Invincible Colliery

Pollution Incident Response Management Plan (PIRMP)

Shoalhaven Coal Pty Limited (Castlereagh Coal)

September 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	20/12/22	Review & Update PIRMP- 10.1 revised and communication forms added.
8.0	18/12/23	Review and Minor Update
9.0	31/07/24	Review of PIRMP
10.0	19/12/24	Review of PIRMP
11.0	14/03/25	Review and Minor Update
12.0	25/09/25	Review and Minor Update
13.0	30/09/26	Annual review and update of the PIRMP against the NSW EPA Pollution Incident Response Management Plans Guideline (April 2026).

TESTING OF THE PLAN HISTORY

Date	Description
25 November 2016	Light vehicle incident at Cullen Valley Mine
13 December 2017	Excavator fuel line breakage at Cullen Valley Mine during earthworks on erosion control structures
13 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	Transmission fluid drum damaged Invincible Colliery
20 December 2022	Dozer hydraulic fluid leak - hose failure resulting in engine bay fire
18 December 2023	Collision between dozer and 1200 Excavator
24 June 2024	Coal spillage

19 December 2024	Simulation of Service Truck Rollover
19 September 2025	Water Cart Oil Spill
25 September 2026	IBC Puncture and Spill at Workshop

Contents

Invincible Colliery 1

Pollution Incident Response 1

Management Plan (PIRMP) 1

1. INTRODUCTION 1

1.1 Background 1

1.2 Ownership and Operations 2

1.3 Definition of a Pollution Incident 2

1.4 Summary of Commitments 5

2.0 Legislative Requirements 6

2.1 Protection of the Environment Operations Act 1997 6

2.1 Protection of the Environment Operations (General) Regulation 2022 6

3.0 Pollution Incident Response Management Plan 8

3.1 Structure of the PIRMP 8

3.2 Risk Assessment 10

3.2 Inventory of Potential Pollutants 10

3.4 Inventory of Safety Equipment 11

3.5 Site Contacts and Responsibilities 12

3.6 Regulatory Authority Contact Details 12

3.7 Nearby Owners and Occupiers of Premises 13

3.8 Reducing Risk of Environmental Harm 14

3.9 Actions to Minimise a Pollution Incident 15

3.9.1 Actions During a Pollution Incident 16

3.9.2 Actions Following a Pollution Incident 18

3.10 Staff Training 18

4.0 Availability of PIRMP 19

5.0 Testing and Review of PIRMP 20

5.1 PIRMP Review 20

5.1 PIRMP Review Requirements 21

Tables

Table 1 Summary of Commitments 5
Table 2 Information Requirements of the PIRMP 9
Table 3 Inventory of Potential Pollutants 10
Table 4 Inventory of Safety Equipment 11
Table 5 Site Personnel Contacts Details 12
Table 6 Regularity Authority Contact Details 13
Table 7 Revision Status 20
Table 8 PIRMP Tests 21

Figures

Figure 1 Regional Locality 4
Figure 2 Invincible Colliery Location of Potential Pollutants 11

1. INTRODUCTION

1.1 Background

The purpose of the Invincible Colliery Pollution Incident Response Management Plan (PIRMP) is to establish procedures for preventing and minimising the risk of pollution incidents, responding effectively to incidents, minimising harm to human health and the environment, and ensuring timely communication with personnel, relevant authorities and people who may be affected by a pollution incident.

The objectives of this PIRMP are to:

- Provide clear direction to Invincible Colliery personnel and contractors for responding to pollution incidents associated with site activities.
- Identify potential pollution hazards, assess their likelihood and consequences, and establish pre-emptive actions to prevent or minimise pollution.
- Establish clear procedures for notifying and communicating with site personnel, emergency response agencies, relevant authorities, and potentially affected owners, occupiers and members of the community.
- Identify the personnel responsible for implementing the PIRMP, coordinating incident responses and making required notifications.
- Specify the actions required to minimise the effects of a pollution incident, including containing releases, preventing further pollution and protecting human health and the environment.
- Establish training, testing and review arrangements to ensure the PIRMP remains accurate, current and capable of being implemented effectively.

This PIRMP has been prepared having regard to the *Protection of the Environment Operations Act 1997* (POEO Act), the *Protection of the Environment Operations (General) Regulation 2022* and the NSW Environment Protection Authority's *Guideline: Pollution Incident Response Management Plans* (April 2026).

Invincible Colliery operates under Environment Protection Licence (EPL) 1095. The licence establishes environmental protection and reporting requirements applicable to the licensed premises. This PIRMP must be maintained and implemented in accordance with the applicable legislative requirements and licence conditions.

Where a pollution incident occurs in the course of an activity and causes or threatens material harm to the environment, the PIRMP must be implemented immediately. Required statutory notifications must be made immediately and without delay.

1.2 Ownership and Operations

Castlereagh Coal owns and manages Invincible Colliery, located approximately 125 kilometres (km) northwest of Sydney. Invincible Colliery is located to the south-east of Cullen Bullen. The location of the site within the regional locality is shown on Figure 1.

Invincible Colliery operates in accordance with Planning Approval (PA) 07_01270 (Mod 5) and Environment Protection Licence (EPL) 1095.

This PIRMP has been developed to ensure that the activities conducted at the Invincible Colliery do not result in adverse impacts on human health and the environment. This PIRMP was reviewed prior to the commencement of mining operations at Invincible Colliery and regularly reviewed thereafter annually and within one month following any reportable pollution incidents.

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(1) of the POEO Act defines material harm to the environment as follows:

> "(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.

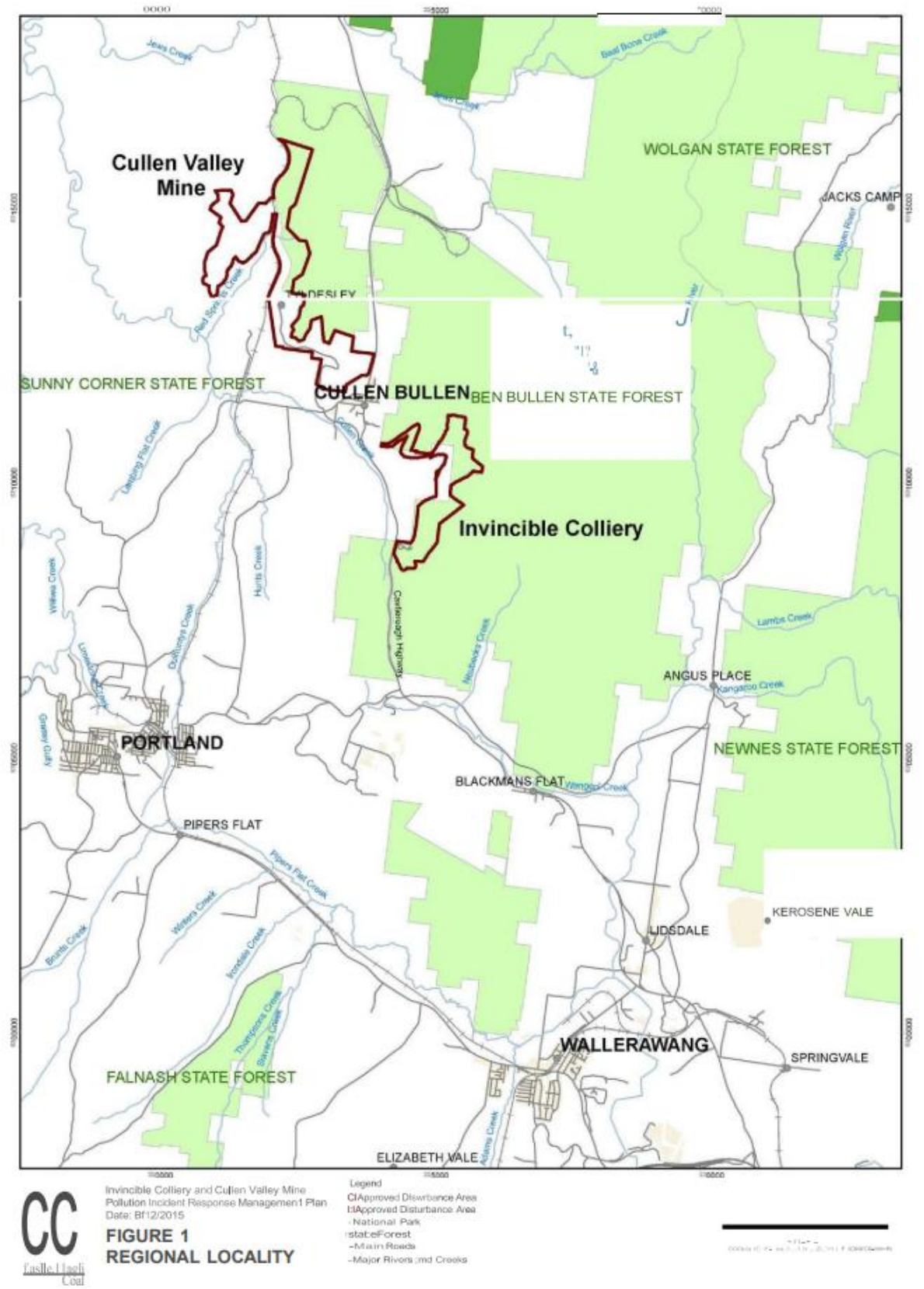

Figure 1 Regional Locality

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.

2.1 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 are outlined in **Table 2.**

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 (iii) are responsible for managing the response to a pollution incident,	Section 3.5

POEO (G) Regulation		
	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

Table 2 Information Requirements of the PIRMP

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.

3.2 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
Invincible Colliery		
Automotive Diesel Fuel	Transtank	90,000L
Fleetmaster CI-4 15w40 Engine Oil	Workshop	3,000L
SAE-50 Gear Oil	Workshop	3,000L
SAE-10W Hydraulic Oil	Workshop	3,000L
SAE-30 Transmission Fluid	Workshop	3,000L
Long Life Coolant Red	Workshop	3,000L
Super Molytac Grease (containers)	Workshop	500kg
Grease (tubes)	Workshop	29 x 200ml tubes

The locations of pollutant storage areas are shown on **Figure 2**.

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, Light Vehicles, Workshops, Administration, Crib Rooms, First Aid Rooms, Fuel Storage Area, Crushing Plant. Invincible Main Colliery Dam Water can be used for firefighting purposes	Inspections and calibration as per manufacturer requirements
Spill kits	Main generator x1 (SK-G01), Trans Tank x2 (SK-T01, SK-T02), Workshop x3 (SK-W01, SK-W02, SK-W03), ROM Pad (SK-R01), Environmental Office x3 Portable Bag Spill Kits.	Monthly
Absorbent pads	Within Spill kits and at workshop	Monthly
Personal Protective Equipment	Administration	Monthly
Material Safety Data Sheets	Main office workshops document system	Annual review
First aid kits	All light vehicles	Monthly
Safety signage	Throughout site	Monthly



Figure 2 Invincible Colliery Location of Potential Pollutants

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 Contacts 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.

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

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.

3.7 Nearby Owners and Occupiers of Premises

Nearby receptors in the vicinity of Invincible Colliery include:

- Residential properties located within 500 m of the lease boundaries;
- The township of Cullen Bullen;
- Cullen Bullen Public School;
- Centennial Coal's Ivanhoe North Coal Mine (currently not operating);
- Glencore's Baal Bone Colliery (currently not operating); and
- Mount Piper Power Station, operated by EnergyAustralia.

In the event of a pollution incident that may affect nearby properties or the community, Castlereagh Coal will implement appropriate communication procedures to provide timely warnings and information to potentially affected people.

The following procedures will be implemented, as appropriate to the nature and severity of the incident:

- Castlereagh Coal personnel will promptly escalate the incident to the relevant site personnel and notify the relevant authorities in accordance with Section 3.6 and the statutory notification requirements.
- Potentially affected landowners, occupiers and community members will be identified based on the location, nature and potential extent of the incident.
- Where there is a risk to human health, property or the environment, appropriate warnings and instructions will be communicated to potentially affected people as soon as practicable. This may include advice to avoid affected areas, close windows or take other protective action, where relevant.
- Castlereagh Coal will coordinate with emergency services and relevant authorities regarding community warnings and ongoing communications, where appropriate. Consultation with an authority must not delay urgent warnings needed to protect people.
- Communication methods may include direct contact with affected landowners and occupiers, telephone calls, public announcements, media releases or updates on the Castlereagh Coal website.
- Relevant updates will be provided as the situation develops, including information about the incident, potential impacts, actions being taken and any further precautions required.
- Following the incident, relevant findings and updates will be communicated to affected parties as appropriate and in accordance with regulatory requirements.

Contact details for nearby landowners and occupiers will be maintained by Castlereagh Coal in the internal version of the PIRMP or associated emergency contact records. Personal information will not be included in the publicly available version of the PIRMP where it is not required to be disclosed

3.8 Reducing Risk of Environmental Harm

Castlereagh Coal will implement appropriate environmental management and pollution prevention measures at Invincible Colliery to minimise the likelihood of pollution incidents and reduce potential impacts on human health and the environment.

The site-specific risk assessment in Appendix A identifies potential pollution incident scenarios, associated hazards and risks, and the control measures required to prevent or minimise harm. The risk assessment must be reviewed and updated to reflect current site operations, infrastructure, pollutant inventories, environmental risks and incident findings. The existing 2017 assessment must be checked to confirm that it remains representative of current site conditions.

Preventive measures may include:

- Implementation of relevant environmental management plans, procedures and work instructions;
- Routine inspections and maintenance of plant, equipment, storage areas, pipelines, dams and other pollution control infrastructure;
- Appropriate storage, handling and containment of fuels, oils, chemicals and wastes;
- Maintenance of spill response equipment and access to current Safety Data Sheets (SDS);
- Protection of stormwater drains and water management infrastructure from pollutants;
- Environmental monitoring and inspections to identify potential pollution risks;
- Training and awareness for employees and contractors; and
- Prompt reporting, investigation and corrective action for environmental incidents and identified deficiencies.

All employees and contractors must complete the applicable site induction before commencing work. Inductions and ongoing training must cover relevant environmental risks, pollution prevention measures, incident reporting procedures, emergency communication arrangements and actions to be taken during and following a pollution incident.

Muster points and emergency assembly arrangements will be communicated through site inductions, signage and ongoing training. Training records will be maintained by Castlereagh Coal at the Invincible site office or in the designated training record system.

3.9 Actions to Minimise a Pollution Incident

The risk assessment in Appendix A identifies potential pollution incident scenarios at Invincible Colliery and the controls required to prevent or minimise their consequences.

General measures to reduce the likelihood and consequences of a pollution incident include:

- Implementation of site safety and environmental management plans;
- Regular site inspections and maintenance;
- Environmental monitoring;
- Appropriate storage, handling and management of pollutants and waste;

- Maintenance of pollution containment and response equipment;
- Training and awareness for employees and contractors; and
- Prompt identification, reporting and correction of environmental hazards.

If a pollution incident occurs or is imminent, Castlereagh Coal will take all reasonable and practicable steps to protect human health and the environment, prevent further pollution and minimise the consequences of the incident.

The response will be proportionate to the nature, location and severity of the incident and may include isolating the source, containing the release, protecting stormwater drains and water management infrastructure, recovering spilled material and arranging specialist assistance.

Where a pollution incident causes or threatens material harm to the environment, the relevant authorities must be notified immediately in accordance with Section 3.6. Potentially affected landowners, occupiers and community members must also be warned as soon as practicable where necessary to protect human health, property or the environment.

3.9.1 Actions During a Pollution Incident

Under Section 148 of the *Protection of the Environment Operations Act 1997* (NSW), pollution incidents that cause or threaten material harm to the environment must be notified immediately to the relevant authorities.

Any person who identifies a pollution incident must promptly raise the alarm and notify the site supervisor or other nominated site contact in accordance with the site's emergency response procedures. Notification to site personnel must not delay emergency calls or legally required notifications.

The following information should be provided, where known:

- Name and contact details of the person reporting the incident;
- Exact location of the incident, including nearby infrastructure or identifiable site features;
- Nature of the incident and the substance involved, if known;
- Date and time the incident occurred or was discovered;
- Estimated quantity or volume released, where known;
- Actual or potential impacts on people, soil, surface water, groundwater, air quality or surrounding properties;

- Immediate hazards and assistance required; and
- Actions already taken or proposed to control the incident.

The following response actions must be undertaken as appropriate to the circumstances:

1. **Protect people first.** Assess immediate dangers. Do not approach or attempt to contain a spill if there is a risk of fire, explosion, chemical exposure or other serious harm. Call 000 where emergency assistance is required.
2. **Raise the alarm and report the incident.** Notify the site supervisor and nominated incident response personnel using the site's emergency communication procedures. Provide the exact incident location and known details.
3. **Assess and control the source.** Where safe and practicable, stop the activity or isolate the source of the release.
4. **Contain the pollution.** Use suitable spill response equipment, absorbent materials, barriers or drain protection to prevent the pollutant spreading, entering stormwater drains or reaching watercourses.
5. **Notify the relevant authorities.** Immediately notify all relevant authorities listed in Table 6 where the incident causes or threatens material harm to the environment. Call 000 first where an immediate threat to human health or property exists.
6. **Warn potentially affected people.** Arrange timely warnings and instructions for nearby landowners, occupiers or community members where required.
7. **Arrange additional assistance.** Engage emergency services, specialist contractors or environmental consultants where required.
8. **Record the incident.** Document the incident details, notifications, response actions and instructions received using the applicable incident reporting forms and site emergency procedures.

All response actions must be undertaken in accordance with site emergency procedures and only where safe to do so. Personnel must follow directions from emergency services and relevant authorities.

Incident reporting and notification records will be retained by Castlereagh Coal in accordance with site procedures.

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3.9.2 Actions Following a Pollution Incident

Following a pollution incident, Castlereagh Coal will undertake an investigation to determine the cause, assess the extent of any environmental impact and identify corrective and preventive actions.

The following actions will be undertaken, as applicable:

- Complete an incident report and document the incident, response actions, notifications and outcomes;
- Assess the extent of contamination or environmental impact and undertake monitoring or sampling where required;
- Arrange appropriate recovery, clean-up, remediation and waste management;
- Notify relevant authorities of additional information as it becomes available and provide investigation findings or reports where required;
- Identify the underlying causes and implement corrective and preventive actions;
- Review the effectiveness of existing environmental controls and update procedures, risk assessments and the PIRMP where necessary; and
- Communicate relevant investigation findings and lessons learned to employees and contractors through toolbox talks, staff meetings or refresher training.

Where a pollution incident causes or threatens material harm to the environment, the PIRMP must be tested within one month of the incident. This test must consider any deficiencies identified during the response and confirm that the plan can be implemented effectively. This requirement is additional to the obligation to test the PIRMP at least once every 12 months.

Corrective actions will be assigned to responsible personnel, tracked to completion and documented. Records of PIRMP testing, identified deficiencies and corrective actions will be retained by Castlereagh Coal.

3.10 Staff Training

All employees and contractors working at Invincible Colliery must receive appropriate induction and training relevant to their roles and responsibilities under the PIRMP.

Training will ensure personnel understand:

- The purpose of the PIRMP and the environmental risks relevant to site operations;
- How to identify and promptly report a pollution incident;
- Site emergency communication procedures, including the designated radio channels and emergency call protocol;

- The location of spill kits, other pollution response equipment and current Safety Data Sheets;
- The circumstances in which personnel must not approach or attempt to contain a spill;
- Appropriate pollution containment and control measures, where safe and within their training;
- Emergency evacuation and muster arrangements;
- The process for escalating incidents and notifying relevant authorities; and
- The procedures for warning potentially affected landowners, occupiers and community members.

Training will be provided during site induction and reinforced through toolbox talks, refresher training and practical exercises, as appropriate. Additional training will be provided where incident investigations, PIRMP testing or changes to site operations identify a need.

Castlereagh Coal will maintain records of training and exercises, including attendance, topics covered and any follow-up actions required. The effectiveness of training will be reviewed through PIRMP testing and incident investigations, with deficiencies addressed through corrective actions.

4.0 Availability of PIRMP

A current copy of this Pollution Incident Response Management Plan (PIRMP), in both electronic and hard-copy formats, will be maintained at Invincible Colliery and made readily accessible to site personnel at all times, including during power or internet outages.

The full PIRMP will be made available to regulatory authorities upon request.

A public version of the PIRMP will be made available on the Castlereagh Coal website (www.ccoal.com.au). The public version will exclude personal information that is not required to be publicly disclosed.

Where the PIRMP is updated, the public version will be updated within 14 days of the change, in accordance with the applicable regulatory requirements.

5.0 Testing and Review of PIRMP

5.1 PIRMP Review

This Pollution Incident Response Management Plan (PIRMP) will be reviewed at least annually to ensure that the information remains accurate and current and that the plan can be implemented effectively.

The PIRMP will also be reviewed and tested within one month of any pollution incident that causes or threatens material harm to human health or the environment. Additional reviews will be undertaken where there are significant changes to site operations, infrastructure, pollutant inventories, environmental risks, emergency response procedures or relevant legislative requirements.

Testing will assess the effectiveness of the PIRMP, including incident response procedures, emergency communications, access to response equipment and Safety Data Sheets (SDS), notification arrangements and personnel training. Findings from tests and incident investigations will be documented, and identified corrective actions will be assigned and tracked to completion.

The revision history of the Invincible Colliery PIRMP is provided in Table 7.

The PIRMP was initially developed as a combined document for Invincible Colliery and Cullen Valley Mine. In December 2021, the document was separated into individual PIRMPs to reflect the separate operations and site-specific environmental risks of each site.

Table 7 Revision Status

No	Date	Description	Commitment
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	20/12/22	Review of PIRMP	Conduct a review and update of the Invincible Colliery PIRMP following an incident involving a hydraulic oil leak and engine bay fire on a D8 Dozer conducting maintenance activities on the 28th of November 2022.
8.0	18/12/23	Review of PIRMP	Simulation involved a report of a collision between a D11 Dozer and a 1200 Excavator. The review considered similar circumstances to a non-pollution incident occurring onsite on 18th July 2023 involving a collision of a dozer and excavator, which was reported to the Resources Regulator
9.0	31/07/24	Review of PIRMP	Conduct a review and update of the Invincible Colliery PIRMP in response to an action following the site Broad Brush Operational Risk Assessment. The review also followed an incident involving a coal spill on the Castlereagh highway from invincible Colliery front gate occurring on 24 June 2024.
10.0	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.
11.0	14/03/25	Review of PIRMP	A review and minor revision of the inventory of safety equipment was updated.
12.0	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.
13.0	13/10/26	PIRMP review and update	Reviewed and updated the PIRMP against the EPA's April 2026 guideline and the findings of the 25 September 2026 desktop exercise. Updates include incident response procedures, site and regulatory contacts, community notification, safety equipment and SDS accessibility, staff training and document availability.

5.1 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 75(1). An overview of the PIRMP tests which have been undertaken previously in addition to the implementation of the PIRMP procedures and subsequent review and simulation are detailed in Table 8.

Table 8 PIRMP Tests

No	Description	Commitment
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.
13 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	There were no deficiencies identified in procedures utilised in the simulation. A review of the contact details for regulators authorities

	to Invincible Colliery Workshop	was also undertaken during the review with regulatory authority numbers in the PIRMP conformed 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	Transmission fluid drum damaged Invincible Colliery	There were no deficiencies in procedures identified and no further review of the PIRMP was required. Personnel demonstrated a good understanding of PIRMP requirements.
20 December 2022	Dozer hydraulic fluid leak - hose failure resulting in engine bay fire	There were no deficiencies in procedures identified as part of the review and simulated re-enactment of the incident of 28 November 2022. Personnel demonstrated a good understanding of PIRMP requirements including access to and use of fire extinguishers, site communications systems and general pollution incident response.
18 December 2023	Collision between dozer and 1200 Excavator	There were no deficiencies in procedures identified as part of the review and simulated re-enactment of the incident of 18th July 2023. Personnel demonstrated a good understanding of PIRMP requirements including reporting of incident, access to and use of fire extinguishers, site communications systems and general pollution incident response.
24 June 2024	Coal spillage	There were no deficiencies in procedures identified and no further review 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.
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 involving a damaged IBC delivered to an incorrect location, leaking an unidentified substance near stormwater drains	Reviewed and updated the PIRMP against the EPA's April 2026 guideline and the findings of the 25 September 2026 desktop exercise. Updates include incident response procedures, site and regulatory contacts, community notification, safety equipment and SDS accessibility, staff training and document availability.

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

Invincible Colliery

PIRMP FORMS

Version 2.0

September 2026

Rev No.	Reviewer		Approved for Issue	
	Name	**Date**	**Name**	**Date**
FINAL	W.Olson	December 2024	W.Olson	December 2024
Version 2.0	T.Tracy	September 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	**☐ 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:

SPILL KIT MAP – INVINCIBLE COLLIERY



Spill Stations

Portable Spill Kits located in Main Office