

Pollution Incident Response Management Plan

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Pollution Incident Response Management Plan

Document History

Rev	Description	Prepared By	Approved By	Date
2	Annual Review and the following updates; Inserted: Table of Figures, Table of Tables, Timing of Activities, Community and Stakeholder Engagement, Environmental Management Framework, Pre-Emptive Controls, Updated: Document template, Title page, Introduction, Scope of Works, Responsibilities, Incident Response, Register for Testing the PIRMP, Table of Contents, Appendix 4. Removed: Appendix 5, 6, 7 and 8.	Dean Woods	Shae Martin	23/02/2024
3	Merge into new plan template. Align with revised TRL Emergency Management Plan. Cross check and align with legislative requirements. Include additional information to meet compliance requirements. Include updated testing history Incorporate other TRL comments and amendments	J. Burton	Amrish Trivedi	4/8/2025

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1. INTRODUCTION

Tritton Resources Limited (TRL), a wholly owned subsidiary of Aeris Resources Limited (ARL) operates the Tritton Copper Mine (Mining Lease (ML) 1544) and the Girilambone Copper Mine complex, including Murrawombie Copper Mine (ML 1280), North East Copper Mine (ML 1383) and the Avoca Tank Project (ML 1818). The Mines are located west and north-west of Nyngan, in the Bogan Shire Council Local Government Area (LGA) within the central west region of New South Wales. The location of the four mining operations is provided in Figure 1.

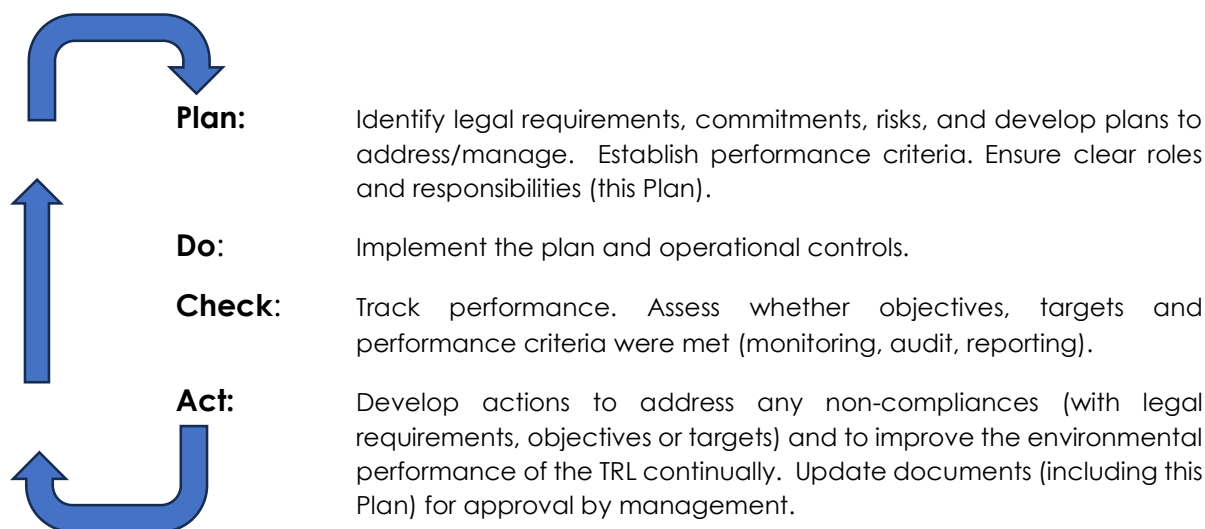
1.1. Purpose

The purpose of the Pollution Incident Response Management Plan (PIRMP) is to describe TRL's response to significant incidents where there is a risk of material pollution occurring. The PIRMP is required to comply with Section 153A of the *Protection of the Environment Operations Act 1997*.

The PIRMP forms part of the Environmental Management Strategy (EMS) for the Tritton Copper Operations and will be reviewed and updated regularly. The PIRMP includes the systems and procedures to be implemented for managing incidents that may occur at, or be associated with, activities at Tritton Copper Operations that could cause material harm to the environment.

1.2. Relationship to Environmental Management System

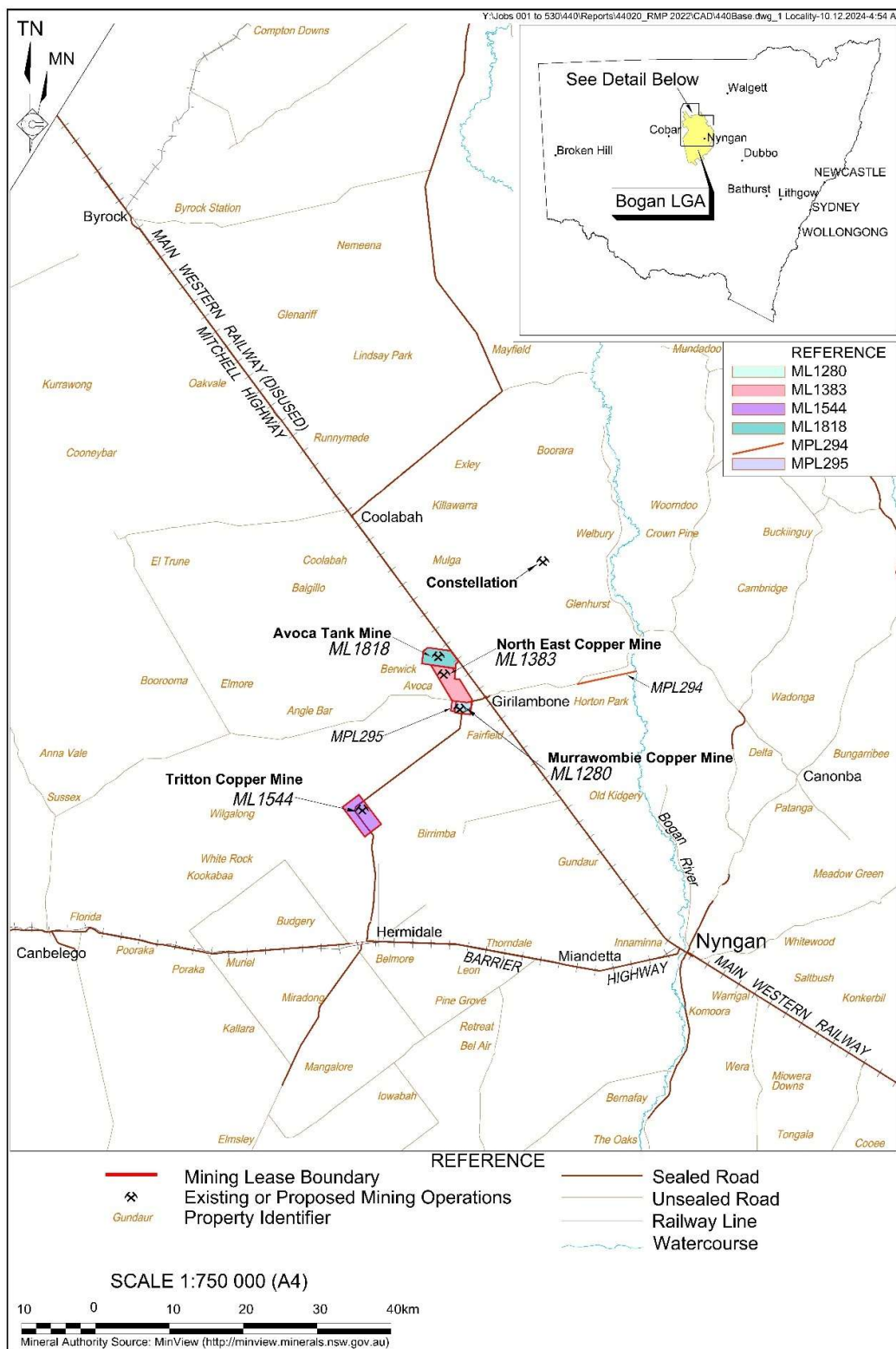
The PIRMP forms part of the overall Environmental Management Framework at Tritton Resources Limited (TRL). The Environmental Management Framework is further described in the Environmental Management Strategy (EMS) ([TRL-HSET-PLN-0023](#)), which includes alignment with the AS/NZS ISO 14001:2016 - Environmental Management Systems. The EMS broadly includes the following key aspects:



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Figure 1 Site Locality



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1.3. Scope

The scope of the PIRMP includes all activities associated with 'premises' as defined by each of the Environmental Protection Licences (EPL's) held by TRL (Table 1). Activities may include those conducted on the premises and related activities conducted outside the premises.

The two EPL's held by TRL apply to the four current mining operations / project sites owned by Aeris Resources / Tritton Resources Limited (TRL) in the vicinity of Nyngan, including:

- EPL 11254
 - Tritton Copper Mine (TCM) (DA 41/98 (including Modification 8) and Mining Lease 1544)).
- EPL 4501
 - Murrawombie Copper Mine (MCM) (DA 1/91 (including Modification 5 (DA 2015/010/4) and Mining Lease 1280)).
 - North East Copper Mine (NECM) (DA 6/95 (including Modifications) and Mining Lease 1383)).
 - Avoca Tank Project (ATP) (DA 10/2015/004/003 (including modifications) and Mining Lease 1818)).

The four mining sites owned by TRL are collectively referred to as 'Tritton Copper Operations'

This plan applies to all personnel, including contractors, subcontractors and visitors at Tritton Copper Operations.

This document is designed so that TRL has a standardised response to a reportable pollution event. Processes for managing minor and non-reportable spill events are included in the Spill Response Procedure (TRL-ENV-PRO-004).

All onsite visitors must be under the direction of a fully inducted TRL employee or contractor, who will be responsible for the visitor at all times, including during an emergency or crisis.

This document refers to response actions for site-based personnel only. Any large-scale incidents will require the Corporate Crisis Management Team (CMT) to convene. Guidance on the CMT is contained in the ARL Crisis Management Plan.

This document is written to provide specific instruction as directed by the *Protection of the Environment Operations (General) Regulation 2022*. It is an overarching document outlining the response to a reportable pollution event as defined in Section 0. Procedures regarding incidents where an emergency has been declared are documented in the site Emergency Management Plan (TRL-HSET-PLN-00002) and other related documents.

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This plan meets and / or aligns with the following requirements:

- *Protection of the Environment Operations Act 1997;*
- *Protection of the Environment Operations (General) Regulation 2022;*
- Guidelines: Pollution Incident Response Management Plans (NSW Environmental Protection Authority (2022);
- TRL Emergency Management Plan (TRL-HSET-PLN-00002);
- Environmental Protection Licences 11254 and 4501.

Table 1 EPL Summary as relevant to this PIRMP

Licensee	Tritton Resources Pty Ltd	
Postal Address	PO Box 386 Nyngan, NSW 2825	
EPL Numbers	EPL 11254	EPL 4501
Version Date	8 June 2021	13 February 2025
Scheduled Activities	Mining for minerals (>500000 – 2000000 T annual production capacity).	Mining for minerals (>500000 – 2000000 T annual production capacity).
Ancillary Activities	Crushing, Grinding or Separating Works. Mineral Processing or Metallurgical Works. Waste Facilities - solid & inert waste landfilling	Chemical Storage Facilities Electricity Generating Works Mineral Processing or Metallurgical Works Petroleum Works Sewage Treatment Systems

1.4. Objectives

The overarching aim of this PIRMP is to ensure that TRL has processes and systems in place to manage potential pollution events and prevent or minimise the impact on the environment and community.

The objectives of the PIRMP are to:

- Minimise and control the risk of pollution incidents occurring at TRL sites by identifying risks and developing actions to mitigate and manage those risks.

- ensure comprehensive and timely communication of a pollution incident to relevant staff members, contractors and subcontractors at the premises, the EPA, and other relevant authorities (such as the Department of Planning and Environment (DPE), local councils, Public Health, SafeWork NSW, and Fire and Rescue NSW) and people outside of the facility (community members) who may be affected by the impacts of the pollution incident.
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

2. STATUTORY REQUIREMENTS

2.1. Legislation

Legal requirements apply to the management of incidents where there is a risk of 'material harm', including impacts to the environment and the health and safety of people. The following sections outline key legislative instruments for managing material incidents.

2.1.1. *Protection of the Environment Operations (POEO) Act 1997 (NSW)*

The objective of the POEO Act is to protect, restore and enhance the environment in NSW and to promote public access to information and involvement in environmental protection.

The Protection of the Environment Operations Act 1997 is the primary legislation for environmental protection in New South Wales. The Act aims to protect and enhance the environment, promote human health, and foster ecologically sustainable development.

The Act provides a framework for environmental regulation in NSW, including setting environmental standards, managing pollution and waste and regulating activities that may significantly impact the environment.

The POEO Act also establishes the Environment Protection Authority (EPA), which is responsible for enforcing the Act and ensuring compliance with its provisions.

The Act:

- provides a single licencing arrangement related to water pollution, noise pollution, air pollution and waste management.
- establishes a system of Environment Protection Licences to carry out scheduled activities (e.g. mining for minerals, chemical production, waste processing, electricity generation, livestock intensive activities, etc);
- requires the public reporting of information relative to the Environment Protection Licence;
- provides for the issue of environment protection notices (clean-up notices, prevention notices, and prohibition notices) - It is an offence under the Act not to comply with such notices;
- includes a duty to notify relevant authorities in case of any pollution incidents where material harm to the environment is threatened or caused.

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- provides for voluntary and mandatory environmental audits and procedural matters for the conduct of investigations (including scope, associated notice requirements, powers of entry, and duty to provide information).

Part 5.7A of the POEO Act requires all licensees to prepare, keep, test and implement a PIRMP.

The POEO Act requires licensees to:

- Implement their PIRMP if, in the course of an activity, a pollution incident occurs that causes or threatens to cause material harm.
- Notify any 'material harm' pollution incidents, in accordance with the requirements set out in the Act.

Part 5.7 of the POEO Act specifies when and how a person should notify each relevant authority about a pollution incident, and who is responsible for the notification. It prescribes what relevant information must be given. In summary, the licensee (or another person) is required to report a pollution incident immediately to:

- the EPA
- the Ministry of Health (via the appropriate Local Health District Public Health Unit)
- Fire and Rescue NSW
- SafeWork NSW
- the relevant local council.

The dictionary definition of 'immediately' is 'promptly and without delay.' This allows response agencies to be notified as soon as a pollution incident is identified so that it can be addressed quickly.

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

Chapter 4 of the regulation requires that all holders of an Environmental Protection Licence must prepare and implement a PIRMP:

- The PIRMP must be in the form required by the regulations and must include the information detailed in the POEO Act (section 153C) and the General Regulation (sections 72 and 73).
- Licensees must keep the PIRMP at the premises the environment protection licence relates to, or where the relevant activity takes place (in the case of trackable waste transporters and mobile plant) (Section 153D of the POEO Act) and make certain parts of the PIRMP available on a publicly accessible website of the licensee or provide a copy upon written request (section 74 of the General Regulation).
- Licensees must test their PIRMP in accordance with the regulations (section 153E of the POEO Act and section 75 of the General Regulation).
- Licensees must implement their PIRMP immediately if a pollution incident occurs that causes or threatens material harm to the environment (as defined in section 147 of the POEO Act) (section 153F of the POEO Act).

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There are offences for licensees if they fail to comply with any of the requirements listed above. The penalties associated with these offences are:

- for corporations
 - \$1,000,000
 - and for continuing offences, a further penalty of \$120,000 per day the offence continues
- for individuals
 - \$250,000
 - and for continuing offences, a further penalty of \$60,000 per day the offence continues.

2.2. Detailed Legislative Requirements

The POEO Act and POEO General Regulation 2022 contain specific items that must be included in a PIRMP. Table 2 below replicates these requirements (as relevant to TRL and this PIRMP) and states the specific section of this PIRMP where the required content is contained.

Table 2 POEO Act Legal Requirements (as relevant to the development of a PIRMP)

Section / Clause	Requirement	Section Where Addressed
Section 5.7A POEO Act		
153A	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates	This PIRMP
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—	Section 8
	(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	Section 8.2
	(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	Section 8.2.3
	(iii) any persons or authorities required to be notified by Part 5.7,	Section 8.2.3

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Section / Clause	Requirement	Section Where Addressed
	(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 8.2.3.3
	(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 8.2.3.3
	(d) any other matter required by the regulations.	Refer below
153D	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	Section 11.1
153E	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.	Section 11.2
153F	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.	Section 8.2.2
Chapter 4 POEO General Regulation 2022		
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 7
	(b) the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,	Section 7
	(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 8.6
	(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Section 7.1

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Section / Clause	Requirement	Section Where Addressed
	(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 7.1
	(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 0
	(g) the names, positions and 24-hour contact details of individuals who—	-
	(i) are responsible for activating the PIRM plan, and	Section 8.2.3
	(ii) are authorised to notify relevant authorities under the Act, section 148, and	Section 8.2.3
	(iii) are responsible for managing the response to a pollution incident,	Section 8.2.2
	(h) the contact details of each relevant authority referred to in the Act, section 148,	Section 8.2.3
	(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 8.2.3.5
	(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 8.2.3.3
	(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,	Section 7.1
	(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 8.2.3.3
	(m) the nature and objectives of a staff training program in relation to the PIRM plan,	Section 0
	(n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,	Section 11.2

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Section / Clause	Requirement	Section Where Addressed
	(o) the dates on which the PIRM plan is updated,	Cover Page
	(p) the way in which the PIRM plan must be tested and maintained.	Section 11.2
73	For the Act, section 153C(d), the following must be included in a PIRM plan for a relevant licence—	-
	(a) the names, positions and 24-hour contact details of each individual who is—	Section 8.2.3
	(i) responsible for activating the PIRM plan, or	Section 8.2.3
	(ii) authorised to notify relevant authorities under the Act, section 148, or	Section 8.2.3
	(iii) responsible for managing the response to a pollution incident,	Section 8.2.2
	(b) the contact details of each relevant authority referred to in the Act, section 148,	Section 8.2.3
	(c) a community engagement protocol that includes procedures for notifying people living or working near a pollution incident and keeping them informed of relevant matters,	Section 8.2.3.5
	(d) details of pre-emptive action required to minimise or prevent a risk of harm to human health or the environment arising out of the activity, including, as a minimum, action that complies with the requirements set out in the Protection of the Environment Operations (Waste) Regulation 2014, clauses 70, 72 and 73,	Section 8.6
	(e) the nature and objectives of a staff training program in relation to the PIRM plan,	Section 0
	(f) the date on which the PIRM plan is tested and the name of the person who carried out the test,	Section 11.2
	(g) the method for testing and maintaining the PIRM plan.	Section 11.2
74	(1) A PIRM plan must be made readily available—	-
	(a) to an authorised officer on request, and	Section 11.1
	(b) to a person who is responsible for implementing the PIRM plan at the premises—	Section 11.1
	(i) to which the relevant licence relates, or	Section 11.1
	(ii) where the activity takes place.	Section 11.1

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Section / Clause	Requirement	Section Where Addressed
	(2) A PIRM 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,	Section 11.1
	(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.	Section 11.1
75	A PIRM plan must be tested—	-
	(a) routinely at least once every 12 months, and	Section 11.2
	(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 11.2
	(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,	Section 11.2
	(b) the PIRM plan is capable of being implemented in a workable and effective way.	Section 11.2
	(3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.	Section 11.2

3. DEFINITIONS

The definitions of key terms and acronyms used throughout this document are included below in Table 3.

Table 3 Definitions

Word / Acronym	Definition / Meaning
ATP	Avoca Tank Project – a mining project associated with the North East Copper Mine.
EMS	Environmental Management Strategy – Overarching / framework environmental management document for Tritton
EPA	NSW Environmental Protection Authority
Immediately	Promptly and without delay
Incident	A set of circumstances that causes or threatens to cause material harm to the environment.
Environment	Environment means components of the earth, including— (a) land, air and water, and (b) any layer of the atmosphere, and (c) any organic or inorganic matter and any living organism, and (d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in paragraphs (a)–(c).
Harm	Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
INX	A commercial document control, incident investigation and action management system adopted and used by TRL.
Material harm	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 \$10,000 (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.
MCM	Murrawombie Copper Mine – a copper mining operation operated by Tritton Resources under Mining Lease 1280.
Minor spills	Incidents that are categorised as "Insignificant" or "Minor" as described in the TM Escalation Procedure appended to the Pollution Incident Notification (TRL-ENV-PRO-003) procedure.

Word / Acronym	Definition / Meaning
ML	Mining Lease – a legal right to extract minerals within a specified area.
NECM	North East Copper Mine – a mining site operated by Tritton Resources, part of the North East Mine operations.
Pollution Incident	'Pollution incident means 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'.
Reportable pollution event	An event that may cause material harm to the environment.
Significant amount	Depending on the solution involved but 1000L can be used as a guide. A significance judgment is to be made by TM Environment personnel and/or the General Manager.
TCM	Tritton Copper Mine – a copper mining operation owned by Tritton Resources located near Nyngan, NSW.
TRL	Tritton Resources Limited – the company / business entity managing the Tritton Copper Operations.

4. OPERATIONS DESCRIPTION

4.1. Site Overview

At the time of preparing this PIRMP, Tritton Resources Pty Ltd owns and operates four mines in the vicinity of Hermidale and Girilambone; each mine is briefly described in the following sections.

4.2. Relevant Operations

4.2.1. Tritton Copper Mine

The mineralisation at the Tritton Copper Mine (TCM) was discovered in 1995 and following a series of preliminary assessments and preparation of an Environmental Impact Statement, Development Application (DA) 41/98 was approved on 1 September 1999 by the Minister for Planning and Urban Affairs. Mining operations under DA 41/98 are approved until 21 December 2028. The former Department of Mineral issued Mining Lease (ML) 1544 on 6 August 1992. DA 41/98 has been modified eight times, with the most recent modification approved in June 2022. Figure 2 presents the approved TCM site layout.

A summary of the approved activities at the Mine is provided as follows.

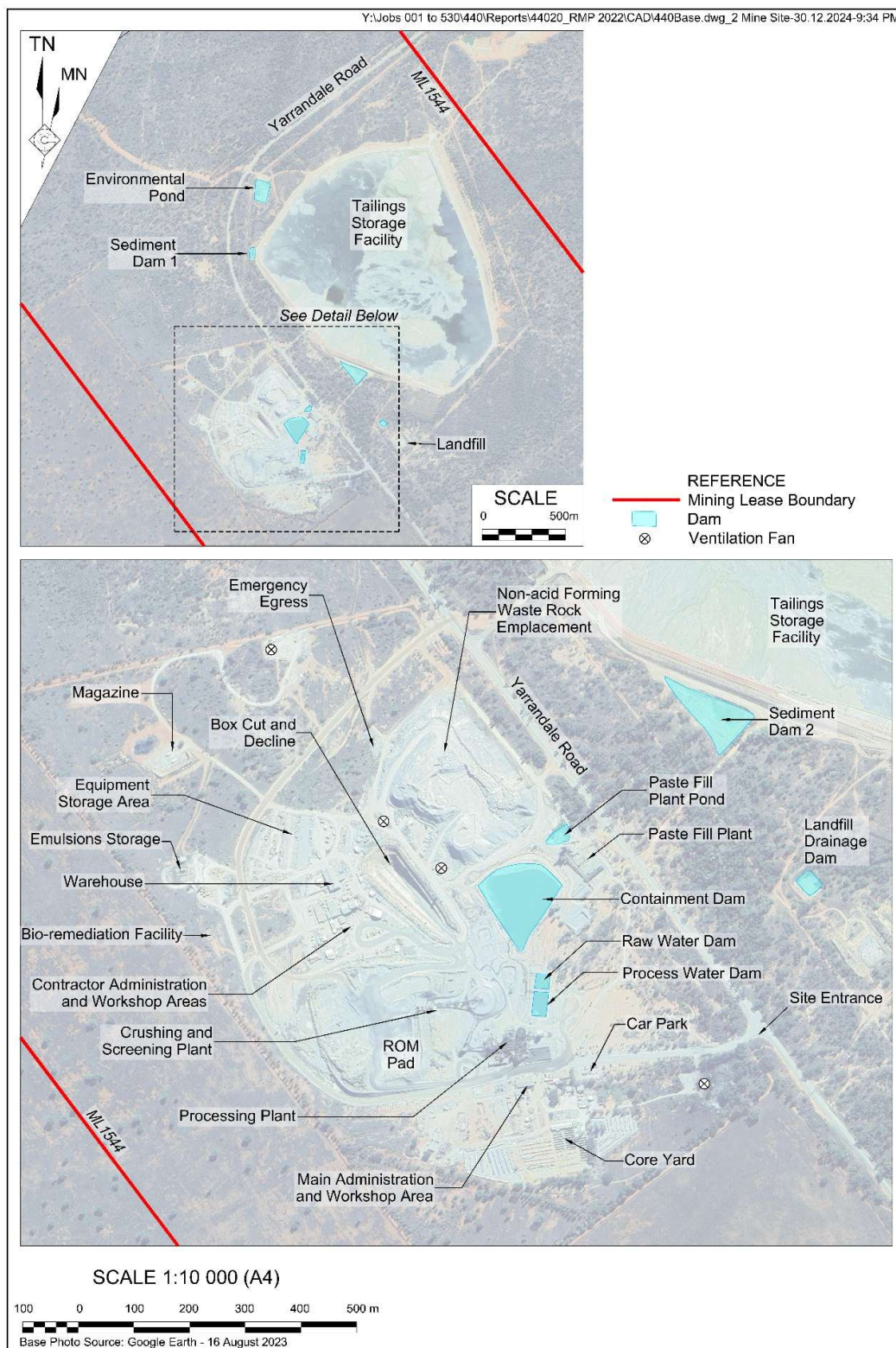
- Extraction of a total of approximately 12.83Mt of copper ore using underground mining techniques.
- Importation of no more than 1Mt of ore material from surrounding TRL operations in a calendar year for processing at the TCM.
- Construction and use of a Non-acid Forming Waste Rock Emplacement to a maximum height of 20m above the natural surface or approximately 291m AHD.
- Processing of on-site and imported ore to produce a copper concentrate.
- Construction and use of a Tailings Storage Facility.
- Export of no more than 30,000 tonnes of waste rock from the TCM in a calendar year, generally for the purposes of local road construction and maintenance.
- Transportation of the copper concentrate in shipping containers to the Hermidale rail siding, located approximately 19km to the south of the TCM, and transportation of that material by train to the port for export.
- Export of tailings for paste fill operations at the Murrawombie Mine.

EPL 11254 applies to TCM

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Figure 2 Tritton Copper Mine layout



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4.2.2. Murrawombie Copper Mine

The operation of the existing Murrawombie Copper Mine (MCM) is approved under Development Application (DA) 1/91. DA 1/91 was issued by Bogan Shire Council, under the Environmental Planning and Assessment Act 1979 (EP&A Act), on 25 March 1991, to permit the mining of copper ore by open-cut mining methods, with the resulting material to be processed on-site using conventional heap leach, solvent extraction, and electrowinning methodologies. Since that time, DA 1/91 has been modified five times, with the most recent being Modification 5, approved on 4 July 2024 (DA 2015/010/4). The MCM operates within Mining Lease 1280. Figure 3 presents the approved MCM site layout.

In summary, approved activities at the MCM include the following.

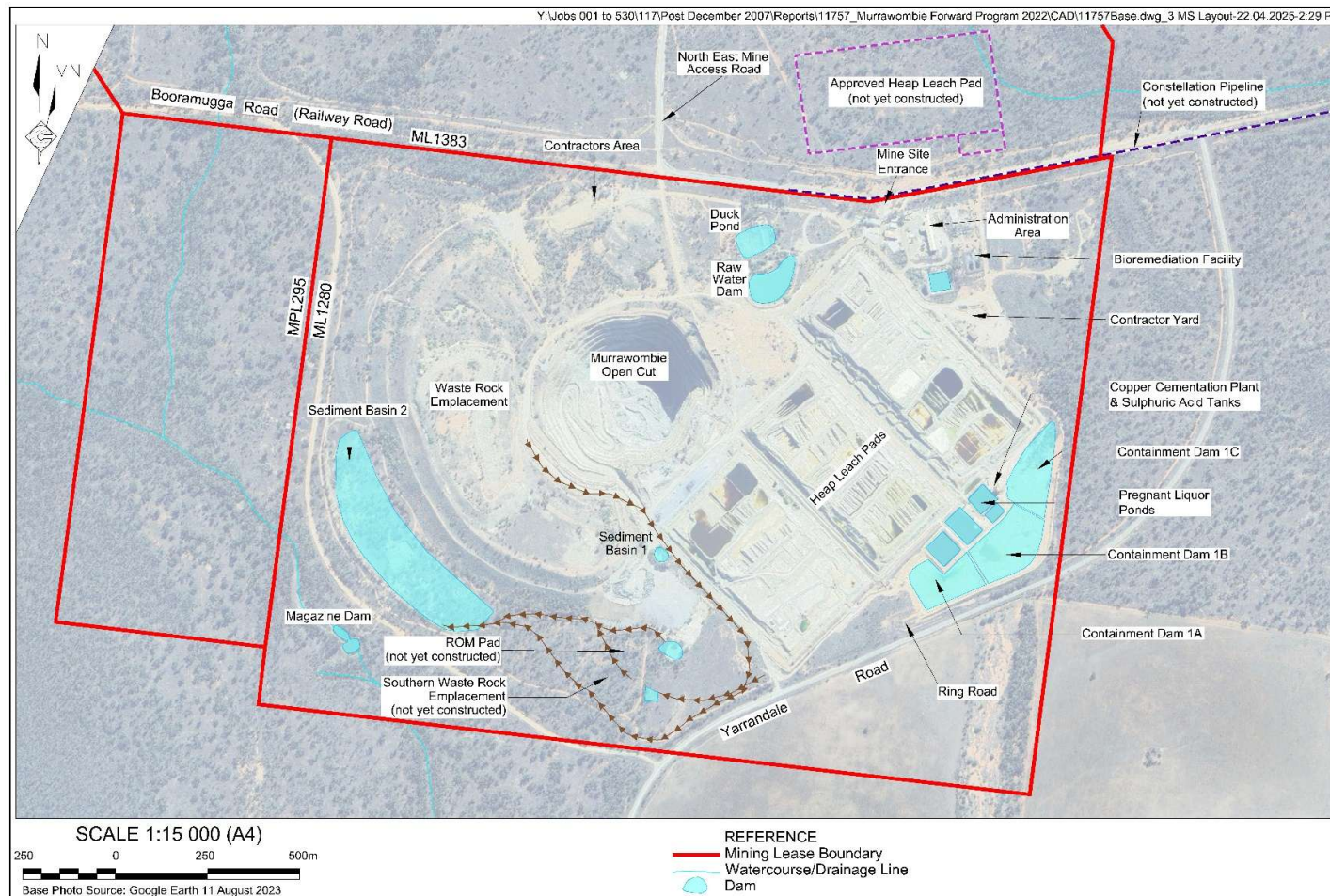
- Mining using open-cut and underground methods in accordance with the approved layout.
- Operation of the MCM on a 24-hour, 7-day per week basis.
- Construction of a waste rock emplacement to the west of the Murrawombie Open Cut.
- Construction of a flotation plant (not constructed).
- Operation of four Heap Leach Pads to the east and northeast of the Murrawombie Open Cut, three of which have been constructed.
- Operation of a copper cementation plant for the recovery of copper.
- Expansion of the Murrawombie open pit (approved under Modification 3)
- Transportation of up to 1Mtpa of copper ore to the TCM for processing.
- Construction and use of ancillary infrastructure, including a mobile concrete Batching Plant.

EPL 4501 applies to MCM.

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Figure 3 Murrawombie Copper Mine layout



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4.2.3. North East Copper Mine

The North East Copper Mine (NECM) is located approximately 6km northwest of the village of Girilambone and operates under Development Application (DA) 6/95 (BSC 2010) and Mining Lease (ML) 1383 and commenced operations in 1996. The development consent was issued by Bogan Shire Council and does not contain an expiry date.

Open-cut mining at the NECM ceased in 1997. During the extraction period, three open pits were mined (Larsen's pit, Northeast pit and Hartman's pit) until copper oxide ore was exhausted in the upper part of the ore body. To process the oxide ore, the extracted ore was transported to the nearby MCM, crushed and placed on heap leach pads where the contained copper was leached using sulphuric acid and recovered using solvent extraction/electrowinning.

From 2007, mining was undertaken by underground extraction methods with mined ore transported to the TCM for processing. This continued until August 2016, before operations were suspended and the NECM was placed in care and maintenance. The north eastern wall of the Hartman's pit contains a boxcut portal and is used to access the Avoca Tank Project which is located to the north of the NECM complex. Other NECM infrastructure is utilised for the Avoca Tank project including ROM pad, Waste Rock Emplacement (within the Hartman's Pit) and ancillary infrastructure including roads, power and water.

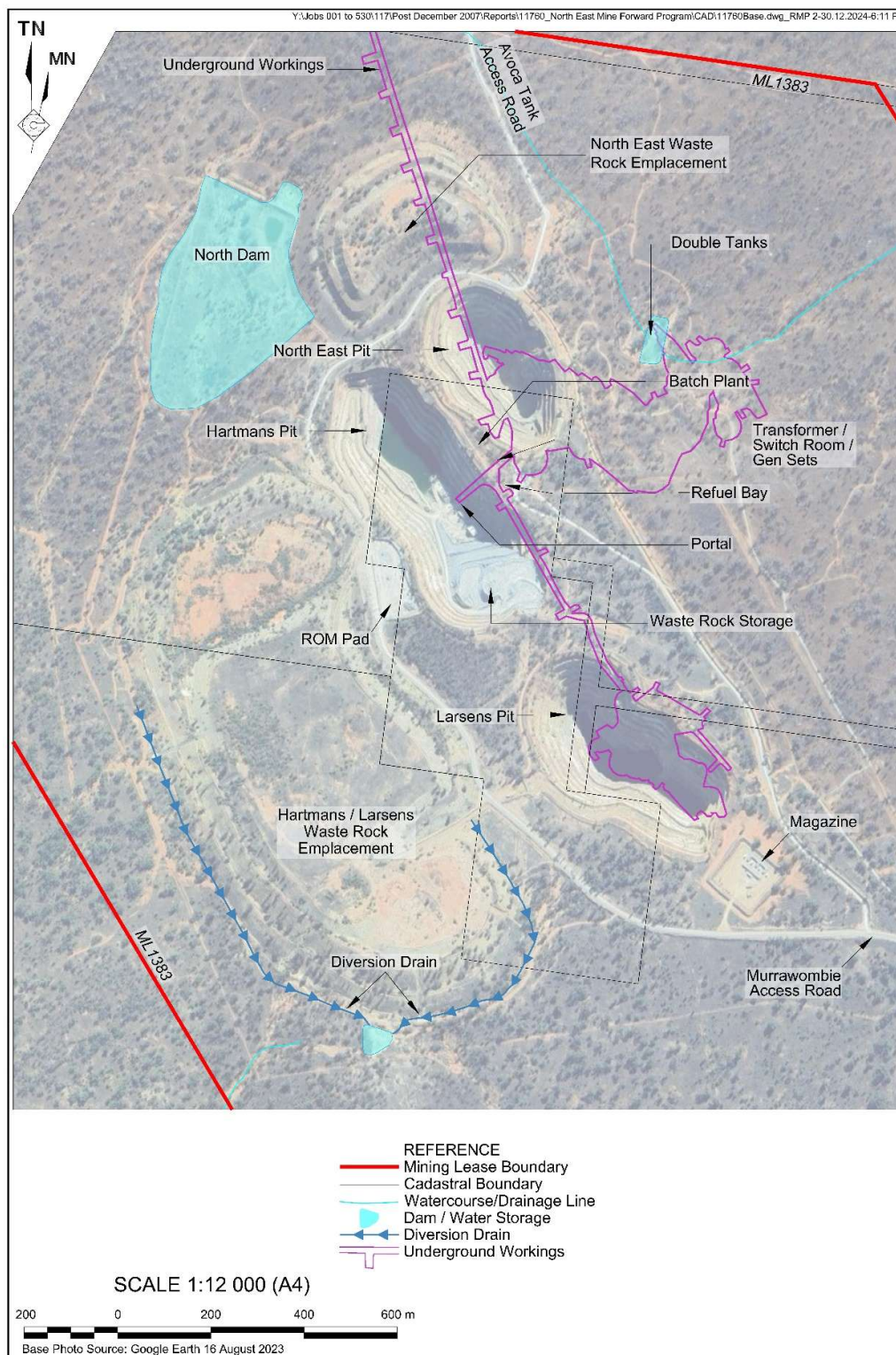
Figure 4 presents the approved NECM site layout.

EPL 4501 applies to NECM.

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Figure 4 North East Copper Mine layout



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4.2.4. Avoca Tank Project

The Avoca Tank Project (ATP) is located approximately 2km north of the NECM and 24km northeast of the TCM and operates under DA 10/2015/004/003 (Bogan Shire Council (BSC) 2025). DA 2015/004 was granted in September 2016 and has been modified twice since its original approval (Mod 2 approved 15 May 2025). Access to the ATP is through an underground drive accessed via the Harmans pit at the NECM. The existing infrastructure on the adjacent NECM is utilised for the ATP, including the existing run-of-mine (ROM) pad and waste rock emplacement (WRE) areas. Other surface infrastructure associated with the ATP includes ventilation fans and an emergency egress. Ore extracted from the ATP is transported and processed at the nearby TCM. ATP operates within Mining Lease 1818. Figure 5 presents the approved ATP site layout.

Collectively, the North East Copper Mine and Avoca Tank Project are also referred to as North East Mine (NEM)

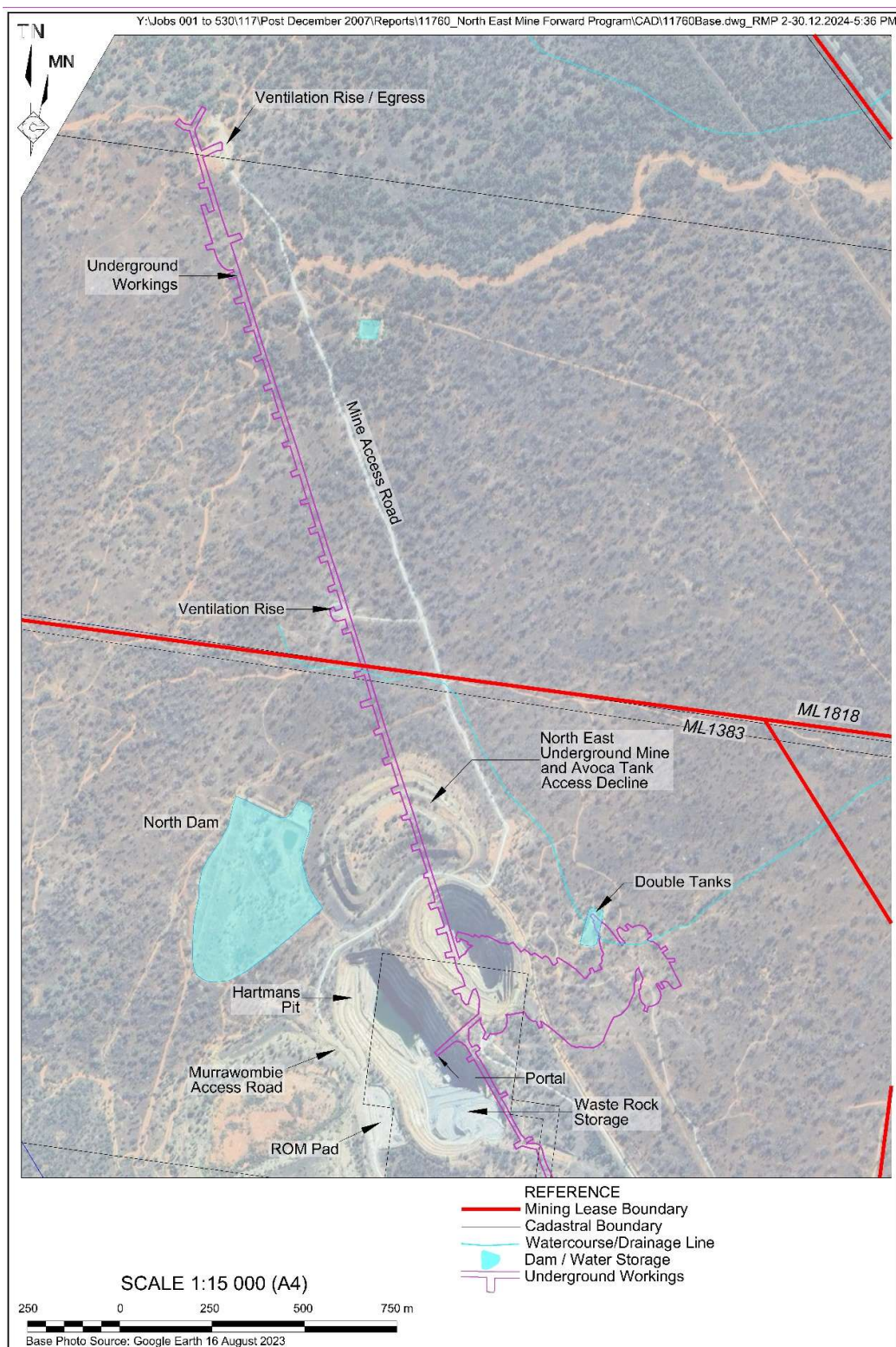
In summary, approved activities at the ATP include the following.

- Use of a portal (within Hartman's Pit), construction of a decline, underground workings and three vent rises (one equipped as an emergency egress and the others with a ventilation fan at surface).
- Extraction of the economically recoverable copper-gold-silver resources to a depth of approximately 500m below surface using bench stoping and long hole open stope mining techniques.
- Transportation of ore material to the TCM for processing using road-registered road trains via a combination of a private haul road and Booramugga and Yarrandale Roads.
- Establishment of a surface waste rock emplacement within Hartman's Pit for storage of waste rock extracted during the construction of access drives and mine development. Waste rock is being used to stabilise a landslip on the southern rim of Hartman's Pit.
- Extension of infrastructure from the NECM, including a site access road, water pipeline and transmission line.
- Establishment of ancillary infrastructure.

EPL 4501 applies to ATP.

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Figure 5 Avoca Tank Project Layout



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5. RESPONSIBILITIES

Personnel, contractors and visitors at TRL all have responsibility for the identification and escalation of pollution incidents to management. Specific roles (Table 4) at TRL have key responsibilities in the approval, maintenance and implementation of this PIRMP.

Table 4 PIRMP Roles and Responsibilities

TRL Role	Responsibility
Site General Manager.	Overall accountability for the environmental performance of the Tritton Copper Operations. Ensure adequate resources are available for implementation of the PIRMP. Authorises (and also by delegation) the external reporting of incidents and initiation of the PIRMP. Site based media spokesperson.
Health, Safety & Environment Manager.	Overall accountability for the development and implementation of this PIRMP and the environmental performance of the Tritton Copper Operations. Responsible for the site safety management system, emergency response and environmental performance of the TRL. Ensure compliance with legal and other requirements. Authorises (and also by delegation) the external reporting of incidents and initiation of the PIRMP. The HSET Manager has the authority to stop an activity if there is reason to believe that environmental harm is occurring or may occur. Assess materiality of incident and activate relevant response systems.
Environmental Superintendent.	Develop, implement and maintain this PIRMP. Ensure compliance with legal and other requirements. Implement the TRL Environmental Management System. Conduct annual tests of the PIRMP and where required, updates to this PIRMP and associated documents. Ensure the PIRMP is publicly available and available at each of the Tritton Copper Operations premises. Responsible for the implementation of environmental risk controls.

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TRL Role	Responsibility
	Ensure staff are trained in relevant environmental procedures (including responding to emergencies). Responsible for external reporting of incidents under this PIRMP. Responsible for the identification, reporting, investigation and corrective actions associated with environmental incidents and non-compliances. Liaise with regulatory authorities on environmental matters. The Environment Superintendent has the authority to stop an activity if there is reason to believe that environmental harm is occurring or may occur.
Senior Environmental Advisors. Environmental Advisors Environmental Technicians	Responsible for implementing: • environmental monitoring programs; • undertaking environmental inspections; • implementing environmental awareness programs; • implementing other environmental programs; and • other tasks as directed by the Environmental Superintendent. Environment Advisors / Technicians have the authority to stop an activity if there is reason to believe that environmental harm is occurring or may occur.
Community Relations Officer.	Responsible for the development, coordination and dissemination of information to community stakeholders.

5.1. PIRMP Contact Details

The following persons may be contacted regarding the content and implementation of this PIRMP.

Table 5 PIRMP Contact Details

Role	Contact Number
Health, Safety, Environment and Training Manager	02 6838 1146 / 0488 209 722
Environmental Superintendent	02 6838 1028 / 0402 597 659
Senior Environmental Adviser	02 6838 1107
Environmental Technician	02 6838 1215

6. COMMUNITY AND STAKEHOLDER ENGAGEMENT

TRL maintains an open-door policy regarding complaints, questions and feedback to the local community. As such, surrounding landholders are regularly consulted through informal telephone conversations and correspondence.

The Tritton Community Consultative Committee (CCC) was established on 22 February 2013 as a means to share information and maintain relationships with the various stakeholders (required as per Condition C6 of the Avoca Tank Project Development Consent (DA 10/2015/004/003)). Its' members consist of representatives from local business, farmers, Bogan Shire Council, Bogan Aboriginal Corporation, Nyngan Local Aboriginal Land Council and NTSCorp. This committee meets once a quarter to discuss issues related to the company's operation and the community. Any material pollution incidents, including TRL's response will be presented and discussed at CCC meetings.

Further information about notifying the community of incidents at the Tritton Copper Operations is included in Section 8.2.3.5.

7. RISK ASSESSMENT

TRL maintain an Environmental Risk Register (TRL-HSET-RAS-0006) which is reviewed and updated on a periodic basis. The Risk Register is further described in the EMS ([TRL-HSET-PLN-0023](#)). During the preparation of this PIRMP, the risk register was used to identify key risks as they relate to pollution events.

The risk register is presented in Appendix B.

The risk register identifies the following hazards (Table 6) that may result in pollution to an extent which may result in material harm (ie a risk of 'moderate' or higher, using the TRL Risk Matrix).

In addition to the above hazards identified in the TRL Risk Register, several additional hazards were identified and relate to the inventory of pollutants (Section 7.1).

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The likelihood of such hazards occurring is included in Table 6 and where relevant is sourced from the TRL Risk Register; for additional hazards, the likelihood and consequence has been determined for this PIRMP using the TRL Risk Matrix (Appendix A).

Table 6 TRL Hazards Register

Hazard	Residual Consequence	Residual Likelihood	Final Risk Ranking
Surface water contamination as a result of a breach or overflow of Containment Dam 1 (MCM)	Major	Unlikely	High
Surface and groundwater contamination from heap leach pads (failure of liner, overtopping of drains etc) (MCM)	Moderate	Possible	High
The spill of hydrocarbons or chemicals outside of designated bunded areas during transportation, storage or use.	Moderate	Unlikely	Moderate
Surface water contamination from waste rock emplacements (MCM, NECM).	Minor	Possible	Moderate
Bushfire (starting a bushfire or impacted by a bushfire).	Critical	Rare	High
Additional Hazards (related to the inventory of pollutants)			
TSF failure causing significant amounts of tailings or contaminated water to discharge onto earthen surfaces or waterways.	Major	Rare	High
Failure of water storage facilities.	Major	Unlikely	High
Any discharge of contaminants (including copper concentrate) off a current operating mine lease.	Moderate	Possible	High
Rupturing of above ground diesel tanks.	Moderate	Rare	Moderate

7.1. Inventory of Potential Pollutants

An inventory of potential pollutants associated with licenced activities (EPL 11254 and EPL 4501) are presented below in Table 7. All other hazardous materials are kept in minor storage. Figure 6, Figure 7 and Figure 8 show the storage locations of hazardous materials at the TCM, MCM and NECM/ATP respectively.

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Table 7 Inventory of Potential Pollutants

Material	Location	Maximum Quantity
Tailings*	TCM - TSF	21.2 million m ³
Copper concentrate**	TCM - Mill Area	5000t
Diesel Fuel	TCM	124000L
	MCM	124000L
	NECM	24000L
Lubricants	TCM - Heavy Vehicle Workshop	9000L
	TCM - Heavy Vehicle Workshop	1t
	TCM - Fixed Plant Workshop	8000L
	TCM - Light Vehicle Workshop	2000L
	TCM - Mill Area	5100L
	TCM - Mill Area	750kg
	TCM - Stores	36000L
	TCM - Stores	10t
	TCM - Underground	3000L
	MCM - Workshop	8000L
	MCM - Workshop	1t
Contaminated waters***	TCM - Containment Dam	13.2ML
	TCM - TSF decant	222ML
	MCM - Containment dam	150ML
	MCM - Pregnant Liquor Ponds	2.4ML
	MCM - Heap Leach Pads	0.5ML
Sediment Laden Waters	TCM - Sediment Dam 1	12ML
	TCM - Sediment Dam 2	4ML
Emulsion	TCM - Magazine	60t
	MCM - Magazine	64t
Shot Crete Additives	TCM - Batch Plant Area	12000L
	MCM - Batch Plant Area	12000L
Collector	TCM - Mill Area	2000L
	TCM - Stores	2000L
Sludgex	TCM - Mill Area	1500L

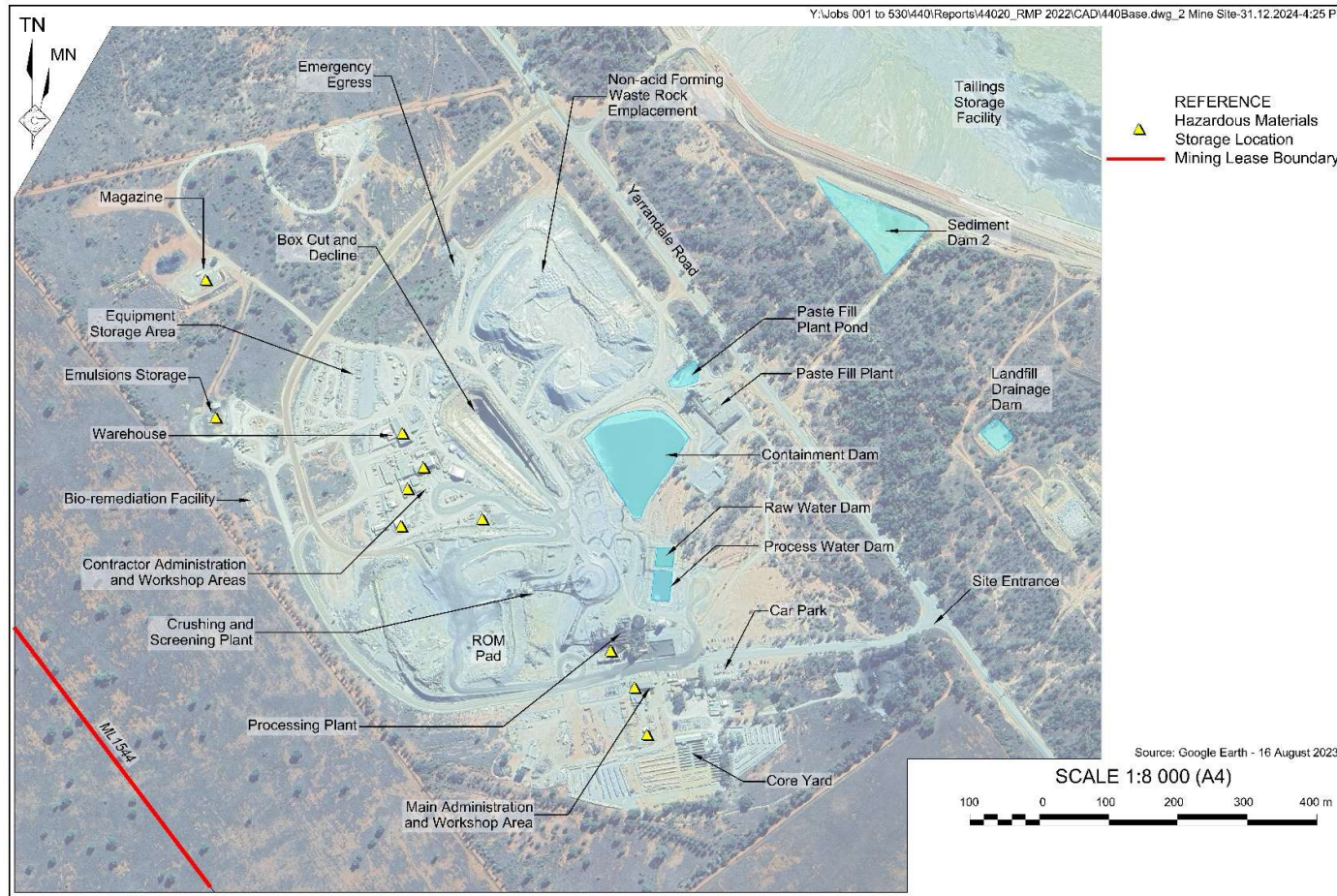
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Material	Location	Maximum Quantity
	TCM - Stores	1000L
Scaleguard	TCM - Mill Area	1500L
	TCM - Stores	2000L
Fluculant	TCM - Mill Area	2.5t
	TCM - Stores	4t
Lime	TCM - Mill Area	80t
	TCM - Batch Plant Area	50t
	MCM - Batch Plant Area	50t
Cement	TCM - Paste Plant	440t
	TCM - Stores	10t
*Tailings are classified as a miscellaneous dangerous good and contains residual waste materials from the copper concentration process which is predominately composed of waste rock with minor milling process constituents including lime, flotation reagent, flocculent and an anti-scaling agent. The hazard associated with a tailings spill is heavy metal loading of the receiving environment causing toxicity. **Copper concentrate is classified as a miscellaneous dangerous good with sulfur (30-40%), iron (30-32%) and copper (24-26%) being the dominant components. The hazard associated with a concentrate spill is heavy metal loading of the receiving environment causing toxicity. ***Contaminated waters contain variable levels of pH and heavy metal concentrations which if released to the environment or ingested by humans can be toxic. These waters are not classified due to their inherent variability but may be considered hazardous for the purposes of this document.		

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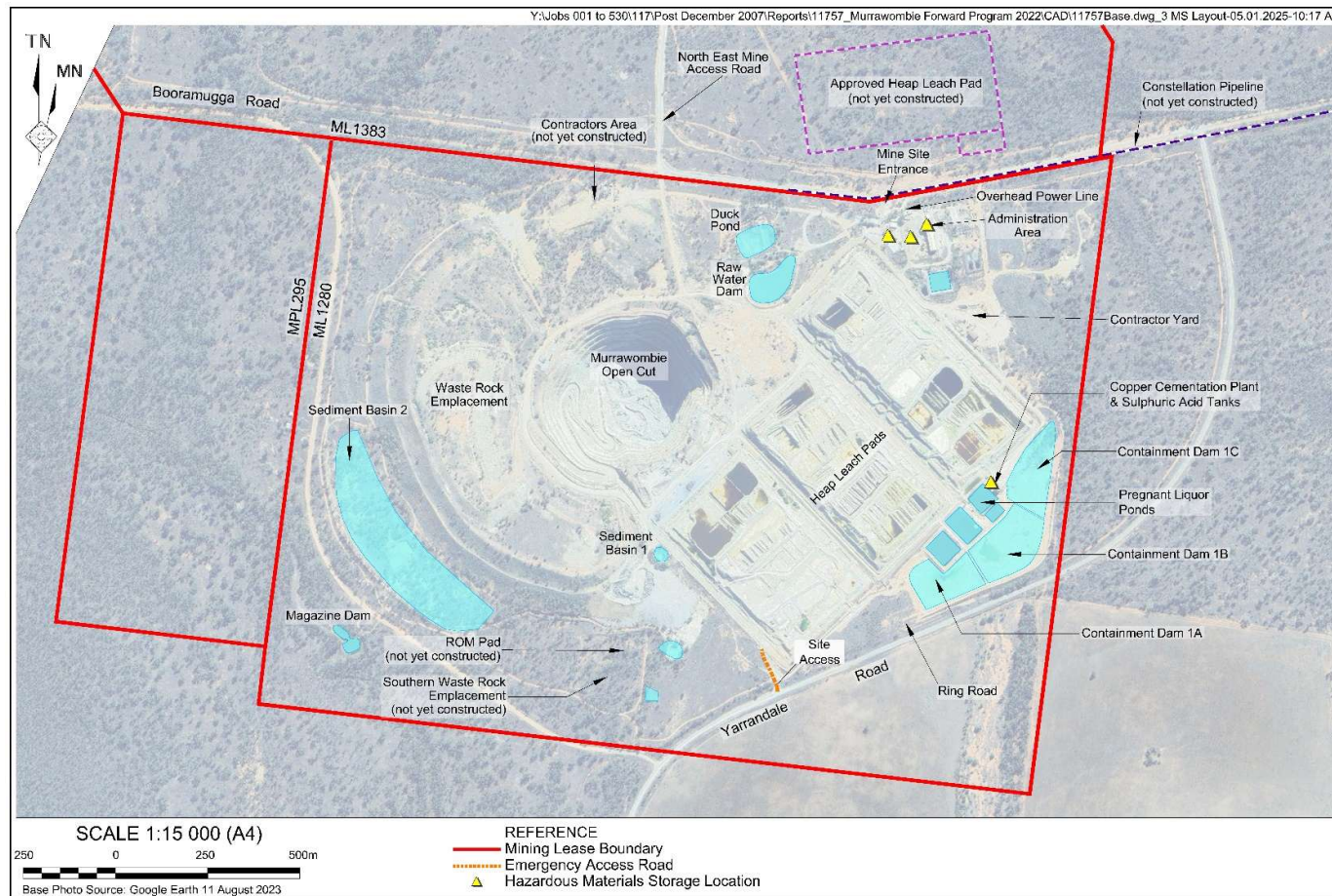
Figure 6 TRL Hazardous Materials Storage Locations



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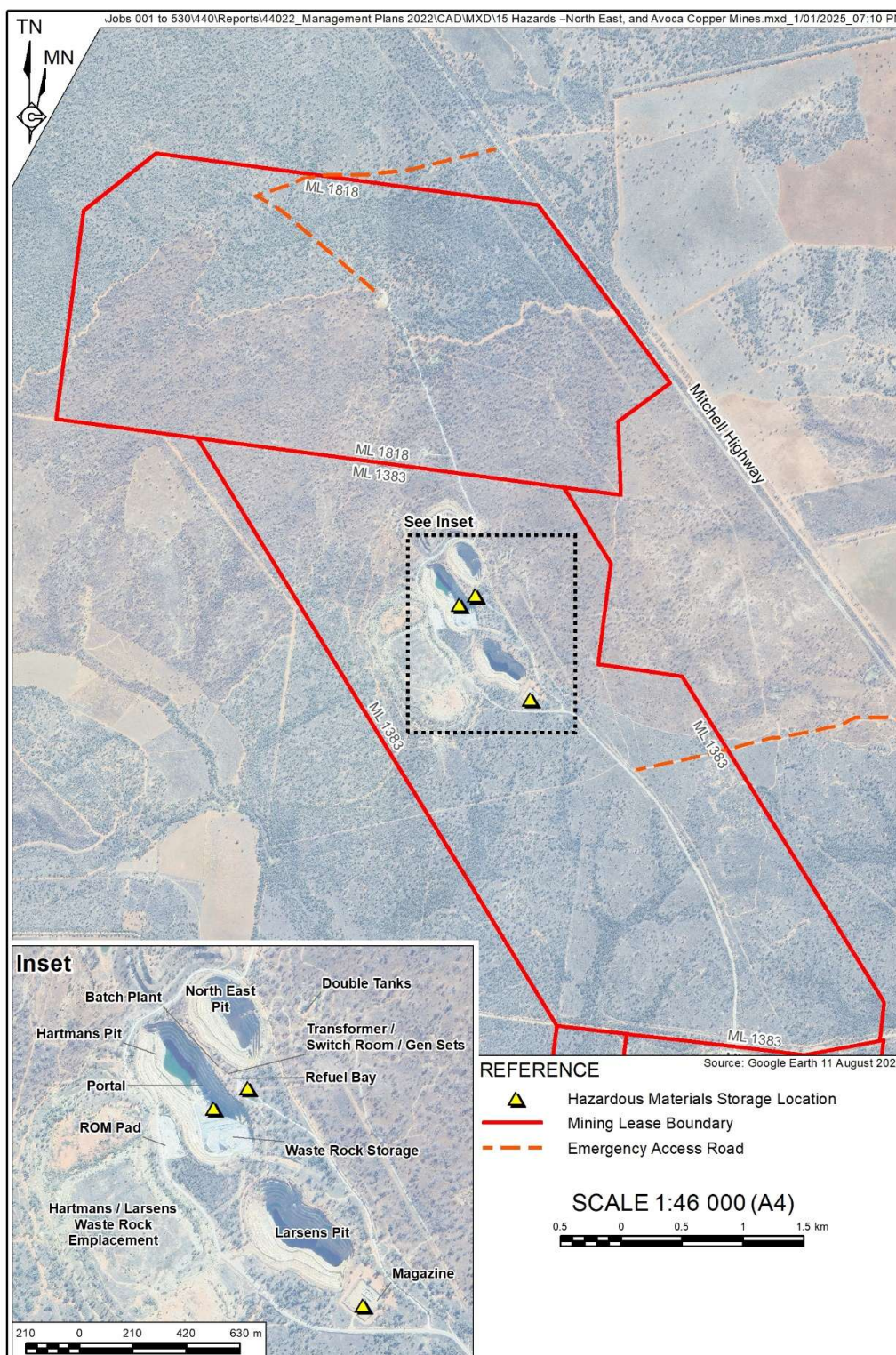
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Figure 7 Murrawombie Hazardous Materials Storage Locations



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Figure 8 NECM / ATP Hazardous Materials Storage Locations



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8. POLLUTION INCIDENT MANAGEMENT MEASURES

8.1. Determining Material Harm

Notifications of a pollution incident are required if there is a risk of 'material harm to the environment', which is defined in Section 147 of the POEO Act 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 \$10,000 (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.

The POEO Act defines 'pollution' in the following terms:

'pollution' means:

- water pollution; or
- air pollution, or
- noise pollution; or
- land pollution.

TRL has processes in place for the reporting and escalation of all environmental incidents to the Environment Superintendent or HSET Manager.

TRL will use its internal risk assessment matrix to determine whether an incident has caused or has the potential to cause material harm and therefore requires external reporting. While every incident will be considered on its merits, generally where the consequence is considered 'moderate or higher, the incident will be considered for external reporting and initiation of the PIRMP. The TRL risk assessment matrix is included as Appendix A.

Incidents that occur outside the defined premises will also be considered as above, where they result from activities associated with the construction and operation of the Tritton Copper Operations, including the transport of goods.

The determination of 'material harm' will be made by the Environment Superintendent and / or HSET Manager.

The General Manager must approve the external reporting of an incident and initiation of the PIRMP.

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8.2. Notification of a Pollution Incident

As a minimum, all employees are required to report all hazards, accidents and incidents which occur in the workplace that either have the potential to, or have caused harm, to personnel, property, or the environment. This requirement is clearly communicated in the site general induction.

The detailed process for escalating and reporting an incident is contained in the TRL Pollution Incident Notification Procedure (TRL-ENV-PRO-003). A summary of the key aspects is included below.

8.2.1. Timeframes for Reporting

If a pollution incident occurs at the premises that causes, or threatens to cause, material harm to the environment, this PIRMP will be implemented. All pollution incidents causing or threatening to cause material harm to the environment are to be reported immediately, which means promptly and without delay following:

- the gathering of sufficient basic information to make the report (Section 8.2.3.4); and
- following the initiation and/or implementation of any immediate measures to prevent further environmental or community harm.

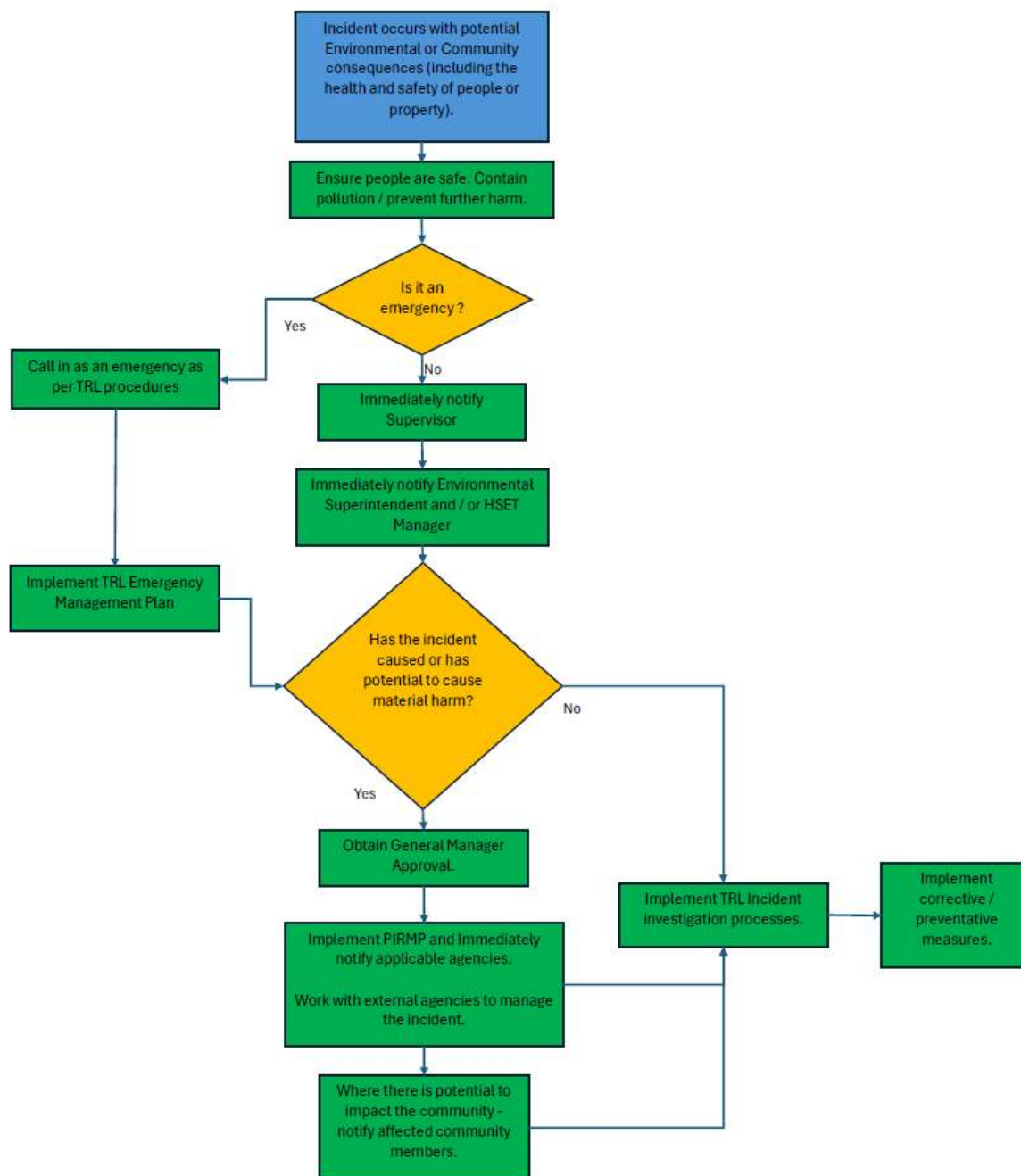
8.2.2. Incident Response Process

The process for responding to an incident that has resulted in, or has the potential to cause material harm is shown in Figure 9.

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Figure 9 Incident Response Process



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8.2.3. Notification Protocol

8.2.3.1. Internal Stakeholders (Employees/Contractors)

In the event of an incident that requires an emergency response, The TRL Emergency Management Plan (TRL-HSET-PLN-00002) will be implemented.

For non-emergency incidents, the established escalation process will be used to notify relevant managers (including the HSET Manager) and the General Manager. Where an incident may result in pollution, the HSET Manager (or under delegation to the Environmental Superintendent) will consider the nature of the incident, risk ranking and determine whether material harm has, or has the potential to occur.

8.2.3.2. External / Government Agencies

TRL employees who have the authority to initiate the PIRMP and notify external or government agencies are provided in Table 8. Prior to any external notification, the site General Manager (or by delegation) must approve the making of an external report.

No other employees have the authority to notify external agencies.

Table 8 TRL Authority to Notify External Agencies

Position	Contact Details
TRL General Manager (or by delegation)	02 6838 1100
HSET Manager (or by delegation)	02 6838 1146 / 0488 209 722
TRL Environmental Superintendent (or by delegation)	02 6838 1028 / 0402 597 659

The relevant external / government agencies provided in Table 9 must be immediately notified (i.e. promptly and without delay) of a pollution incident that has caused, or has the potential to cause material harm. Depending on the nature of the incident, the HSET Manager (or by delegation) will assess and determine the appropriate agencies to notify. Notification will be undertaken by those roles listed in Table 8.

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Table 9 External Agencies Contact Details

External Agency	Contact Details
Emergency Response Agencies (Fire & Rescue, Ambulance, Police)	000 (Emergency)
Fire and Rescue NSW Nyngan office.	(02) 6832 1014.
Nyngan Police Station	(02) 6831 1311
Environmental Protection Authority	131 555
Bogan Shire Council	(02) 6835 9000
Ministry of Health Public Health Unit located in Dubbo.	(02) 6885 8666 (Dubbo Base Hospital) ask for Public Health Officer on call, if no answer: - 0418 866 397 ask for the Public Health Officer on call.
SafeWork NSW	13 10 50;
Department of Planning, Housing and Infrastructure.	(02) 4247 1852 compliance@planning.nsw.gov.au
NSW Resource Regulator	1300 814 609 nswresourcesregulator@service-now.com
NSW State Emergency Services	132 500

8.2.3.3. Initial Incident Response

The following actions will be considered and implemented as required to initially manage an incident with the objective of preventing or minimising effects on people, the environment, property, production, and company reputation.

1. Ensure people are safe. Evacuate the area, establish barricades etc.
2. Where possible and safe to do so, undertake any immediate emergency measures, such as use of fire extinguisher to put out a fire etc.
3. In the case of a spill, implement measures to contain, limit or stop a spill.
4. Initiate emergency response if required.
5. Notify supervisors, the Environmental Superintendent and HSET Manager (initiation of PIRMP if triggered).
6. Secure / freeze the scene.
7. Gather information (i.e. environmental monitoring).
8. Manage stakeholders arriving at site.
9. Provide for the safety and welfare of all responders, employees, contractors and visitors, including the safe escorting of emergency services as required.

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8.2.3.4. Relevant information to be given to authorities

Section 150 of the POEO Act outlines the relevant information that must be provided when notifying the authorities about a pollution incident:

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

8.2.3.5. Local Community

TRL maintain an internal register of community stakeholders, including contact details which will be used to identify and notify any affected community members.

Community stakeholders that are potentially affected by a pollution incident will be notified immediately (i.e. promptly and without delay) by one (or more) of the following methods:

- door knocking by company representatives or emergency services personnel;
- phone call by a company representative;
- other methods as determined by the HSET Manager in consultation with the Community Relations Advisor.

If required (dependent on the nature of the incident) the communication may identify the practical things the community members can do to minimise the risk of harm to their health or property during and after the incident. This may include instructions to close windows and doors and remain inside, avoid accessing water in creeks and rivers etc.

Regular updates will be provided to the affected community stakeholders throughout the course of the event.

8.3. Incident Investigation

The TRL Environment Management Strategy ([TRL-HSET-PLN-0023](#)) contains details on how TRL investigates and manages incidents. A summary is provided below:

All incidents are reported and escalated as per TRL procedures and as communicated in the TRL general Induction.

Incidents where there is an environmental or community consequence are assessed by the TRL Environmental Superintendent or HSET Manager using the TRL Risk Matrix.

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Incidents that meet the definition of 'material harm' are externally reported as stated in Section 8.2 and as contained in the TRL Pollution Incident Notification Procedure (TRL-ENV-PRO-003).

TRL utilise INX as an incident management system.

All incidents (including those deemed to cause 'material harm') are entered into INX and investigated to identify basic and root causes (using the Incident Cause Analysis Method (ICAM) framework).

Corrective and preventative measures are developed and assigned to the relevant person for implementation. INX is used to track the completion of assigned tasks. Tasks that are overdue are escalated to the relevant manager, followed by the General Manager to ensure completion.

All records associated with a reportable incident are stored electronically within INX.

8.4. Emergency Management

Emergency protocols for an incident, that presents an immediate threat to the health and safety of people or threat to property are included in the TRL Emergency Management Plan (TRL-HSET-PLN-00002). The emergency notification procedure is provided in Figure 10.

Immediately following the reporting of an emergency situation:

- Information is gathered regarding the incident;
- the occurrence of an incident is escalated to TRL management including the HSET Manager who is responsible for both emergency response, potential pollution arising from an incident and where required initiation of the PIRMP;
- an assessment is conducted as to the potential consequences of any reported incident where pollution may occur; and
- Where the incident may result in 'moderate' or higher consequence, related to pollution (TRL Risk Matrix), the PIRMP is initiated including the notification of external parties as per the Pollution Incident Notification Procedure (TRL-ENV-PRO-003).

The Emergency Management Plan (TRL-HSET-PLN-00002) includes ten Emergency Response Guides for scenarios that are considered reasonably possible. Five of the scenarios have the potential to result in pollution including:

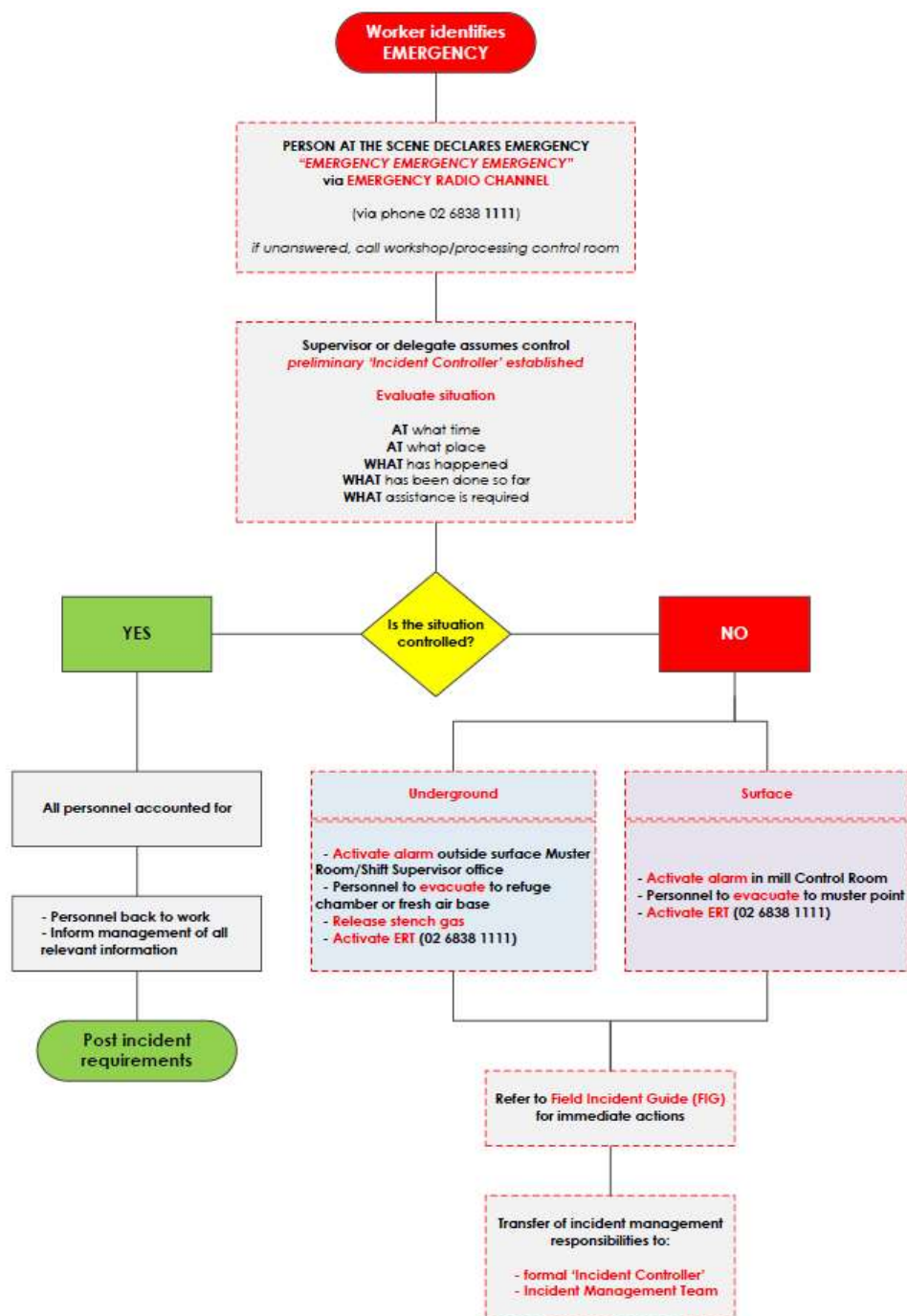
1. Responding to a wildfire
2. Responding to a hazardous substance incident
3. Response to road crash rescue
4. Responding to an explosive's storage area incident
5. Responding to a structural wildfire

These Emergency Response Guides can be accessed via the TRL Emergency Management Plan (TRL-HSET-PLN-00002) and have not been replicated in this PIRMP.

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Figure 10 Emergency notification procedure (Source Emergency Management Plan (TRL-HSET-PLN-00002))



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8.5. Specific Measures for Identified Hazards

Specific measures for identified hazards (Section 7) are included in the below sections.

8.5.1. Tailings, Contaminated or Poor Quality Water Spill

Table 10 Potential Pollution Incident – Tailings, contaminated or poor quality water spill

Examples of a tailings, contaminated or poor quality water spill include, but are not limited to:	
☐ Dam wall failure and release	☐ Pipe rupture and release
☐ Major pump failure/Pump house loses power	
First person on scene:	
☐ Stop work in the area and turn off all machinery and vehicles ☐ Report spill to your supervisor ☐ Remove injured people from danger and render first aid ☐ Wear appropriate PPE as per the product MSDS and if possible, attempt to stop the flow ☐ If possible, contain the spill with barriers, earth bunds and block drains ☐ Await further assistance and / or instructions from Supervisor/ Superintendent, HSET Department or attending Emergency Services ☐ Be prepared to handover the scene to Emergency Services and assist as directed.	
Supervisor:	
☐ Ensure all actions above have been carried out ☐ Take control of the area and inform the HSET Department and Department Manager ☐ Attempt to stop the flow of the material and contain the spill if safe to do so ☐ Commence clean-up if possible ☐ Establish an exclusion zone around the spill and post sentries if required. Deny access to the area to non-essential personnel ☐ Carry out instructions from HSET or Emergency Services ☐ Maintain control of the area until relieved	
Important considerations:	
☐ If the spill is uncontrollable activate site emergency procedures ☐ If necessary, temporarily slow down or shut down concentrator operations ☐ Mobilize heavy equipment to assist with clean up, as required ☐ Additional equipment or personnel may be required to assist with clean-up ☐ If clean-up is remote or lengthy, consider the welfare of clean-up teams ☐ Names and details of fatalities should not be stated over the radio ☐ Don't provide details of fatalities or injured people to family, friends, members of the public or media ☐ Once the response is over, preserve the scene to ensure it remains unchanged ☐ Begin recording details of the incident and prepare for incident reporting and investigation activities i.e. what occurred, date, time, location, list of witnesses.	

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8.5.2. Other Hazardous Materials Spill

Table 11 Potential Pollution Incident – Other hazardous materials spill

Examples of a hazardous material spill include, but are not limited to:	
☐ Hazardous chemical spill	☐ Corrosive substance spill
☐ Concentrate spill	☐ Hydrocarbon spill
☐ Flammable substance spill	☐ Solution spill
First person on scene:	
☐ Stop work in the area and turn off all machinery and vehicles ☐ Evacuate area if material causes dangerous fumes, especially if spill is in confined space or non-ventilated area ☐ Remove injured people from danger and render first aid ☐ For flammable materials, identify and remove any sources of ignition ☐ Turn off any air conditioners and exhaust fans and close all windows and doors ☐ Notify your Supervisor when safe to do so ☐ If possible, contain the spill with barriers, earth bunds and block drains. ☐ Attempt to clean the spill area if: ☐ Sufficient amounts of the correct absorbent materials are available ☐ The appropriate PPE is available and worn ☐ Adequate disposal containers are available for chemical and absorbent materials	
☐ Warn others of the danger and keep people clear of the area. Notify staff and visitors to muster to a central point if required ☐ Remain upwind of fumes and smoke ☐ Await further assistance and / or instructions from Supervisor/ Superintendent, HSET Department or attending Emergency Services	
Supervisor:	
☐ Ensure all actions above have been carried out ☐ Take control of the area and inform the HSET Department and Department Manager ☐ Ensure people have been evacuated to a safe location (upwind and uphill) for materials that cause dangerous fumes, especially if spill is in confined space or non-ventilated area ☐ Attempt to identify the hazardous material and collect the MSDS sheets ☐ Attempt to stop the flow of the material and contain the spill ☐ Establish an exclusion zone around the spill and post sentries if required. Be prepared to deny access to the area to non-essential personnel ☐ Carry out instructions from HSET or Emergency Services ☐ Maintain control of the area until relieved	
Important considerations:	
☐ Notify environmental personnel and use spill kits where appropriate. ☐ Additional equipment or personnel may be required to assist with clean-up ☐ If clean-up is remote or lengthy, consider the welfare of clean-up teams ☐ Names and details of fatalities should not be stated over the radio ☐ Don't provide details of injured people to family, friends, members of the public or media ☐ Once the response is over, preserve the scene to ensure it remains unchanged ☐ Begin recording details of the incident and prepare for incident reporting and investigation activities i.e. what occurred, date, time, location, list of witnesses.	

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8.6. Pre-Emptive Controls

A number of key environmental and community risks have been identified in the current TRL Risk Register (Appendix B). TRL implement a number of pre-emptive management measures to prevent, control or mitigate these risks (Table 12).

Table 12 TRL Pre-emptive Management Measures

Aspect	Pre-emptive Controls
General measures	TRL have an established Environmental Management Strategy.
	Regular training for site personnel (including the site general induction).
	Risk assessments undertaken prior to tasks and activities to identify risks to health, safety, the environment and the community.
	Maintenance schedules for mobile and fixed plant equipment.
	Pre-shift communications and toolbox talks delivered to site personnel to communicate incidents, hazards and corrective actions.
	Independent environmental audits.
Hydrocarbon or Chemical Spill	Hydrocarbon and chemical storage in accordance with Australian Standards (Hydrocarbon and Chemical Management Plan (TRL-HSET-PLN-0027)).
	Spill kits located where chemicals or hydrocarbons are stored or used (documented in a Spill Kit Register). Spill kits checked and replenished as required.
	Regular inspections of hydrocarbon and chemical storage facilities.
	Register of approved chemicals and hydrocarbons (Chemalert).
	Approval and risk assessment processes for bringing new chemicals to site.
	Fire suppression plant and equipment.
	Eye-wash stations and showers.
	Spill containment equipment (Hydrocarbon and Chemical Management Plan (TRL-HSET-PLN-0027)):
	- Emergency spill kits. - Pumps. - Earth moving equipment. - Trained Emergency Response Team.
	Tertiary (ie stormwater) containment systems.

Aspect	Pre-emptive Controls
Spill or breach of water storage dam / TSF	Engineered design of dams, embankments and structures.
	Regular inspections of dam water levels, including following rainfall.
	Formal NSW Dam Safety inspections and reports on the TSF embankment.
	Erosion and sediment controls for the capture and containment of stormwater (Water Management Plan (TRL-HSET-PLN-0032)).
	Surface and groundwater monitoring (Water Management Plan (TRL-HSET-PLN-0032)).
Surface or groundwater contamination from Heap Leach Facilities / Waste Rock Emplacements	Surface and groundwater monitoring (Water Management Plan (TRL-HSET-PLN-0032)).
	QA/QC processes during liner installation.
	Erosion and sediment controls for the capture and containment of stormwater (Water Management Plan (TRL-HSET-PLN-0032)).
	Regular inspections of water containment structures.

8.7. Emergency Response Resources Register

All TRL employees and contractors receive emergency preparedness and response training during their site general induction.

TRL maintains an emergency response team who undergo regular training and operational drills.

Specialised equipment available to the emergency response team is itemised in

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Table 13

Emergency spill kits are stored adjacent to hydrocarbon and chemical storage locations.

All required PPE is made available to all employees, contractors and visitors. Mandatory PPE is identified for operational areas by the use of signs. Mandatory PPE is specific to the materials and activities conducted in each area.

General mining equipment, such as earth moving equipment is made available to assist in the management and control of incidents.

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Table 13 Emergency Response Resource Register (Source: Emergency Management Plan (TRL-HSET-PLN-00002))

Road crash and industrial rescue	Underground search and rescue
eDraulic Battery Operated Spreader	14 Drager BG4 Long Duration Sets (In Mask Comms Units)
eDraulic Battery Operated Cutter (Jaws)	Large & Small Air Compressor
eDraulic Battery Operated Ram (twin-staged)	Oxygen Booster Pump & Cylinders
Airbag 67 tonne	Red & Green Cyalumes Sticks
Airbag 24 tonne	Bolt Cutters
Airbag 11 tonne	50m Rope
Airbag Controller set (Controls, Hoses, Regulator)	Small Rigging Kit
Milwaukee Reciprocating Saw, Wrench, Cutter, Blower	Emergency Maps
Glass Management Kit (Window Punch)	Gas Detector Altair 5x
Stab-fast Stabilisation + Holton Foot	Pelican Pick / Shovel
Black Rat Cable Winch	Scaling Bar
Impact Socket & Ratchet Set	Cap Lamps
Screwdriver Set	Self-Rescuer
Step Block Engine Bay Shelves	Portable LED Lighting
Timber Hardwood Packing Set	Fire & hazmat
Timber Softwood Packing Set	Fire Truck – 4WD – onboard 1500L Tank plus pump, hose reels.
Timber Wedge Bag + Mallets	Turbex Foam Generator
Timber Boards (Casualty hard protection Vehicle Rescue)	20m Vent Bag
Sharp Edge Protection Set (Vehicle Rescue)	High Expansion Foam Concentrate
Vertical & Confined Space Rescue	AFFF Concentrate
Vertical Rescue Attendant Kit	12 Compressed Air Breathing Apparatus Sets (inc DSU)
Large Rigging Kit	Level 2 Structure Fire Jackets
Rescue Recovery Bag (6:1, Sling, Snap Hook, Spreader bar)	Bush Fire Jackets
Recovery Pole	Flash Hoods
Vertical Rescue Litter	Fire Fighting Gloves
4:1 Pulley Set	Variable Flow Branches and Hose Spanners
Tripod	Foam Nozzle and Adapter
50m Ropes	Lay Flat Hose 38 mm and 65 mm
100m Ropes	Frenay Trauma Pack with Oxy viva, AED.
200m Rope	Small Trauma Pack
Litter Sling	Emergency Care (First Aid)
Latchways Wire Rope Inertia Reel	Ambulance - 4WD – capable of transporting one patient
Sked Stretcher	Trauma Pack, Oxy Viva Kit, AED
	Stokes Litter
	Spine Board
	Kendrick Extraction Device
	Cervical Collars (Soft and hard)
	Head Blocks & Straps
	SAM Pelvic Slings, Body Bag
	Prescribed Medication – locked box of S4.
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9. COMPLIANCE, AUDITING AND REPORTING

9.1. Independent Environmental Audits

Condition 8 of the TCM Development Consent (DA41/98) requires the undertaking of a three yearly independent environmental audit. The audit will assess the Company's performance against compliance conditions and the implementation of this PIRMP.

Similarly, Condition C8 of the ATP Development Consent (DA 10/2015/004/003) requires that within 2 years of the commissioning of the development, and every three years thereafter, that an independent environmental audit is undertaken. The audit will assess the Company's performance against compliance conditions and the implementation of this PIRMP.

9.2. Reporting

9.2.1. TRL Development Consents

The EMS ([TRL-HSET-PLN-0023](#)) includes details on the required reporting mechanisms as they apply to the various TRL Operations. Formal annual reporting mechanisms (Annual Review) are required to meet the TCM Development Consent (DA41/98) and the ATP Development Consent (DA 10/2015/004/003). For each annual report produced, the report will include (where relevant to the specific operation / consent) a summary of:

- Significant incidents including:
 - where the PIRMP was initiated;
 - the nature of the incident;
 - a summary of the incident response;
 - corrective and preventative measures; and
 - any significant improvements to the EMS including the revision of management plans.

9.2.2. Environment Protection Licence

The two EPLs held by Tritton Resources Limited require the completion of an annual return. The annual return will be submitted, via the EPA's 'EConnect' portal in accordance with conditions and within 60 days after the licence anniversary date. The completion of the EPL annual return is included in the TRL Legal and Other Obligations Register (TRL-HSET-REG-0002) to ensure completion. Each annual return requires a summary of PIRMP review, testing and implementation.

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10. TRAINING AND AWARENESS

All personnel involved in on-site operations at each of the Tritton Copper Operations will receive training on the PIRMP (as applicable to the general workforce). The objective of the training is to ensure all employees and contractors are aware of:

- the PIRMP;
- their responsibility to notify and escalate incidents; and
- who to notify and escalate incidents to (ie to their supervisor, the Environmental Superintendent, or HSET Manager).

The training will provide information relating to the following:

- Pollution incident notification procedure;
- Types of incidents requiring regulatory notification;
- Identifying incidents and emergencies; and
- General emergency response training.

Training will be undertaken through the completion of the site general induction.

Awareness covering relevant topics, such as incident and emergency management will be provided throughout the year through daily pre-starts, posters and safety meetings.

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11. REVIEW AND IMPROVEMENT

This PIRMP will be reviewed and if required, revised on an annual basis. The review will be conducted following the testing of the PIRMP, to ensure any identified improvements (from the test) are included in the revised plan. The scheduled review is included in the TRL Legal and Other Obligations Register (TRL-HSET-REG-0002).

11.1. Availability of the PIRMP

In accordance with Section 153D of the POEO Act and Part 3A Section 98D of the POEO Regulation 2009, the plan will be made available to all site personnel via the site document control system.

The plan will be made available to the public via the Aeris Resources website.

A copy of the plan will be provided to any person, free of charge, upon request.

A copy of the plan will be maintained at the:

- TCM site entrance
- the MCM site entrance (which includes access for the NECM and ATP)

11.2. Testing of the PIRMP

The PIRMP will be tested annually and will include:

- a desktop review of the plan to ensure that the information is accurate and up to date; or
- a drill exercise to simulate one of the potential hazards identified in Section 7.

As it is a requirement of the legislation, this plan will also be tested within one month of any reportable pollution incident occurring onsite.

The purpose of the test is to ensure:

- the information included in the PIRMP is accurate and up to date,
- the PIRMP is capable of being implemented in a workable and effective way.

Testing will cover all components of the PIRMP, including the effectiveness of training.

Testing will reflect the:

- nature of activities undertaken at the premises;
- risk level determined for the site (eg TRL Risk Register); and the
- environmental context (including location, sensitive/protected waterways (water catchment), air quality, land habitat, sensitive receivers who are close by etc).

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Table 14 Register of TRL PIRMP Tests

Date of Test	People Involved	Description
26/04/2017	HSET Manager, Emergency Response & Training Coordinator and Environmental Advisor	Annual testing of PIRMP
14/09/2018	Environmental Advisor, Mill Maintenance Supervisor, Boilermaker	Annual testing of PIRMP
30/8/2019	Processing Manager, Senior Risk and Compliance Officer and Environmental Advisor.	Annual testing of PIRMP
31/7/2020	Senior Environmental Advisor and Light Vehicle Supervisor	Annual testing of PIRMP
30/7/2021	Processing Trainer and Senior Environment Advisor	Annual testing of PIRMP
28/7/2022	Processing Superintendent and Environmental Superintendent	Annual testing of PIRMP
7/7/2023	Exploration Geologist, Exploration Field Assistant and Environmental Advisor	Annual testing of PIRMP
27/7/2023	Environmental Technician and Cementation Supervisor	Annual testing of PIRMP
2024	Environmental Superintendent	Annual testing of PIRMP
30/7/2025	Environmental Superintendent, 2x Senior Environmental Advisor, and Environmental Technician	Annual testing of PIRMP

12. RELATED DOCUMENTS

Internal documents referenced within this PIRMP are presented in Table 15Table 15.

Table 15 Internal Documents Relevant to this PIRMP

Doc No.	Document Name	Author
TRL-HSET-PLN-0023	Environmental Management Strategy	TRL
TRL-HSET-RAS-0006	Environmental Risk Register	TRL
TRL-HSET-REG-0002	TRL Legal and Other Obligations Register	TRL
TRL-HSET-PLN-00002	TRL Emergency Management Plan.	TRL
TRL-ENV-PRO-004	Spill Response procedure	TRL
TRL-HSET-PLN-0024	Air Quality and Greenhouse Gas Management Plan	TRL
TRL-HSET-PLN-0028	Natural Hazards Management Plan	TRL
TRL-ENV-PRO-003	Pollution Incident Notification Procedure	TRL
TRL-HSET-PLN-0027	Hydrocarbon and Chemical Management Plan	TRL
TRL-HSET-PLN-0032	Water Management Plan	TRL
	Aeris Resources Limited Crisis Management Plan	Aeris Resources

13. REFERENCES

Bogan Shire Council (BSC) (2025). Avoca Tank Project Development Consent (Modification 2 DA10/2015/004/003).

Protection of the Environment Operations Act 1997;

Protection of the Environment Operations (General) Regulation 2022

NSW Environmental Protection Authority (2022). Guideline: Pollution Incident Response Management Plans.

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14. APPENDICES

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14.1. Appendix A - TRL Risk Matrix

Step 1. Determine the consequence				
TRITTON CONSEQUENCE TABLE (What is the maximum reasonable consequence)				
5. Insignificant	4. MINOR	3. MODERATE	2. MAJOR	1. CRITICAL
Health and Safety				
▪ First aid treatment or injury only;	▪ Medical Treatment Injury (MTI);	▪ Single Lost Time Injury (LTI);	▪ Multiple Lost Time Injuries;	▪ Permanent disability > 30%;
▪ Low level soreness or small amount of pain.	▪ Restricted Work Injury (RWI);	▪ Short term hospitalisation (< 7 days);	▪ Extended hospital treatment (> 7 days);	▪ One or more fatalities.
	▪ Presented to hospital (no overnight stay).	▪ Reversible impairment to human health.	▪ Permanent disability < 30%;	
			▪ Serious long-term health issue.	
Environment				
▪ No or very low environmental impact;	▪ Low environmental impact;	▪ Moderate environmental impact;;	▪ Major environmental impact;	▪ Severe environmental impact;
▪ Impact confined to a small area.	▪ Rapid clean-up by internal staff or contractors;	▪ Clean-up by internal staff or contractors;	▪ Considerable clean-up effort required by internal staff and external contractors;	▪ Likely species destruction and long recovery period;
	▪ Impact contained to area already impacted by operations.	▪ Impact confined within lease boundary.	▪ Impact may extend across lease boundary.	▪ Extensive clean-up using external resources;
				▪ Impact on a regional scale.
Community/External Relations				
▪ Isolated complaint received;	▪ Multiple or sporadic complaints received;	▪ Repeated or serious rate of complaints;	▪ Ongoing complaints from local groups, NGO's or regulators;	▪ High level concern from community, regulators, stakeholders and /or stakeholders;
▪ No media coverage;	▪ No media coverage	▪ Local media interest and coverage;	▪ Regional/national media interests;	▪ Adverse national or international media coverage;
▪ No damage to reputation or relationships with stakeholders	▪ Short-term damage with relationship with one or more stakeholders but no damage to reputation.	▪ Reversible damage with stakeholders and to reputation.	▪ Protests by external stakeholders;	▪ International damage to reputation.
			▪ Local or regional damage to reputation.	
Legal				
▪ Questionable or minor non-conformance with operating condition;	▪ Non-compliance with operating conditions;	▪ Breach of local or national law with potential prosecution by regulator;	▪ Major breach of local or national law;	▪ Significant breach of national or international law with potential jail sentence;
▪ No fine or prosecution;	▪ Could attach low level administrative response from regulator;	▪ Continuing occurrence of minor breach.	▪ Prosecution or penalties by regulator likely;	▪ Operations suspended or cease (short term or long term);
▪ Unlikely to attract regularity interest;	▪ No court appearance required		▪ Short term treat to operations continuing	▪ Licenses withdrawn or revoked;
▪ Easy to resolve.			▪ Civil action initiated.	▪ Class action initiated.
Operational/Cost				
▪ Minor impact, easily corrected with insignificant cost to the operation:	▪ Minor damage/failure to equipment or infrastructure with minimal associated cost:	▪ Damage/failure to equipment or infrastructure marginal cost to the operation:	▪ Damage/failure to equipment or infrastructure resulting in significant cost to the operation;	▪ Damage/failure to equipment or infrastructure resulting in a detrimental cost to the operation:
▪ <\$5,000	▪ \$5,000 - \$50,000	▪ \$50,000 - \$100,000	▪ \$100,000 - \$500,000	▪ > \$500,000
Business interruption				
Minimal disruption to concentrate production (<4hrs):	Minor loss of concentrate production (< 1 day):	Significant loss of concentrate production (1 - 3 days):	Major disruption to concentrate production (3 - 7 days):	Critical loss of revenue from extended disruption to concentrate production (>1 week):
<100,000	\$100, 000 to \$500, 000	\$500,000 - 1,500,000	\$1,500,000 - \$4,500,000	> \$4,500,000

(What is the expected frequency of the consequence given the current controls)

Rating	Description in terms of full operating life of the site	Description in terms of frequency
Almost Certain	Consequences expected to occur in most circumstances	Daily or continuous
Likely	Consequences will probably occur in most circumstances	Weekly or monthly
Possible	Consequences could occur at some time	Annually
Unlikely	Consequence will probably NOT occur in most circumstances	Within the life of the operation
Rare	Consequence may occur in exceptional circumstances	>100 years

(Risk = Consequence x Likelihood)

		Consequence				
	Likelihood	5	4	3	2	1
		Insignificant	Minor	Moderate	Major	Critical
A	Certain	15	10	6	3	1
B	Likely	19	14	9	5	2
C	Possible	22	18	13	8	4
D	Unlikely	24	21	17	12	7
E	Rare	25	23	20	16	11
	Critical					
	High					
	Moderate					
	Low					

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14.2. Appendix B – TRL RISK REGISTER

RISK CONTEXT				RISK ANALYSIS AND EVALUATION									
Risk Summary				Energy & Causes				Current Controls		Current Risk			
Department	Area	Activity/Category	Top Event - Risk Description (Include Activity, Product, Service description etc.)	Energy Type (Hazard/Threat)	Energy Context	Event mechanism/Cause/Contributing factors(s)	Maximum reasonable Consequence	Current Controls	Risk Category - Major Impacted Area	Consequence	Likelihood	Risk Level	
HSET	Environment	Surfacewater Management	Contamination due to a breach of Containment Dam 1 dam wall or overtopping	Chemical/contaminant	Potential for spillage/release of chemicals	Insufficient Storage Capacity Excessive Consecutive Rainfall Events	Contamination of Surface Water Contaminated Water discharged from Site Breach of License Conditions	CD1 maintained at minimal water levels as per Surface Water Management Plan Management strategy for containment	Legal Compliance	2	D	12	HIGH
HSET	Environment	Groundwater Management	Further contamination from the Heap Leach Pads (W-drains and rainfall run-off).	Chemical	Potential for spillage/release of chemicals	Failure of lining in W-drains. Excessive rainfall (inadequate drainage capabilities of access roads).	Contamination of surface and groundwater. Financial penalties for non-compliance.	Weekly inspections. Groundwater monitoring. Maintenance of access roads (drainage).	Legal Compliance	3	e	20	MODERATE
HSET	Environment	Hydrocarbon Storage and Handling	The spill of hydrocarbon or chemical compounds outside of designated bunded areas during transportation, storage or use	Chemical/contaminant	Potential for spillage/release of chemicals	Failure of bunding (overtopping, structural). Failure of load security during transportation. Storage vessel damage or failure. Malfunction of transportation vessel. LTA handling practices.	Legal prosecution. Environmental damage (contamination).	Chemicals stored in bunded areas. Vehicles site compliant. Spill response procedures (CCC). Training and awareness through inductions. Bunded areas designed to contain chemical/hydrocarbon stored. Personnel trained in handling and storage of chemicals and hydrocarbons. Incident reporting. Adequate storage vessels used on-site. Monthly environmental inspections. Bunding at hydrocarbon laydown area to be improved.	Legal Compliance	3	d	17	MODERATE
HSET	Environment	Surfacewater Management	Contamination from water runoff from the Waste Rock Emplacement	Chemical/contaminant	Potential for spillage/release of chemicals	Excessive rainfall event. Insufficient drainage. Inadequate capping of waste rock dump.	Contamination of surface water. Contaminated water discharged from site. Financial penalties for non-compliance.	Drainage of waste rock dumps. Capping of WRE's. Quarterly WRE run-off water quality monitoring. Drains around Triton WRE.	Legal Compliance	4	c	18	MODERATE
HSET	Environment	Surfacewater Management	Contamination of a local waterway or off site water storage dam	Chemical/contaminant	Potential for spillage/release of chemicals	Insufficient Storage Capacity Failure of Dam Wall Failure of contaminated water pipe lines	Contamination of a local waterway or off site water storage dam Financial Penalties Strained Community Relations.	Established dam storage capacities. Engineering certificates for TSF. Waterpipe integrity inspections. Diversion drains.	Legal Compliance	4	d	21	LOW

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RISK CONTEXT				RISK ANALYSIS AND EVALUATION									
Risk Summary				Energy & Causes				Current Controls		Current Risk			
Department	Area	Activity/Category	Top Event - Risk Description (Include Activity, Product, Service description etc)	Energy Type (Hazard/Threat)	Energy Context	Event mechanism/Cause/Contributing factors(s)	Maximum reasonable Consequence	Current Controls	Risk Category - Major Impacted Area	Consequence	Likelihood	Risk Level	
HSET	External Relations	Air Quality Management	Emission of excessive dust from mining operations. Resulting in complaints from neighbours.	Physical	Dust	Heap Leach Pads. Unsealed roads. Haulage operations. Crushing/processing of ore. TSF operations. Construction operations (earthworks, heavy mobile equipment). Excessive dust or lost product when transporting ore/product via the public road	Excessive complaints from neighbours affecting community relations. Potential breach of licenses.	Dust suppression (water sprays, water carts). Dust monitoring. Complaints register. Yarrandale Rd sealed.	Legal Compliance	4	e	23	LOW
HSET	Environment	Hydrocarbon Storage and Handling	Inadequate disposal of waste hydrocarbon/chemical contaminated materials	Chemical/contaminant	Storage/Disposal requirements not met	LTA training and awareness. Human Error - Disposal of hydrocarbons within general waste.	Legal prosecution. Environmental damage (contamination).	Induction includes awareness of environmental requirements in relation to handling, storage and disposal of waste. Site notice board communication. Toolbox talks. Appropriately labelled waste disposal vessels/areas. Site landfill inspections.	Legal Compliance	4	d	21	LOW
HSET	Environment	Hydrocarbon Storage and Handling	The spill of hydrocarbon or chemical compounds within designated bunded areas such as re-fueling areas, stores warehouse/laydown yard and washdown bay	Chemical/contaminant	Potential for spillage/release of chemicals	Failure of containment vessel. Fuel overflow during re-fuelling. Damage of containment vessels.	Minimal operational cost.	Bioremediation facility. Chemicals stored in bunded aareas. Spill response procedures (CCC). Training and awareness through inductions. Bunded areas designed to contain chemical/hydrocarbon stored. Personnel trained in handling and storage of chemicals and hydrocarbons. Incident reporting. Adequate storage vessels used on-site. Monthly environmental inspections.	Operational	5	d	24	LOW
HSET	Environment	Waste Disposal	Failure of the septic system	Biological	Other	System malfunction (pumps, pipes, tanks etc). Inadequate servicing.	Environmental impact. Biological health impacts.	Servicing/maintenance schedule. Weekly inspections. Innoxious vapour.	Environmental	4	d	21	LOW
HSET	Environment	Natural Distasters	Bushfire - Either starting a bushfire or being caught up in one	Fire	Potential for fire	Drought. Lightening. Seasonal fuel build-up (leaves, grass etc). Vehicle/machinery malfunction. Hot work. Human error or sabotage. Hot weather. High winds.	Serious injury or Fatality. Property damage. Environmental impact. Equipment damage. Community impacts (farm land residents).	Bushfire management plan. Fire breaks. Emergency response (internal and external). Evacuation procedures. Preventative maintenance for vehicles/machinery. Hot work permit system.	Health & Safety	1	e	11	HIGH
HSET	Environment	Natural Distasters	Flooding on surface.	Flood	Potential for flood	Excessive rainfall event. Failure of drainage. Failure of containment dams.	Property damage. Equipment damage. Environmental impact. Operational cost. Community relations impact.	Drainage lines. Containment dams. Pumping systems.	Legal Compliance	4	D	21	LOW

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