

CS ENERGY PROCEDURE

ENVIRONMENTAL COMMUNICATION AND TRAINING PROCESS CS-ENV-03

Responsible Officer: Environmental Specialist
 Responsible Manager: Head of Health, Safety and Environment
 Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Original Issue				27/01/1999
Updated responsibilities, removed public environmental review.				17/05/2000
New section 3.2 Media and EPA contact.				03/07/2000
Added Diagram.				28/08/2000
Altered diagram, added review and auditable outputs, restructured to clarify training as separate but related to communication.				17/11/2000
Expanded Section 3.4 Minor editorial changes.				24/11/2000
Update document history.				16/02/2001
Mica Creek reference documentation updated, legislation references added.				31/10/2001
Section 3.1 Community Consultation modified.				17/12/2001
Section 3.1 modified re-release of environmental information and joint ventures, Section 3.2 modified re joint ventures, Section 3.2 re appointment of media spokesperson during incidents or emergency situations, minor changes to titles and responsibilities, minor editing.				18/11/2002
Minor editing.				25/11/2003
New "joint venture communication" paragraph in Section 3.1; minor editing; document owner; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.				04/06/2005
Update to ISO 14001:2004; clarification of training needs analysis and schedules in Section 3.8; update organisational titles; include contractors in Section 4.4; minor editing.				19/04/2006
EPA replaced with DERM; release of environmental information to public in s.3.1 elaborated; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.				13/07/2009
Document transferred to new CS Energy template, minor editing.	J Lafferty		R Hartigan	16/11/2011
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

Level: CS ENERGY
Procedure No: CS-ENV-03
TRIM Ref No: B/D/11/31091
Reviewed: 12/23
Review Due: 12/25



DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Reviewed and updated with current position titles. Text restructured and other editorial edits made. Process flow chart updated	J Ritchie	R Harvey	B Prain	20/12/2023

CONTENTS

1	PURPOSE	4
2	SCOPE	4
3	ACTIONS	4
3.1	Communication	5
3.1.1	<i>External Communication.....</i>	5
3.1.2	<i>Internal Communication.....</i>	7
3.2	Internal Training Requirements	8
3.2.1	<i>All employees and contractors.....</i>	8
3.2.2	<i>Line Managers – Environment Team.....</i>	8
4	RESPONSIBILITIES	9
4.1	General Managers	9
4.2	Head of Health, Safety and Environment and Principal Environmental Specialist.....	9
4.3	Environment and Stakeholder Business Partner	9
4.4	Employees and Contractors	9
5	REVIEW	9
6	AUDITABLE OUTPUTS.....	9
7	DEFINITIONS.....	11
8	REFERENCES	11
9	RECORDS MANAGEMENT	11

1 PURPOSE

The purpose of this procedure is to document the processes for:

- Communicating the objectives of the CS Energy Environmental Management System (EMS) to staff and the general public.
- Consulting with staff and the public where appropriate on environmental matters.
- Ensuring ongoing and relevant learning and development related to environmental matters.

The overall process for environmental communication and training is summarised in Figure 1.

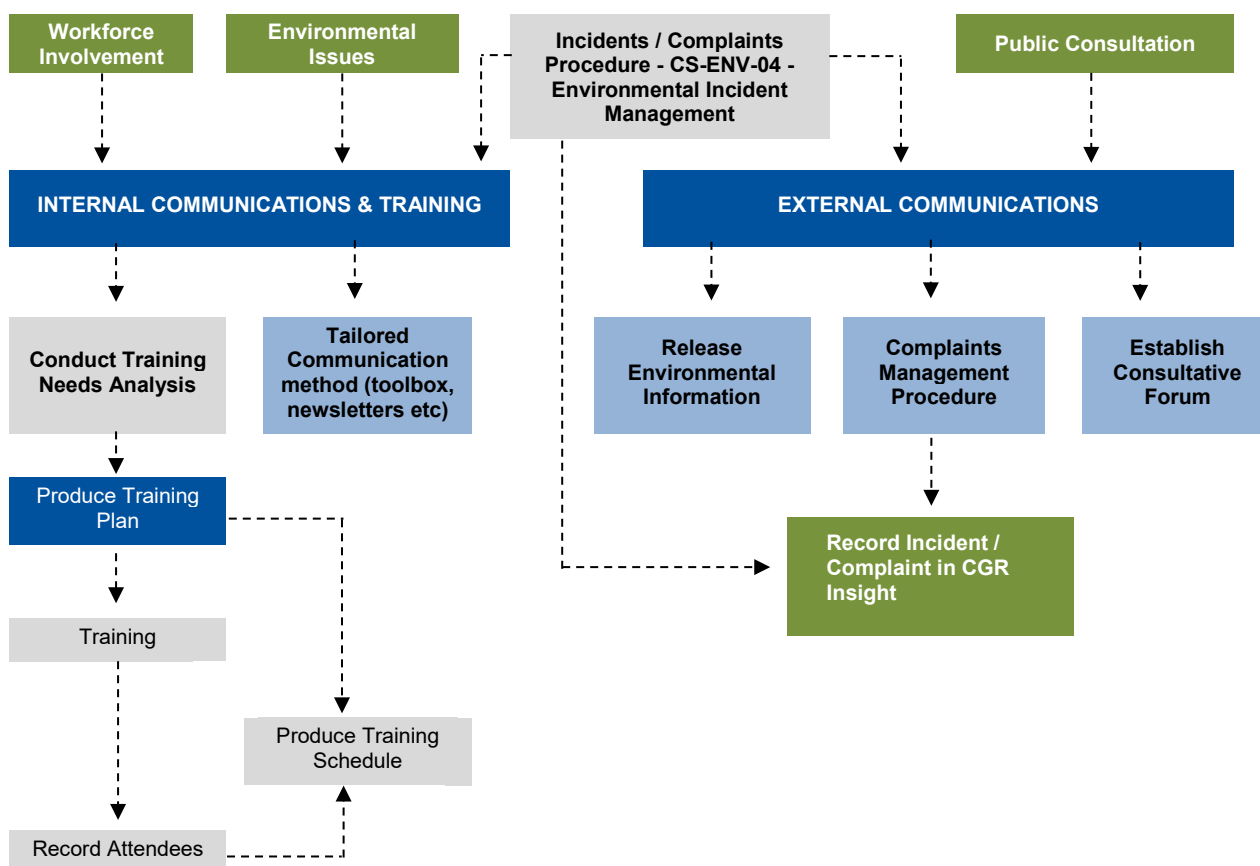


Figure 1: Environmental Communication & Training Process Flow Diagram

2 SCOPE

This procedure applies to internal and external communication of environmental issues or incidents across CS Energy operations and to internal training processes.

3 ACTIONS

The sections below describe the specific actions to be completed to ensure communication related to environmental matters is delivered consistently and accurately. The actions associated with internal environmental training requirements ensure all team members are appropriately trained, and training needs are regularly reviewed.

3.1 Communication

The requirement to communicate environmental matters with external and/or internal stakeholders may be initiated in several ways, including:

- In response to an environmental incident.
- In response to an environmental complaint.
- In preparation for an audit, inspection or investigation.
- To share environmental information relevant to CS Energy's activities.

The communication methods to be applied will vary and should be tailored to the specific circumstance. Therefore, some items below will not be applicable to every situation.

3.1.1 External Communication

3.1.1.1 Appointment of CS Energy Spokesperson

Contact with the media is planned and arranged by the Head of Corporate Affairs. The Chief Executive, Executive General Managers or Site General Managers have the authority to speak to the media when nominated as part of the communication strategy for a particular issue. Other staff are authorised from time to time to speak to the media on specific issues in their area of expertise. Approval for such contact is on an issue-specific basis. Staff likely to be called to speak to the media are to undergo media training. Refer also to Corporate Communications Procedure - CS-COMMS-00 - Media and Communications Guideline.

In the event of an incident or emergency situation, an officer is nominated as authorised media spokesperson in accordance with Procedure - CS-IM-02 - Crisis Management.

For site matters, contact with the Queensland Environmental Regulator is authorised by the Site General Manager and coordinated through the site Environment and Stakeholder Business Partner.

The Head of Health, Safety and Environment and Principal Environmental Specialist are authorised to contact the Queensland Environmental Regulator in consultation with the Site General Manager and the Environment and Stakeholder Business Partner.

In the case of joint-ventures, agreement is reached between the joint-venture parties as to how external communications are organised. For issues related to a joint-venture power plant, this is usually through the joint-venture management company.

3.1.1.2 Routine external communication methods

CS Energy does not externally communicate information in relation to all identified significant environmental issues. It does, however, release specific information to the public predominantly in the Annual Report and to a lesser extent through the Corporate website, National Pollutant Inventory (NPI) website, newsletters, factsheets and media releases. The methods used and the types of information released to the public include:

- Annual Report, which typically contains:
 - Performance against key objectives and targets for the current reporting period.
 - Likely targets for the next reporting period.
 - Number of environmental incidents and complaints.
 - Greenhouse gas intensities.
 - Fly ash generation and reuse.
 - Water consumption and efficiencies.
 - Renewable energy investments.

- Corporate Website, which provides access to:
 - Annual Report.
 - Environment Policy.
 - Environment Procedures.
- National Pollutant Inventory (NPI), which provides information on CS Energy's water, air and land emissions by reporting year.
- Intranet articles, newsletters, site factsheets and media releases issued via other forums that make reference to CS Energy activities and topical environmental issues.
- Asset-specific community (external) complaint procedures will be developed and maintained. The complaint procedure must address the following:
 - Registration and documentation of community complaints.
 - Provision of feedback to the complainant.
 - Mechanism for signoff when actions completed.
 - Registration of complaints of an environmental nature as per the EMS Procedure - CS-ENV-04 - Environmental Incident Management.
- Any CS Energy assets with joint-venture arrangements in place will maintain regular communication processes addressing at least the following:
 - Environmental approval obligations and amendments.
 - Status of any environmental management programs, including any programs in place to meet a Direction or Notice issued by the Queensland Environmental Regulator.
 - Items from monthly reports.
 - Management and close-out of incidents reported.
 - Management and close-out of community complaints.
 - Outcomes from audits and status of actions recommended.
 - Plant issues affecting environmental performance.
 - Environmental approval non-compliances.
 - Review of plant and environmental monitoring performance.
 - Review of any Contracted Environmental Management Plans.

3.1.1.3 Bespoke external communication methods

In managing external communications with regard to an asset's environmental impacts, management will establish an external environmental communication strategy. The strategy should consider establishing a community consultation forum.

The following should be considered when determining the need for a community consultation forum:

- Number of external complaints (incidents) received (refer to Procedure - CS-ENV-04 - Environmental Incident Management).
- Verification of need to take action on a complaint.
- Proposed changes to site operations.
- Communication policy of the operation.
- Community needs / expectations.

If it is decided that a forum is to be established, then the following should be documented:

- Objectives of the forum.
- Terms of reference.
- General procedure for conducting meetings.
- Meeting minutes.

In the case of assets where joint-ventures are involved, the joint-venture parties need to agree on the management of community relations.

3.1.2 Internal Communication

3.1.2.1 Routine internal communication methods

Routine internal communication methods include:

- An Environment Team meeting to be held at an appropriate interval (no less than monthly). The structure and function of the Environment Team meeting will:
 - Include representation from site and corporate environmental management.
 - Include reviewing incidents and complaints.
 - Include reviewing environmental targets and objectives (KPIs).
 - Discuss matters of environmental importance.
 - Provide an avenue for communication to the workforce.
 - Act as a means for promoting environmental awareness and discussing job-related environmental impacts.
- Adopt an agenda similar to that specified in Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation.
- Document key outcomes / issues identified during the Environmental Team meeting to be taken into consideration when reviewing policy, goals and targets.
- A combined Health, Safety and Environment (HSE) Team meeting to be held at an appropriate interval (no less than monthly). This forum will include updates on environmental issues across the business and also aids in increasing the Health and Safety team's awareness of environmental activities.
- A quarterly Central Health Safety and Environment Committee meeting where environmental performance is reviewed with the Chief Executive and Executive General Managers.
- Preparation of the Monthly Performance Report (MPR) for Health, Safety and Environment. This report includes information on environmental activities, risk and opportunities for the previous month and is provided to the Chief Executive and Executive General Managers.
- Distribution of the environment scorecard each month. This report contains progress against the environment strategy targets and asset-specific targets. It also provides information on risk management actions and environmental incidents for the previous month. It also provides information on the number of environment-related communications issued during the previous month. The scorecard is distributed via email to the entire business and also available on the CS Energy Intranet page.
- Distribution of newsletters and legislation updates from subscriptions (e.g. SAI Global and Queensland Environmental Regulator).

3.1.2.2 Bespoke internal communication methods

A range of communication methods may be applied within the business to ensure staff are aware of their environmental obligations. Of interest are staff whose work may create a significant impact upon the environment. Internal communications should target these roles and provide staff with information and advice.

Depending on the environmental issue of interest, one or more of the following internal communication methods may be suitable:

- Workplace news items.
- Lunch and Learn sessions.
- Toolbox talks.
- Notice board flyers.
- Inductions.
- Working groups.

3.2 Internal Training Requirements

3.2.1 All employees and contractors

It is a requirement for all new staff and contractors to complete the Environmental Awareness Module through the CS Energy Learning Management System (LMS) prior to, or soon after commencing work.

This module ensures that staff and contractors are made aware of:

- CS Energy's Environment Policy.
- General awareness of the EMS implemented on site.
- General site conditions / rules.
- Specific site information e.g. recycling, drainage systems.
- Responsibilities – General Environmental Duty (Section 319 of the Environmental Protection Act 1994).
- Legal obligation to report all incidents.

3.2.2 Line Managers – Environment Team

Line managers will conduct a training needs analysis and develop a suitable training plan and schedule for staff in the Environment Team.

The needs analysis must consider the following information during development:

- Awareness of the EMS implemented on site.
- The needs of managers and staff to facilitate their understanding of environmental impacts relevant to their operations or processes.
- Staff responsibilities, and how they are to manage impacts associated with their job tasks.
- Incidents that have occurred in the past as a result of poor understanding.
- Current targets or goals that require specific training.
- Current risk plans.

Training needs analysis and schedules will be prepared through the following processes:

- For new starters, as a component of the new starter package to identify training needs and delivery.
- For graduates, as part of a targeted graduate development program.
- For other staff, through identification of training needs during individual staff six-monthly or annual performance reviews. Results of these reviews are recorded in Individual Achievement Plans (IAPs).

4 RESPONSIBILITIES

4.1 General Managers

- Develop external environmental communications plan establishing communication lines with the public on environmental issues and the release of environmental information to the public.

4.2 Head of Health, Safety and Environment and Principal Environmental Specialist

- Conduct a training needs analysis for environment staff. Consult with Environment and Stakeholder Business Partners to capture training needs for asset-based team members.
- Develop Corporate environmental reports.

4.3 Environment and Stakeholder Business Partner

- Implement the community (external) environmental complaints process.
- Contribute to corporate environmental reports.
- Develop asset-specific environmental reports.
- Consult with the Head of Health Safety and Environment and the Principal Environmental Specialist to capture training needs for asset-based team members.

4.4 Employees and Contractors

- Be active in communicating incidents, environmental issues and supplying feedback on the general environmental management philosophy of CS Energy operations.
- Complete the CS Energy Environmental Awareness Module through the LMS as required.

5 REVIEW

The EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed correctly. This review action aligns with Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation.

6 AUDITABLE OUTPUTS

The following items are outputs of this procedure:

- Records of communication with the Queensland Environmental Regulator.
- Environment updates to Annual reports.
- Complaints recorded in CGR Insight as an incident and in Consultation Manager.
- Minutes of Community Consultation Meetings / Forums (if conducted).
- Environment Team meeting minutes.
- Health, Safety and Environment Team meetings.

- Central Health Safety and Environment Committee meetings.
- Monthly Performance Reports.
- Environment Scorecard.
- Newsletters and regulatory update information.
- Any bespoke internal communication products.
- Environmental Awareness Module training completion records.
- Training needs analysis and schedules in Individual Achievement Plans (IAPs).
- Training records.

7 DEFINITIONS

Term	Definition
EMS	Environmental Management System
NPI	National Pollutant Inventory
HSE	Health, Safety and Environment
MPR	Monthly Performance Report
IAPs	Individual Achievement Plans
LMS	Learning Management System

8 REFERENCES

Reference No	Reference Title	Author
B/D/14/22838	Procedure - CS-COMMS-00 - Media and Communications Guideline	CS Energy
B/D/11/43851	Procedure - CS-IM-02 - Crisis Management	CS Energy
B/D/11/31092	Procedure - CS-ENV-04 - Environmental Incident Management	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation	CS Energy
B/D/11/39706	Policy - Environment	CS Energy

9 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.