Level:	CS ENERGY
Procedure No:	CS-ENV-11
TRIM Ref No:	B/D/11/31098
Reviewed:	10/26
Review Due:	10/28

CS ENERGY PROCEDURE

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) MANUAL

CS-ENV-11

Responsible Officer: Environmental Specialist
Responsible Manager: Head of Environment and Cultural Heritage
Responsible Executive: Chief Operating Officer

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Initial version.	A Hanly		G Joy	Jan 1999
Updates to s 3 and 5.2.	R Hartigan		B Smith	May 2000
Added EMS Management Review in s 10. Responsibilities added to s 11.4.	R Hartigan		B Smith	Jul 2000
Updates to s 5.2, 7, 8.2. Updated BMS review in s 10. New procedure included in s 11.3	R Hartigan		B Smith	Nov 2000
s. 11- CS-ENV-05 ERA.	R Hartigan		B Smith	Feb 2001
s. 6 – Added new issue definitions.	R Hartigan		B Smith	Mar 2001
Updated power plant descriptions in s 3. Updates to 5.1 and 5.2. Updated reference in 8.	R Hartigan		A Aspinall	Dec 2001
Updated power station descriptions in s 3. Removal of reference to EMRO and Environmental Review in s 9. Removal of reference to Incident Reporting Database in s 10.	R Hartigan		A Andersen	Nov 2002
s. 5 – Env Policy responsibility now GM Prod.	R Hartigan		A Aspinall	Aug 2003
Removal of guide to online browser use / Removal of outdated audit hints / Update of power station descriptions / Update of Issue Identification / EIMPs.	R Hartigan		A Aspinall	Nov 2003
s. 3 – installed plant / map. s. 5.2 – update.	R Hartigan		R Roduner	Mar 2005
s. 3 – CPP / ref to EIMP. s. 9.2 – Environmental reporting. s. 11.3 – Responsibilities updated.	R Hartigan		R Roduner	Jun 2005
s. 1 – Updated responsibilities. s. 2 – Alignment with ISO14001:2004. s. 4 – Alignment with ISO14001:2004. 6.1 on EIR. s. 11.3 – Responsibilities updated. s. 12 – updated glossary for alignment with ISO 14001:2004 additional terms.	R Hartigan		R Roduner	Apr 2006
s. 3 – amended Kogan Creek 'Project' references, JV details / map. s. 5 – target dates.	R Hartigan		J James	Nov 2008
Updated following ISO14001 audit observations from past 2 years. s. 3.1 – Clarified that Kogan Creek currently not ISO 14001 certified although intended to be obtained in 2010.			G Joy	Jul 2009
Updated to reflect company changes post the July 2011 Generator Restructure.			R Hartigan	Nov 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 ISO 14001:2015 Standard and current business processes.	S Harabasz	R Hartigan	B Monckton	23/02/2018
Updated to reflect current business processes and address internal EMS audit recommendations and findings.	S Harabasz	S Verano	B Monckton	15/02/2019
Updated TRIM links in document and removed references to Wivenhoe power station.	L Hodgson S Harabasz	S Verano	B Monckton	10/03/2022
Updated to reflect current business processes and update document references.	L Crawford	S Verano	B Monckton	28/03/2022

Level:	CS ENERGY
Procedure No:	CS-ENV-11
TRIM Ref No:	B/D/11/31098
Reviewed:	09/26
Review Due:	09/28

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Updated following the migration of Incidents management from SAP to CGR Insight System (Insight), and Review of Action -ID#955 related to ISO14001 Recertification – OBS1- BV Recert 2022 – 4.3 – IT SO System. 5.3.8 Guidelines for Contractor Environmental Management Plan - Responsibilities	S Verano M Paton	J Ritchie R Harvey	B Prain	25/01/2024
Incorporation of cultural heritage information and use of the term “contingent worker”. Some document links updated to remove obsolete or outdated documentation.	R Harvey	D Lawrence	B Prain	17/03/2025
Reviewed to align with recent organisational structural changes and associated procedural reviews. Global change from CGR Insight to Clew Insight	R Stockley	J Choong R Harvey	B Monckton	30/10/2026

FORWARD

CS Energy implements and maintains an Environmental Management System (EMS) that conforms to the AUS/NZS ISO 14001standard. This Corporate EMS Manual has been developed to describe how environmental issues and potential impacts are identified and managed at CS Energy operational assets within the scope of the EMS certification. The EMS supports continual improvement of CS Energy's environmental performance in accordance with the ISO 14001 standard. CS Energy seeks to engage in world-class electricity generation performance by:

- Measuring and reporting performance through Environmental Key Performance Indicators (KPIs).
- Complying with our legal, regulatory and other environmental and cultural heritage obligations.
- Proactively monitoring and managing our emissions and impacts on the environment.
- Continually improving our environmental performance through innovative and responsible use and reuse of natural resources and waste.
- Integrating environmental and cultural heritage outcomes into our business planning and performance management.
- Seeking innovative solutions to position CS Energy for an environmentally sustainable future.

This manual corresponds with the CS Energy EMS manuals for operational assets within the scope of the EMS:

- Procedure - CAL-ENV-001 - Callide Power Station Environmental Management System Manual C/D/16/3315.
- Procedure - KA-ENV-M-01 - Kogan Creek Power Station Environmental Management System Manual K/D/10/1945.

CONTENTS

FORWARD 3
1 SCOPE 5
2 NORMATIVE REFERENCES 5
3 TERMS AND DEFINITIONS 5
4 ORGANISATIONAL CONTEXT 5
4.1 Business Outline 5
4.2 Operational Power Station Sites and Brisbane Office 6
4.3 CS Energy and the Environment 6
4.4 Needs and Expectations of Interested Parties 8
4.5 Scope of the Environmental Management System (EMS) 8
4.6 EMS Interactions with Wider Business Processes 9
5 LEADERSHIP AND COMMITMENT 10
5.1 Strategy and Performance 10
5.1.1 EMS Alignment with Strategic Business Plan 10
5.1.2 Tracking of EMS Condition and Compliance 10
5.1.3 Communication of Need for EMS and Environmental Compliance 11
5.1.4 Environmental Key Performance Indicators 12
5.1.5 Environmental Incidents, Investigations and Close-out 12
5.2 Environmental Policy 13
5.3 Organisational Roles and Responsibilities 13
6 PLANNING 17
6.1 Actions to Address Risks and Opportunities 17
6.1.1 General 17
6.1.2 Environmental Aspects 18
7 RESOURCES AND SUPPORT 19
7.1 Resources 19
7.2 Competence 19
7.3 Awareness 19
7.4 Communication 20
7.5 Control of Documented Information 21
8 OPERATION 21
8.1 Operational Planning and Control 21
8.1.1 Maintenance Strategies for Equipment with Environmental Aspects 22
8.2 Emergency Preparedness and Response 22
9 PERFORMANCE EVALUATION 22
9.1 Monitoring, Measurement, Analysis and Evaluation 22
9.2 Internal Audit Program 24
9.3 Management Review 24
10 IMPROVEMENT 25
10.1 EMS Review 25
10.2 Non-conformance Procedures 25
10.3 Non-conformance Register and Improvement Plans 26
11 RECORDS MANAGEMENT 26

1 SCOPE

This Environmental Management System (EMS) Manual has been developed to document how CS Energy will identify and manage environmental issues and potential impacts associated with operations, as required by the CS Energy ISO 14001 accredited EMS. This EMS Manual also details how implementation of the EMS will support continual improvement across CS Energy's operations.

The scope of CS Energy's AUS/NZS ISO 14001:2015 EMS accreditation includes the following:

- Brisbane Corporate Office
- Callide Power Station, comprising:
  - Callide A and B Power Stations (Environmental Authority (EA) Number: EPPR00536313)
  - Callide C Power Station (EA Number: EPPR00707213)
- Kogan Creek Site, comprising:
  - Kogan Creek Power Station (EA Number: EPPR00918113)
  - Associated ash disposal activities (EA Number: BRID0033)
  - Oversight and governance of mining contractor operations at the Kogan Creek Mine (EA Number: EPML0041213)

The scope of the EMS is available to interested parties through the CS Energy Intranet (Environmental management system - CS Energy Intranet). The EA conditions and the requirements for other licences issued to CS Energy (e.g., water allocation licences) are also available in the Intranet (Environmental approvals - CS Energy Intranet).

2 NORMATIVE REFERENCES

There are no normative references included in this document.

3 TERMS AND DEFINITIONS

Terms and definitions utilised within this EMS Manual align with AS/NZS ISO 14001 Environmental management systems – Requirements with guidance for use.

4 ORGANISATIONAL CONTEXT

4.1 Business Outline

CS Energy is a government-owned corporation that owns and operates two power stations in Queensland, with the corporate office based in Brisbane. The company was formed on 1 July 1997 following the Queensland Government's reform of the Queensland electricity industry through the disaggregation of AUSTA Electric. On 1 July 2011, the restructure of Queensland's government-owned electricity generating companies came into effect. CS Energy, Tarong Energy Corporation and Stanwell Corporation were restructured and merged into two companies – CS Energy and Stanwell Corporation. CS Energy employs around 600 full-time employees.

CS Energy aims to strengthen its business through innovation and quality of service. Implementation and maintenance of the CS Energy ISO 14001EMS accreditation is fundamental to achieving this business objective.

CS Energy determines its internal and external issues relevant to the business through the Enterprise Risk and Compliance System, including the Insight system, which is used to document risks, obligations and incidents along with all related actions to be delivered to ensure compliance with the EMS.

4.2 Operational Power Station Sites and Brisbane Office

Our current generating portfolio comprises the 1,105 megawatt (MW) coal-fired Callide Power Station near Biloela in Central Queensland and the 750 MW Kogan Creek Power Station near Chinchilla in South West Queensland. For the purposes of the EMS, the Brisbane Office in Fortitude Valley is considered a third site. Additional detail on the three sites within the scope of the EMS is provided below.

Callide Power Station is located in central Queensland, near Biloela. Two 350 MW coal-fired units at the Callide B station have been fully operational since 1989. The original coal-fired Callide A station was previously used for an oxy-fuel firing project, is now permanently decommissioned and has been set aside to be demolished at some time in the future. The Callide Power Plant (Callide C) comprises two 405 MW advanced-cycle coal-fired units commissioned during 2001.

CS Energy formed a joint venture with IG Power (Callide) Pty Ltd in the ownership of two generating units on the existing Callide site – referred to as the Callide Power Plant. CS Energy is the operator-maintainer of these units under a contract with the joint-venture partners.

Under Schedule 8F2 of the 'Callide Power Project Operation and Maintenance Agreement' the Operator (CS Energy as the O&M Contractor), in consultation with the Manager (Callide Power Management), is required to establish and thereafter maintain during the Term of the Contract, an Environmental Management Plan (EMP) for the Facility.

The EMP, together with the CS Energy EMS, addresses specific environmental management issues contractually related to its obligations for the Callide Power Plant. As described in Procedure - CS-ENV-01 - Environmental Issue Identification, and Procedure - CS-ENV-02 - Developing Environmental Planning, they both collectively encompass:

- Environmental Risk Management Plans (Risk Treatment Plans) in the Risk Management System (refer to CS-RISK-01 - Enterprise Risk Management Framework) which have been developed in response to significant and high- risk environmental issues. Procedure - CS-ENV-01 - Environmental Issue Identification details the process for identifying significant environmental issues and the method for documenting the associated risk actions in the Enterprise Risk Management System (Insight).
- Issue-specific or asset-specific procedures management plans that address certain environmental approval requirements and/or voluntary agreements.

Kogan Creek Power Station is located in the western Darling Downs near Chinchilla in Queensland. Kogan Creek Power Station can generate up to 750 megawatts of baseload electricity. It was commissioned in 2007 and uses supercritical boiler technology to produce steam at a higher pressure and temperature than conventional subcritical boiler power stations.

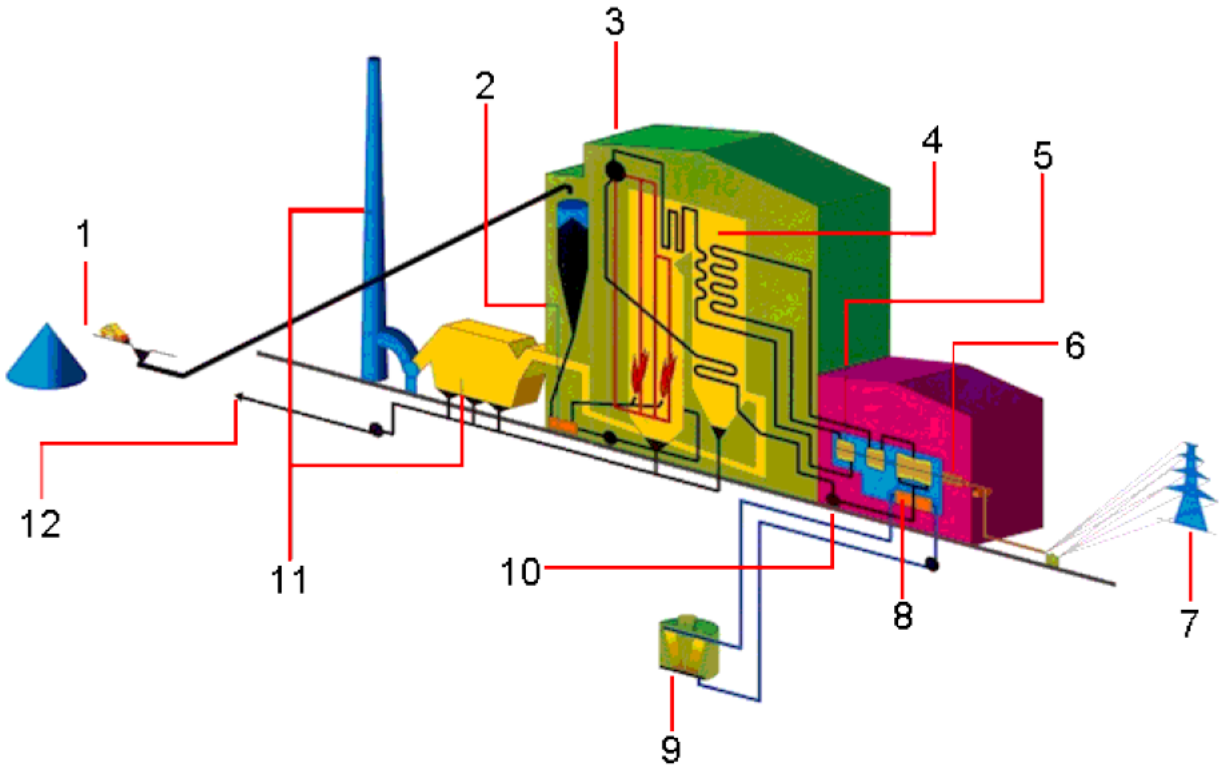
CS Energy also owns the neighbouring Kogan Creek Mine, which supplies black coal to the power station via a four-kilometre overland conveyor belt and is operated by Golding Contractors. Kogan Creek Mine is an open cut coal mining operation that supplies more than two million tonnes to the power station each year. Ash generated from the power station is disposed into ash cells also managed by CS Energy. CS Energy provides overview, governance and periodically audits the Kogan Creek Mine to ensure that Golding is operating in compliance with environmental requirements.

Brisbane Office supports the operational sites and manages the corporate environmental functions for CS Energy.

4.3 CS Energy and the Environment

As can be seen from Figure 1, a power station has many activities which interact with the environment. Steam turbine power generation uses the heat from fuel combustion (in this case, coal) to heat water to steam. This steam is used to drive a turbine, converting heat energy to mechanical energy (in the form of rotation). The rotational energy of the turbine is then converted to electricity via a generator.

Some of these interactions include pumping water to and from dams and selling fly ash for cement manufacture. Each of the inputs and outputs needs to be monitored and managed closely to ensure CS Energy meets environmental licencing and compliance obligations. The development and use of an EMS plays a key role in achieving this aim.



1. Providing Fuel. Coal for Callide and Kogan Creek is delivered by conveyor belt from the mine and it is then stockpiled or transported by conveyor belt to the boiler.
2. Igniting the Fuel. Coal is ground into a fine powder by pulverisers before being blown into the boilers where it is ignited.
3. Heating Water. The fire in the boiler heats the water to produce steam.
4. Super Heating Steam. The steam is super-heated to a high temperature before being fed under high pressure conditions, to the turbine.
5. Driving the Turbine. The super-heated steam causes the turbine and generator shaft to turn rapidly.
6. Generating Energy. The rotating generator shaft contains a large electro-magnet which produces electricity as it turns inside the generator.
7. Energising. Electricity is delivered to customers through a network of high voltage transmission lines. This is known as the transmission grid.
8. Condensing the Steam. The steam is condensed into water after the turbine has used all its available energy.
9. Cooling Off. The water used to cool the steam in the condenser is cooled by being pumped through the cooling tower.
10. Repeating the Cycle. Water from the condenser is pumped back to the boiler for reuse.
11. Cleaning Gases. Precipitators and/or fabric filters ensure that ash, dust and grit are removed from the heated boiler flue gas before it is released from the chimney.
12. Releasing and Recycling. The ash, dust, and grit remaining after the coal is ignited are either sold for reuse or stored on site.

Figure 1 – Overview of Steam Turbine Power Generation Process

4.4 Needs and Expectations of Interested Parties

CS Energy has a Stakeholder Engagement Framework which outlines how CS Energy identifies key stakeholders, their needs, and our approach to engagement with them.

The key objectives of CS Energy's Stakeholder Engagement Framework are:

- Provide a coordinated approach to local communications and community relations activities, with clear and realistic expectations about stakeholder involvement, responsibilities, and areas of influence.
- Ensure CS Energy's community relations activities align with business priorities and are adequately planned, resourced, leveraged and reviewed. Genuinely deliver on our corporate commitment to the local community, in line with our values and culture.
- Mitigate or minimise potential reputational issues by building stakeholders' primary understanding of our operations (e.g., ash dam management) and future plans (e.g. major overhauls).
- Foster community understanding of CS Energy's role in the energy and resources sector with an education focus to engagement activities and supporting materials.
- Elevate CS Energy's local profile as a safe and trusted operator of reliable generation plant.

CS Energy takes a tailored approach to stakeholder engagement and creates specific plans for projects and initiatives that consider stakeholders and their specific needs, for example:

- Overhauls at power stations have individual plans: Callide and Kogan Creek.
- The needs and expectations of interested parties for the Kogan and Callide sites are maintained by the Environment and Stakeholder Business Partners.
- The per and poly-fluoroalkyl substances (PFAS) monitoring program at Callide has an individual plan and other communication collateral (e.g. fact sheets).

The plans are updated annually or as needed by Corporate Affairs in consultation with the Station General Managers and the Executive Leadership Team.

The Corporate Affairs team also maintains a separate plan for crisis management.

Document Title	TRIM Link
Stakeholder Engagement Framework – Appendix 1 – High Level Stakeholder Map	B/D/19/26526
Stakeholder Engagement Plans – Callide Power Station	F/10/2586
Stakeholder Engagement Plans – Kogan Creek Power Station	F/10/4212
Needs and Expectations of Interested Parties list - Callide	C/D/22/3307
Needs and Expectations of Interested Parties list - Kogan	K/D/22/8800
PFAS Investigation – Communications Materials	F/20/4435

4.5 Scope of the Environmental Management System (EMS)

The EMS provides a series of management documents and processes that focus on identifying, managing and reporting environmental issues related to CS Energy operations at the three sites detailed in Section 4.2.

This document provides an overview of the EMS and associated documents. The two types of EMS documents are described below:

- EMS Manual (this document) – provides a general overview of what the EMS is and how it works. There are CS Energy EMS manuals for the Callide Power Station and Kogan Creek Power Station.

- EMS Procedures - documents that explain the specific requirements of the EMS such as setting policy, goals and targets or identifying environmental issues. The Procedures are listed in Section 8 of this Manual. These procedures are maintained at a corporate level and provide guidance for the development of site-specific environmental procedures. Site-specific procedures are also maintained as part of the EMS established for operational sites within the scope of the EMS.

There are five key systems that support implementation of the EMS, as listed below:

- Enterprise Risk Management System in Insight
- Incident Management System in Insight
- Compliance Obligations System in Insight
- Business Audit Register in Insight
- Electronic Document and Records Management System (TRIM)

There are also a range of other supporting documents which belong to various business management systems across the organisation, accessible through TRIM, under the Business Classification Scheme 'Corporate Governance – Policies - CS Energy Registered Procedures and Policies'. Key supporting documents owned by other parts of the organisation are referenced within this Manual where appropriate.

Document Title	TRIM Link
Callide Power Station EMS Manual	C/D/16/3315
Kogan Creek Power Station EMS Manual	K/D/10/1945

4.6 EMS Interactions with Wider Business Processes

CS Energy implements integrated business processes between business functions such as Health and Safety, Procurement, Governance, Finance, Records Management and Environment. These business functions are linked through key procedures and processes which are maintained at a corporate level. The procedures assist in providing a controlled and uniform approach to maintaining assurance programs across the business.

The table below lists critical documents and processes from other areas of CS Energy that are relevant to the implementation of the EMS. Successful implementation of the EMS requires an understanding of these processes.

Document Title	TRIM Link
CS Energy Code of Conduct	B/D/11/39710
Enterprise Risk Management Framework	B/D/12/63934
Enterprise Compliance Management Framework	B/D/24/15411
Incident Management Procedure	B/D/11/45318
Procurement Guidelines (CS-CSP-602)	B/D/10/17028
Media and External Communication Guidelines (CS-COMMS-00)	B/D/14/22838
Internal Communication Framework	B/D/22/8137

5 LEADERSHIP AND COMMITMENT

5.1 Strategy and Performance

5.1.1 EMS Alignment with Strategic Business Plan

The CS Energy Corporate Plan is prepared for the coming 5 years to fulfil the requirements of the *Government Owned Corporations Act 1993* (Qld) (GOC Act), and guides CS Energy's business direction for the next five years.

Environmental goals and targets are set periodically (generally annually) as part of the business planning cycle, translating into Key Performance Indicators (KPIs) that are monitored and assessed throughout the year. Progress against KPIs is reviewed and reported monthly in conjunction with other business performance metrics.

The Environment and Cultural Heritage Plan on a Page (PoaP) is developed annually as part of the business planning process and establishes the Environment and Cultural Heritage team's key priorities, focus areas and performance measures for the financial year. . The PoaP provides the framework for aligning environmental management activities with CS Energy's strategic, business and operational priorities.

The priorities and performance measures established within the PoaP drive the development of site and corporate environmental objectives, goals, targets, KPIs and improvement initiatives. Together, these support the strategic goal of proactively managing CS Energy's environmental responsibilities and maintain its environmental social license to operate.

Document Title	TRIM Link
CS Energy Environment Strategy	B/D/21/524

5.1.2 Tracking of EMS Condition and Compliance

A range of metrics are tracked, and various methods are used to assess the performance of the EMS. Business areas utilise many delivery methods to review and discuss performance including team boards, team meetings, toolbox talks and action requests via automated email.

The items below summarise processes and systems used by CS Energy to track actions and monitor EMS compliance:

- **Compliance Obligations** – key environmental and cultural heritage activities are scheduled using the 'Insight Obligations Module'. A database of key activities sends workflow or work request emails to the process owner. Once the work is completed, the workflow owner must access Insight to 'close-out' the request as completed, adding details and raising any other subsequent work requests. For details on how to manage obligations within Insight, refer to the CGR Insight – Obligation Quick Guide. CS Energy has legal obligations that need to be met, and these can be found in the Environmental and Cultural Heritage Legal Compliance Manual (ECHLCM) which outlines all Commonwealth and State legislation and other requirements relevant to CS Energy.
- **Compliance Checklists** – completed each quarter by the person owning obligations with a significant or extreme risk to identify any compliance issues in the previous quarter. The Compliance Checklists are completed via Insight.
- **Incident Actions** – Environmental Incidents are reported and managed through Insight. Actions derived from incidents within Insight also generate workflow requests to complete these actions. Emails from the system cascade to managers of areas for follow-up if actions are classified as overdue in Insight.
- **Risk Register** – The Enterprise Risk Register schedules periodic risk reviews of items through Insight workflow emails. All high (significant) risk scores are to be reviewed at least quarterly,

significant risks 6-monthly, with low and moderate risks to be reviewed on an annual basis.. Actions arising from risk assessments are captured within the Insight system and can be reviewed using the system dashboard.

- **Audit Findings and Actions** – Instruction - CS-ENV-10 - Environmental and Cultural Heritage Audit Process provides guidance on the type of audits conducted to assess business performance. Once audits are completed, audit findings are captured in Insight – Internal Audit and Independent Management Reviews Module. The system issues workflow emails to drive completion of audit actions based on the schedules entered into the Module. Workflow emails cascade upwards within the business if actions are overdue.
- **Environmental Key Performance Indicators** (KPIs) – Environmental KPIs are developed as part of business planning processes and reported monthly through the Environment and Cultural Heritage Scorecard.

Document Title	TRIM / Intranet Link
Resources for managing compliance obligations and quarterly compliance certificates are available on the intranet	Enterprise Compliance - CS Energy Intranet
Resources for documenting and managing risks and are available on the intranet	Enterprise risk - CS Energy Intranet
Environmental and Cultural Heritage Legal Compliance Manual - Volume 1	B/D/25/44556
Environmental and Cultural Heritage Legal Compliance Manual - Volume 2	B/D/25/44555
Environment and Cultural Heritage Scorecard	B/D/22/1623

5.1.3 Communication of Need for EMS and Environmental Compliance

Communication of environmental matters occurs using multiple communication pathways for both permanent on-site staff and contingent workers.

- **Environmental Policy** – The Environmental Policy for CS Energy is displayed at various locations across CS Energy sites, on the CS Energy intranet, and is available electronically in TRIM. The policy is reviewed periodically to align with business objectives.
- **Induction** – The online Environmental, Health and Safety Induction module covers key environmental compliance requirements for entering and performing work at a CS Energy site. The induction identifies key environmental management areas and is compulsory for all staff and contingent workers working on a CS Energy site.
- **Awareness training** – The online Environmental Awareness training is a compulsory module for all CS Energy employees. The module provides information on the CS Energy EMS and how activities across the business are integrated with the EMS.
- **Environment and Cultural Heritage Scorecard** – Issued monthly and reports on a range of items including environmental incidents, communication interactions, open actions, progress on the Environment and Cultural Heritage PoaP and site KPIs. The Environment and Cultural Heritage Scorecard is distributed to the business each month and is also available on the Intranet page and TRIM.
- **Toolbox talks** – Toolbox talks with environmental content are completed at site and tracked as part of the Environmental KPIs for the business. Toolbox talks are stored in TRIM.
- **Environment and Cultural Heritage meetings** – Requirements of the EMS, environmental risks and compliance requirements are communicated as part of a number of key environmental meetings, including but not limited to, the Central Health Safety and Environment meetings, and Environment and Cultural Heritage Team meetings.
- **Contractor briefings and work planning meetings** – Toolbox talks discussing key environmental requirements are completed as part of the preparation for major works

contracts on site such as outages. The Contractor Management Process Roadmap outlines the management process for contracts and contractors.

Document Title	TRIM Link
Environment Policy	B/D/11/39706
Environment and Cultural Heritage Scorecard	B/D/22/1623
Toolbox talks	F/17/3996
Central Health Safety and Environment Committee Meetings	F/19/4096
Environment and Cultural Heritage Team Meetings	F/22/1220
Contractor Management Process Roadmap	B/D/13/34119

5.1.4 Environmental Key Performance Indicators

Key Performance Indicators (KPIs) are developed for the business as part of the business planning process. Each year, KPIs are reviewed and agreed with site General Managers and the Executive Leadership Team. The KPIs are planned, defined and set considering environmental and cultural heritage risks, compliance obligations and the Environment PoaP. The development of an Environmental KPI Action Plan is completed considering:

- Appropriate resourcing is put in place to ensure the KPIs set for each site are achievable
- Roles and responsibilities are defined to ensure accountabilities related to individual KPIs is clear and achievable
- How the individual KPIs will be achieved
- What timeframes and schedules are set and apply to the individual KPIs

CS Energy evaluates and reports on the KPIs on a monthly basis and communicates performance via the Environment and Cultural Heritage Scorecard. Where KPIs are not met, a preferred course of action to rectify the matter is implemented by the relevant site.

Each month the individual KPIs are allocated a red, amber or green dot to indicate whether the KPI has been satisfactorily achieved for that month. The final Environment Scorecard for each month is saved in TRIM and linked to the CS Energy Intranet (under EMS section here: Environmental management system - CS Energy Intranet).

The individual colours in this traffic light system are defined below:

- GREEN – 100% conformance with the KPI
- AMBER – The KPI is at risk of not being achieved or is partially achieved
- RED – The KPI has not been achieved

Where a KPI is linked to a legal obligation, the obligation is entered into Insight as described in the Risk and Compliance Management Framework. Workflow emails are sent to obligation owners to complete activities to meet legal obligations and sign-off within Insight once complete. This process drives conformance with KPIs.

Document Title	TRIM Link
Environment and Cultural Heritage Scorecard	B/D/22/1623

5.1.5 Environmental Incidents, Investigations and Close-out

Enterprise business systems are provided through Insight for reporting incidents and managing corrective actions arising from incidents. Procedure - CS-IM-01 – Incident Management outlines how incidents are to be managed within the business, including Environmental and Cultural Heritage incidents.

Document Title	TRIM Link
Procedure - CS-IM-01 - Incident Management	B/D/11/45318

5.2 Environmental Policy

ISO 14001 requires CS Energy to have an Environmental Policy. This policy must be established, implemented and maintained by executive management, within the defined scope of the CS Energy EMS, and must:

- Be appropriate to the purpose and context of CS Energy, including the nature, scale and environmental impacts of CS Energy and its activities, products and services
- Be fully supported by senior management
- Outline the environmental intentions and principles of the company
- Provide a framework for setting and reviewing environmental objectives and targets
- Be communicated to all persons working for and on behalf of CS Energy and be available to interested parties
- Commit the corporation to comply with legal compliance and other environmental requirements that may affect the organisation
- Commit the corporation to pollution prevention and other specific commitments relevant to CS Energy, including protection of the environment and continual improvement

The policy should contain statements that relate to the size and impact of the activities undertaken by the organisation.

The CS Energy Environmental Policy is available in TRIM and is reviewed periodically. The Policy is also available on the company intranet and internet.

Document Title	TRIM Link
Environmental Policy	B/D/11/39706

5.3 Organisational Roles and Responsibilities

The responsibilities of various CS Energy officers pertaining to environmental management are detailed in relevant procedures and instructions and in individual role purpose statements. Overall organisational risk and compliance management responsibilities are documented within the Standard - CS-RISK-01 - Enterprise Risk Management Framework and the Standard – CS-FW-RC-001 Enterprise Compliance Management Framework.

The table below provides more detailed information on the organisational roles and responsibilities associated with the suite of environmental procedures established at the corporate level that underpin this EMS Manual.

Role	Summary of responsibilities under the EMS
CS Energy Board	Review and authorise CS Energy's Environment Policy.
Chief Executive	Recommend Environment Policy to the Board. Manage activities under their control to comply with policies, procedures and environmental approval limits.

Role	Summary of responsibilities under the EMS
General Managers - Assets	Develop asset-specific policy, goals and targets. Initiate asset-specific Policy review. Allocate resources for implementation of action/management plans. Allocate resources for achieving goals and targets. Approve Environmental Management Plans (EMPs) developed for assets or specific environmental issues/risks. Develop an external environmental communications plan establishing communication line with the public on environmental issues and the release of environmental information to the public. Approve and allocate resources for incident management and close-out. Manage activities under their control to comply with policies, procedures and environmental approval limits. Ensure resources are available for carrying out the environmental monitoring and measurement programs.
Corporate Legal Council	Notify Head of Environment and Cultural Heritage of any significant changes in environmental legislation with potential to influence operations. Offer legal advice upon request for specific legal environmental issues.
Head of Environment and Cultural Heritage (or Delegate)	Facilitate development of policy, goals and targets consistent with the CS Energy Environment PoaP and planning processes. Allocate resources for achieving goals and targets. Initiate review of this procedure and ensure outputs are updated. 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. Manage activities under their control to comply with policies, procedures, and environmental approval limits. Update procedures in accordance with changes in policy. Provide technical advice / liaison with environmental regulators. Convene regular Health, Safety and Environment Due Diligence meetings. Implement the EMS.
Risk and Compliance Facilitators and Technical Risk Owners	Review identified issues/risks in accordance with the Enterprise Risk Management Framework. Review identified compliance obligations in accordance with the Enterprise Compliance Management Framework. Develop and review environmental risk management plans within the Risk Management System (Insight).

Role	Summary of responsibilities under the EMS
Environment and Stakeholder Business Partner (or Environment and Stakeholder Advisor, where delegation is appropriate)	Provide technical advice relating to the identification and risk assessment of environmental issues. Provide technical advice relating to environmental issues. Formulate and/or oversee the formulation of EMPs. Provide support in the dissemination of environmental policy and goals. Develop issue-specific or asset-specific goals and targets. Manage activities under their control to comply with policies, procedures, and environmental approval limits. Ensure that all incidents are entered into the Enterprise Risk Management System (Insight). Provide technical advice / liaison with environmental regulators. Review site incident management procedures as required and after incidents. Implement the community (external) environmental complaints process. Contribute to corporate environmental reports. Develop asset-specific environmental reports. Consult with the Head of Environment and Cultural Heritage and the Principal Environmental Specialist to capture training needs for asset-based team members. Collate information and prepare protocols, monitoring and measurement programs. Review site monitoring and measurement programs. Collect specific performance data. Review site environmental issues. Develop, implement and maintain the EMS for operational assets within the scope of the EMS. Review asset-specific environmental procedures. Assess the hazards/risks associated with on-site activities at the planning and scoping stage of the work/contract. Establish environmental criteria and evaluate the environmental elements included in submissions from potential contractors (including pre-qualification requirements). Review the Contractor's Environmental Management Plan (EMP) in the Contractor's work pack. Notify the CS Energy contract owner or designated project lead that the EMP has been evaluated and requires approval prior to works commencing. Complete periodic reviews of health, safety and environment pre-qualification requirements as defined in the Enterprise Vendor Management Platform (FELIX) or where triggered by scope creep, incident, or a change in the health, safety and environment system.

Role	Summary of responsibilities under the EMS
Principal Environmental Specialist (or Environmental Specialist and/or HSE Systems and Compliance Officer where delegation is appropriate)	Provide technical advice relating to the identification and risk assessment of environmental issues. Provide technical advice relating to environmental issues. Formulate and/or oversee the formulation of EMPs. Provide support in the dissemination of environmental policy and goals. Develop issue-specific or asset-specific goals and targets. Manage activities under their control to comply with policies, procedures and environmental approval limits. Ensure that all incidents are entered into the Enterprise Risk Management System (Insight). Provide technical advice/liaison with environmental regulators. Review site incident management procedures as required and after incidents. 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. Manage updates to the ECHLCM via Corporate Legal Counsel. Supply additional legal reference material to Environment and Stakeholder Business Partners. Initiate appropriate review processes. Manage the audit schedule in consultation with the Environment and Stakeholder Business Partners. Coordinate the production of any environmental information and associated data. Develop, implement and maintain the Corporate EMS. Support implementation of the EMS across all sites. Review the Corporate EMS Manual and Procedures.
Internal Auditors	Conduct internal audits as per audit schedule. Raise audit actions and recommendations.
Employees and Contingent Workers	Identify environmental issues within their asset area and implement control actions. 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 Learning Management System (employees only). Manage activities under their control to comply with policies, procedures and environmental approval limits. Follow site procedures including environmental procedures to ensure compliance with EMS requirements. General requirement to prevent environmental harm. Control and report incidents.
CS Energy Contract Owner	Ensure the EMP is approved prior to work commencing on site. Audit EMP compliance, performance and identify opportunities for improvement.

Role	Summary of responsibilities under the EMS
Contingent Worker (performing on-site activities)	Develop an EMP (if required for the scope of work) and work with the site Environment and Stakeholder Business Partner and/or Principal Environmental Specialist 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.

6 PLANNING

6.1 Actions to Address Risks and Opportunities

6.1.1 General

CS Energy's policy statement and approach to managing business risk is outlined within the Governance, Risk and Compliance Policy.

The purpose of risk and compliance management is to support CS Energy's strategy through understanding and controlling uncertainties, and ensuring compliance with legal, regulatory and other obligations.

To support effective risk and compliance, Standard - CS-RISK-01 - Enterprise Risk Management Framework and Standard – CS-FW-RC-001 Enterprise Compliance Management Framework outline the core elements required to deliver robust risk data, risk management and compliance outcomes. These frameworks provide a corporation-wide view of risk and compliance management processes and responsibilities at all levels of the organisation.

Procedure - CS-ENV-03 - Environmental Communication and Training Process outlines how risk will be identified, assessed, evaluated, updated, treated, recorded and reported in order to enhance CS Energy's ability to meet its strategic objectives by maximising opportunities and minimising threats to shareholder value. It demonstrates the Board and Management's commitment to effective risk management as a key element of business success.

The Procedure - CS-ENV-01- Environmental Issue Identification provides an outline to identify environmental risks and how key risk system processes are to be applied.

An enterprise-wide risk register exists within Insight for recording and ranking risks across all aspects of the business. Risks are reviewed periodically based on the level of risk. Reviews are scheduled by workflow emails sent by Insight to Risk Owners and Technical Owners.

Environmental and Cultural Heritage risks are reviewed and updated periodically as required in accordance with the Standard - CS-RISK-01 - Risk Management Framework. Triggers which may lead to the review and update of an environmental risk include, but are not limited to:

- Changes to plant
- Environmental incidents
- Changes to operations
- Legislative changes

The risk framework structure for CS Energy is outlined below and is described in more detail within the Standard - CS-RISK-01 - Risk Management Framework.



Overview of the Risk Management Process (Refer to CS-RISK-01)

Document Title	TRIM Link
Governance, Risk and Compliance Policy	B/D/11/39708
Standard - CS-RISK-01 - Enterprise Risk Management Framework	B/D/12/63934
Standard – CS-FW-RC-001 Enterprise Compliance Management Framework	B/D/24/15411
Procedure - CS-ENV-03 - Environmental Communication and Training Process	B/D/11/31091
Procedure - CS-ENV-01 - Environmental Issue Identification	B/D/11/31089

6.1.2 Environmental Aspects

The identification and management of environmental aspects (risks) associated with the operation of the CS Energy assets is a fundamental element of the EMS. Procedure - CS-ENV-01 - Environmental Issues Identification details the process for identifying and documenting significant environmental issues.

Procedure - CS-ENV-02 - Developing Environmental Planning outlines the process by which Environmental Plans are developed for inclusion within business and operational goals. The procedure also describes the key roles and responsibilities within the organisation for goal setting and approval.

CS Energy holds a number of EAs and other licences that contain prescribed licensing conditions. The EAs and other licences/permits can be accessed through the CS Energy intranet page (Environmental approvals - CS Energy Intranet) and are referenced within the following asset-specific EMS Manuals:

- Procedure - CAL-ENV-001 - Callide Power Station Environmental Management System Manual.
- Procedure - KA-ENV-M-01 - Kogan Creek Power Station Environmental Management System Manual.

Document Title	TRIM Link
Procedure - CS-ENV-01 - Environmental Issue Identification	B/D/11/31089
Procedure - CS-ENV-02 - Developing Environmental Planning	B/D/11/31090
Procedure - CAL-ENV-001 - Callide Power Station Environmental Management System Manual	C/D/16/3315
Procedure - KA-ENV-M-01 - Kogan Creek Power Station Environmental Management System Manual	K/D/10/1945

7 RESOURCES AND SUPPORT

7.1 Resources

CS Energy has a dedicated environmental team structure. Environmental staff resources are shown in the CS Energy organisational chart. The chart is available online in the link here.

The Head of Environment and Cultural Heritage is the most senior environmental role and assumes responsibility for aiding the business to maintain compliance and improve environmental management processes.

In addition to site CS Energy employees, CS Energy has many support contracts in place to complete works associated with environmental aspects of the business.

7.2 Competence

Training and communication for CS Energy is outlined within Procedure - CS-ENV-03 Environmental Communication and Training Process. Wider training requirements within the business are addressed through a structured program. Individual Achievement Plans (IAPs) developed for employees include targets linked with environmental KPIs and strategic goals.

Inductions inclusive of environmental content are mandatory to obtain access to site. Records for training completion and inductions are maintained, and access to site is prohibited if induction competencies lapse.

Document Title	TRIM Link
Procedure - CS-ENV-03 - Environmental Communication and Training Process	B/D/11/31091

7.3 Awareness

Awareness of environmental matters occurs using multiple communication pathways for both employees and contractors.

- **Environmental Policy** – The Environmental Policy for CS Energy is displayed at various locations across the sites, on the CS Energy intranet and internet, itis also discussed within the online Environmental, Health and Safety Induction and Environmental Awareness Training.
- **Induction** – The online Environmental, Health and Safety Induction module covers key environmental compliance requirements for entering and performing work at CS Energy. This module it compulsory for all CS Energy employees and contingent workers and is allocated to each individual's learning profile accessible via Success Factors (CS Energy's human resources management portal).
- **Awareness training** – The online Environmental Awareness training is a compulsory module for all CS Energy employees and is allocated to each individual's learning profile accessible via Success Factors (CS Energy's human resources management portal). The module provides information on the CS Energy EMS and how activities across the business are integrated with the EMS.
- **Toolbox talks** – Toolbox talks with environmental content are completed at site and tracked as part of the Environmental KPIs for the business. Toolbox talks are stored in TRIM.
- **Individual Achievement Plans** (IAPs) – developed for employees include targets linked with environmental KPIs and strategic goals.
- **Contractor briefings and work planning meetings** – Briefings and inductions presenting key environmental requirements are completed as part of the preparation for major works contracts on site such as outages. The Contractor Management document outlines the management process for contracts and contractors.

Document Title	TRIM Link
Environment Policy	B/D/11/39706
Environment and Cultural Heritage Scorecard	B/D/22/1623
Toolbox talks	F/17/3996
Contractor Management Process Roadmap	B/D/13/34119

7.4 Communication

Media and external communication processes at CS Energy are defined within the Guideline - CS-COMMS-00 - Media and External Communications Guidelines.

As noted in section 4.4 above, CS Energy has a Stakeholder Engagement Framework which identifies key stakeholders and describes our approach for engagement.

CS Energy maintains external communication to the public. External parties may include Shareholding Ministers, regulators, local government, adjacent community, environmental groups, customers, community groups and the media.

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 community consultation forums, and to a lesser extent through the CS Energy website, National Pollutant Inventory website, factsheets and media releases.

Internal communication or communication within the company is important for employees to know about the current issues and the company's position with respect to their management. This helps employees to be knowledgeable about CS Energy's environmental performance while at work and in the community. CS Energy has an Internal Communication Framework that advocates for a leader-led cascade approach to communication.

All employees have an environmental contribution to make whether they have an operational, maintenance, planning or support function. Internal communications include - inductions, training, newsletters, notice boards, staff briefings, intranet news items, Workvivo posts, and toolbox talks. The monthly Environment and Cultural Heritage Scorecard presents information on the number of communication interactions the environment team has proactively issued to the wider business during the month.

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

Contact with the QLD Environmental Regulator is authorised by Management and coordinated through the Head Environment and Cultural Heritage and site Environmental and Stakeholder Business Partners. The Head Environment and Cultural Heritage is authorised to contact the QLD Environmental Regulator in consultation with Management.

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 joint-venture power plant, this is usually through the joint-venture management company.

Should complaints be received, they are managed through Procedure - CS-ENV-03 - Environmental Communication and Training Process, which details the mechanism for responding to external complaints or comments.

EMS Document	TRIM Link
Procedure - CS-ENV-03 - Environmental Communication and Training Process	B/D/11/31091
CS-COMMS-00 - Media and External Communications Guidelines	B/D/14/22838
Stakeholder engagement framework	B/D/19/26526

Internal communication framework	B/D/22/8137
Environment and Cultural Heritage Scorecard	B/D/22/1623
Procedure - CS-IM-02 - Crisis Management	B/D/11/43851

7.5 Control of Documented Information

CS Energy is a government-owned corporation and must comply with a range of document control requirements as described in Section 11. A document management system is used to control the creation, storage, review and disposal of documents related to CS Energy operations. CS Energy's document management system is called TRIM *(Content Manager)*. Most common document management functions are described within the TRIM Basic User Manual.

CS Energy must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. All documentation created in relation to CS Energy business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.

EMS Document	TRIM / Intranet Link
Retention and Disposal of CS Energy Records INST-DRM-001	B/D/12/12861
TRIM Basic User Manual	Intranet Link

8 OPERATION

8.1 Operational Planning and Control

A wide range of operational controls are utilised at CS Energy's assets to plan and control environmental performance, including formal monitoring plans, permits to authorise activities, data reviews, inspections and scheduled tasks.

As part of its lifecycle perspective, CS Energy considers relevant lifecycle stages when planning and controlling operational activities, including procurement, operation, maintenance and end-of-life activities such as decommissioning and rehabilitation.

A list of the Corporate EMS environmental procedures is provided in the table below.

Document Title	TRIM Link
Procedure - CS-ENV-01 - Environmental Issue Identification	B/D/11/31089
Procedure - CS-ENV-02 - Developing Environmental Planning	B/D/11/31090
Procedure - CS-ENV-03 - Environmental Communication and Training Process	B/D/11/31091
Procedure - CS-ENV-05 - Environmental Legal Compliance	B/D/11/31093
Procedure - CS-ENV-06 - Environmental Monitoring and Measurement	B/D/11/31094
Procedure - CS-ENV-07 - Environmental Performance Evaluation	B/D/11/31095
Instruction - CS-ENV-08 - Guidelines for Contractor Environment Management Plans	B/D/11/31096
Instruction - CS-ENV-10 - Environment and Cultural Heritage Audit Process	B/D/12/15420

Environmental procedures, programs, permits and plans are detailed within Section 8 of the individual site EMS manuals. Additionally, maintenance tasks for equipment with environmental aspects are also discussed within Section 8 of the individual site EMS manuals:

- CMP-ENV-001 Callide Power Station Environmental Management System Manual C/D/16/3315.
- KA-ENV-M-01 Kogan Creek Power Station Environmental Management System Manual K/D/10/1945.

8.1.1 Maintenance Strategies for Equipment with Environmental Aspects

Equipment Strategies are key maintenance documents within CS Energy. Assets within the power stations are divided into systems under 'Asset Strategies', with 'Equipment Strategies' detailing maintenance routines for the assets. Assets with potential environmental aspects (i.e. have the potential to cause environmental impact) have scheduled maintenance activities within SAP, and these preventative maintenance routines are summarised at the rear of each Equipment Strategy document.

8.2 Emergency Preparedness and Response

Emergency Response for CS Energy is covered in the following set of cascading documents:

- Procedure - CS-IM-01 - Incident Management.
- Emergency Response Plan – CS-IM-03. This document contains information on the steps to be taken in the event an incident reaches the threshold of an emergency. Response to emergency incidents is the role of the site rescue or response personnel. These teams consult with environmental staff if any emergency has the potential to impact the environment
- Procedure - CS-IM-02 - Crisis Management Plan. This document contains information on the steps to be taken in the event an incident reaches the threshold of a crisis. This plan lists CS Energy key staff and their contact information to be used in conjunction with Procedure - CS-IM-01 - Incident Management.

Potential incidents and their likely required response are identified through significant environmental issue identification and control plans formulated in accordance with Procedure - CS-ENV-01 - Environmental Issue Identification and Procedure - CS-ENV-02 - Developing Environmental Planning.

EMS Document	TRIM Link
Procedure - CS-IM-01 - Incident Management	B/D/11/45318
Emergency Response Plan CS-IM-03	CS-IM-03
Procedure - CS-IM-02 - Crisis Management Plan	B/D/11/43851
Procedure - CS-ENV-01 - Environmental Issue Identification	B/D/11/31089
Procedure - CS-ENV-02 - Developing Environmental Planning	B/D/11/31090

9 PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

Reviewing environmental management at CS Energy is achieved through a number of processes. The processes used by the EMS include:

- Environmental risk reviews
- Environmental obligation reviews
- Business planning process
- Environmental KPIs
- Central HSE Committee meetings
- Safety and Environment Committee meetings
- Risk management process
- Internal audits
- External audits

The purpose and required outcomes of these processes are detailed in Procedure - CS-ENV-07 - Environmental Performance Evaluation.

The overall focus of these processes is to demonstrate how CS Energy's EMS assesses environmental performance. Where possible, the information is gathered and handled in accordance with the Australian/NZ Standard ISO 14031:2013 'Environmental Management - Environmental Performance Evaluation – Guidelines'.

CS Energy's EMS builds on the ISO14001requirement to assess the effectiveness and suitability of policy, objectives and targets set by the organisation. It aims to measure overall environmental performance. CS Energy measures a number of parameters against KPIs to enable it to monitor:

- Management system performance.
- Asset (operational) performance.
- Condition of the ambient environment.

Procedure - CS-ENV-07 - Environmental Performance Evaluation details how CS Energy assesses its environmental performance.

Monitoring and measurement programs are set up in accordance with Procedure - CS-ENV-06 Environmental Monitoring and Measurement. Monitoring programs cover areas such as:

- Compliance with environmental approval requirements e.g. particulate emissions, discharge water quality
- Compliance with internal policy e.g. coal stockpile dust suppression
- Performance of CS Energy's EMS
- Receiving environment monitoring
- National Pollutant Inventory (NPI) emission estimation

These monitoring programs assist CS Energy in determining the overall environmental performance of its operations.

Information gathered from the monitoring process is required for a number of internal and external reporting requirements such as:

- Annual report
- Environmental reports - Site and Corporate
- Environmental approval compliance reporting
- Monthly operational reports
- Monthly reports to the Executive Management Team
- Monthly and quarterly reports against corporate goals, targets and KPIs
- Monthly Performance Reports to the Board
- EMS reviews
- External agreement progress and review reports

CS Energy publishes information on its environmental performance in its Annual Report. In addition, internal reports are prepared to support the information in the Annual Report.

EMS Document	TRIM Link
Procedure - CS-ENV-07 - Environmental Performance Evaluation	B/D/11/31095
Procedure - CS-ENV-06 - Environmental Monitoring and Measurement	B/D/11/31094

9.2 Internal Audit Program

Changing regulatory requirements, market competition and community expectations dictate that environmental performance / compliance be assessed and reported. CS Energy uses environmental audits to assess the impacts and management of its operations to identify system and process improvements, including continual improvement and evaluation of compliance with legal requirements.

Audit findings are reported to management or appropriate staff through the audit processes discussed in Instruction - CS-ENV-10 – Environment and Cultural Heritage Audit Process. The Internal Audit and Independent Management Reviews module within Insight captures actions and workflows audit findings to completion.

Several types of audits may be undertaken by CS Energy (either by internal staff or by contracting external audit services). Auditors are independent of the unit being audited to ensure that results are impartial and objective.

Audits undertaken may include:

- Legal compliance
- Technical /process e.g. hazardous substance storage and management
- Energy use
- Environmental impacts
- Due diligence
- Waste management
- Environmental Management Systems

Audits are scoped according to their main objective. For example, an EMS audit has the primary objective of assessing the performance of the management system, not the asset. Therefore, its scope focuses primarily on compliance with procedures and management of information. In contrast, a technical audit focuses on the impacts associated with design and operation of plant or equipment.

The audit objectives will determine the protocol to be used by the auditors and the qualifications required of the auditor or audit team.

An Instruction - CS ENV-10 - Environment and Cultural Heritage Audit Process has been prepared to provide consistency in internal EMS auditing.

Audits are scheduled and completed in accordance with Procedure - CS-ENV-07 - Environmental Performance Evaluation.

EMS Document	TRIM Link
Procedure - CS-ENV-07 - Environmental Performance Evaluation	B/D/11/31095
Instruction - CS ENV-10 - Environment and Cultural Heritage Audit Process	B/D/12/15420

9.3 Management Review

Management Review of the EMS is incorporated into three processes performed by the organisation ():

- **Business Management System – Corporate Business Plan Review:** This process is incorporated into Procedure - CS-ENV-02 - Developing Environmental Planning whereby policy, goals and targets are reviewed as a part of the annual business planning process. The Head of Environment and Cultural Heritage, in consultation with the Executive General Managers, reviews the current and future direction of corporate environmental strategies which includes policy, goals and targets. Site specific goals and targets are also identified in site business plans.

- **Environmental Management System – Audit Review:** This process is incorporated into Procedure - CS-ENV-07 - Environmental Performance Evaluation whereby EMS processes and procedures are audited in accordance with the annual audit schedule to seek continual improvement. Results of the EMS audits and associated audit actions are reviewed by the site Environment and Stakeholder Business Partners and corporately by the Head of Environment and Cultural Heritage. EMS review is a routine agenda item for site management review meetings, and the Central HSE meeting. The site Environmental Business Partners are responsible for review of the site EMS manual and procedures.
- **Environmental Management System – Management Review:** Procedure - CS-ENV-03 - Environmental Communication and Training Process identifies the range of meetings and other communication methods applied to ensure appropriate management review of the EMS and associated outputs. At operational assets, management reviews will be completed at a frequency determined appropriate at the site level as set out in the respective site EMS Manuals. A summary of the site-based management reviews will be presented at the Central Health Safety and Environment meeting/s as required to seek conformance with the ISO standard and continual improvement. The Management Reviews will consider all the requirements of 9.3 Management Review of the ISO 14001 EMS Standard..

In addition to this, the Environment and Cultural Heritage Team hold routine meetings to raise any issues associated with the EMS or other related outputs. The monthly environment and cultural heritage scorecard is a means to communicate environmental compliance status, environmental management and improvements.

Business-wide and site specific KPIs are reported and discussed monthly, inclusive of environmental performance metrics as indicated in Section 5.1.4 of this Manual.

EMS Document	TRIM Link
Procedure - CS-ENV-02 - Developing Environmental Planning	B/D/23/10861
Procedure - CS-ENV-07 - Environmental Performance Evaluation	B/D/23/12646
Procedure - CS-ENV-03 - Environmental Communication and Training Process	B/D/23/10862

10 IMPROVEMENT

10.1 EMS Review

The Environment Team plays a key role in monitoring and reporting on environmental compliance in relation to the various legal obligations listed in the site EAs and other licence / permit documentation. To assist in managing and reporting on the environmental compliance status, all environmental legal requirements are listed in Insight as 'Obligations'. Frequencies are specified in Insight, and routine notifications are sent to Environment and Stakeholder Business Partners or the responsible person to complete and close-out obligations.

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, CS Energy's 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.

10.2 Non-conformance Procedures

All environmental complaints and incidents are documented in Insight. Depending on the nature of the incident and incident consequences, additional folders may be created in TRIM for reports / correspondence. The process is described in Procedure - CS-IM-01 - Incident Management.

EMS Document	TRIM Link
CS-IM-01 Incident Management	B/D/11/45318

10.3 Non-conformance Register and Improvement Plans

The Insight System collates non-conformance issues and corrective actions, including:

- Non-conformances arising from incidents are entered into Insight with corrective actions as allocated. The process is described in Procedure - CS-IM-01 - Incident Management.
- Risk items with low, moderate and high risk of non-conformance are assessed with control plans entered into the Enterprise Risk Register Actions Tracker in Insight.
- Business improvement actions arising from sources such as internal and external audits are also included in Inight under the Internal Audit and Independent Management Reviews Module.

EMS Document	TRIM Link
CS-IM-01 Incident Management	B/D/11/45318

11 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed by the responsible team within a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of registered 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.

For CS Energy level registered documents, contact the Records Manager to request a review copy.

For Site registered documents, contact the Document Management Officer to request a review copy.

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.