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CS ENERGY PROCEDURE FOR DEVELOPING ENVIRONMENTAL PLANNING CS-ENV-02

Responsible Officer: Environmental Specialist
 Responsible Manager: Head of Environment
 Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
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Section 3.2 modified re strategic planning process, Sections 3.2 and 3.3 modified to cover goals and targets from owners to operator-maintainer, Section 3.4 modified re approval of plans, minor changes to titles and responsibilities, minor editing.				18/11/2002
Deleted 3.5 and other references to Environmental Action Plans. Minor editing.				25/11/2003
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EPA replaced with DERM; term, 'EIMPs' broadened in s. 3.4; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.				6/07/2009
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1 PURPOSE

The purpose of this document is to provide a process to:

- Formulate environmental policy, goals and targets; and
- Prepare Environmental Issue Management Plans.

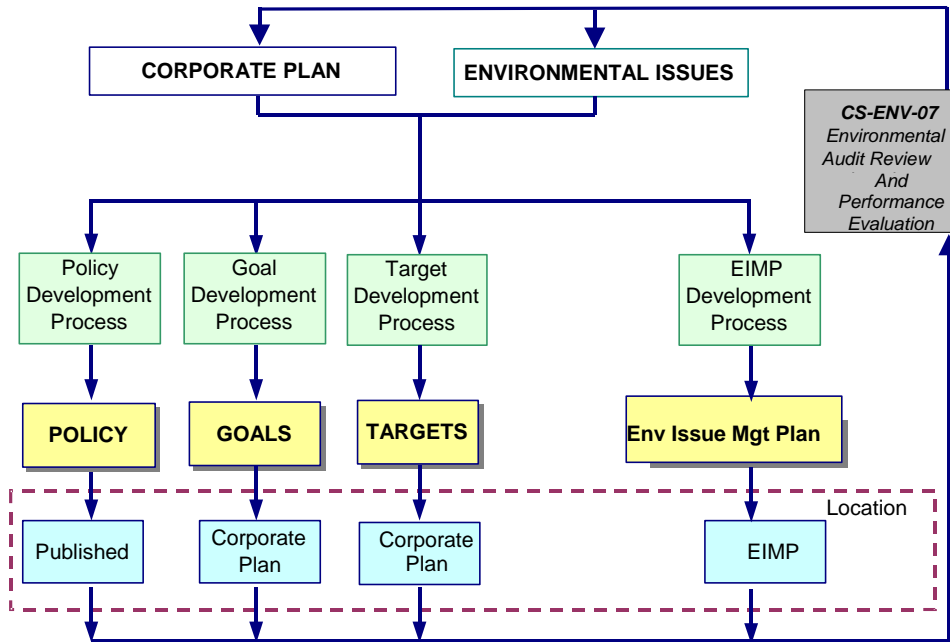


Figure EMSP-02: Environmental Planning Flow Diagram

2 SCOPE

This procedure applies to the management of environmental issues. Outputs from this procedure are implemented through the Environment Policy, Corporate Plan and Environmental Issue Management Plans.

3 ACTIONS

The specific details/examples of these instructions have been separated according to the item being developed / amended.

3.1 Formulating Environmental Policy

Development process:

It is the responsibility of the Executive General Manager – Plant Operations to review the Environment Policy as required as part of the corporate management review process. As part of this review, the policy's effectiveness and relevance is assessed. The environmental team together with the site and corporate General Managers review the policy for changes and recommend the revised policy through the Chief Executive for approval by the Board.

3.2 Formulating Environmental Objectives (Goals) and Targets (KPIs)

Development process for objectives (goals):

The development of corporate goals is in accordance with strategic planning for development of the Corporate Plan. The Corporate Plan includes key objectives that are monitored as a scorecard. Divisional business plans and individual site business plans are also developed for internal use.

The Chief Executive and General Managers carry out a strategic assessment and analysis of business drivers including environmental drivers e.g. technological changes, significant risks, legal requirements, and the views of invited parties.

The environmental issues produced by the Environmental Issue Identification Procedure (CS-ENV-01) at each site are considered during the development process for site-specific goals and targets.

In the case of plant owned by joint ventures, goals may also be set for CS Energy as the operation and maintenance contractor.

General strategic goals should contain the following information:

- Statement on broad environmental issue being addressed; and
- Where possible, state some quantitative indicator.

Information must be available for external (public disclosure) when requested.

Development process for targets (KPIs):

The development of targets occurs via the following methods:

- From the Environment Policy and goals that have to be achieved. These are reviewed annually as part of the business planning cycle which involves the development of both Corporate and site business plans and associated KPIs.
- From the Owner's Environmental Management Plan and any owner-specified goals when performing an operation and maintenance contract role.
- From high-risk issues where the Site General Managers, Head of Environment and Site Environmental Business Partners agree there is a need.

The process results in corporate targets (KPIs) identified in the Corporate Plan and also site-specific targets (KPIs) which are identified in the site business plans.

Targets (KPIs) should be measurable and specific and follow the SMART rule:

Specific

Measurable

Attainable

Relevant

Trackable

Documented objectives and targets can be found in the:

- Corporate Business Plan
- Statement of Corporate Intent
- Environmental business plans – Corporate and site

- The Corporate and Site EMS Manuals

3.3 Environmental Issue Management Plans

Issue management plans may result in specific environmental targets for specific sites.

Environmental Issue Management Plans (EIMPs) are a general term that collectively describes:

- Risk Management Plans (Risk Treatment Plans) in the Risk Management System (Refer to CS-RISK-01 - Enterprise Risk and Compliance Management Framework) which have been developed in response to significant and high risk environmental issues (see CS-ENV-01).
- Issue-specific procedures that address certain environmental approval requirements and/or voluntary agreements.

These plans may be initiated as a result of any of the following events:

- As a result of a CS Energy investigation of an incident or complaint or requirement of the Queensland Environmental Regulator following an incident or complaint or submission of a Program Notice (see CS-ENV-05: Environmental Legal Compliance).
- Environmental approval requirements such as Stormwater Management Plans, Waste Management Plans.
- Voluntary industry agreements.

The minimum contents of a plan are:

- Listing of the environmental issue being managed and its effects.
- Environmental risk rating.
- Operational controls in place.
- List of actions being undertaken for the issue, noting:
 - Action description
 - Expected completion date
 - Work order number or SAP notification if relevant
 - Responsible person/plant group.

EIMPs undergo management review and are accepted and agreed through this process.

4 RESPONSIBILITIES

4.1 CS Energy Board

- Review and authorise CS Energy Environment Policy.

4.2 Chief Executive

- Recommend Policy to Board.

4.3 General Managers

- Development of policy, goals and targets
- Initiate Policy review

- Allocating resources for implementation of action/management plans
- Allocating resources for achieving KPIs
- Approval of Issue Management Plans converted to Risk Management Plans

4.4 Risk and Compliance Facilitators and Technical Risk Owners

- Preparation and review of Risk Management Plans

4.5 Head of Environment

- Facilitate development of policy, goals and targets consistent with the environmental Corporate strategy and planning processes
- Allocating resources for achieving KPIs
- Initiating review of this procedure and ensuring outputs are updated

4.6 Site Environmental Business Partner

- Provide technical advice relating to environmental issues.
- Formulate and/or oversee the formulation of Environmental Issue Management Plans (EIMPs).
- Provide support in the dissemination of environmental policy and goals.
- Development of site goals and targets (KPIs).

5 REVIEW

Reviews listed below are described in the EMS Procedure CS-ENV-07.

- The EMS Audit Program encompasses checking of this document (See CS-ENV-07 Environmental Audit, Review and Performance Evaluation)
- The policy and goals are reviewed as part of the strategic planning process to formulate the Corporate Plan.
- The environmental action plans, issues management plans and environmental targets are reviewed as part of the Environmental Issues Review (See CS-ENV-07 Environmental Audit, Review and Performance Evaluation).

6 AUDITABLE OUTPUTS

These items are outputs of this procedure and are to be assessed by auditors.

- Environment Policy
- Environmental goals and targets
- Environmental Issue Management Plans

7 DEFINITIONS

Term	Definition

8 REFERENCES

Reference No	Reference Title	Author
"B/D/15/22460"	CS-ENV-01 - EMS Procedure - Environmental Issue Identification	CS Energy
"B/D/11/31093"	CS-ENV-05 - EMS Procedure – Environmental Legal Compliance	CS Energy
"B/D/11/31095"	CS-ENV-07 - EMS Procedure – Environmental Audit, Review & Performance Evaluation	CS Energy
	Corporate Plan	CS Energy
	Statement of Corporate Intent	CS Energy
"B/D/12/63934"	CS-RISK-01 – Risk and Compliance Management Framework	CS Energy

9 RECORDS MANAGEMENT

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. 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.

CS Energy 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 CS Energy business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.