



CS ENERGY PROCEDURE FOR
ENVIRONMENTAL LEGAL COMPLIANCE
CS-EMSP-5

Responsible Officer: Portfolio Environment Manager

Approved: GM Portfolio Services

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1. Purpose

This procedure documents the process which ensures that staff have access to up-to-date legal information pertaining to CS Energy operations. The Environmental Legal Compliance Manual (ELCM) is compiled and maintained by an external Legal Adviser.

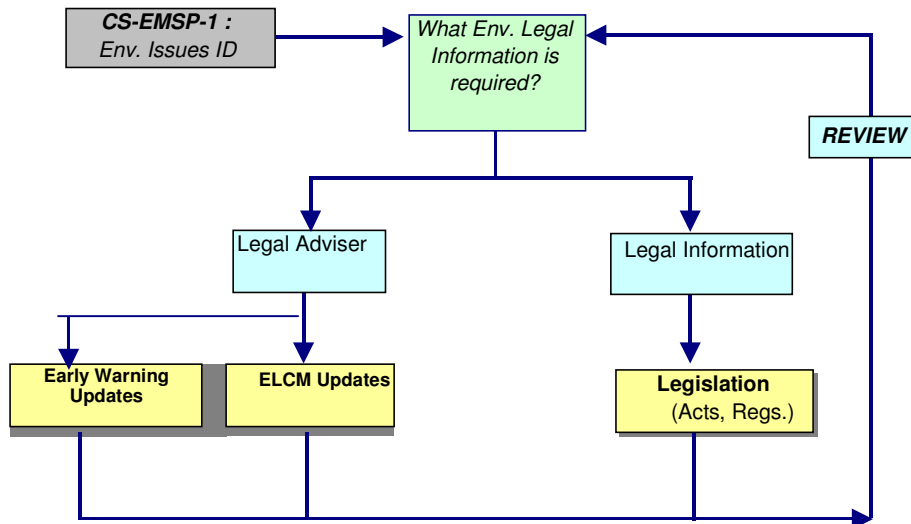


Figure EMSP-5: Environmental Legal Information flow diagram.

2. Scope

The Environmental Legal Compliance Manual covers all legal and related matters relevant to the activities carried out by the organisation.

This procedure covers the Manual, legislation to be held on-site and suggested reference material.

3. Actions

3.1 Identification of legal and other requirements

Legal and other environmental requirements are identified from the nature of major activities undertaken by the organisation. This information is used by the Legal Adviser to identify relevant content for the Manual and the issue of Early Warning Updates.

Legal Requirements

- Lists of relevant legislation.
- Description of the relevance of the legislation to the business operations.
- Incorporates Early Warning Updates.

Other Requirements

- Lists of Industry Codes of Practice.
- Lists of Standards.
- Lists of Guidelines issued by the Department of Environment and Resource Management (DERM).

- Lists of sampling and analysis manuals published by the DERM.

3.2 Distribution and use of legal information

Any staff member must request legal advice, through the CS Energy Corporate Legal Counsel, where significant legal compliance matters are identified as relevant, before any of the following events:

- Commencement of a new project which has been identified as having an impact on the environment;
- During internal reviews of procedures which influence the control of any environmental issue; and
- Any inquiries raised by other staff members concerning environmental issues.

To assist in deciding whether any of the above may have a legal consequence, first refer to the Legal Compliance Manual.

A Legal Enquiry Telephone Hotline provided by CS Energy through the Corporate Legal Counsel, can also be used to screen any relevant legal issues.

Environmental staff are to refer to the Legal Compliance Manual and Early Warning Updates before advising or distributing legal information relating to environmental issues. Corporate environmental staff coordinate provision of legal support and also forward legal update information via email to site Environmental Coordinators.

Legislation and environmental approval information is to be available on-site. Each site is to hold or have access to the following information:

- Latest version of Environmental Authority (licence), Development Approval or Registration Certificate.
- An electronic or paper copy of the Environmental Legal Compliance Manual.
- A copy of environmental legislation and its subordinate legislation (e.g. Qld *Environmental Protection Act 1994*, *Environmental Protection Regulations* and *Environmental Protection Policies*).
- A copy of any local authority environmental legal requirements (refer to ELCM).
- Subscription to appropriate journals or newsletters (refer to CS-EMSP-3 Environmental Communication & Training Process).

3.3 Maintenance of legal information

Legal information described by this procedure is to be maintained annually or as required by significant legal changes or initiatives to improve the usefulness of the ELCM.

Details of the updating procedure are provided in Corporate Procedure CS-ENVLEGAL-1 "Environmental Legal Compliance Manual Update".

4. Responsibilities

4.1 Portfolio Environmental Managers

- Initiate contract for updating the Environmental Legal Compliance Manual.
- Ensure that updated information is transferred to the Environmental Legal Compliance Manual.
- Supply of additional reference material to site Environmental Coordinators.

4.2 Corporate Legal Counsel

- Notify Portfolio Environmental Managers of any significant changes in environmental legislation with potential to influence operations.
- Offer legal advice upon request for specific legal environmental issues.

4.3 Site Environmental Coordinator

- Maintain current copy of environmental approval(s) on site.
- Maintain access to copies of legislation via the Internet.

5. Review

The following items are described in CS-EMSP-7 Environmental Audit, Review and Performance Evaluation:

- EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed correctly.
- The Environmental Legal Compliance Review will check the appropriateness of the Legal Compliance Manual.
- The Environmental Issues Review will identify if new issues or activities have arisen and therefore modifications to the Environmental Legal Compliance Manual are to be initiated.
- Documentation review will check that appropriate environmental approval, statutory and other legal requirements are referenced in these documents where deviation in processes can affect legal compliance.

6. Auditable Outputs

- Environmental Legal Compliance Manual
- Early Warning Updates

7. Definitions

Definitions to the following are found in the EMS Manual Glossary: environmental issue.

8. Reference Documentation

CS Energy / General	QA Doc No.	Location
EMS Procedure – Environmental Issue Identification	EMSP-1.doc	K:\Corprocs1\Environment
EMS Procedure – Environmental Communication & Training Process	EMSP-3.doc	K:\Corprocs1\Environment
EMS Procedure – Environmental Audit, Review & Performance Evaluation	EMSP-7.doc	K:\Corprocs1\Environment
Environmental Legal Compliance Manual		Intranet – Environmental Management
EMS Procedure - Environmental Legal Compliance Manual Update	CS-ENVLEGAL-1	K:\Corprocs1\Environment
Environmental Protection Legislation	N/A	http://www.legislation.qld.gov.au/OQPChome.htm

9. Attachments

None

10. Document History

Issue Date	Nature of Changes
27.1.1999	Original Issue
17.5.2000	Update responsibilities
3.7.2000	Expand Section 3.1 other requirements
28.8.2000	Added diagram
17.11.2000	Added Review and Auditable Outputs
24.11.2000	Minor Editorial changes, Reference to CS-ENVLEGAL-1.
16.02.2001	Updated document history, ERA to maintain licence
31.10.2001	Reference documentation updated
18.11.2002	Replacement of “Environmental Legislation Register” with “Environmental Legal Compliance Manual”, reference to Legal Hotline, removal of reference to EMRO, minor editing.
25/11/2003	Minor editing
06/06/2005	Document owner; minor editing; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.
19/04/2006	Clarification and amendment of processes detailed in Sections 3.1, 3.2 and 3.3; inclusion of Early Warning Updates in Section 6; update organisational titles; minor editing.
6/07/2009	EPA replaced with DERM; references to site-specific documentation removed; ‘Legal Officer’ changed to ‘Corporate Legal Counsel’; responsibilities for Corporate Legal Counsel added to s. 4; references to ‘licence’ or ‘authority’ changed to ‘approval’; update organisational titles; minor editing.