

DEVELOP

Pollution Incident Response Management Plan (PIRMP)

Woodlawn Zinc Copper Project

Contents

1. Purpose and definitions	3
2. EPL Details	4
3. Persons responsible	5
4. Notification of relevant authorities	6
5. Notification of neighbours and the local community	8
6. Description and likelihood of hazard	9
7. Pre-emptive actions to be taken.....	9
8. Inventory of pollutants	9
9. Maps and Plans.....	11
10. Actions to be taken during or immediately after a pollution incident.....	13
11. Testing and updating of the PIRMP	14
12. Pollution incident immediate notification log	15

Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 2 of 15

1. PURPOSE AND DEFINITIONS

Pollution incident response management plan Licence number: EPL20821

Purpose:

Tarago Operations (a fully owned subsidiary of DEVELOP) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Woodlawn Mine. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), DEVELOP must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates. This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2022. Reference has also been made to the EPA's Guideline: Pollution incident response management plans.

A copy of this plan is kept within the administration building and in the main box at the main site entrance at 507 collector road. A copy suitable for release to the general public is also available on the DEVELOP website: <https://www.develop.com.au/woodlawn-sustainability/>

If a pollution incident occurs during an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

Definitions of what constitutes pollution and a pollution incident as included in the POEO Act are as follows:

- Harm to the environment is **material** if:
 - *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
 - *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
 - *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."*
 - **Note:** ... *it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.*
- **Pollution:** *(a) water pollution, or (b) air pollution, or (c) noise pollution, or (d) land pollution"*
- **Pollution incident:** *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."*

Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 3 of 15

2. EPL DETAILS

Environment Protection Licence (EPL) details	
Name of licensee: (including ABN)	Tarago Operations Pty Ltd ABN 87 127 810 413
EPL number:	20821
Premises name and address:	507 Collector Road Tarago NSW 2580
Community Hotline (24/7)	1800 371 124
Company or business contact details	Name: Chris Taylor Position or title: General Manager Business hours contact number/s: After hours contact number/s: Email:
Website address:	https://www.develop.com.au/woodlawn-sustainability/
Scheduled activity/activities on EPL:	<ol style="list-style-type: none"> 1. Concrete works 2. Contaminated groundwater treatment 3. Crushing, grinding and separating 4. Mineral processing 5. Mining for minerals
Fee-based activity/activities on EPL:	<ol style="list-style-type: none"> 1. > 50000m³ annual production capacity 2. Any handling capacity 3. > 500,000-2,000,000 T annual processing capacity 4. > 500,000-2,000,000 T annual processing capacity 5. > 100,000-500,000 T annual production capacity 6. Mineral waste generation: > 100 T amount of waste on site at any time

3. PERSONS RESPONSIBLE

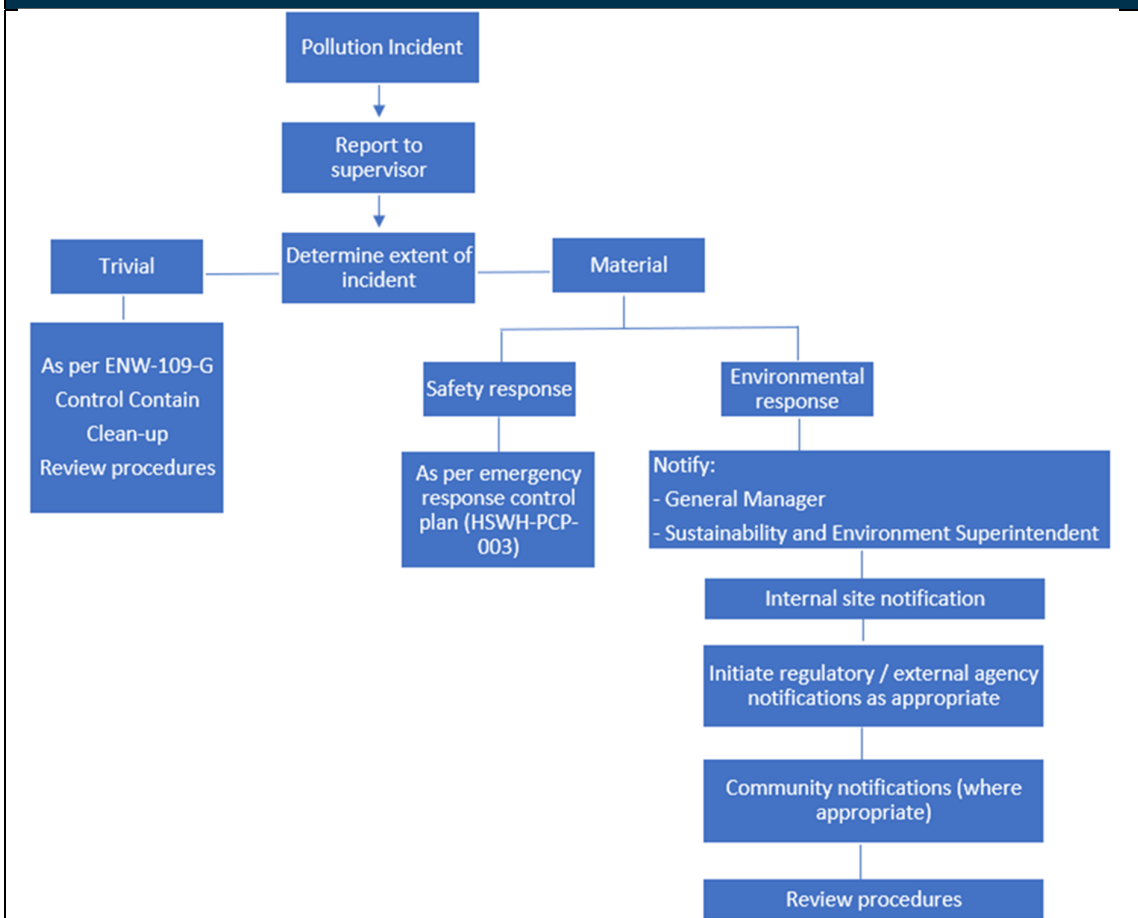
Pollution incident – person/s responsible	
PIRMP activation Notifying relevant authorities Managing response to pollution incident	Name of person responsible: Chris Taylor Position or title: General Manager Business hours contact number/s: After hours contact number/s: Email:
Alternative contact PIRMP activation Notifying relevant authorities Managing response to pollution incident	Name of person responsible: Kiara Crook Position or title: Environment & Compliance Superintendent Business hours contact number/s: After hours contact number/s: Email:
Minimising harm to persons on the premises	
<p>There is an on-site emergency notification system which is communicated to all site workers through on-boarding and site induction processes. Hazards should only be attempted to be minimized by responders (e.g. use of a fire extinguisher or spill kit) if it is safe to do so. If in doubt, the internal emergency response guide (HSW-300-G) specifies persons should wait for assistance to arrive.</p>	

4. NOTIFICATION OF RELEVANT AUTHORITIES

Notification details	
<p>In accordance with the POEO Act notifications to each relevant authority are to be made immediately after the occupier of a premises become aware of the pollution incident. The following incidents are not required to be reported:</p> <ul style="list-style-type: none"> • The person is aware that the incident has already come to the notice of each person or authority required to be notified. • If the incident is an ordinary result of action required to be taken to comply with an environment protection licence, an environment protection notice or other requirement of or made under the POEO Act. <p>The initial notification should be made by the general manager and include as much of the following information (if known) as possible. Both the EPA and resources regulator (as specified in the mining lease) should be notified immediately. The EPA should be notified via phone (131 555) and then written notification to be provided within 7 days. The relevant information to be provided to the EPA under Section 150 of the Act includes:</p> <ul style="list-style-type: none"> • The time, date, nature, duration and location of the incident, • The location of the place where pollution is occurring or is likely to occur, • The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known, • The circumstances in which the incident occurred (including the cause of the incident, if known), • The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; • Other information prescribed by the Regulations 	
Notification of relevant authorities (where required)	
Police, Fire and Ambulance NSW (as applicable)	000
Rural Fire Service (Yass Command)	(02) 6226 3100
Environment Protection Agency (EPA)	131 555
Fire and Rescue NSW	1300 729 579
Goulburn Mulwaree Council	(02) 4823 4500 After hours: (02) 4823 5500
Water NSW	1800 061 069
NSW Resource Regulator	1300 814 609
NSW Department of Planning - Compliance	1300 305 695
Roads and Maritime Services	131 782
SafeWork NSW	131 050
Goulburn Public Health Unit (Murrumbidgee and Southern NSW LHD)	(02) 4825 4944 After hours: (02) 6053 4800
Dam Safety NSW	0403 681 645
NSW SES (SE Zone)	132 500

Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 6 of 15

Notification overview



Notification of relevant authorities (supplementary list)

Mines Rescue	(02) 4286 5499
Sydney Catchment Authority	1800 061 069
Roads and Maritime Services (road spills)	132 701
Palerang Shire Council	1300 735 025
NSW Health – Environmental Health Officer	0407 060 237(a/h 1300 066 055)
Poisons Information Centre	131 126
Goulburn Hospital	(02) 4827 3111
Tarago Police Station (not 24 hrs)	(02) 4849 4411
Essential Energy (power line emergencies)	132 080

Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 7 of 15

5. NOTIFICATION OF NEIGHBOURS AND THE LOCAL COMMUNITY

Notification of neighbours and the local community		
Neighbor description	Name	Contact details
Veolia Woodlawn Eco-Precinct Manager	Justin Houghton	
Veolia Bioreactor Operation Manager	Rene Oosting	
Veolia Woodlawn Operations Supervisor	Mick Dodson	
Pylara farm manager (Veolia)	Rene Oosting	
Willeroo farm manager (West of SML)	Henry Gundry	
Iberdrola Wind Farm	Michael Johnson	
Hallam family (SW of SML on Taylors Ck Road)	Laurie Hallam	
Tarago Rural Fire Service Brigade	Michael Church	
Taylors Creek Rural Fire Service Brigade	David Elward	
Windellama SES First Aid Unit First Aid Controller	Kevin Muffet	
Communicating with neighbours and the local community		
<p>In case of pollution incidents that may potentially pose a threat to health or safety of the neighbours the nearby residents need to be urgently notified either by phone or door knock. The initial notification should be brief and contain only a description of the environmental threat together with instructions what to do. For example:</p> <ul style="list-style-type: none"> • Due to a fire on site or bushfire nearby, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice. • An accidental discharge occurred from the site. There may be emergency vehicles using the Collector Road. • Due to a diesel spillage onto a street from the site, a clean-up operation is being organised. Please be watchful for road closures in relation to this operation. <p>Follow up information on the resolution of emergency situation would be timely conducted also on the phone. If required, further information would be disseminated by means of leaflets in a letterbox drop.</p>		

6. DESCRIPTION AND LIKELIHOOD OF HAZARD

Description and likelihood of hazards

The type of pollution incident that could occur at the Woodlawn Mine include:

1. Fire, explosions and smoke on the surface or within the underground workings.
2. On-site spills or leaks of fuel, oil, hydraulic fluid, chemicals, acidic water or tailings.
3. Discharge of acid or saline water off-site either through overtopping or dam failure.
4. Noise.
5. Dust.

The likelihood of hazards occurring and details of any conditions or events that could, or would, increase that likelihood:

1. Rarely.
2. Possible, although severity varies and rarely would leave site.
3. Rarely, although increased during periods of heavy rainfall or significant seismic events.
4. Unlikely, influenced by weather and climatic events.
5. Unlikely, although enhanced during temperature inversions or isolated periods of elevated site activity.

Description

Likelihood	Almost Certain	>1 per week (> 25%)	Likely to occur often during the life of the system (daily to weekly).
	Likely	1 / week - 1 / month (10 - 25%)	Likely to occur several times in the life of the system (weekly to monthly).
	Possible	1 / month - 1 / year. (1% - 10%)	Likely to occur sometime in the life of the system (monthly to yearly).
	Unlikely	1 / year - 1 / 10 years. (0.1 - 1%)	Possible to occur sometime in the life of the system (once every year to 10 years).
	Rare	1 / 100 years. (<0.1%)	So unlikely to occur in the life of the system that it may be assumed not to be experience (once every 100 years).

7. PRE-EMPTIVE ACTIONS TO BE TAKEN

Pre-emptive actions to be taken

Pre-emptive actions include:

- Implementation of the Woodlawn environmental management system,
- Periodic compliance monitoring of waterways, stormwater, ground water and land,
- Audits and inspections of systems and procedures,
- Bunding of storage tanks, fuel and chemical containers,
- On-site emergency notification system,
- SOP's and procedures for storage, handling and disposal of hazardous material,
- Strategic location of spill containment kits, and
- Training operators of procedures for safe storage, handling and use of hazardous materials.

8. INVENTORY OF POLLUTANTS

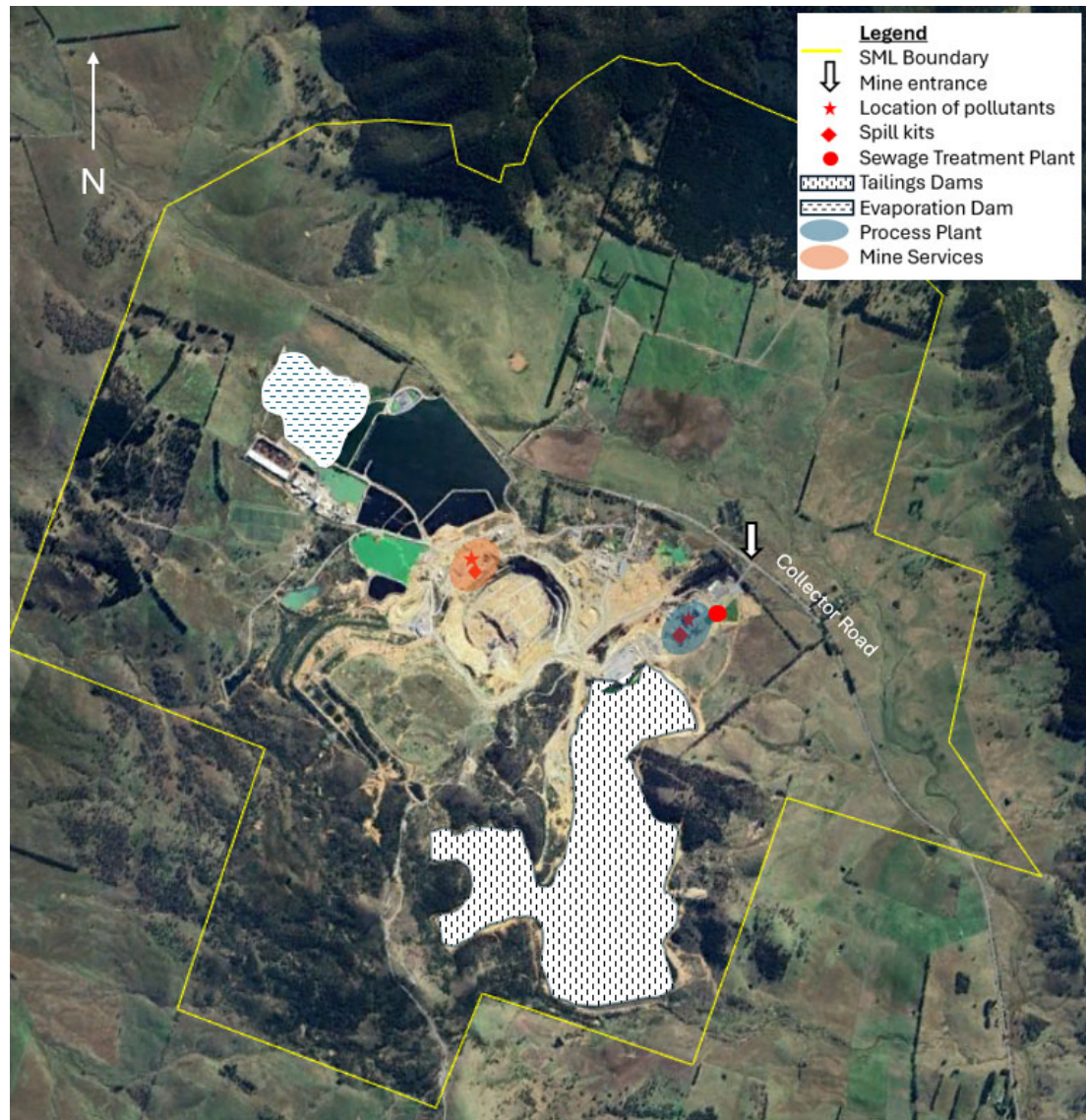
Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 9 of 15

Inventory of pollutants			
Storage location(s)	Contents	Max. quantity	Comments
Process Plant	Isopropyl Ethylthiocarbamate (FT1344)	12,000 L	
Process Plant	Dithiophosphate Sale (AERO 404)	12,000 L	
Process Plant	Lubricant	1,000 L	
Process Plant	Emulsion	1,000 L	
Process Plant Mine Services	Coolant	4,000 L	
Process Plant	Grease	1,000 L	
Process Plant Mine Services	Waste Oil	4,000 L	
Mine Services	Hydraulic Oil	2,000 L	
Mine Services	Transmission Oil	2,000 L	
Mine Services	Automatic transmission fluid	2,000 L	
Mine Services	Diesel	64,000 L	
Mine Services	Engine Oil	2,000 L	
Mine Services	Gearbox oil	2,000 L	
Mine Services	Degreaser	2,000 L	
Mine Services	Mining grease	2,000 L	
Mine Services	Tailings dams and evaporation dams	2 GL	
Sewage Treatment Plant	Sewage	-	
Safety equipment			
<p>Pollution Response safety equipment available on site includes:</p> <ul style="list-style-type: none"> • SDS for all chemicals on site (located at storage locations and Admin); • Chemical / hydrocarbon storage containers with bunding; • Spill kits; • First aid kits, (located in refuge chambers, vehicles, offices and emergency response compound); • Emergency Response Vehicle; • Eye wash stations and emergency showers; • Fire extinguishers, hydrants and fire truck; • Breathing apparatus; • Chemical suits and PPE; • Machinery for establishing bunds or containments; • Gas monitors; • Pumps and generators; and • Pollution clean up material – eg limestone, crushed lime 			

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Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 10 of 15

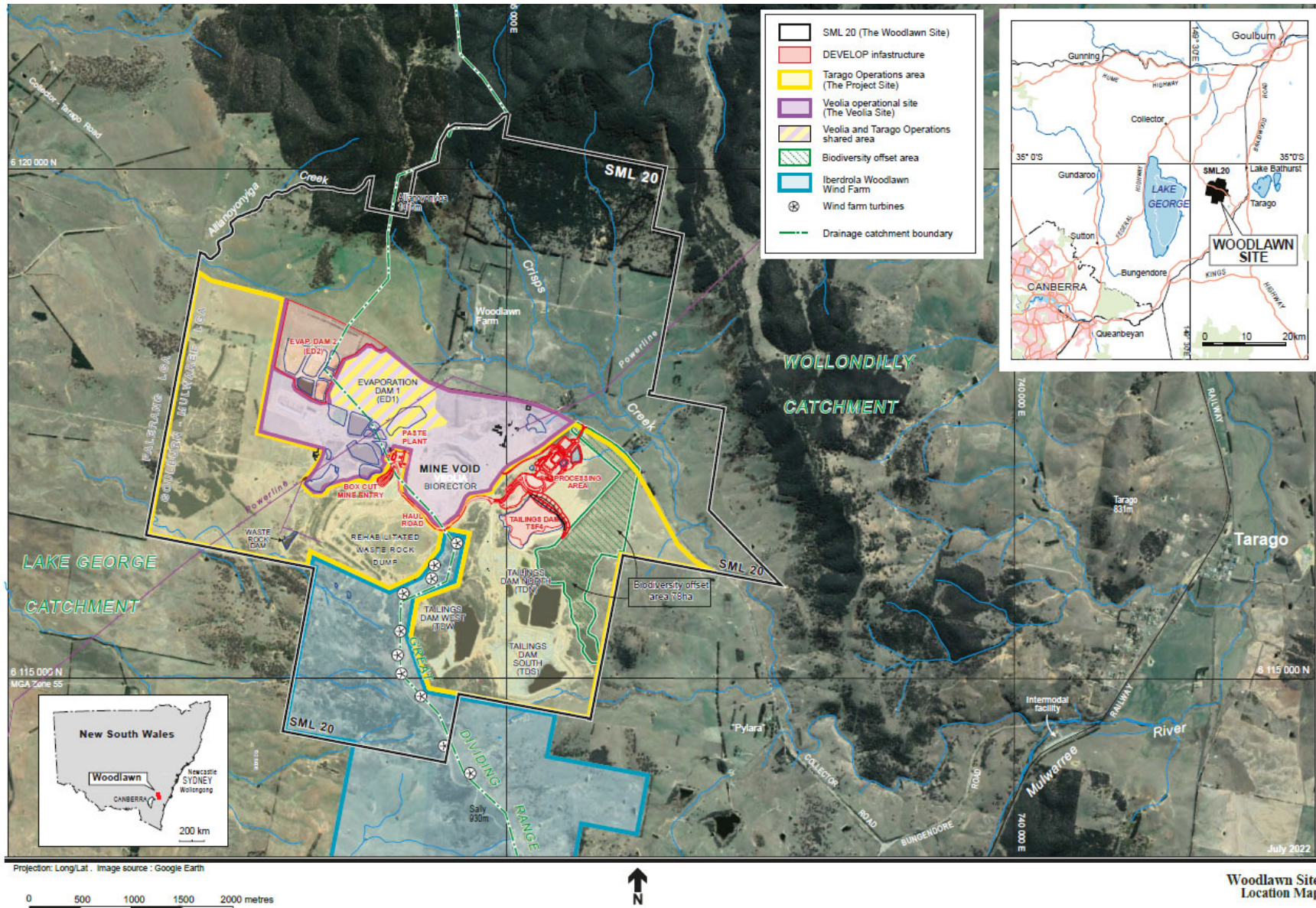
9. MAPS AND PLANS

Maps



Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 11 of 15

WOODLAWN MINE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



10. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

Actions to be taken during or immediately after a pollution incident

Steps following pollution incident notification to be the responsibility of the general manager or delegate:

1. Attempt to minimize the hazard by immediately deploying suitable spill kits or soil.
2. Identify any sensitive receptors or preferential pathways: clean water dams, drains, buildings etc.
3. Identify and rank affected parties if required to inform the notification process and timeline. Action in order of priority.
4. Identify additional or required resources and timing to be mobilised to respond to incident.
5. In the event of a large spill the focus should be on minimising spread and impact to identify receptors which may mean temporarily blocking or redirecting drains if suitable to do so.
6. Review the ranking and notification of receptors when conditions change (escalate or de-escalate). Refer to notification of neighbors section for recommended wording and message structure.
7. Ensure notified parties are notified when event/risk has passed.

Coordinating with persons

A notification log will be generated to track communications to relevant authorities and neighbors (Attached to end).

All communications will go through the general manager or delegate

Staff training

Training of the PIRMP will be provided as follows:

- Site induction;
- Tool-box / pre-shift meetings;
- Desk top and practical exercises; and
- Spill kit and spill response training

All training and induction records are to be kept on site and entered into the training register. Records of any toolbox talks are to be maintained by the relevant supervisor using the pre-shift meeting proforma. Records of training, exercise, incident reporting and review and corrective action is entered and stored in the INX management system.

Document :	ENW-012-PI	Issue Date	21/07/2025	Version#: 11
Document Name	Pollution Incident Response Management Plan	Review Date	21/07/2026	
Prepared by :	ENW	Approved by:	GM	Page 13 of 15

11. TESTING AND UPDATING OF THE PIRMP

Testing and updating of the PIRMP				
It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment. Updates and testing are tracked in the INX database and summarized below.				
PIRMP testing details				
Date tested	Details of test	Tested by	Test findings	Next scheduled testing date
15/03/2023	Desktop simulation	Site leadership team	Duplication between PIRMP and site emergency plan	
07/03/2024	Desktop simulation – tailings dam discharge	Site leadership team	Clarification of roles and responsibilities	-
14/08/2024	Desktop simulation – oil spill	KC Environment and Compliance Superintendent	Some detail on clean up missing	14/08/2025 (at the latest)
PIRMP update details				
Date of update	Details of updates	Revision No.	Reviewed by	Approved by
20/02/2015	Draft for Review	1	RB	HS
19/12/2016	Revision 2	2	RB	AL
20/03/2017	Operational	3	RB	AL
6/11/2018	2018 Update	4	RB	AL
26/02/2021	2021 Revision	5	ZR	TB
04/01/2022	Update of contact numbers	6	ZR	TB
28/12/2022	Develop template	7	ZR	CT
15/03/2023	Updated to reference Emergency Response Management Plan rather than detail in PIRMP	8	ZR	CT
12/03/2024	2024 Revision following desktop exercise completed 7/3/24.	9	S&ES	GM
14/08/2024	Template change, updates following desktop test	10	KC	KC
21/07/2025	Annual update	11	KC	KC

12. POLLUTION INCIDENT IMMEDIATE NOTIFICATION LOG

Person undertaking notification (Name/Function):			
Date and time when first become aware of the incident:			
Incident type:			
Comments: 			
Initial immediate notification log			
Notification to:	Time of call	Respondents name/ function	Approx call duration
Summary of initial communication: 			