible	Significant
Oil or hydraulic fluid spill	Contamination of soil, stormwater and waterways.	Maintain mobile plant, repair leaks promptly and keep spill kits stocked.	Moderate	Possible	Medium
Hazardous substance spill	Harm to workers or the environment.	Store substances securely, maintain current SDSs, provide PPE and train personnel in spill response.	Major	Possible	Significant
Fire involving plant or fuel	Smoke emissions and pollution from fuel leaks or firefighting water.	Maintain fire equipment, store hazardous substances safely and consider containment of contaminated firefighting water.	Major	Unlikely	Medium
Sewage leak or overflow	Contamination of soil and waterways.	Inspect sewage systems, arrange timely pump-outs and respond promptly to leaks.	Minor	Unlikely	Low
Coal or material leaving site	Pollution of public roads, adjoining land or drainage systems.	Secure loads, maintain site access areas and promptly clean up spills.	Moderate	Possible	Medium

Dust emissions	Reduced air quality and impacts on nearby receptors.	Apply dust suppression, maintain roads and equipment, and investigate complaints.	Moderate	Unlikely	Medium
Heavy rainfall or bushfire	Increased runoff, dam overflow and loss of pollution controls.	Monitor weather forecasts, maintain drainage and sediment controls, and secure hazardous materials.	Major	Possible	Significant
Pump or pipeline failure	Loss of water management capacity or uncontrolled discharge.	Inspect and maintain pumps and pipelines and establish contingency arrangements for failures.	Major	Unlikely	Medium
Delayed spill response	Spills reaching drains or waterways and increasing environmental harm.	Map spill-kit locations, maintain accessible SDSs and response instructions, and clarify emergency communications and notification procedures.	Major	Possible	Significant

APPENDIX B

Forms for PIRMP Activation

CULLEN VALLEY MINE

PIRMP Form

Version 2.0

October 2026

Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	**Date**	**Name**	**Date**
FINAL	Will Olson	19th December 2024	Will Olson	December 2023
Version 2.0	Tess Tracy	14th October 2026		

Instructions: Complete this form as soon as practicable. Record information as it becomes available. Do not delay calling 000, implementing emergency procedures or notifying relevant authorities to complete this form. Do not approach a spill if there is a risk of fire, explosion, chemical exposure or other serious danger.

SECTION 1 — INCIDENT DETAILS

Information required	Details
Date incident occurred	
Time incident occurred	
Date and time incident discovered	
Name of person reporting incident	
Position	
Contact number	
Name of person completing this form	
Exact incident location, including nearby infrastructure or landmarks	
Incident type	☐ Spill/leak ☐ Water discharge ☐ Fire ☐ Dust/emissions ☐ Sewage ☐ Waste/material release ☐ Other:
Is the incident ongoing?	☐ Yes ☐ No ☐ Unknown
Has the source been stopped or isolated?	☐ Yes ☐ No ☐ Not applicable
Is there an immediate threat to people or property?	☐ Yes ☐ No
Has 000 been called, if required?	☐ Yes ☐ No ☐ Not required

SECTION 2 — INCIDENT DESCRIPTION AND POLLUTANT DETAILS

Information required	Details
What happened? Describe the incident and suspected cause.	

Substance or material released	
Quantity or volume released, including units	
Estimated quantity remaining or potentially unreleased	
Duration of release, if known	
Is the substance identified and labelled?	**☐ Yes ☐ No ☐ Partially**
Is a current Safety Data Sheet (SDS) available?	**☐ Yes ☐ No ☐ Not applicable**
Known hazards of the substance	
Has the substance entered or potentially reached a drain, dam, watercourse, soil or off-site area?	**☐ Yes ☐ No ☐ Unknown**
Describe the potential pathway and affected area.	
Are environmental monitoring results available or required?	
Other relevant information	

SECTION 3 — IMMEDIATE SAFETY AND RESPONSE ACTIONS

Action	**Completed**
Emergency declared using the site radio procedure, if required	**☐ Yes ☐ No ☐ Not required**
Supervisor and nominated incident response personnel notified	**☐ Yes ☐ No**
Work stopped and area isolated, where safe	**☐ Yes ☐ No ☐ Not safe / not applicable**
People moved away from the hazard, if required	**☐ Yes ☐ No ☐ Not required**
Source stopped or isolated, where safe	**☐ Yes ☐ No ☐ Not safe / not applicable**

Spill kit or appropriate response equipment obtained **See attached map**	**☐ Yes ☐ No ☐ Not required**
Appropriate PPE confirmed before response	**☐ Yes ☐ No ☐ Not applicable**
Drains and potential flow paths protected, where safe	**☐ Yes ☐ No ☐ Not applicable**
Spill contained or further release prevented	**☐ Yes ☐ No ☐ In progress**
Specialist contractor or emergency service assistance requested	**☐ Yes ☐ No ☐ Not required**

Describe the actions taken, by whom and at what time:

If the spill could not be safely approached or contained, describe the precautions and assistance requested:

SECTION 4 — REGULATORY AUTHORITY NOTIFICATIONS

Where a pollution incident causes or threatens material harm to the environment, all relevant authorities must be notified immediately in accordance with the PIRMP. Internal reporting must not delay these notifications.

Authority	Required / applicable?	Date and time notified	Person contacted / reference number
Appropriate Regulatory Authority (ARA)	**☐ Yes ☐ No ☐ To be confirmed**		
NSW Environment Protection Authority (EPA), where it is not the ARA	**☐ Yes ☐ No ☐ To be confirmed**		
SafeWork NSW	**☐ Yes ☐ No ☐ To be confirmed**		
Local authority, where it is not the ARA	**☐ Yes ☐ No ☐ To be confirmed**		
Fire and Rescue NSW	**☐ Yes ☐ No ☐ To be confirmed**		
Emergency services via 000, if required	**☐ Yes ☐ No ☐ Not required**		

Person responsible for regulatory notifications: _____

If any required authority has not been notified, explain why and record the action taken to address this:

SECTION 5 — COMMUNITY AND LANDHOLDER NOTIFICATIONS

Information required	Details
Could nearby residents, landowners, occupiers or other receptors be affected?	☐ Yes ☐ No ☐ Unknown
Potentially affected receptors or locations	
Are warnings or protective instructions required?	☐ Yes ☐ No ☐ Under assessment
Has the relevant authority or emergency service been consulted, where appropriate?	☐ Yes ☐ No ☐ Not applicable
Who was notified, by whom and when?	
Communication method	☐ Telephone ☐ Direct contact ☐ Public announcement ☐ Website/media ☐ Other
What information or instructions were provided?	
Are further updates required?	☐ Yes ☐ No

SECTION 6 — CLEAN-UP, RECOVERY AND WASTE MANAGEMENT

Information required	Details
How was the source controlled?	
How was the pollutant contained or recovered?	
What clean-up method was used?	
Were absorbents, contaminated soil or other wastes generated?	☐ Yes ☐ No
How were contaminated materials collected, labelled, stored and managed?	
Was specialist clean-up or waste disposal assistance required?	
Is further sampling, monitoring or remediation required?	☐ Yes ☐ No ☐ To be assessed
Has the spill kit been restocked following use?	☐ Yes ☐ No ☐ Not applicable
Has the Environmental Superintendent been notified?	☐ Yes ☐ No
Has the affected area been inspected before normal activities resume?	☐ Yes ☐ No ☐ Not yet

SECTION 7 — INCIDENT INVESTIGATION AND FOLLOW-UP

Information required	Details
Preliminary or confirmed cause of incident	
Actual or potential environmental impacts	
Were PIRMP procedures followed?	☐ Yes ☐ No ☐ Partially
Were any response deficiencies identified?	☐ Yes ☐ No
Is an incident investigation required?	☐ Yes ☐ No
Is a PIRMP review required?	☐ Yes ☐ No
Did the incident cause or threaten material harm?	☐ Yes ☐ No ☐ Under assessment
Is a PIRMP test required within one month?	☐ Yes ☐ No ☐ To be confirmed
Corrective actions, responsible role and due date	
Have corrective actions been completed and verified?	☐ Yes ☐ No ☐ In progress
Has relevant information been communicated to workers and contractors?	☐ Yes ☐ No ☐ Not required

SECTION 8 — RECORDS AND SIGN-OFF

Supporting records attached:

☐ Photographs
☐ SDS
☐ Environmental monitoring or sampling results
☐ Authority notification records
☐ Waste disposal records
☐ Incident investigation report
☐ Corrective action records
☐ Other: _____

Completed by: _____

Position: _____

Signature: _____

Date: _____

Reviewed by: _____

Position: _____

Signature: _____

Date: _____

Incident closed out: ☐ Yes ☐ No

Outstanding actions and responsible role:



LEGEND

Spill kit location

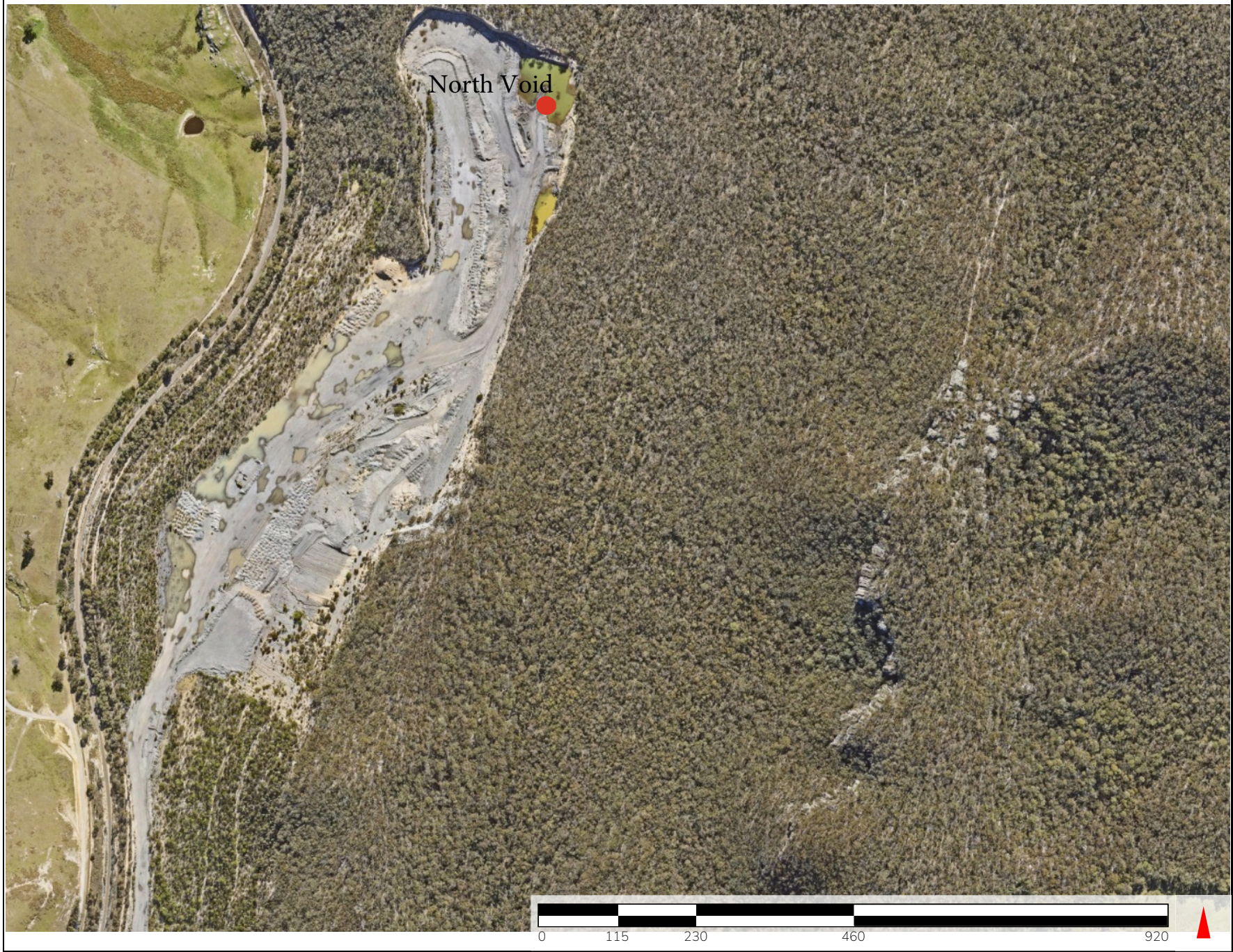
FYFE

Site: NSW_87220-3 Castlereagh Coal

Survey: Jul 15, 2026

File created: Oct 14, 2026

propeller



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