

sunrise
energy metals

Sunrise Project

Pollution Incident Response Management Plan



December 2023



SUNRISE PROJECT

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

REVISION 3



15 DECEMBER 2023
Project No. CTL-17-03
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1 INTRODUCTION

The Sunrise Project (the Project) is situated near the village of Fifield, approximately 350 kilometres (km) west-northwest of Sydney, in New South Wales (NSW) (Figure 1).

The Project includes the establishment and operation of the following (Figure 1):

- mine (including the processing facility);
- limestone quarry;
- rail siding;
- gas pipeline;
- borefield, surface water extraction infrastructure and water pipeline;
- accommodation camp; and
- associated transport activities and transport infrastructure (e.g. the Fifield Bypass, road and intersection upgrades).

SRL Ops Pty Ltd owns the rights to develop the Project. SRL Ops Pty Ltd is a wholly owned subsidiary of Sunrise Energy Metals Limited (SEM)¹.

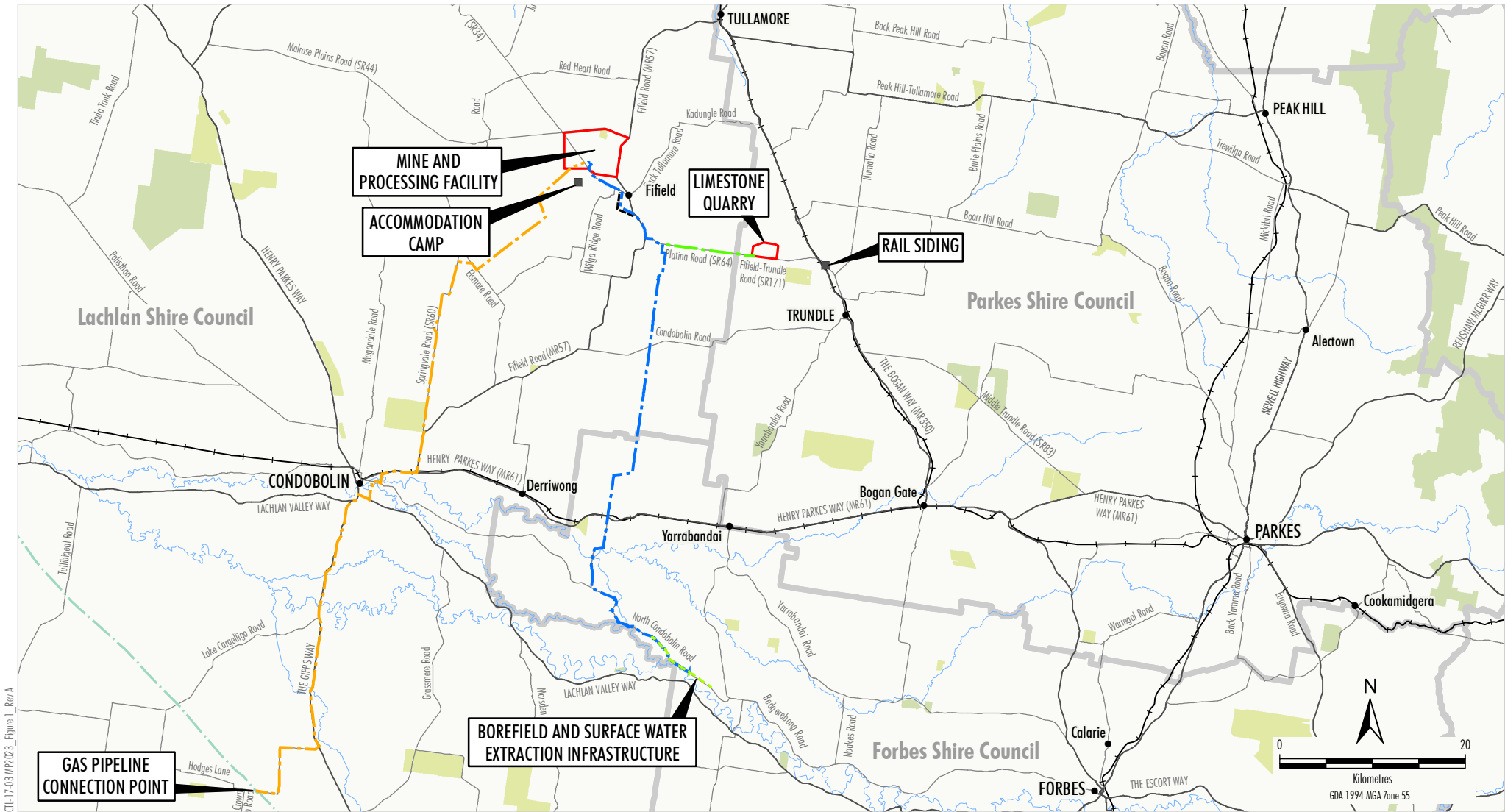
Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) in 2001. Seven modifications to Development Consent DA 374-11-00 have since been granted under the EP&A Act:

- 2005 – to allow for an increase of the autoclave feed rate, limestone quarry extraction rate and adjustments to ore processing operations;
- 2006 – to allow for the reconfiguration of the borefield;
- 2017 – to allow for the production of scandium oxide;
- 2017 – to amend hazard study requirements;
- 2018 – to relocate the accommodation camp;
- 2018 – to implement opportunities to improve the overall efficiency of the Project; and
- 2022 – to implement changes to optimise the construction and operation of the Project.

SEM holds Environmental Protection Licence (EPL) 21146 issued under the NSW *Protection of the Environment Operation Act 1997* (PoEO Act) for the mine component of the Project.

Construction at the mine has not commenced at this stage.

¹ SEM was previously Clean TeQ Holdings Limited (Clean TeQ).



CLT-17-03 M12/2023 Figure 1 Rev A



- LEGEND**
- National Park/Conservation Area
 - State Forest
 - Local Government Boundary
 - Railway
 - Existing Gas Pipeline
 - Mining Lease Boundary (ML)
 - Gas Pipeline
 - Water Pipeline
 - Borefield Infrastructure Corridor
 - Limestone Quarry Water Pipeline
 - Fifeild Bypass

Source: Sunrise Energy Metals (2021, 2022); Clean TeQ (2017, 2018, 2020); Black Range Minerals (2000); NSW Spatial Services (2023)



SUNRISE PROJECT
Regional Location

Figure 1

1.1 PURPOSE AND SCOPE

This Pollution Incident Response Management Plan (PIRMP) has been prepared to provide a framework for the prevention and management of pollution incidents at the Project, and includes procedures for the notification of relevant parties and other communication protocols following a pollution incident (Section 5). Further, and in accordance with section 153A of the PoEO Act, SEM is required to prepare a PIRMP being the holder of an EPL.

As construction at the Project has not commenced at this stage, this PIRMP has been prepared to manage pollution incidents associated with the current environmental monitoring and care and maintenance activities at the Project.

This PIRMP applies to all employees and contractors at the Project, and covers all areas within Mining Lease (ML) 1770 (defined in condition 2.1 of the EPL and shown in Appendix A).

Section 153C of the PoEO Act requires that the PIRMP include the information listed in Table 1.

Table 1
Pollution Incident Response Management Plan Protection of the Environment Operations Act 1997
Information Requirements

Protection of the Environment Operations Act 1997 section 153C	Section Where Addressed in this PIRMP
<i>A pollution incident response management plan must be in the form required by the regulations and must include the following –</i>	
<i>a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to –</i>	
<i>(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</i>	Section 5.2.2
<i>(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</i>	Section 5.2.1
<i>(iii) any persons or authorities required to be notified by Part 5.7,</i>	Section 5.2
<i>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,</i>	Sections 5.1 to 5.3
<i>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,</i>	Section 5
<i>d) any other matter required by the regulations.</i>	See Table 2 below

Under clause 98C of the *Protection of the Environment Operations (General) Regulation 2009*, the PIRMP is required to include the additional matters listed in Table 2.

Table 2
Pollution Incident Response Management Plan Protection of the Environment Operations (General)
Regulation 2009 Information Requirements

Protection of the Environment Operations (General) Regulation 2009 clause 98C	Section Where Addressed in this PIRMP
(1) <i>General</i> The matters required under section 153C (d) of the Act to be included in a plan are as follows:	
(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),	Section 2
(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Section 2.2
(c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,	Section 3
(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Appendix B
(e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,	Appendix B
(f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,	Section 3.3
(g) the names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident, 	Section 4
(h) the contact details of each relevant authority referred to in section 148 of the Act,	Section 5.2.1
(i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,	Section 5.2.2
(j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,	Section 3
(k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,	Appendices A and B
(l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,	Sections 3 and 5
(m) the nature and objectives of any staff training program in relation to the plan,	Section 6

Protection of the Environment Operations (General) Regulation 2009 clause 98C	Section Where Addressed in this PIRMP
(n) the dates on which the plan has been tested and the name of the person who carried out the test,	Section 8
(o) the dates on which the plan is updated,	Cover Page
(p) the manner in which the plan is to be tested and maintained.	Section 8

1.2 OBJECTIVES

This PIRMP will be implemented by SEM in the event of a pollution incident. Specifically, the objectives of the PIRMP are to provide a framework to:

- provide comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), Lachlan Shire Council, Parkes Shire Council, Forbes Shire Council, NSW Ministry of Health, Department of Planning and Environment (DPE), SafeWork NSW, Fire and Rescue NSW, and anyone outside the facility who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident at the facility by identifying risks and developing actions to minimise and manage those risks; and
- adequately implement the plan by training staff, identifying persons responsible for implementing the plan, and regularly testing the plan for accuracy, currency and suitability.

A written copy of this PIRMP will be made available to any authorised EPA officer and to any person who is responsible for implementing the plan.

1.3 DEFINITIONS

The following definitions are taken from *Guideline: Pollution Incident Response Management Plans* (NSW EPA, 2022). The definition of a pollution incident is:

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.

A pollution incident is required to be reported 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.*

Under section 148 of the PoEO Act, SEM is required to report pollution incidents immediately to the EPA, NSW Health, the DPE, Fire and Rescue NSW, SafeWork NSW, Lachlan Shire Council, Parkes Shire Council and Forbes Shire Council.

1.3.1 STRUCTURE OF THE PIRMP

The PIRMP will form part of the overarching Environmental Management Strategy for the Project (Figure 2). The remainder of the PIRMP is structured as follows:

- Section 2: Describes the hazards identified at the Project.
- Section 3: Outlines the preventative actions proposed to minimise any risks associated with pollution incidents.
- Section 4: Provides contact details of personnel authorised to initiate the PIRMP.
- Section 5: Outlines the pollution incident response and reporting procedure.
- Section 6: Details the training proposed to be undertaken at the Project, relevant to this PIRMP.
- Section 7: Describes how this PIRMP will be made available.
- Section 8: Describes the review and testing process of this PIRMP.
- Section 9: Outlines the responsibilities which have been delegated as part of this PIRMP.
- Section 10: Lists the references cited in this report.

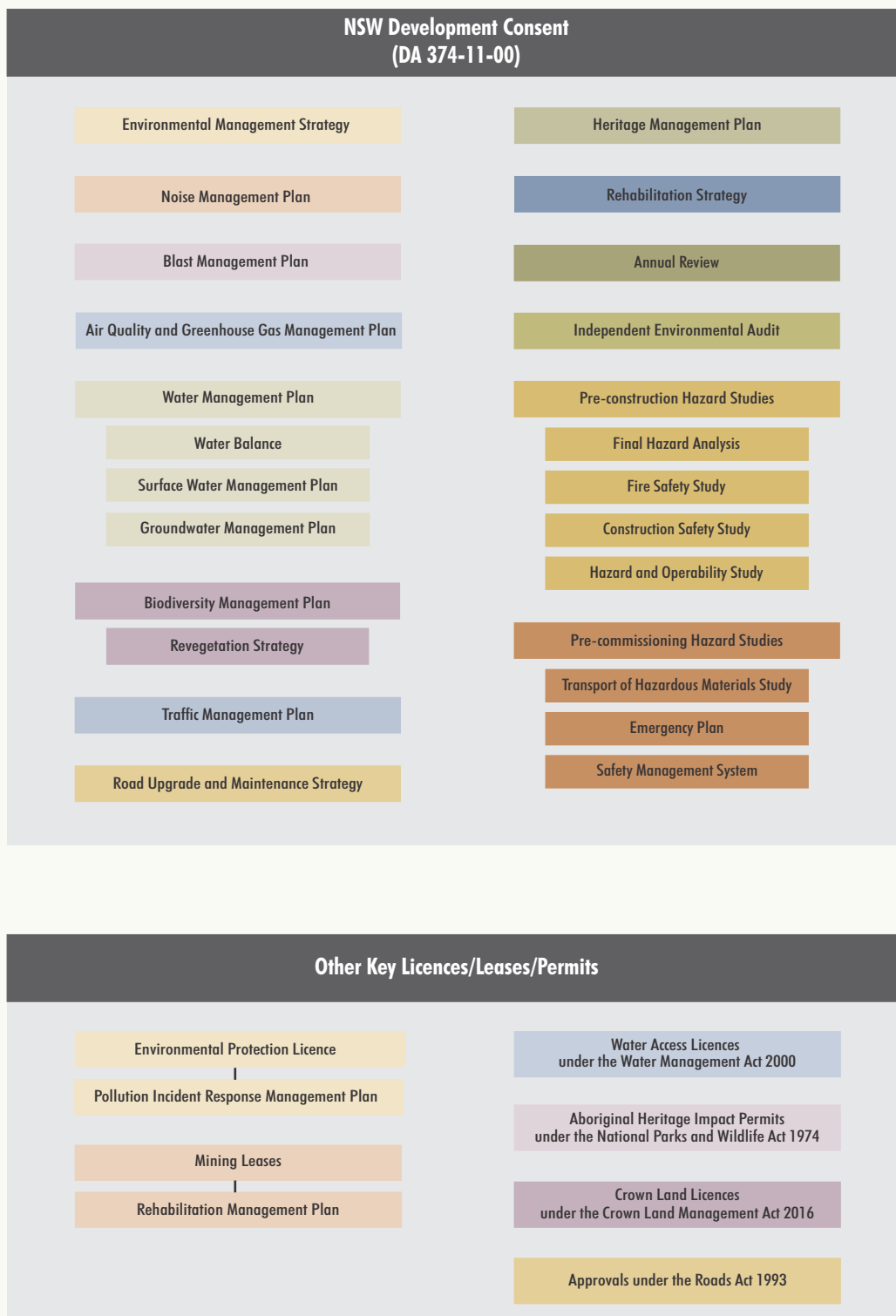


Figure 2

2 HAZARD IDENTIFICATION

The following section lists the hazards identified at the Project which are relevant to this PIRMP.

2.1 GENERAL HAZARDS

There are limited potential hazards to human health and the environment generally associated with environmental monitoring and care and maintenance activities.

2.2 HAZARDS OF INCREASED LIKELIHOOD

The following are considered to have a possible likelihood of occurring at the Project:

- minor spills of hydrocarbons or other chemicals from site.

2.3 INVENTORY OF POTENTIAL POLLUTANTS

All chemicals stored on-site will be accompanied by the relevant Safety Data Sheet (SDS) as required by Work Health and Safety regulations.

The majority of potential pollutants stored on-site would be located at the site office, however some potential pollutants may be temporarily stored outside of the site office.

Additionally, a full inventory of potential pollutants, including maximum quantities, is provided in Appendix B. The inventory within Appendix B will be updated progressively if additional pollutants are stored on-site.

3 PREVENTATIVE ACTIONS

SEM has implemented a number of management measures including standard work practices, hazard reporting, Take 5 Risk Assessments and site specific management plans (Figure 2) to minimise potential impacts and reduce the likelihood of a pollution incident occurring on-site. The specific measures used to reduce the likelihood of potential pollution incidents, as outlined in Section 2, are described below.

A description of the safety equipment and other devices that are used to minimise the risks to human health, and to contain or control a pollution incident, are also detailed below.

3.1 RISK ASSESSMENTS

Prior to undertaking certain activities, a pollution incident risk assessment will be undertaken to identify potential pollution incident risks associated with the activity. Mitigation measures would then be developed and implemented during the activity to minimise the potential of the identified pollution incidents occurring.

3.2 SAFE WORK METHOD STATEMENTS

In addition to pollution incident risk assessments, a safe work method statement will be prepared prior to undertaking certain high risk activities. The safe work method statements will identify and describe any safety and environmental risks associated with the activity, and describe the measures that will be put in place during the activity to minimise the potential of the identified risks occurring.

It is likely that the information gathered during the risk assessment process (Section 3.1) would assist in the preparation of the safe work method statements.

3.3 WATER MANAGEMENT

A Water Management Plan (WMP) has been prepared by SEM to satisfy the requirements under Development Consent DA 374-11-00. The WMP describes the water management measures to be implemented at the site to minimise the risk of contaminated discharges. These include, but are not limited to:

- Separation of runoff from disturbed and undisturbed areas, where practicable.
- Management of runoff from construction areas through the Project water management system.
- Construction of suitable erosion and sediment controls such as drains, diversion banks and sediment dams to contain and manage sediment laden surface runoff.
- Controlling all discharges from the site and ensuring they are licensed and meet all relevant water quality discharge requirements.
- Implementing a procedure for the management and reporting of incidents, complaints and non-compliances related to surface and ground water.

Personnel at the Project will be trained to put their safety first by identifying hazards and the risks associated with water management.

3.4 HAZARDOUS MATERIALS MANAGEMENT

3.4.1 Chemicals and Hydrocarbons

Chemicals and hydrocarbons will be managed through the procedures for site contamination prevention and control described below. These procedures will minimise the potential for land and water contamination from the handling, storage and disposal of these substances.

Chemicals and hydrocarbons will be transported and stored on-site in accordance with the NSW *Work Health and Safety Act 2011* and *Work Health and Safety (Mines and Petroleum Sites) Act 2013*. Additionally, all chemicals stored on-site will be accompanied by the relevant SDS as required by Work Health and Safety regulations.

On-site controls will include storage within properly sealed containers and controlled areas, banded for medium to long-term storage requirements. These storage and waste receipt areas will be isolated from clean water catchments to minimise the risk of land or water pollution should an unplanned spill occur.

The response to any accidental spills or ground contamination will be assessed on a case-by-case basis and remediated using biodegradable spill absorbent (Section 3.3). Emergency response procedures will also be enacted as required, in accordance with the relevant environmental procedures. Hydrocarbon or chemical spills will be reported in the Project's incident reporting and management system with corrective and preventative measures taken as appropriate.

3.5 SAFETY EQUIPMENT

Personal Protective Equipment for the safe handling of all chemicals stored on-site is available at the Project site office. In addition, spill kits will be available at various high risk locations at the site, and will include:

- absorbent material;
- absorbent pads;
- containers for collection, storage and disposal;
- gloves for handling contaminated substances; and
- absorbent booms.

4 CONTACT DETAILS

The following personnel (listed in Table 3 below) have the authority to activate this PIRMP and notify the relevant authorities (Section 5.2.1) and communicate with external stakeholders regarding pollution incidents at the Project.

Table 3
Contact Details for Relevant Authorised Persons to Notify External Parties

Position	Contact	Phone Number
Sunrise Regional Manager	Mike Wood	0418 818 372
Environment, Approvals and Community Lead	Bronwyn Flynn	0429 066 086
Site Manager	Mick Hanlon	0418 451 530

5 INCIDENT RESPONSE AND REPORTING PROCEDURE

Sections 5.1 to 5.3 below detail the pollution incident response and notification procedure. The overall pollution incident response procedure is outlined in Figure 3. Where possible, all communications described in Sections 5.1 to 5.3 are to be made by the Sunrise Regional Manager (Figure 3).

A “pollution incident” is defined in Section 1.3.

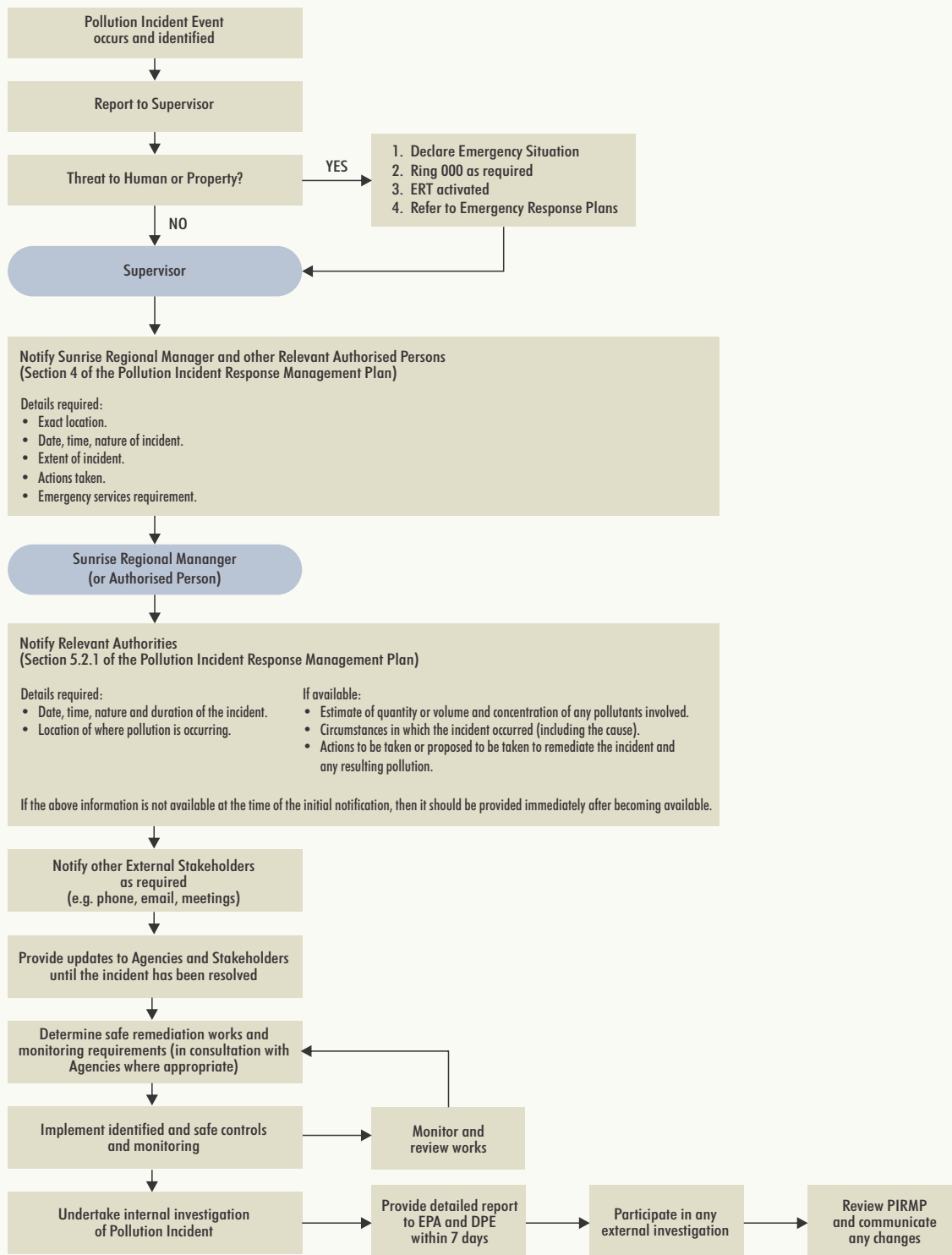
5.1 DURING A POLLUTION INCIDENT

The PIRMP will be activated when:

- a Project employee, contractor or supplier becomes aware of a pollution incident or potential pollution incident that has caused, or threatens to cause, material harm to the environment; or
- a notification from an external party provides evidence that a pollution incident or potential pollution incident may have occurred at the Project.

Upon activation of the PIRMP the following internal and external notification process is to be followed:

1. Report potential pollution incident to supervisor immediately.
2. If there is an immediate threat to life or property, declare an emergency situation and contact the national emergency telephone number (000) immediately. Refer to Emergency Response Plans.
3. Supervisor reports pollution incident to Sunrise Regional Manager and other Relevant authorised persons (Table 3) immediately and provide the following details:
 - a. exact location of pollution incident;
 - b. date, time and nature of pollution incident;
 - c. extent of pollution incident;
 - d. actions taken; and
 - e. whether emergency services are required, or have been contacted.
4. Relevant authorised persons (Table 3) will notify relevant authorities (Table 4) immediately upon becoming aware of the pollution incident in accordance with Section 5.2 below. Relevant authorities will be provided with factual information.
5. Where other stakeholders may be impacted (e.g. community members) or where directed by the EPA, other stakeholders are to be contacted.



CTL-17-03 MP2023_PIRMP_002A

Figure 3

5.2 NOTIFICATIONS OF A POLLUTION INCIDENT

5.2.1 Authorities

As described above, if there is an immediate threat to life or property, the emergency call service will be contacted immediately and prior to informing the authorities in Table 4 on the national emergency telephone number (000).

If a pollution incident on-site occurs where material harm to the environment is caused or threatened, SEM must immediately implement this PIRMP. The authorities listed in Table 4 shall be notified immediately of the pollution incident by an authorised person (Table 3). All pollution incidents causing or threatening material harm to the environment are to be reported immediately.

Table 4
Authority Contacts Details

Authority	Phone Number
EPA	131 555 (24 hour hotline)
NSW Ministry of Health via Local Public Health Unit	(02) 6330 5880 (Bathurst Public Health Unit) 0428 400 526 (after hours)
SafeWork NSW	131 050 (24 hour hotline)
Lachlan Shire Council	(02) 6895 1900 (daytime) (02) 6895 1900 (after hours)
Parkes Shire Council	(02) 6861 2333 (daytime) 1800 648 585 (after hours)
Forbes Shire Council	(02) 6850 2344 (daytime) 1300 978 633 (after hours)
Fire and Rescue NSW	(02) 9265 2999
DPE	(02) 6841 2180 (Dubbo Office)
Department of Regional NSW – Mining, Exploration and Geoscience	(02) 4063 6860

5.2.2 Impacted Stakeholders and Wider Community

Any pollution incident causing or threatening material harm to the environment will be communicated to all potentially impacted stakeholders as soon as practicable by an authorised person (listed in Table 3). For water and hydrocarbon related pollution incidents, the closest private water user downstream of the operations will be notified of the pollution incident. Ongoing communication will continue until the pollution incident has been controlled and impacts as a result of the pollution incident have been rectified.

SEM will contact those affected by a pollution incident in conjunction with emergency services by either direct contact or telephone. Updates will be provided to the wider local community in affected areas via newsletters, information sheets, the Project website (<https://www.sunriseem.com/sunrise-project/>) or media statements. The method and content of communication will depend on the pollution incident and the actions required to protect human health.

5.3 FOLLOWING A POLLUTION INCIDENT

During and following a pollution incident at the Project the following actions will be undertaken:

- assessment of the pollution incident to determine necessary controls during a pollution incident, which may include:
 - installation of controls;
 - deployment of spill containment equipment; and/or
 - shutdown of relevant processes or equipment;
- assessment of the incident to determine necessary remedial works immediately after a pollution incident, which may include:
 - sampling and/or monitoring;
 - installation of controls;
 - engagement of specialist consultants and/or contractors;
 - procurement of additional/replacement supplies (e.g. spill kit material);
 - assessment of relevant processes and/or equipment; and
 - consultation with agencies or stakeholders;
- updates of agencies and stakeholders;
- internal investigation of the pollution incident;
- a detailed report of the pollution incident to be provided to the DPE and any relevant agencies including the relevant local council within 7 days of the date of the pollution incident in accordance with Condition 8, Schedule 5 of the Development Consent DA 374-11-00, which outlines the following:
 - date, time and nature of the pollution incident;
 - identifying the cause (or likely cause) of the pollution incident;
 - describing what action has been taken to date; and
 - describing proposed measures to address the pollution incident;
- participation in any external investigation of the pollution incident;
- review of the PIRMP for effectiveness; and
- appropriate communication of any changes to the PIRMP.

6 TRAINING

A training program has been developed with the objective of informing personnel of the appropriate implementation of the PIRMP. As part of the training program, the following actions will be undertaken:

- communication with employees and contractors informing them about the existence and purpose of the PIRMP in inductions;
- informing personnel of the appropriate methods of notification of environmental incidents;
- communication with relevant personnel outlining their role and responsibilities under the PIRMP; and
- providing updates to personnel when the PIRMP is revised.

7 PLAN AVAILABILITY

A copy of this PIRMP will be maintained at the Project site and will be readily available to Project personnel and to any authorised EPA officer on request.

In addition, a copy of the plan will be made publicly available on the Project website (<https://www.sunriseem.com/sunrise-project/>).

8 REVIEW AND TESTING

A copy of this PIRMP will be kept at the Project at all times and implemented in the case of a pollution incident. The PIRMP will be reviewed:

- within 3 months of any changes to licence conditions relating to pollution incidents;
- following a pollution incident at the Project;
- following an independent environmental audit which recommends changes to the PIRMP; and
- if there is a relevant change in technology or legislation.

The PIRMP will be tested regularly in such a manner as to ensure that the information included in the plan is accurate, up to date and is capable of being implemented in an effective manner. Testing will be undertaken by desktop simulation or using practical drills at the following intervals:

- at least once every 12 months (i.e. prior to November each year); and
- within one month of any pollution incident occurring.

A record of testing undertaken on the PIRMP is provided in Table 5 below. This table will be progressively updated over time.

Table 5
Record of Testing

Testing Date	Personnel

9 RESPONSIBILITIES

The responsibilities assumed under this PIRMP are listed in Table 6 below.

Table 6
Pollution Incident Response Management Plan Responsibilities

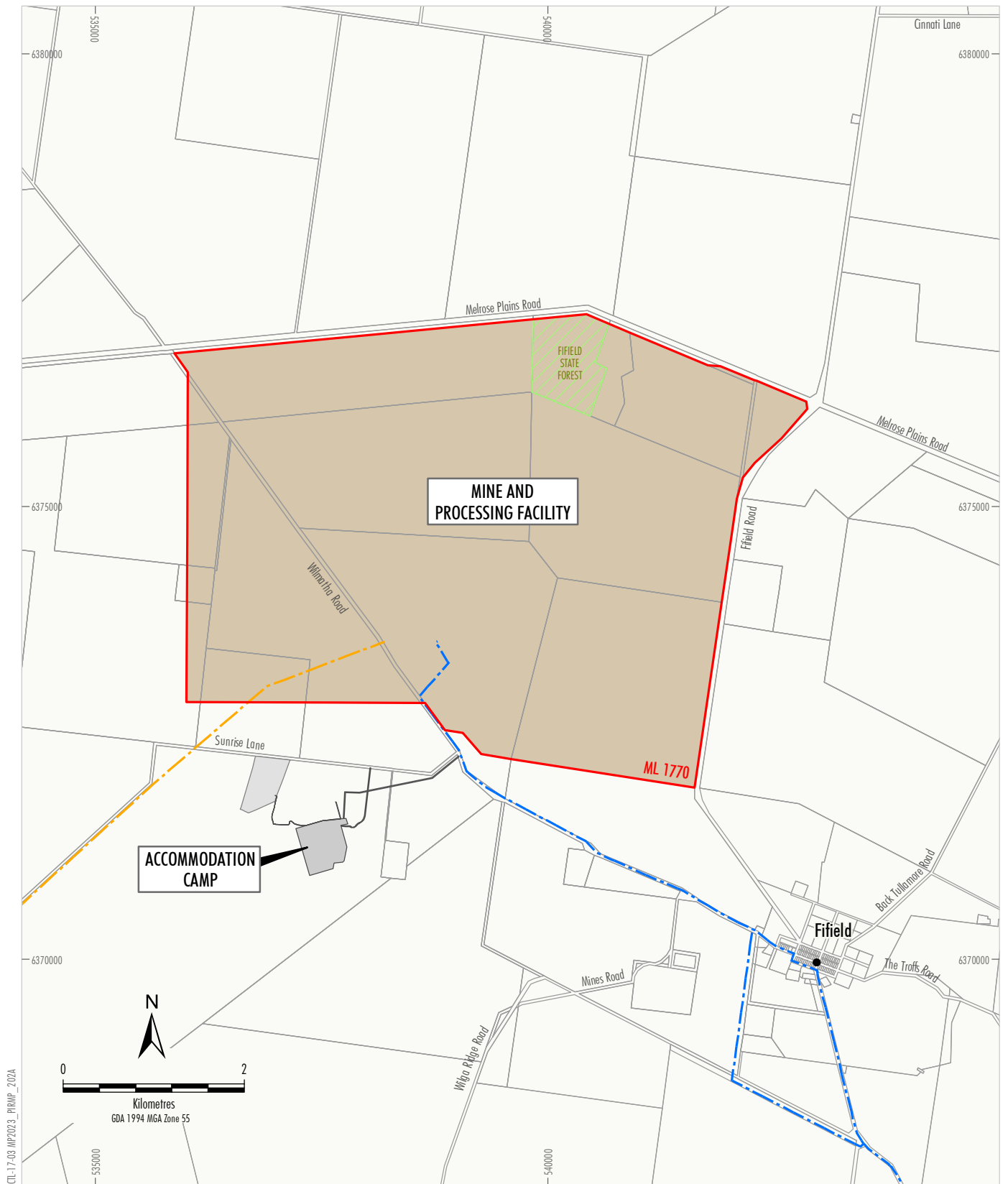
Role	Responsibility
Sunrise Regional Manager	<ul style="list-style-type: none"> • Provide adequate resources to implement the requirements of the PIRMP. • Notify relevant authorities and potentially affected external stakeholders of pollution incidents in accordance with Sections 5.1 to 5.3.
Environment, Approvals and Community Lead	<ul style="list-style-type: none"> • Notify relevant authorities and potentially affected external stakeholders of pollution incidents in accordance with Sections 5.1 to 5.3 (where the Sunrise Regional Manager is not available). • Coordinate the response to pollution incidents. • Prepare reports relating to pollution incidents. • Provide all employees and contractors adequate training in environmental awareness, legal responsibilities, and pollution incident response. • Coordinate relevant reviews of the PIRMP.

10 REFERENCES

New South Wales Environment Protection Authority (2012) *Environmental Guidelines: Preparation of Pollution Incident Response Management Plans*.

APPENDIX A

ENVIRONMENT PROTECTION LICENCE PREMISES MAP



Source: Black Range Minerals (2000); Ivanplats Syerston (2005); NSW Spatial Services (2023)

LEGEND

- State Forest
- Mining Lease Boundary (ML)
- Water Pipeline
- Premises



SUNRISE PROJECT

Premises Map

APPENDIX B

DANGEROUS GOODS INVENTORY

Dangerous Good	Storage Location	Approximate Quantity On-site
Gladiator	On-site dangerous goods storage shed	60 Litres
Haloxyp 520	On-site dangerous goods storage shed	20 Litres
Verdict	On-site dangerous goods storage shed	10 Litres
Grazon	On-site dangerous goods storage shed	30 Litres
Astir	On-site dangerous goods storage shed	40 Litres
Glyphix	On-site dangerous goods storage shed	30 Litres
Dicamba	On-site dangerous goods storage shed	20 Litres
Associate	On-site dangerous goods storage shed	400 grams
Diesel	On-site dangerous goods storage shed	380 Litres
Engine Oil	On-site dangerous goods storage shed	25 Litres