Level:	CS ENERGY
Procedure No:	CS-ENV-08
TRIM Ref No:	B/D/11/31096
Reviewed:	02/25
Review Due:	02/27

CS ENERGY PROCEDURE

GUIDELINES FOR CONTRACTOR ENVIRONMENTAL MANAGEMENT PLANS
CS-ENV-08

Responsible Officer: Environmental Specialist
Responsible Manager: Principal Environmental Specialist
Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Original Issue				12/02/2002
Owner title; site H&S officer title				06/06/2005
Inclusion of new Sections 5 - Review and 6 - Auditable Outcomes				19/04/2006
Update organisational titles.				06/07/2009
Remove reference to Health and Safety Management Plans and focus on the requirements for Environmental Management Plans.				06/06/2011
Document transferred to new CS Energy template	J Lafferty		R Hartigan	17/11/2011
Update Risk Management Framework	J Lafferty		R Hartigan	27/04/2012
Updated to reflect current business processes and address internal EMS audit recommendations	S Harabasz	R Hartigan	T Wiltshire	22/01/2016
Updated to reflect current business processes and address internal EMS audit recommendations and findings	S Harabasz	S Verano	B Monckton	15/02/2019
Document reviewed no changes required	S Harabasz	T van den Berg	B Monckton	27/08/2021
The outdated Risk Matrix attachment removed. Current link in References	S Collard	N/A	B Monckton	21/03/2022
Updated Organisational Changes and formalised the “Procedure” as guideline	S Verano	S Bulten P Salmon	R Harvey	24/03/2023
Updated with EP Act changes and to align with updated contractor management framework	D Lawrence	R Harvey	B Prain	18/02/2025

CONTENTS

1 INTRODUCTION

It is a requirement of CS Energy's Environmental Management System (EMS) that all contractors (and associated contingent workers) identify, evaluate and manage environmental risk associated with the supply and use of services and labour. This guideline aligns with Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management (09/22) - CS Energy Registered (B/D/13/34521).

The identification, evaluation and management of environmental risks should be considered from the Scope of Works development and implemented during the execution of the works. An Environmental Management Plan (EMP) is a project-specific plan developed to ensure that appropriate environmental management practices are followed to minimise the risk of environmental harm and/or nuisance, and to ensure compliance with environmental legislation and CS Energy's commitment to environmental management.

2 SCOPE AND PURPOSE

This guideline is applicable to all contingent workers and CS Energy personnel tasked with managing contracted work on a CS Energy site, including OPEX and CAPEX projects of any size. The contractor management process is detailed in Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management (09/22) - CS Energy Registered (B/D/13/34521).

The purpose of this procedure is two-fold:

- To guide the review, evaluation, approval and management of an EMP by CS Energy's Site Environment and Stakeholder Business Partner and CS Energy's Contract Owner nominated in the Contract with the Contractor; and
- To guide the preparation of an EMP.

3 CONTRACT MANAGEMENT PROCESS AND EMP

Contractor management at CS Energy helps to achieve business deliverables in a safe, cost effective, timely and environmentally responsible manner utilising external resources. Figure 1 shows how the EMS and the EMP are integrated into the contractor management stages process (B/D/13/34521).

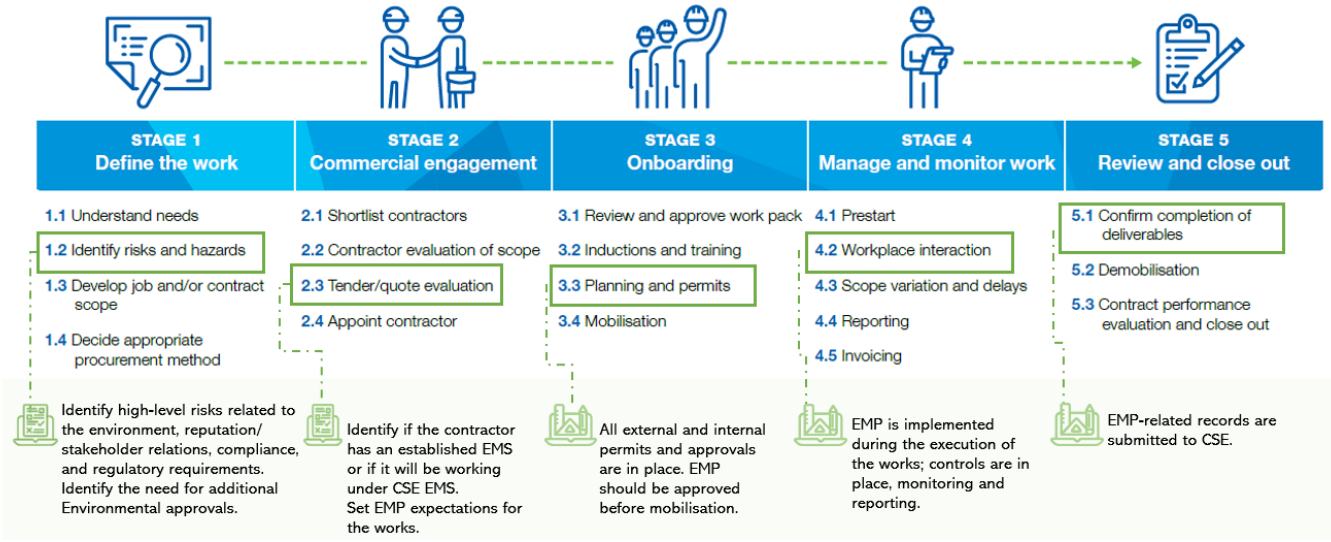

Figure 1. Contractor Management Stages, EMS and EMP integration.

3.1 Stage 1: Define the Work

This stage of the contractor management process involves a high-level identification of risk related to the proposed project scope. The CS Energy Enterprise Risk Management Framework [B/D/13/17881 - Risk Matrix (CS-RISK-01 / CS-RISK-03) - Risk Management Framework] and the CGR Insight system – Risk Assessment Module are tools to identify risk related to environment, reputation/stakeholder and compliance and regulatory requirements during the scope definition stage of any project.

This stage also assesses the need for any additional environmental approvals, agreements, licenses and permits from local Council and/or State Government Departments to allow delivery of the proposed scope of work. Such approvals may be necessary for the handling of regulated wastes, vegetation removal, taking wildlife, ground distribution of herbicides, contaminated land, works in road reserves, operational works and/or cultural heritage. Understanding if these additional items will be required assists in defining the scope of work and the associated risk profile to be considered. If uncertain, it is recommended that advice is sought from CS Energy's Site Environment and Stakeholder Business Partner. The Site Environment and Stakeholder Business Partner will seek further advice if necessary.

3.2 Stage 2: Commercial Engagement

During commercial engagement, it is important to evaluate the Contractor's EMS and its capability to fulfil all internal and external compliance requirements, approvals and licence conditions.

Based on the established level of risk of the works or project and the type of commercial agreement, the Environment and Stakeholder Business Partner or Environment Specialist will determine:

- if the completion and successful implementation of a Job Safety Environmental Analysis (JSEA) is sufficient to meet the Contractor's environmental management requirements,
- if the Contractor should formulate an EMP in addition to task-specific JSEAs; and
- if alignment between CS Energy's expectations and the Contractor's EMP is required. In this instance, CS Energy will work with the Contractor to ensure the Contractor can provide a project-specific EMP as soon as possible after the contract has been awarded (and prior to mobilisation). Where a project-specific EMP is to be prepared, it will be consistent with the CS Energy ISO 14001 accredited EMS and will meet the relevant requirements of the *Environmental Protection Act* and the *Planning Act*. The purpose of the EMP for the project is to provide the framework for the contractor to:
    - be specific for the work to be undertaken for CS Energy;
    - achieve the implementation of the appropriate environmental practices to minimise the risk of environmental harm and/or nuisance;
    - ensure compliance with relevant environmental and cultural heritage legislation and CS Energy's licences and permits; and
    - outline environmental objectives and detail key performance indicators.

3.3 Stage 3: Onboarding

The Contractor will issue to CS Energy a project-specific EMP that will be reviewed by the Environment and Stakeholder Business Partner before mobilisation and approved by the CS Energy Contract Owner.

3.4 Stage 4: Manage and Monitor Work

During delivery of the scope of work, there will be interactions between the Contractor and the CS Energy Designated Lead to ensure compliant implementation of the EMP, as detailed in Section 4.3. As detailed in Section 4.4, the EMP may be reviewed and updated during delivery of the scope of work.

3.5 Stage 5: Review and close out

At completion of the scope of work, the CS Energy Designated Lead will confirm completion of all deliverables.

4 ENVIRONMENTAL MANAGEMENT PLAN (EMP) PREPARATION

4.1 Determine Scope of EMP

The Contractor's EMP scope should detail the work and activities associated with the project. An EMP template is available from CS Energy, however, a Contractor is not obliged to use this template.

It is CS Energy's expectation that an EMP includes, as a minimum:

- Project description;
- Environmental objectives and key performance indicators;
- Environmental management structure and responsibility;
- Risk assessment for applicable environmental values (some publicly available guidance documents associated with noise and erosion control are provided in the list of references below);
- Environmental management activities and site-specific controls;
- Approval and licensing requirements;
- Schedule of environmentally significant works;
- Environmental monitoring requirements;
- Cultural heritage;
- Incident management and corrective action procedures;
- EMP reporting process;
- Environmentally relevant document and record management;
- Environmental training required and evidence of this training;
- Change management procedure;
- Complaints handling procedure; and
- Emergency contacts and response.

4.2 Assess Potential Environmental Impacts

When preparing the EMP, the Contractor should consider the potential environmental risks by assessing relevant factors and identifying appropriate controls. Potential risks to consider include (but are not limited to):

- Types and quantities of hydrocarbons and chemicals, equipment and other materials being brought to the site;
- Types and quantities of wastes likely to be produced;
- Likely receptors if chemicals or wastes are spilled;
- Possible impacts on air quality, noise generation, water quality (including stormwater), weed control, nearby residents and road users (and any other environmental value);
- If earthworks are involved, the potential presence of significant cultural heritage in the area, presence of protected vegetation / fauna in the area, the susceptibility of soils to erosion, and the likelihood of exposing potentially contaminated soils;

- Possible non-conformances with site Environmental Authorities, Project approvals (e.g. Development approvals, council permits, etc); and
- Possible breaches of environmental legislation including **but not limited to**:
  - Environmental Protection Act and Regulations.
  - Environmental Protection Policies (Air, Water, Noise).
  - Planning Act.
  - Aboriginal Cultural Heritage Act.
  - Local Council planning and environmental laws.

4.3 Implementation

Works cannot commence until the EMP is approved by the Environment and Stakeholder Business Partner and CS Energy Contract Owner.

All staff members working under the given contract are expected to be aware of the EMP and its requirements.

EMP implementation will be subject to audits and inspections by the CS Energy Designated Lead (or delegate).

4.4 Revision and Update

The EMP is a living document that focuses on continual improvement and as such may need to be revised and updated.

The timing of review and possible update will depend on the nature and scale of the project or task.

It is generally advised that a review take place when:

- There is a change in project scope;
- An environmental or cultural heritage incident has occurred;
- There is a need to improve performance in an area of likely environmental or cultural heritage impact; and/or
- At the request of a CS Energy Representative.

If changes are made, it is recommended that reasons for making the changes are documented and copies of the previous version kept for reference.

5 EMP EVALUATION AND APPROVAL

CS Energy will review, evaluate, approve, and audit the EMP, ensuring that it:

- Applies appropriate environmental management to a project/task;
- Identifies key environmental and cultural heritage hazards and appropriate controls to manage these hazards;
- Complies with the site Environmental Authority and relevant environmental and cultural heritage legislation, and is consistent with the CS Energy EMS; and
- Achieves an overall reduction in the risk of environmental and cultural heritage harm and incident occurrence to a level considered ‘tolerable’ under the CS Energy Enterprise Risk Management Framework.

EMP evaluation and approval occurs before the onset of works and periodically throughout the project in order to ensure compliance and identify opportunities for continual improvement.

6 ROLES AND RESPONSIBILITIES

At commercial engagement, detailed roles and responsibilities will be defined for stakeholders relevant to the delivery of the activity or task. These must be reflected in the EMP.

The roles and their responsibilities will vary depending on the complexity of the activity or task. Typically, the roles and responsibilities described below are relevant to any activity or task completed on a CS Energy site. The roles and responsibilities described here align with Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management (09/22) - CS Energy Registered - Attachment 1 - Detailed Roles And Responsibilities (B/D/13/34521). The below roles are specific to the EMP.

6.1 CS Energy's Contract Owner

The CS Energy Contract Owner is required to:

- Ensure the requirement for an EMP is clearly reflected in contractual documentation.
- Be accountable for the contract and is the key point of contact in relation to the contract.

6.2 CS Energy's Designated Lead

The CS Energy Designated Lead is required to:

- Ensure the EMP is approved prior to work commencing on site.
- Audit EMP compliance, performance and identify opportunities for improvement.

6.3 CS Energy's Site Environment and Stakeholder Business Partner

The CS Energy Site Environment and Stakeholder Business Partner is required to:

- Assess the hazards / risks posed to environmental and cultural heritage values with the work at the planning and scoping stage of the work / contract.
- Establish environmental criteria during the procurement phase and evaluate the health, safety and environment (HSE) submission of potential contractors (including pre-qualification requirements).
- Review the Contractor's EMP in the Contractor's work pack.
- Complete periodic reviews of HSE pre-qualification requirements as defined in the vendor management system or where triggered by scope creep, incident, or change in HSE system.
- Notify the CS Energy Designated Lead that the EMP has been evaluated and requires approval prior to works commencing.

6.4 Contractor

The Contractor is required to:

- Develop the EMP and work with the site Environment and Stakeholder Business Partner to obtain its approval.
- Ensure the approved EMP is provided to onsite personnel prior to work commencing on site.
- Ensure ongoing compliance with the EMP.
- Continually identify opportunities for improvement and update the EMP as required.

7 EMP AUDITABLE OUTCOMES

The following items are outputs of this procedure:

- Environmental risk assessment;
- Environmental Management Plan (EMP); and
- Evidence of EMP implementation.

8 DEFINITIONS

Term	Definition
Contractor	Any service provider subject to the CS Energy Power Station Site Conditions (CS-SCP-609). Examples include trade service providers (plumber, fitter, scaffolder), cleaners, and building and construction contractors.
Environmental Harm	Any adverse, or potential adverse effect (whether temporary, permanent and of whatever magnitude, duration or frequency) on an environmental value, and includes environmental nuisance.
Environmental Management Plan (EMP)	A project-specific plan developed to ensure that appropriate environmental management practices are followed while undertaking contract works to minimise the risk of environmental harm and to ensure compliance to the CS Energy Environmental Management System and legislative obligations.
Environmental Management Systems (EMS)	The part of an organisation's overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the Environmental Policy.
Environmental Nuisance	Unreasonable interference or likely interference with an environmental value caused by aerosols, fumes, light, noise, odour, particles or smoke; or an unhealthy, offensive or unsightly condition because of contamination; or another way prescribed by regulation
Environmental Policy	Statement by an organisation of its intentions and principles for environmental performance.
Environmental Value	A quality or physical characteristic of the environment that is conducive to any of the following: -ecological health -public health, safety or amenity -a contribution to biological diversity and integrity, intrinsic or attributed scientific value or interest, amenity, harmony and sense of community"
Designated Lead	Also known as the CS Energy Representative; is the person appointed by CS Energy to supervise the operation of a contract.
Site Environment and Stakeholder Business Partner	CS Energy's site environmental representative and a key point of contact for the Contractor.

9 REFERENCES

Reference No	Reference Title	Author
Web Link	*Environmental Protection Act* and Regulations	Qld Govt
Web Link	Environmental Protection Policies (Air, Water, Noise)	Qld Govt
Web Link	*Planning Act*.	Qld Govt
Web Link	*Aboriginal Cultural Heritage Act*	Qld Govt
Web Link	Aboriginal Cultural Heritage Act Duty of Care Guidelines (2004)	Dept Env & Resource Mgmt
Web Link	Guideline for the Preparation of Environmental Management Plans (2004)	Aust Govt
ISO 14001:2015 Environmental Management Systems | Audit & Certification | Intertek SAI Global Australia	AS/NZS ISO 14001:2015 Environmental management systems – Requirements with guidance for use.	Standards Aust
AS 1055.1-1997 Acoustics-Description and measurement of environmental noise - General procedures	Australian Standard 1055.1: Acoustics - Description and Measurement of Environmental Noise - Part 1-3.	Standards Aust
Erosion and sediment control (ESC) on construction sites | Environment | Department of the Environment, Tourism, Science and Innovation, Queensland	Soil Erosion and Sediment Control: Engineering Guidelines for Queensland Construction Sites	DETSI
N/A	Local council planning and environmental laws.	N/A
B/D/16/2453	Environmental and Cultural Heritage Legal Compliance Manual – Volume 1	CS Energy
B/D/16/2454	Environmental and Cultural Heritage Legal Compliance Manual – Volume 2	CS Energy
B/D/12/63934	Standard - CS-RISK-01 - Risk and Compliance Management Framework	CS Energy
B/D/13/11406	Procedure – CS-RISK-03 – Enterprise Risk Management Guideline	CS Energy
B/D/13/17881	Attachment - Risk Matrix - Risk Management Framework	CS Energy
B/D/11/28673	Procedure - CS-SCP-609 - Site Conditions	CS Energy

10 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of controlled documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

Government Owned Corporations must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.