

AUR-PEA-ENV-PLN-004

PLAN

PEAK POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN



TABLE OF CONTENTS

1.	QUICK REFERENCE GUIDE.....	4
	24hour 7 day Contact Numbers	5
2.	PURPOSE	6
3.	SCOPE	6
4.	KEY REFERENCES.....	7
5.	DEFINITIONS.....	7
6.	SITE DETAILS AND CONTEXT	8
6.1.	The New Cobar Complex	9
6.2.	Peak Complex.....	9
6.3.	Surrounding Sensitive Environments.....	10
6.4.	Peak Mines Emergency Management	11
7.	HAZARDS	12
7.1.	Water management	12
7.2.	Hazardous Substances	13
7.3.	Other Hazards.....	13
7.4.	Dangerous Goods Locations.....	15
7.4.1.	New Cobar Hazardous Chemicals	15
7.4.2.	Peak Site Hazardous Chemicals	16
7.5.	Potential impacts.....	18
7.5.1.	Dam failure/ overflow	18
7.5.2.	Accidental release of gasses	18
7.5.3.	Pipeline failures	18
8.	THE PLAN: ACTIVATION OF THE PIRMP	21
8.1.	PIRMP Implementation.....	21
8.2.	24 hour 7 day contact numbers.....	21
8.3.	Immediate response.....	22
8.4.	Health and Safety	23
8.5.	Roles and Responsibilities	23
8.6.	Records and templates	24
8.6.1.	Incident Management System	24
8.6.2.	Templates	24
8.7.	Relevant Agencies to Notify	26

8.8.	Other Government Agency contacts	27
8.9.	Local community contacts	27
8.10.	Persons on the premises	29
9.	TRAINING AND TESTING	29
9.1.	Competence and Awareness Training	29
9.2.	Testing	29
9.3.	Revisions	30
Appendix 1. Legislation		32
	Protection of the Environment Operations Act 1997 No 156	32
	Protection of the Environment Operations (General) Regulation 2022.....	34
	Work Health and Safety Act 2011	35
	Work Health and Safety (Mines and Petroleum Sites) Act 2013	35
Appendix 2. Templates		36

Table of Figures

Figure 1 The Consolidated Mining Leases (CMLs)	8
Figure 2 The New Cobar Complex	9
Figure 3 Peak Mine Complex	10
Figure 5: New Cobar Dangerous Goods Locations	15
Figure 4: Peak Complex Dangerous Goods Locations	17
Figure 6: Plan of water ways potentially affected by overflows and extent of air pollution from chemical release	19
Figure 7: Plan of Pipelines	20

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1. QUICK REFERENCE GUIDE

All staff have a responsibility to report environmental incidents to their supervisor. The Incident And Hazard Management Procedure details escalation responsibilities.

Environmental incidents include

- Any substance (chemical, fuels or oils, ore, tailings, waste materials, contaminated water) **entering drains, dams or waterways**
- **Waste material (Tailings, drill core, waste PAF) deposited in unauthorised locations, does not include the spills or leaks onto land only**
- **release of pollutants to air including significant dust, particularly for tailings or concentrate, fumes, odours, gasses smoke from explosions or fires**

Supervisors must attend to minor incidents and log the incident in the Incident Management System (IMS).

Major Incident are to be reported to ESO and Environment Team.

Example	Actions
Minor Incidents	
Small spill	Use spill kits
Controllable leak	Control leak and clean up
Hydrocarbons on bare ground	Clean up and scrap up surface material if able to for environmental management
	Seek Enviro advice if necessary
Major Incidents	
Large spills, leaks or escape of substance (liquids or gasses) i.e. can not be managed with a single spill kit	Contact ESO on 555, radio "Emergency, emergency, emergency"
Fire	
Dam overflow or breach	
Waste materials disposed of unlawfully	Contact Enviro Advisor on shift

Carry out the following actions, if safe to do so, in order of priority. If a step cannot be completed, proceed to the next. The safety of all personnel in the vicinity takes precedence over all other considerations

- Remove yourself and others from danger as required
- Report to your supervisor, ESO, 555 as necessary
- Control, Deenergise or Isolate the source e.g. Close valves, turn off power
- Contain e.g. deploy spill kits, block drains
- Activation of PIRMP See Section 8.1

All staff, contractors and agents have a duty to report any potential pollution incidents to their employer, that is immediate supervisors. Supervisors report up immediately to ESO

The Duty to notify lies with the "person carrying on activity" or the "employer". The General Manager of the Peak Gold Mines is the individual with the duty to notify.

Environment Advisor is to:

- Document relevant information and make records. See Section 8.6.
- Collect details of the incident
- Provide advice on initial response
- Evaluate Material Harm
- Inform Superintendent, HSEC Manager and General Manager
- POEO Act requires immediate notification
- Support clean up and restoration tasks
- Make follow up notifications and investigations

Environmental Harm Thresholds

Environmental harm occurs when pollution significantly impacts ecosystems or results in substantial financial costs for remediation.

Examples of Significant Harm

- **Non-trivial ecological impacts:**
Pollution that kills or injures plants, animals, fish, insects, or birds.
Indicators include: wilting, bleaching, or other visible damage to vegetation.
- **Soil degradation:**
Land or soil becomes infertile and unable to support plant growth.
- **Air Pollutants**
Release of chemicals or fumes that drift off-site and can harm people's health or poison plants and animals.

Generation of waste in the course of doing business is not a pollution incident unless that waste is not disposed of lawfully. Waste generated on-site may be relocated and or placed on disturbed ground if the placement is temporary for sorting, repackaging, or drying.

- **Major financial impact:**
Damage requiring clean-up costs exceeding **\$50,000**, which may involve:
 - Disposal of thousands of litres of contaminated liquids (e.g., oily water).
 - Repairs to infrastructure such as dams and pipelines.
 - Remediation of soils affected by hydrocarbons.

The legislation has set \$50,000 as the value of damages that makes environmental harm significant. Estimating costs can be challenging. If clean-up requires extensive planning, logistics, and specialized work, expenses can quickly exceed this threshold.

24hour 7 day Contact Numbers

Role	Name	Mobile	
ESO 24/7 contact	555	02 6830 2265	
Environmental Advisors	Sara Waak	/ Craig Flemming	Back to Back
	██████████	/ ██████████	
Environment Superintendent	Marek Holin	██████████	Thu to Thu
HSEC Manager	Scott Ginnivan	██████████	Mon to Mon
General Manager	Angus Wyllie	██████████	
Mine Managers	Lachlan Mahaffey	/ Stuart Long	Back to back
	██████████	██████████	
Mill Manager	Todd Whittle	██████████	

2. PURPOSE

The Pollution Incident Response Management Plan (PIRMP) is a requirement of Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act). As an Environmental Protection Licence holder (EPL) 3596, Peak Mines must prepare, keep and implement a plan of Pollution Incident Response Management. This plan has been prepared in accordance with the Part 5.7A of the POEO Act, the *Protection of the Environment (General) Regulation 2022* (the Regs) and *The Guideline: Pollution Incident Response Management Plans* (PIRMP Guideline).

The PIRMP outlines how environmental and pollution incidents are integrated into the Peak Mine Complex Emergency Management System and protocols.

The purpose of this PIRMP is to:

- Identify risks that may lead to the release of pollutants causing air, water or land pollution;
- Identify escalation and mitigation factors ;
- Pre-assess potential environmental harm to prepare for incidents, respond promptly and minimise impacts;
- Prepare clear decision factors to help guide assessment of material harm and the need to notify authorities of relevant incidents according to legislation;
- Detail external stakeholder notification procedures;
- Define training and awareness of personnel;
- Review of the PIRMP through desktop trials / mock incidents;
- Specific measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire;
- Provides reference and summary of the inventory of potential pollutants on site. Inventory is contained in ChemAlert system; and
- Provides reference to the minimum safety equipment requirements are set out in Emergency Response Control Plans.

3. SCOPE

The Scope of the PIRMP extends to:

- Environmental hazards with the potential to cause air, water and land pollution incidents at the Peak Mine Complex and Great Cobar Mine Complex authorised by EPL 3596.
- The storage, handling and transport of hazardous substances including:
 - Cyanide, Ammonia
 - Concentrates (lead, copper and zinc)
 - Tailings
 - Explosives
- Response and decision-making processes in the event on an incident
- Notification protocols
- Incident investigation, recovery and restoration.

The PIRMP forms part of the overall emergency management framework for the mine site as described in the Environmental Management Strategy AUR-PEA-ENV-STR-001. Overall emergency Response procedures are listed in the Incident and Hazard Management Procedure and Emergency Response Control Plan. As an operating mine site emergency management prioritises harm to workers, while environmental harms may be associated with events that also cause harm to workers it is important in an emergency to have an integrated system to ensure the environment can be considered during all emergency circumstances. Where environmental harm is threatened, the relevant procedures in the site emergency management system are supplemented by the PIRMP. The protection of workers responding to an environmental incident is also a priority for the site emergency management system.

The PIRMP does not include incidents that are related to emergency management situations not involving environmental impacts such as worker injuries, evacuation due to hazardous work environments or the failure of plant and equipment not posing a risk to the environment.

4. KEY REFERENCES

Important definitions are listed in the POEO Act and have been included in Appendix 1

These include Pollution incident, Material Harm, Pollution and Relevant Authorities for notification.

Other key plans and procedures that are relevant to the management of environmental incidents are included in AureliaDoc. The following are specifically referenced in this document:

AUR-GRP-WHS_PRO-001	Incident and Hazard Management Procedure
AUR-PEA-WHS-PLN-040	Emergency Response Control Plan
AUR-R-WHS-PRO-038	Introduction of Hazardous Substances to Site Procedure

5. DEFINITIONS

The following definitions have been translated into plain English. The original legislation has been referenced verbatim in Appendix 1.

Table 1 Plain English Definition from the Protection of the Environment Operations Act 1997

Term	Definition
Air Pollution	the emission into the air of any air impurity.
Land Pollution	putting any substance—solid, liquid, or gas—onto or into land in a way that harms or is likely to harm human health, animals, ecosystems, or property in a non-trivial way. It also includes storing or placing harmful materials in buildings, containers, or fixtures on the land. Substances that are specifically excluded by regulation are not considered land pollution.
Water Pollution	putting any substance into water—directly or indirectly—that changes its condition or makes it harmful, dirty, unsafe, poisonous, or otherwise unfit for people, animals, aquatic life, or lawful use. It also includes placing material anywhere it could reasonably enter and pollute waterways or stormwater systems. Prescribed water pollutants are listed in the Protection of the Environment Operations (General) Regulation 2022 - NSW Legislation
Pollution Incident	“An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise” (POEO Act).
Material Harm	Harm to the environment that is substantial See POEO Act Protection of the Environment Operations Act 1997 No 156 - NSW Legislation
Duty to report	The general duty to notify an environmental incident to your supervisor, ESO, Environment department. The General Manager has the duty to notify a pollution incident that threatens to or has caused material harm, on the advice of the Senior Environmental Advisor, Environment Superintendent or HSEC Manager, to the Relevant Authorities. The General Manager may delegate this responsibility to anyone else for a given incident.
Relevant Authority	The NSW Environment Protection Authority (EPA), Cobar Shire Council, Fire and Rescue NSW, Police, NSW Health, and Resources Regulator (Work Health and Safety (Mines and Petroleum Sites) Act 2013)

6. SITE DETAILS AND CONTEXT

Peak Mines is an underground metalliferous mine owned by Aurelia Metals Limited (Aurelia). The mine has two sites (New Cobar Complex and Peak Complex) to which this plan applies. The New Cobar Complex is located within CML 6, and Peak Complex is located within CML 8, approximately 3km and 10km respectively, southeast of Cobar in far west New South Wales (NSW) (Figure 1).

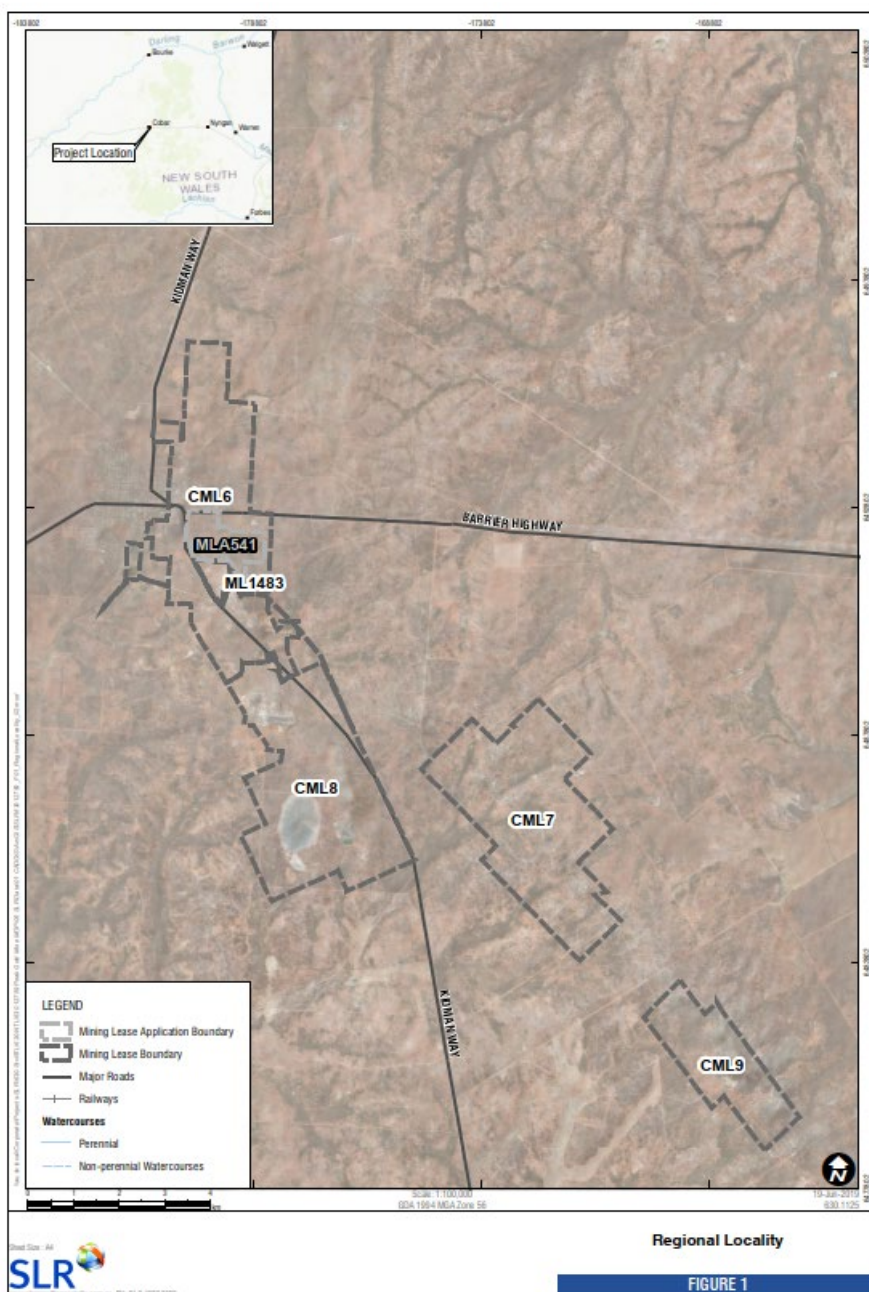


Figure 1 The Consolidated Mining Leases (CMLs)

6.1. The New Cobar Complex

New Cobar is closer to both urban and rural sensitive receivers, the risks associated with the site are limited to fuel and explosives storage, underground mining operations and placement of waste rock and ore on the surface stockpiles. Crushing and loading of ore also occurs on the surface.

New Cobar Complex is situated in a rural area, bounded by private property and Crown Land (Figure 2).

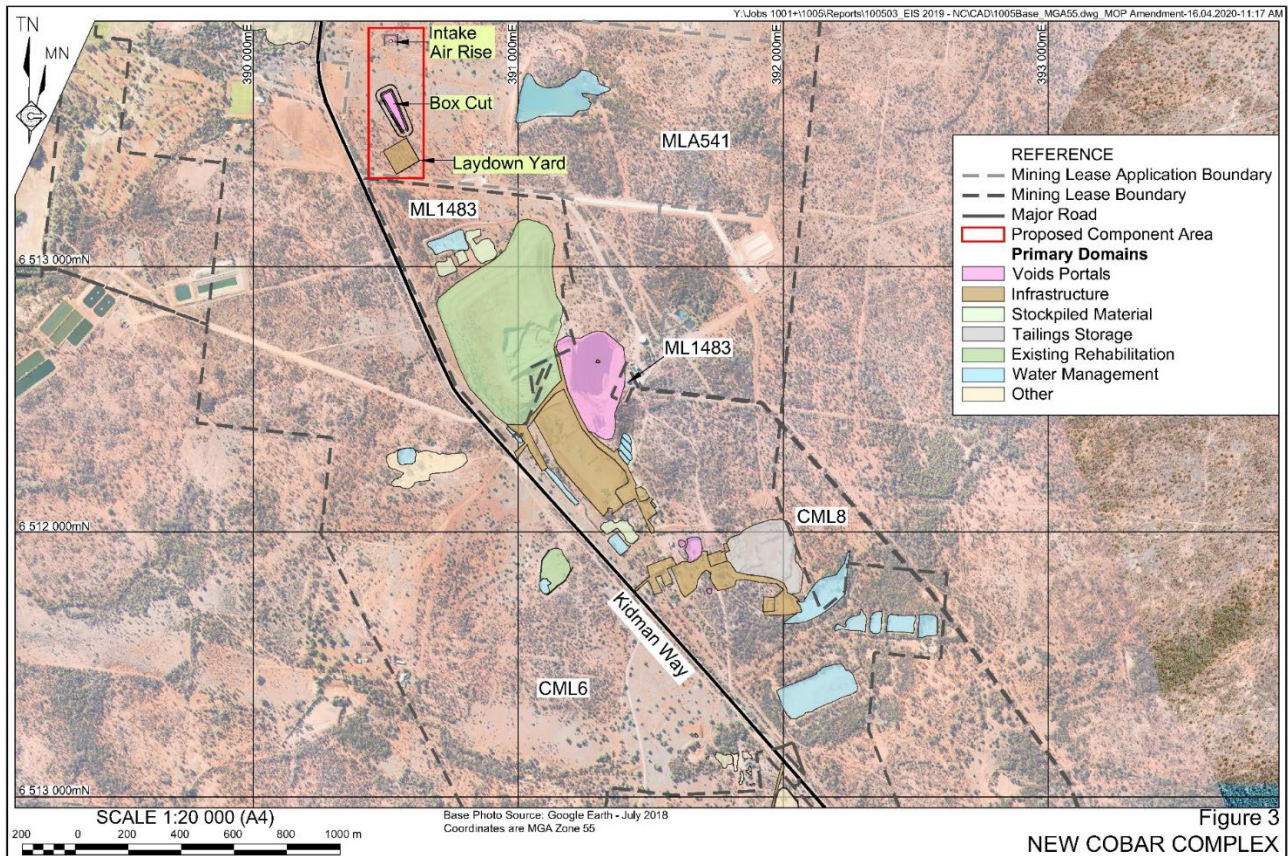


Figure 2 The New Cobar Complex

6.2. Peak Complex

The peak site is situated further away 10km from Cobar and has no immediate sensitive receivers around the site. It includes

- fuel and explosives storage,
- underground mining operations
- stockpiling of ore
- processing of ore to produce concentrate
- storage of cyanide, ammonia and other hazardous substances
- placement of tailings in the tailing's storage facility.

The general arrangement of operational facilities is shown in Figure 3.

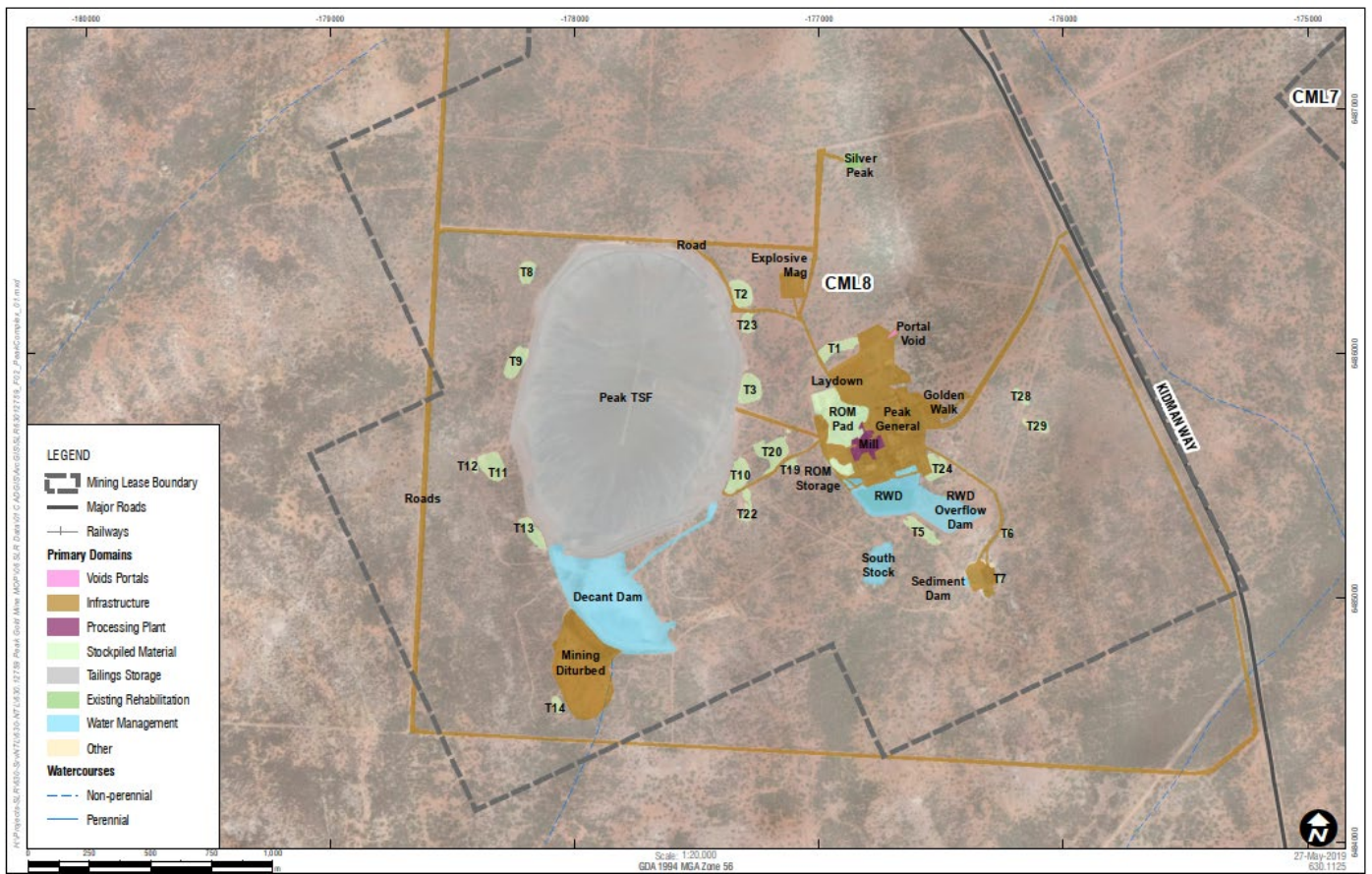


Figure 3 Peak Mine Complex

6.3. Surrounding Sensitive Environments

No endangered ecological communities or populations were recorded or are predicted to occur within the surrounds of the complexes. There are no continual flowing creeks in or within the surrounds of the complexes.

6.4. Peak Mines Emergency Management

Peak Mines' emergency management is described through the Emergency Response Control Plan (ERCP). The ERCP forms part of the Peak Mines Work Health and Safety Management System (HSMS). It serves to outline a framework of systems, employed to effectively manage emergency situations and associated risks as well as direct to other sub systems that are utilised to achieve the aim of a healthy and safe workplace.

An emergency is an incident that:

- Poses or has already caused threat to life, health, property or the environment.
- Has a high potential of escalating to cause immediate danger to life, health, property or the environment.

The purpose of the ERCP is to document the following for the Peak Mines operations:

- Identify foreseeable emergency response scenarios and the requirements to respond to these potential events.
- Outline the responsibilities, actions, reporting requirements and resources available, regarding emergency response.
- Achieve compliance with regulatory expectations, standards, conditions, and commitments through the effective and timely management of emergencies; and
- Mitigate risks to prevent injury and damage across the business and provide confidence to our workforce, the community, the regulators, and other stakeholders, in our ability to manage emergency events in an effective and timely way.

The ERCP is applicable to all workers, contractors and visitors on site at Peak Mines. All personnel are to comply with the ERCP in the event of an emergency. The scope of the ERCP addresses:

- Site wide emergency response needs based on risk assessment.
- Potential emergency situations involving personnel, environment, asset and business loss.
- Support and emergency assistance from external agencies e.g., ambulance, fire brigade, police, aeromedical resources.

Emergency Management Structure included in the ERCP is based on the Australasian Inter-service Incident Management System (AIIMS) and can scale up or down in size to effectively manage and respond to an emergency.

The ERCP provides for:

- Initial and ongoing emergency notification to internal and external resources
- Events and communication logs
- Controlling access to site, including log of traffic
- Role accountabilities
- Evacuations
- Specific emergency situations, as identified by risk assessment.
- A process for escalating a site emergency to an Aurelia crisis level.
- Critical incident management process
- Debrief process after any emergency.

The plan has Duty Cards to offer guidance to everyone in understanding the requirements and the logical sequences to follow in the event of an emergency.

7. HAZARDS

POEO Regs s72 (a) *a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),*

POEO Regs s72 (b) *the likelihood of the hazards occurring, including details of conditions or events that could, or would, increase the likelihood,*

POEO Regs s72 (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,*

Hazards relate to the risk of pollution incidents that may cause material or actual harm to human health or the environment. Note that hazards that only pose a risk to workers are managed through work health and safety management systems. Hazards that may only pose a risk to breaching licence conditions, emission standards or legislative requirements are not addressed under the PIRMP as the Environmental Management Strategy includes management processes for these circumstances.

7.1. Water management

The Peak Mines operations areas are contained “dirty water” catchments where all runoff is captured. Water Management is described in the Peak Mines Water Management Plan. Runoff water is captured and recirculated for on-site use or evaporated. Given the climate conditions and water demands of the mine, release of runoff water from the mine site is rare and sufficient capacity exists to capture major runoff events as well as any spills, leaks or escapes, and fire water from firefighting activities.

Any spills, leaks or discharges into the managed catchment of the site is not considered to be waters that may be polluted as the site water storages include water that has had contact with mining operations, hard stands, ore stockpiles and underground workings. Dams are also used for secondary containment for process water storages.

Where a substance enters mine site water, it will only be considered pollution of the water. That water can no longer be used in the context of the mine’s operations water management plan unless treated.

Several pipelines carry water to and from the Peak Complex and New Cobar Complex. This includes water lifted from the underground workings to keep mining operations dry. Underground water is passed through a settling pond system to remove suspended solids. New Cobar mine water has a low pH therefore pH is adjusted by adding caustic at the settling pond. Underground water is nominated as recycled water in the water management plan. As this water comes from underground workings it contains high levels of heavy metals dissolved from the ore bodies.

Recycled water pipeline that traverses outside of the mining operations-controlled catchment areas are inspected regularly for leaks. Where a leak results in pooling of water on the surface it is not considered a significant pollution hazard as heavy metals in the water do not make a significant change to the already mineralised soils in the region that contain significant background levels of heavy metals.

Recycled water leaks that flow into or towards receiving waters should be assessed as to whether it would meet the definition of water pollution. If so, a pollution incident may have occurred.

7.2. Hazardous Substances

The Peak Mines use and store a range of hazardous substances including bulk amounts of diesel fuel, cyanide, acid and caustic substances used for the processing of ore. These substances are managed through Chem alert where storage locations and inventory are kept up to date.

In accordance with the Introduction of Hazardous Substances to Site Procedure (IHSS), all hazardous substances are stored in accordance with dangerous goods best practice including undercover storage, bunded storage areas, suitable separation and co-location requirements.

Initial environmental risk containment measures are managed through bunding and adjacent spill kits. With these measures in place most hazardous substances are not likely to cause pollution or material harm to the environment. However, failure of these first line measures may result in land, air or water pollution.

POEO Regs s72 (d) *an inventory of potential pollutants on the premises or used in carrying out the relevant activity,*

POEO Regs s72 (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,*

POEO Regs s72 (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,*

An up-to-date inventory of pollutants is found in the CHEMALERT system. Storage and safety protocols are detailed in the IHSS.

7.3. Other Hazards

Other hazards involve the handling and storage of cyanide, explosives, tailings slurry (containing cyanide), tailing decant water (dams and pipelines), transportation of concentrate, dust from tailings or stockpiles of concentrate.

Table 2 Environmental Hazards for Peak Mines

Hazard (HH or env)	Likelihood of pollution incident or harm	What would increase likelihood	Preemptive actions to reduce risk
Storage of Hazardous substances	Unlikely with secondary containment structures in place	Breach of secondary containment, Excessive rainfall	Routine inspection of storage and secondary containment integrity, Removal of rainwater from secondary containment as necessary Prompt repairs to secondary containment as necessary
Cyanide Receiving, sparging, storage failure	Rare, industrial safety features in place to maintain safe containment	Untrained people operating storage equipment, faulty delivery or storage equipment	Maintenance of Cyanide storage system, Training in cyanide management, mock exercises for emergency situations.
Mining operations	Low, Mining operations kept within defined areas with several environmental management plans to manage environmental risks	Failure of environmental management system,	Mine site water management contains all runoff within the mines operational areas and diverts clean runoff around mine operational areas. Operations comply with approval conditions to authorize minimal impacts on the environment

Hazard (HH or env)	Likelihood of pollution incident or harm	What would increase likelihood	Preemptive actions to reduce risk
Tailings Slurry Pipeline	Low, Pipeline alignment is banded to contain any escapes	High pressure release not captured in bunding, Rainfall flooding pipeline bund	Pipeline and bund inspections carried out regularly. Corrective actions assigned if necessary
Tailings storage facility - dust	Low, tailings is kept wet and rarely dries out before more wet tailings is deposited over the top. Natural rainfall also maintains tails surface moisture	Reduction of tailing deposition leading to drying, excessive windy conditions, prolonged dry conditions	Continuous application of tails to the TSF, Monitoring of tails conditions in dry and windy conditions
Tailings decant dam. Overflow or impact to animals using water	Rare, water levels maintain suitable freeboard and monitored for cyanide levels.	Heavy rain increasing volume in dam. Failure of decant being pumped out.	Dam level maintained well below minimum freeboard level. Regular inspections for dam conditions, and dead or injured wildlife
Tailings Decant pipeline	Unlikely, pipeline not aligned near waterways, decant water quality unlikely to cause land pollution	Rainfall and prolong leak flushing decant water towards waterways	Pipeline inspections carried out regularly. Corrective actions assigned if necessary
Recycled water pipelines	Possible, pipeline mostly not aligned near waterways, recycled water quality unlikely to cause land pollution	Rainfall and prolong leak flushing recycled water towards waterways, Leak at waterway crossings	Pipeline d inspections carried out regularly. Corrective actions assigned if necessary
Recycled water dams overflow	Unlikely – RWD has overflow containment with minimum freeboard limits	RWD Overflow full, Excessive rainfall, Dam failure	RWD Dam level maintained below spillway RWD overflow dam maintained below minimum freeboard level. Regular inspections for dam conditions. Monitoring of water quality.
Explosives	Unlikely – explosive stored in explosive magazine with blast and runoff protection	Uncontrolled fire or detonation causing release of Nox Release of fire water from magazine	Maintenance of explosive magazine, Explosives safety protocols for storage and handling.
Concentrate storage	Unlikely Concentrate storage inside Mill banded area contained in Netted Dam,	Excessively dry and windy conditions	Maintain moisture content, package concentrate as soon as possible, Maintain stockpiles in covered areas
Concentrate transport	Unlikely transported under dangerous good transport requirements	Traffic accident, truck roll over, damage to containers Rainy or windy weather	Dangerous Goods truck and driver licensing. Maintenance of container integrity.
Fire Flammable substances waste and other materials emitting hazardous smoke	Unlikely – Existing fire control systems, Distance from sensitive receivers	Hot and windy conditions Power failure disabling the fire system	Maintain fire system, dangerous goods handling, On site fire fighting capacity Hazardous waste management and waste separation. Smoking ban.

7.4. Dangerous Goods Locations

7.4.1. New Cobar Hazardous Chemicals

The storage location of each substance has been identified in Figure 5. All chemicals storage areas have a QR Code link to Chem Alert for information on chemicals and Safety Data Sheets (SDS) as required by work, health and safety regulations. The bulk storage of chemicals and hazardous substances at New Cobar Complex are listed in Table 3.

TABLE 3: BULK ITEMS STORED AT NEW COBAR COMPLEX

Chemical	Storage volume/mass	Location
Caustic Soda	26,000L	New Cobar Settling Ponds
ANFO	50,000L	DGL24
Diesel fuel	50,000L	DLG25



Figure 4: New Cobar Dangerous Goods Locations

7.4.2. Peak Site Hazardous Chemicals

The storage location of each substance has been identified in Figure 5. All chemicals storage areas have a QR Code link to Chem Alert for information on chemicals and Safety Data Sheets (SDS) as required by work, health and safety regulations. The bulk storage of chemicals and hazardous substances at Peak Mines are listed in Table 4

TABLE 4: BULK ITEMS STORED AT PEAK

Material	Storage volume/mass	Location
ANFO	50,000L	DGL23 Explosive Magazine
Copper Sulphate	30 Tonne	DGL2 Reagents Storage
Cyanide	165,000L	DGL19
Diesel fuel	85,000L	DGL20
Hydrated Lime	20,000L	DGL2 Reagents Storage
Hydrochloric Acid	20,000L	DGL8
Liquid Petroleum Gas	15,000L	DGL6
Oxygen	45,000L	DGL18
Sodium Hydroxide	22,000L	DGL7
Sodium Metabisulphate	30 Tonne	DGL3
Waste Oil	15,000L	DGL20
Zinc Sulphate	30 Tonne	DGL2 Reagents Storage



Figure 5: Peak Complex Dangerous Goods Locations

7.5. Potential impacts

POEO Regs s72 (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,*

7.5.1. Dam failure/ overflow

Identified hazards are not likely to have widespread impacts. Local water courses are typically dry and are not used for water supplies. Low relief would suggest uncontrolled flow would not extend very far or quickly. Hazardous releases are likely to be contained on-site. The water catchment controls are likely to keep any spills within the mine disturbance footprint. See Figure 6 for area potentially impacted by dam overflows. Dams are inspected on a regular basis in accordance with Water Storage Inspections Procedure PRO-08-002-03.

7.5.2. Accidental release of gasses

Air pollution risks may impact areas off site. Depending on wind direction. The most likely off-site impacts are to do with emissions to air from cyanide, ammonia, fires or explosive detonation fire. See Figure 6 for the area potentially impacted by air pollutants.

Air Pollution risks arise primarily from the unintended release of hazardous substances such as cyanide and ammonia. These are situated in the Mill processing areas. If an accident occurs that releases toxic fumes, they may be blown off site. The closest public spaces that may be affected are the Kidman Way with public road uses at 1km distance and other residences at 5km distances. Figure 6 shows the extent of potential the 1 and 5km radius area from the Mill source of possible toxic gas emissions. The risk is considered extremely low at these locations.

At the Kidman Way (1000 m), even under worst credible conditions (Class F, 3 m/s), dilution is extremely high at 16,566 : 1. To exceed 5 ppm at the highway, the released concentration would need to be 82,830 ppm at the Mill on the Peak site. No accidental industrial release is likely at 8.3% concentration by volume, so achieving 5 ppm at 1 km is physically impossible. Under neutral or mixed conditions, dilution is even stronger 264,298 : 1. This assessment assumes ideal terrain conditions and real-world exposures will be orders of magnitude lower.

People on the highway (1000 m) and at residences/workplaces (5000 m) are not at risk, because the predicted concentrations are thousands of times lower than the 5 ppm safe threshold. Even the most conservative, worst-case atmospheric conditions produce huge dilution factors. The initial concentration would need to exceed the concentration of pure gas to reach harmful levels at those distances. Therefore, based on quantitative dispersion modelling and atmospheric science, the accidental release is not likely to pose a hazard to the public off the site.

7.5.3. Pipeline failures

Pipelines pass through some crown land and the common with public access. Pipeline leaks, although not uncommon, rarely flow far from the leak and do not impact the public. See Figure 7 for the alignment of pipelines between Peak Mine Complex.

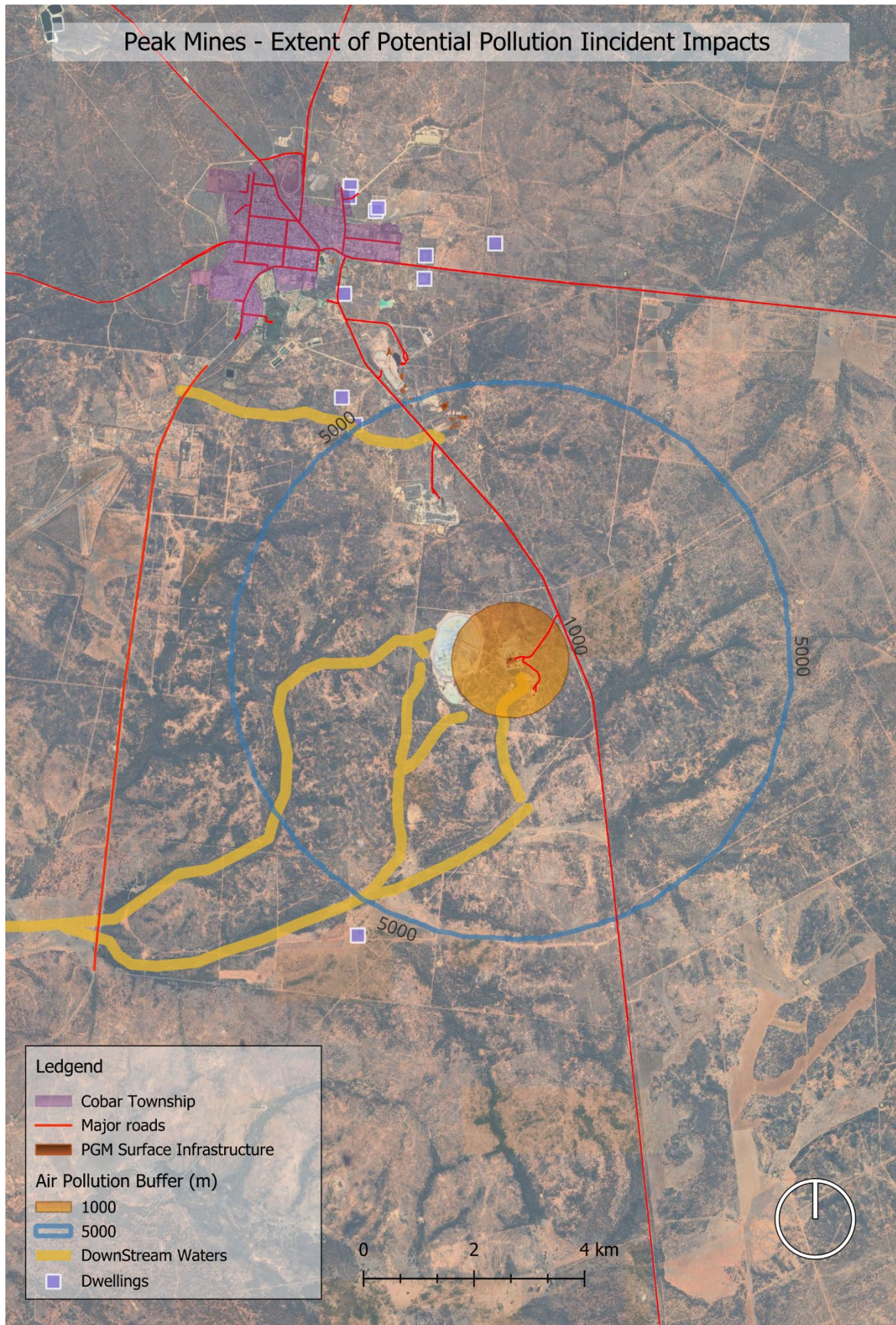


Figure 6: Plan of water ways potentially affected by overflows and extent of air pollution from chemical release

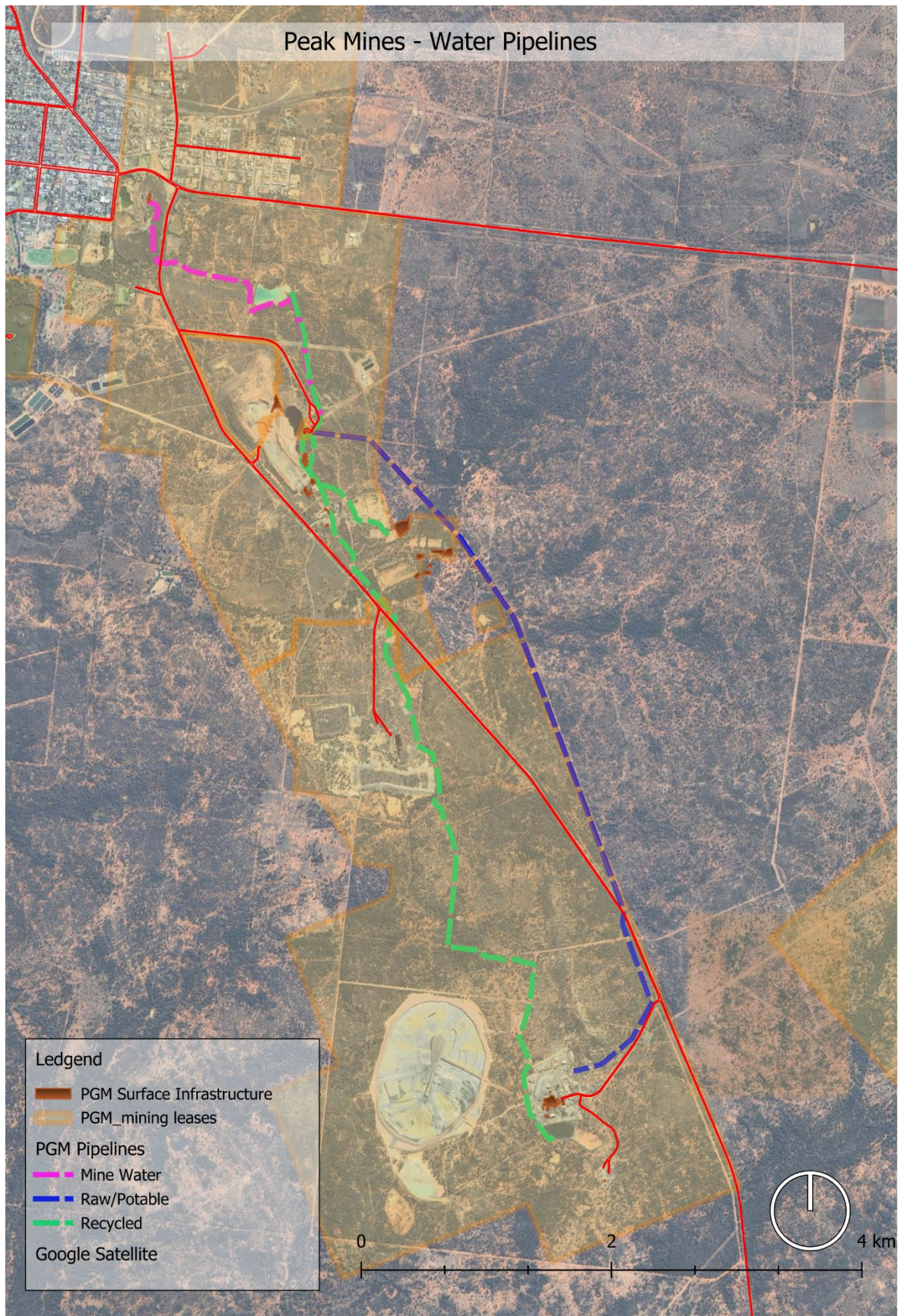


Figure 7: Plan of Pipelines

8. THE PLAN: ACTIVATION OF THE PIRMP

8.1. PIRMP Implementation

The PIRMP is considered activated once a pollution incident has been determined to be causing or threatening to cause material harm.

The procedure to determine if PIRMP activation is warranted is as follows.

1. Environmental incident reported to supervisor
2. Supervisor reports to ESO/ Environmental advisor(EA). ESO will contact EA.
3. EA will collect details of the incident, may attend the location to gather information or assist in managing the incident.
4. The Emergency Response Control Plan will be followed to determine if the incident is considered an emergency and tasks are assigned in accordance with the duty card system. An Incident Management Team (IMT) may be stood up to manage the incident if necessary.
5. If necessary, activation of the PIRMP is to be done immediately, therefore the EA should attend to the PIRMP tasks as soon as they reasonably can.
6. EA will determine if there is pollution, and it is causing or threatening material harm. The Material Harm evaluation template can be used in **the** moment to assist **decision making but** must be completed as part of the incident management procedure.
7. If material harm is suspected, the Incident details reporting template should be completed and presented to the Environment Superintendent, HSEC manager or the General Manager. Delegates include Mining Manager or Mill Manager.
8. The PIRMP is considered activated once the GM or relevant delegate (the person carrying on activity) has approved the notification of the incident,.
9. The GM may delegate, to any person, making notifications as per the notification template, but it is presumed the Environment Advisor will make the notifications.

8.2. 24 hour 7 day contact numbers

POEO Regs s72 (g) *the names, positions and 24-hour contact details of individuals who—*

- (i) are responsible for activating the PIRM plan, and*
- (ii) are authorised to notify relevant authorities under the Act, section 148, and*
- (iii) are responsible for managing the response to a pollution incident,*

TABLE 5: 24HOUR 7 DAY CONTACT NUMBERS

Role	Name	Mobile	
ESO 24/7 contact	555	02 6830 2265	
Environmental Advisors	Sara Waak	/ Craig Flemming	Back to Back
	██████████	██████████	
Environment Superintendent	Marek Holin	██████████	Thu to Thu
HSEC Manager	Scott Ginnivan	██████████	Mon to Mon
General Manager	Angus Wyllie	██████████	
Mine Managers	Lachlan Mahaffey	/ Stuart Long	Back to back
	██████████	██████████	
Mill Manager	Todd Whitla	██████████	

8.3. Immediate response

POEO Regs s72 (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,

Carry out the following actions, if safe to do so, in order of priority. If a step cannot be completed, proceed to the next. The safety of all personnel in the vicinity takes precedence over all other considerations

- Remove yourself and others from danger as required
- Report to your supervisor, ESO, 555 as necessary
- Control, deenergise or Isolate the source (Close valves, turn off power)
- Contain (deploy spill kits, block drains)
- Activation of PIRMP See Section 8.1
- Environment Advisor to document relevant information and make records. See Section 8.6.

The following steps will take place once the initial response is completed. Depending on the scale of the incident or harm involved, these steps may require investigations or assessment before they can be completed. The Enviro Advisor will lead these processes.

- Clean up
- Restore – repair damaged equipment etc
- Review the incident – debrief the response and “test” the response procedures.

8.4. Health and Safety

Before responding to a pollution incident, stop and Take 5.

Health and safety risks are to be identified and assessed by suitably qualified personnel. Any relevant risk assessment that has been developed shall be followed in the event of an emergency. If either Peak or New Cobar Complexes are required to be evacuated because of a pollution event, relevant site evacuation procedures must be followed. The Peak Complex muster point is the Southern Carpark. The New Cobar Complex muster point is in the administrative building carpark.

8.5. Roles and Responsibilities

Table 6 lists the roles and responsibilities for the PIRMP.

Table 6: Roles and Responsibilities

Position	Accountable Task
General Manager	<p>Ensure the resources are available for the implementation of this Pollution Incident Response Management Plan; and</p> <p>Make determination or delegate responsibility to determine Material harm and implement PIRMP notification procedures.</p> <p>Accountable for the overall environmental performance of the Project, including the outcomes of this Pollution Incident Response Management Plan.</p>
Environment Advisor	<p>Investigate environmental incident and provide advice to the General Manager or delegate.</p> <p>Ensure the implementation of this PIRMP;</p> <p>Ensure the onsite induction includes environmental awareness training; and</p> <p>Ensure managers and superintendents are provided with sound environmental advice to effectively manage their areas of responsibility.</p>
Communications Advisor	<p>Coordinate external stakeholder and media communications as necessary</p>
All personnel	<p>Ensure adequate understanding of chemical storage, spill action plan, appropriate waste disposal and prevention of fires;</p> <p>Ensure sound knowledge of site emergency evacuation procedure;</p> <p>Report all pollution incidents to their supervisors and the Environment Advisor; and</p> <p>Seek environmental advice as required.</p>

8.6. Records and templates

8.6.1. Incident Management System

An Incident Management System (IMS) environmental incident must be raised for any material harm pollution incident. Associated actions should be generated and tracked.

Relevant actions should include:

1. Verbal notifications,
2. Written notifications,
3. Clean up.
4. Restoration,
5. PIRMP Activation Test

8.6.2. Templates

To evaluate whether an incident is or likely to cause material harm to the environment, document incident details, and make notifications the following templates are to be used.

- | | |
|--|---------------------|
| • PIRMP Material Harm Evaluation Form V1.0 | AUR-PEA-ENV-FRM-001 |
| • PIRMP Incident Notification Form V2.0 | AUR-PEA-ENV-FRM-002 |
| • PIRMP Written notification of incident Template V1.0 | AUR-PEA-ENV-TMP-001 |
| • PIRMP Incident report Template v1.0 | AUR-PEA-ENV-TMP-002 |
| • PIRMP Test Report Template V2.0 | AUR-PEA-ENV-TMP-003 |

Templates are attached in Appendix 2, Word documents can be found in the Aurelia Doc Document Management System. [AureliaDoc - Home](#)

8.6.2.1. Material Harm Evaluation

The Material Harm evaluation form documents the considerations for determination of material harm. The Form must be completed at the completion of the incident. However, it shall be used to help determine whether material harm has or is likely to occur.

The form requires details of the pollution, the circumstances and the potential harm threatened. Extracts of the legislation is included for quick reference to legal requirements.

8.6.2.2. Incident Notification

The Incident Notification form is to be used to document the incident's details and information required to be notified under s 147 of the POEO Act.

This form should include details of the General Manager or delegates who authorises the activation of notification procedures.

Details of each relevant authority contact information are included in the form. The time, date and any reference provided by the relevant authority must be recorded along with any notes for each notification.

The completed form must be signed, scanned and added to the INX Notification Action.

8.6.2.3. Written notification of incident

Notification in writing is required by *Protection of the Environment General Regulation 2022* (the Regs) section 137 (1)(b). The template provides a letter template to complete and provide relevant information. Details may be updated with any relevant information that has been discovered since the verbal notification.

Written notice of incident must be provided to each relevant authority within 7 days.

8.6.2.4. Incident report Template v1.0

An Incident report is not a requirement of the Part 5.7 or Part 5.7A of the POEO Act, however, there may be necessary to investigate the incident internally in case further information requests are made by one of the relevant authorities. The EPA may require information under EPL Condition R3 Written Report of Pollution Incident or through a section 91 or 93 notice to provide records and information.

8.6.2.5. Test Report Template V2.0

The PIRMP must be tested annually and within 1 month of activating the PRIMP. The Test report captures relevant information about the test including the date, scenarios tested, attendance and recommended outcomes to update the PIRMP.

8.7. Relevant Agencies to Notify

POEO Regs s72 (h) *the contact details of each relevant authority referred to in the Act, section 148,*

Mandatory notifications under Part 5.7 are specified by Section 148 POEO Act. Section 137 of the Regs specifies that notifications made immediately must be made verbally, and that the notification details must be provided in writing to the relevant authorities within 7 days. Table 7 contains the contact details for verbal and written notifications.

Table 7 Relevant Authority Contacts

Agency	Phone Number for verbal notification	Email for written notification
NSW Environment Protection Authority	131555	info@epa.nsw.gov.au
Cobar Shire Council	BH (02) 6836 5888 AH [REDACTED] (Peter Vlatko– General Manager)	council@cobar.nsw.gov.au
Resources Regulator ¹ Notification of the regulator under the WHS(MPS) Act does not require duplicate notification	1300 814 609 option 1	cau@dpird.nsw.gov.au
Fire and Rescue NSW	1300 729 579	ResponseCoordinators@fire.nsw.gov.au

For incidents associated with the New Cobar Complex SSD 10419 project, a notification may need to be made in accordance with condition C7. *The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5. See the Environmental Management Strategy for details of SSD Incident Notification Protocols.*

¹ The POEO Act defines relevant Authorities to include the EPA, Local Council, Fire and Rescue NSW, and SafeWork NSW. However SafeWork NSW is qualified by clause 1 of Schedule 2 to the [Work Health and Safety Act 2011](#), which refers to the Regulator under the [Work Health and Safety \(Mines and Petroleum Sites\) Act 2013](#) for mines and petroleum sites.

8.8. Other Government Agency contacts

Other government agencies may need to be contacted depending on the circumstances.

Table 8 Government Agency Contacts

Agency	Contact Details
Dams Safety NSW	(02) 9842 8073 or 0403 681 645
Natural Resources Access Regulator	1800 633 362
Crown Lands Division	(02) 6836 3018

8.9. Local community contacts

POEO Regs s72(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,

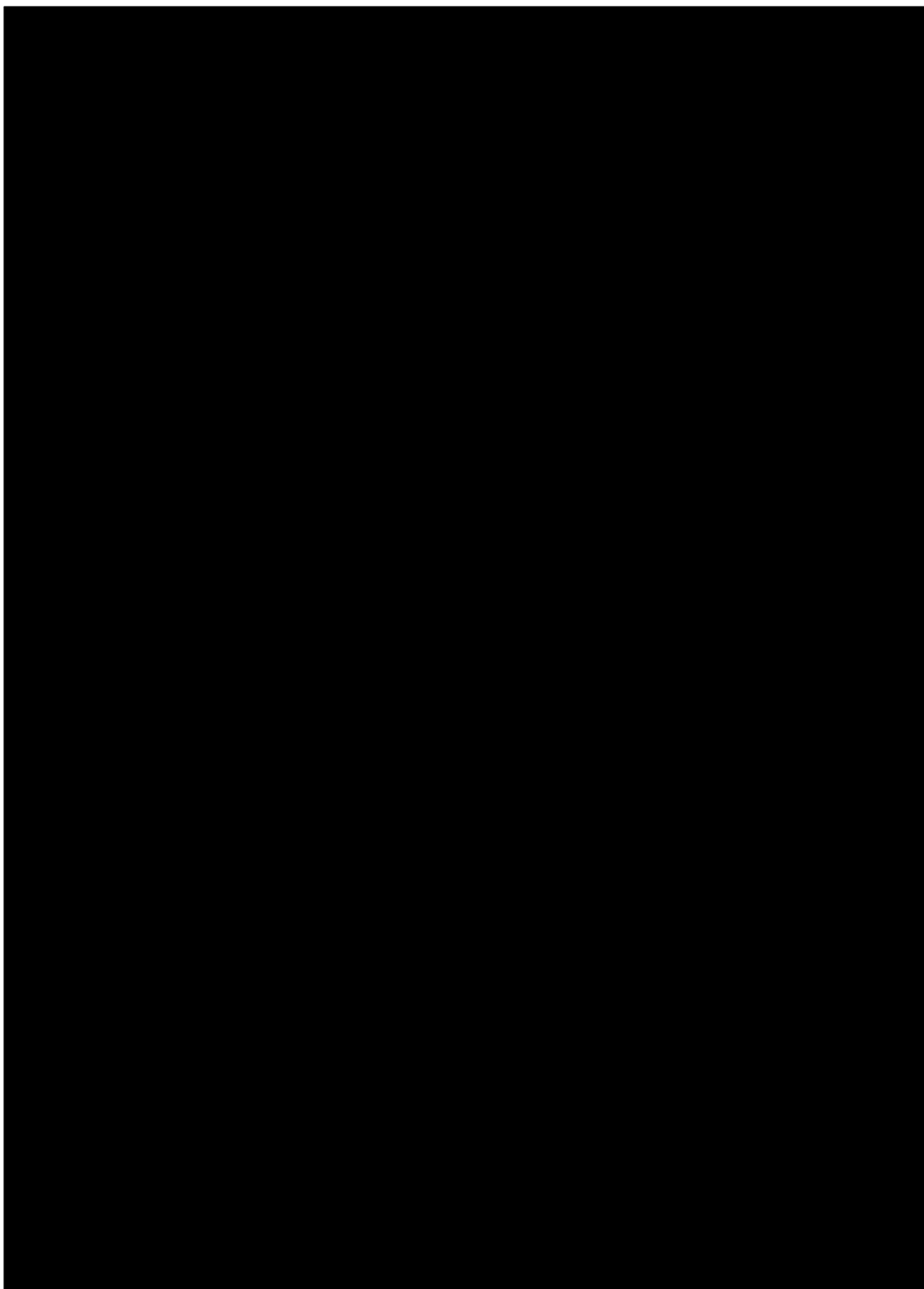
The local community includes near neighbours, crown land and the town of Cobar. Where incidents are likely to affect anyone off the site, early warnings, and updates will be made through the ERCP Communication plan.

Any incident that is likely to have an impact on publicly accessible Crown Land, public roads, or the Fort Bourke Lookout, temporary signage and safety warnings or temporary access restrictions may be installed as determined with relevant authorities, Council or Crown Lands.

Near neighbours are listed below. The broader Cobar Community can be contacted through social media, and the Aurelia SMS notification subscription service.

Table 9 Residents - Neighbouring Community Properties (as per map location below):

Neighbour	Property name	Contact
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]



8.10. Persons on the premises

POEO Regs s72(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,

As a mine site, entry to the premises is strictly controlled. All workers must be inducted to site and follow the policy and procedures of the site. Visitors are always accompanied.

Site evacuation procedures are detailed in the Emergency Response Control Plan.

9. TRAINING AND TESTING

POEO Regs s72 (m) the nature and objectives of a staff training program in relation to the PIRM plan,

General staff are provided direction to report all environmental incidents to their supervisor and to the centralised ESO for activation of relevant incident and emergency response.

This training is provided in site inductions which are repeated every xx years.

Staff involved in environmental incident response are trained through the annual PIRMP testing.

9.1. Competence and Awareness Training

All site personnel will conduct the site induction program before entering site.

The Emergency Response Team will be trained in handling hazardous material products and emergency response. Specific procedures for training employees in environmental safety and health are included in the Emergency Management Plan. This management plan is available to all site personnel.

9.2. Testing

POEO Regs s72 (n) the dates on which the PIRM plan has been tested and the name of the person who carried out the test,

Testing is carried out at least annually and within 1 month of an incident when the PIRMP is activated.

The test shall be attended by the Environment Superintendent, HSEC Manager, General Manager and any other person expected to be involved in PIRMP activation and the scenario being tested.

A record of test is kept in the PRIMP in Table 11: PIRMP Tests

POEO Regs s72 (p) the way in which the PIRM plan must be tested and maintained.

PIRMP Test will involve a desk top scenario with key people to establish their understanding of pollution incident identification, determination of material harm and considerations of communications and support to resolve the scenario.

The test will consider which people will need to fill what roles and responsibilities and confirm those people are aware of their responsibilities in an emergency.

TABLE 12: DOCUMENT REVISION

Revision	Date	Change Details	Change Approved By
Rev 0	07/01/2014	Last review date on record	Jenna Marret & Andrew Raal
Rev 1	10/06/2020	Change of Format	Jonathon Thompson
Rev 2	22/06/2021	Update of hazardous chemical table and contacts details	Michael Priest
Rev 3	09/06/2022	Update of hazardous chemical table, maps and contact details	Diana Barnes
Rev 4	03/04/2023	Update maps, contact details and appendix 1.	Diana Barnes
Rev 5	05/07/2023	PRIMP triggered. Reviewed, no updates	Diana Barnes
Rev 6	12/09/2023	PRIMP triggered. Reviewed, added information to quick reference guide, included a flowchart and information to notification sheets.	Diana Barnes
Rev 7	22/12/2023	Update to authorities contact details and site details added	Diana Barnes
Rev 8	24/05/2024	Update to authorities contact details and site details, formatting, logo	Diana Barnes
Rev 9	10/07/2024	Reviewed. No change.	Diana Barnes
Rev 10	09/10/2024	Reviewed, updated contacts and added ESO to notifications	Diana Barnes
Rev 11	12/04/2025	Reviewed plan and checked contacts	Laura Newton
Rev 12	30/04/2025	Reviewed plan and updated contacts	Laura Newton
Rev13	10/05/2025	Reviewed. No change.	Laura Newton
Rev14	23/07/2025	Reviewed, minor spell/format edits.	Laura Newton
Rev15	24/07/2025	Reviewed. No change.	Laura Newton
Rev16	24/08/2025	PIRMP triggered, no change.	Laura Newton
Ver 17	29/11/2025	PIRMP Reviewed and updated to Aurelia Controlled Document	Marek Hollin

Appendix 1. Legislation

Part 5.7 of the *Protection of the Environment Operations Act 1997* is the general duty to notify pollution incidents.

Protection of the Environment Operations (General) Regulations 2022, includes additional requirements for form of notifications,

Protection of the Environment Operations Act 1997 No 156

Current version for 12 December 2025 to date (accessed 11 February 2026 at 7:38)

Chapter 5 Part 5.7

Part 5.7 Duty to notify pollution incidents

147 Meaning of material harm to the environment

(1) For the purposes of this Part—

(a) harm to the environment is material if—

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations), and

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

148 Pollution incidents causing or threatening material harm to be notified

(1) **Kinds of incidents to be notified** This Part applies where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.

(2) **Duty of person carrying on activity to notify** A person carrying on the activity must, immediately after the person becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.

(3) **Duty of employee engaged in carrying on activity to notify** A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.

(3A) **Duty of employer to notify** Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must, immediately after being notified or otherwise becoming aware of the incident, notify each relevant authority of the incident and all relevant information about it.

(4) **Duty of occupier of premises to notify** The occupier of the premises on which the incident occurs must, immediately after the occupier becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.

(5) **Duty on employer and occupier to ensure notification** An employer or an occupier of premises must take all reasonable steps to ensure that, if a pollution incident occurs in carrying on the activity of the employer or occurs on the premises, as the case may be, the persons engaged by the employer or occupier will, immediately, notify the employer or occupier of the incident and all relevant information about it.

(6) **Extension of duty to agents and principals** This section extends to a person engaged in carrying on an activity as an agent for another. In that case, a reference in this section to an employee extends to such an agent and a reference to an employer extends to the principal.

(7) The regulations may prescribe pollution incidents, or classes of pollution incidents, to which this part does not apply.

(8) **Meaning of “relevant authority”** In this section—

relevant authority means the following—

- (a) the appropriate regulatory authority,
- (b) if the EPA is not the appropriate regulatory authority—the EPA,
- (c) if the EPA is the appropriate regulatory authority—the local authority for the area in which the pollution incident occurs,
- (d) (Repealed)
- (e) SafeWork NSW as referred to in clause 1 of Schedule 2 to the [Work Health and Safety Act 2011](#),
- (f) Fire and Rescue NSW.

149 Manner and form of notification

(1) If the regulations prescribe the manner or form of notifying pollution incidents under section 148, the notification is to conform to the requirements of the regulations.

(2) Without limiting subsection (1), the regulations—

- (a) may require that verbal notification be followed by written notification, and
- (b) may provide that notification to a designated person or authority is taken to be notification to the relevant person or authority under section 148.

150 Relevant information to be given

(1) The relevant information about a pollution incident required under section 148 consists of the following—

- (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.

(2) The information required by this section is the information known to the person notifying the incident when the notification is required to be given.

(3) If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.

151 Incidents not required to be reported

(1) A person is not required to notify a pollution incident under section 148 if the person is aware that the incident has already come to the notice of each person or authority required to be notified.

(2) A person is not required to notify a pollution incident under section 148 if the incident is an ordinary result of action required to be taken to comply with an environment protection licence, an environment protection notice or other requirement of or made under this Act.

151A EPA may require other notification of pollution incidents

- (1) This section applies to the occupier of premises where a pollution incident has occurred in the course of an activity so that material harm to the environment is caused or threatened.
- (2) The EPA may direct a person to whom this section applies to notify such other persons of the incident as the EPA requires.
- (3) The direction is not required to be given in writing.
- (4) The direction may specify the manner or form of notifying the pollution incident and the information that must be provided.
- (5) The direction may require that an initial verbal notification be followed by written notification.
- (6) A person must not fail to comply with a direction given under this section.
- (7) (Repealed)
- (8) If a direction under this section is given to a person who is carrying out an activity, is engaged as an employee in carrying out an activity, or is the employer of such a person, the obligations under this section are in addition to, and not in derogation of, the obligations under section 148 (except as provided by section 151 (1)).

152 Offence

A person who contravenes this Part is guilty of an offence.

Maximum penalty—

- (a) for a corporation—\$4,000,000 and, for a continuing offence, a further penalty of \$480,000 for each day the offence continues, or
- (b) for an individual—\$1,000,000 and, for a continuing offence, a further penalty of \$240,000 for each day the offence continues.

Note.

An offence against this section committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation—see section 169.

153 Incriminating information

- (1) A person is required to notify a pollution incident under this Part even though to do so might incriminate the person or make the person liable to a penalty.
- (2) Any notification given by a person under this Part is not admissible in evidence against the person for an offence or for the imposition of a penalty.
- (3) Subsection (2) does not apply to evidence obtained following or as a result of the notification.

Protection of the Environment Operations (General) Regulation 2022

Current version for 12 December 2025 to date (accessed 11 February 2026 at 7:38)

137 Pollution incidents—notification—the Act, s 149

- (1) For the Act, section 149(1), a pollution incident that is required to be notified under the Act, section 148—
 - (a) must be notified verbally to each relevant authority, and
 - (b) must be followed by notification in writing within 7 days of the date on which the incident occurred.
- (2) Notification of the EPA may be achieved by telephoning the EPA environment line.

Note—

The Act, section 150(2) provides that the information contained in a notification must be the information known when the notification occurs. If information becomes known between the immediate notification given verbally and the time when written notification is required to be given, the new information will be required to be notified immediately after it becomes

known and to be included in the written notification.

In relation to the relevant Authority s148(8)(e) SafeWork NSW as referred to in clause 1 of Schedule 2 to the [Work Health and Safety Act 2011](#),

Work Health and Safety Act 2011

Schedule 2 The regulator

1 The regulator

(1) For the purposes of this Act, the regulator is—

(a) the SafeWork Commissioner, unless paragraph (b) applies, or

(b) in relation to a mine or petroleum site to which the Work Health and Safety (Mines and Petroleum Sites) Act 2013 applies or a workplace at which activities under the Petroleum (Offshore) Act 1982 are carried out—the regulator under the Work Health and Safety (Mines and Petroleum Sites) Act 2013.

Work Health and Safety (Mines and Petroleum Sites) Act 2013

5 Definitions

(1) In this Act—

Department means the Department of Regional NSW.

regulator means the Secretary of the Department.

Appendix 2. Templates

To evaluate whether an incident is or likely to cause material harm to the environment, document incident details, and make notifications the following templates are to be used.

- | | |
|--|---------------------|
| • PIRMP Material Harm Evaluation Form V1.0 | AUR-PEA-ENV-FRM-001 |
| • PIRMP Incident Notification Form V2.0 | AUR-PEA-ENV-FRM-002 |
| • PIRMP Written notification of incident Template V1.0 | AUR-PEA-ENV-TMP-001 |
| • PIRMP Incident report Template v1.0 | AUR-PEA-ENV-TMP-002 |
| • PIRMP Test Report Template V2.0 | AUR-PEA-ENV-TMP-003 |

Templates are attached in Appendix 2, Word documents can be found in the Aurelia Doc Document Management System. [AureliaDoc - Home](#)

ATTATCH Above FORMS and Template for Hard Copy reference.