

CS ENERGY PROCEDURE

ENVIRONMENTAL LEGAL COMPLIANCE CS-ENV-05

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

DOCUMENT HISTORY

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1 PURPOSE

The purpose of this procedure is to document the process to ensure CS Energy employees have access to up-to-date legal information pertaining to CS Energy's operations. The Environmental Legal Compliance Manual (ELCM) is compiled and maintained by an external legal advisor and is made available to CS Energy staff through the CS Energy Intranet.

The overall process for ensuring CS Energy is provided with up-to-date legal information is summarised in Figure 1.

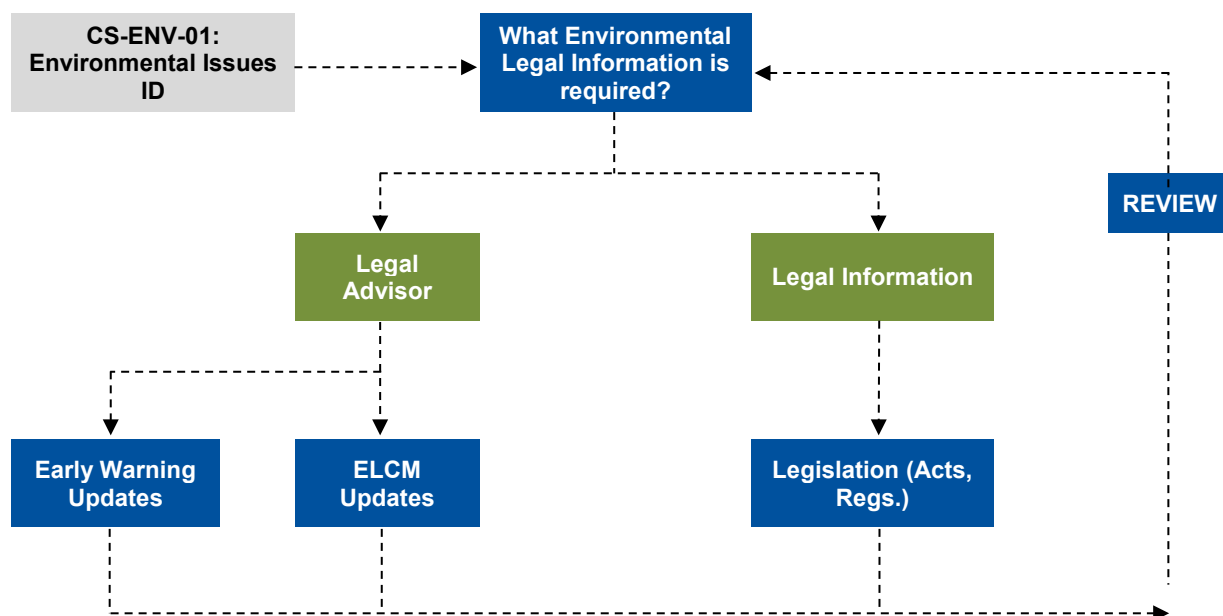


Figure 1: Environmental Legal Information Flow Diagram

2 SCOPE

This procedure applies only to the process for maintaining the ELCM and the distribution of updated legal information associated with managing environmental issues associated with CS Energy activities.

3 ACTIONS

The sections below describe the specific actions to be completed to ensure relevant legal and other information is identified, maintained and distributed on a regular basis to ensure CS Energy's environmental obligations are appropriately managed.

3.1 Identification of Legal Requirements

Environmental legal requirements relevant to CS Energy's operations are informed by understanding the nature of the activities undertaken by the organisation. This information is used by the external legal advisor engaged by CS Energy to identify relevant content for the ELCM.

The ECLM is available on the Intranet and outlines all Commonwealth and State legislation and other requirements relevant to CS Energy. The ECLM comprises two volumes, as described below:

- Volume 1 contains information on applicable statutory and non-statutory requirements for all operational assets. This volume contains detailed descriptions of all relevant State and Commonwealth environmental legislation, guidelines, policies, standards, strategies, codes of

practice, agreements and plans, as well as relevant local laws and planning scheme requirements of relevant regional councils.

- Volume 2 summarises legal requirements by environmental aspect (e.g. air, noise etc.) for all operational assets. This volume contains the legal and other requirements and definitions relevant to CS Energy's licences and permits for operational assets.

The ECLM is used to identify the legal requirements relevant to operational assets.

The external legal advisor also issues Early Warning Updates or other publications relating to legal changes that occur from time to time.

3.2 Identification of Other Requirements

Other environmental requirements associated with operating assets can be identified by referring to the following range of information sources:

- Industry Codes of Practice.
- Australian Standards.
- Guidelines issued by the Queensland Environmental Regulator.
- Sampling and analysis manuals published by the Queensland Environmental Regulator.
- Documents issued via subscriptions to appropriate journals or newsletters (refer to Procedure - CS-ENV-03 - Environmental Communication and Training Process).

Combined Health, Safety and Environment Due Diligence meetings are held routinely to review information from these sources and identify any risks to legal compliance and any actions required to align with new information.

3.3 Access to Legal Information

Legislation and environmental approval information is available through the Internet or the CS Energy Intranet. All staff are to have access to the following information:

- Commonwealth legislation, accessible on-line at <https://www.legislation.gov.au>.
- Queensland Environmental Protection legislation, accessible on-line at <https://www.legislation.qld.gov.au>. This website is managed by the Office of the Queensland Parliamentary Council.
- Information on the Queensland Environmental Regulator's website in relation to regulatory requirements, licensing and permitting. Staff can subscribe to regular updates issued via email from the regulator.
- The latest versions of Environmental Authorities (EA) (licences) or Development Approvals (DA) via the CS Energy Intranet.
- The CS Energy ELCM via the CS Energy Intranet.
- Early Warning Updates issued by the external legal advisor and saved in TRIM: [F/23/2990](#).
- Australian Standards available via the CS Energy Intranet ([ISO 14001:2015 | Techstreet Enterprise](#))

3.4 Obtaining Legal Advice

Any staff member must request legal advice, through the CS Energy Corporate Legal Counsel, where significant environmental 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.
- Any enquiries 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 ELCM.

The Corporate Legal Counsel, utilising the services of an external Legal Advisor as required, can also be used to identify any relevant legal issues.

3.5 Distribution and Use of Legal Information

Environmental staff are to refer to the ELCM 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 Environment and Stakeholder Business Partners.

The legal and other requirements relevant to operational assets are to be used to identify environmental obligations as per the Enterprise Risk and Compliance Management Framework (CS-RISK-01).

3.6 Maintenance of Legal Information

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

4 RESPONSIBILITIES

4.1 Head of Health, Safety and Environment

- Convene regular Health, Safety and Environment Due Diligence meetings.

4.2 Principal Environmental Specialist

- Manage updates to the ELCM via Corporate Legal Counsel.
- Supply additional reference material to Environment and Stakeholder Business Partners.

4.3 Corporate Legal Counsel

- Notify Head of Health, Safety and Environment of any significant changes in environmental legislation with potential to influence operations.
- Offer legal advice upon request for specific legal environmental issues.

5 REVIEW

The EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed correctly. The review of incoming Early Warning Updates from the external Legal Advisor initiates the identification of any impacts to the management of environmental obligations and risks for operating assets. Updates to the ELCM when significant changes to environmental legislation occur also

initiates changes to operations to ensure compliance with legal obligations. These review actions align with Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation.

6 AUDITABLE OUTPUTS

- Early Warning Updates and other publications relating to legal changes.
- Environmental Legal Compliance Manual.

7 DEFINITIONS

Term	Definition
ELCM	Environmental Legal Compliance Manual
EA	Environmental Authorities
DA	Development Approvals

8 REFERENCES

Reference No	Reference Title	Author
B/D/16/2453	Environmental Legal Compliance Manual (ELCM) Volume 1	CS Energy
B/D/16/2454	Environmental Legal Compliance Manual (ELCM) Volume 2	CS Energy
B/D/11/31091	Procedure - CS-ENV-03 - Environmental Communication and Training Process	CS Energy
B/D/12/63934	Standard - CS-RISK-01 - Risk and Compliance Management Framework	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation	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.