



CS ENERGY PROCEDURE FOR ENVIRONMENTAL COMMUNICATION AND TRAINING PROCESS CS-ENV-03

Responsible Officer: Environmental Specialist
 Responsible Manager: Head of Environment
 Responsible Executive: Executive General Manager People and Safety

DOCUMENT HISTORY

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Key Changes	Prepared By	Checked By	Approved By	Date
Updated to reflect current business processes and address internal EMS audit recommendations	S Harabasz	R Hartigan	T Wiltshire	22/01/2016

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1 PURPOSE

This procedure aims to ensure that the objectives of the EMS are communicated to staff and the general public. It also defines the requirements of an operation to institute consultation with staff and the public where appropriate.

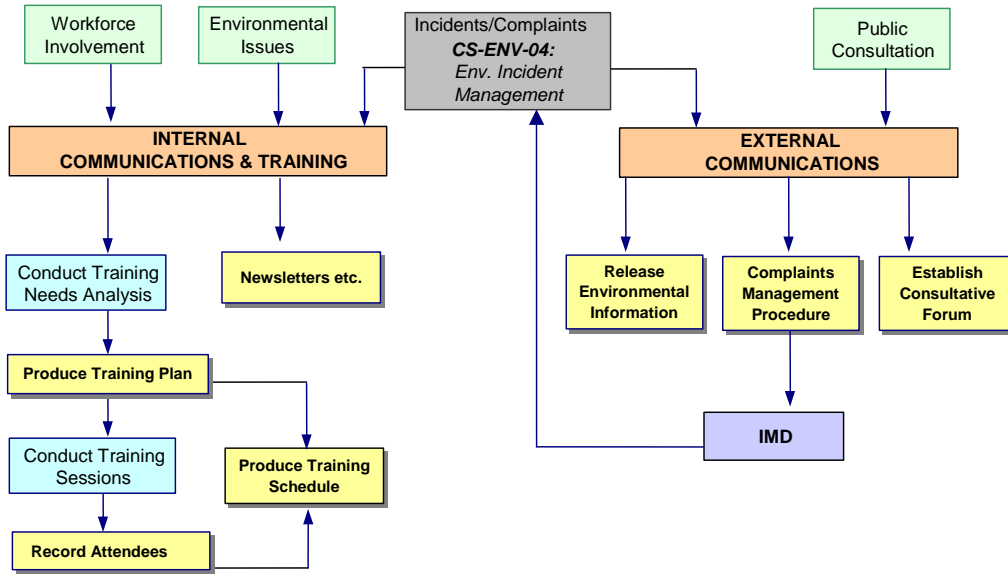


Figure EMSP-03: Environmental Communication & Training Process Flow Diagram

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

3.1 External Communication

In managing external communications with regard to an operation’s environmental impacts, management will establish an external environmental communication strategy dealing with the following



matters:

Consider establishing a community consultation forum

The criteria to be considered when deciding on whether an operation needs to set up such a forum are:

- Number of external complaints (incidents) received (refer to CS-ENV-04: Environmental Incident Management Procedure);
- Verification of need to take action on a complaint;
- Proposed changes to site operations;
- Communication policy of the operation; and
- 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; and
- Meeting minutes.

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

Release Environmental Information

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 website, newsletters, factsheets and media releases. The types of information released to the public

include:

Annual Report

- Performance against key objectives and targets for 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

- Public access to Annual Report and Environment Policy.

National Pollutant Inventory

- Water, air and land emissions by reporting year.

Intranet articles, newsletters, site factsheets and media releases

- Topical environmental issues.

Make available and publicise CS Energy's Environment Policy

- CS Energy's Environment Policy, developed as a part of EMS Procedure (CS-ENV-02 Developing Environmental Planning) is communicated to the public via the CS Energy Internet web site.

Maintain a community (external) complaint procedure

This procedure addresses 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.

Communication with joint-venture partners

Any CS Energy sites 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 or Transitional Environmental Programs in place;
- Items from monthly reports;
- Management and close-out of incidents reported since last meeting;
- Management and close-out of community complaints reported since last meeting;
- Outcomes from audits and status of actions recommended;
- Plant issues affecting environmental performance;
- Environmental approval non-compliances;
- Review of plant and environmental monitoring performance; and
- Review of any Contract Environmental Management Plan.

3.2 Appointment of CS Energy Spokesperson

Contact with the media is planned and arranged by the Manager Corporate Communications. 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-002 - Media and Communications Guideline.

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.

For site matters, contact with the Department of Environment and Heritage Protection (DEHP) is authorised by the Site General Manager and coordinated through the site Environmental Coordinator.

The Head of Environment is authorised to contact the DEHP in consultation with their General Manager.

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.

3.3 Internal Training

In managing internal training with regard to an operation's environmental impacts, line managers will:

Conduct a training needs analysis & develop a suitable training plan & schedule for staff

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; and
- 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; and
- For other staff, through identification of training needs during individual staff six-monthly or annual performance reviews. Results of these reviews are recorded in the Individual Achievement Plans (IAPs)

It is a requirement that new staff and contractors undertake appropriate environmental inductions prior to or soon after commencing work.

These induction modules are to ensure 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); and
- Legal obligation to report all incidents.

3.4 Internal Communication

In managing internal communication with regard to an operation's environmental impacts, management will:

Consider other process(es) for informing staff of their environmental obligations

Apart from the training programs, staff whose work may create a significant impact upon the environment must receive information and advice.

Environmental awareness may be maintained and communicated where appropriate through the use of: Intranet news items, environmental newsletters (e.g. SAI Global Environmental Newsletters,



Environmental Manager) e-mail releases; media releases; work group meetings, forms, notice boards, and tool box talks.

Environmental Coordinators Meeting

At an appropriate interval (target six-monthly), the Site Environmental Coordinators and the Manager Environment will meet to initiate a collaborative forum. The structure and function of which will:

- Include representation from site and corporate environmental management.
- Include reviewing incidents and complaints;
- Provide an avenue for communication to the workforce; and
- Act as a means for promoting environmental awareness and discussing job related environmental impacts.

The agenda for this forum is to be similar to that specified in CS-ENV-07 for Environmental Management System Review. Key outcomes/issues identified during the Environmental Coordinators' meeting will be taken into consideration when reviewing policy, goals and targets within the Environmental Management System Review (see Section 3.5 of CS-ENV-07).

Quarterly Business Reviews

Performance against environment business plans is reviewed quarterly with the CEO and Executive General Managers.

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 Environment

- Conduct a training needs analysis for site environment staff.
- Development of Corporate environmental reports.
- Initiating review of this procedure and ensuring outputs are updated.

4.3 Site Environmental Coordinator

- Implement the community (external) environmental complaints process.
- Develop suitable training plan and schedule for environmental staff.

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.

5 REVIEW

The following item is described in CS-ENV-07 Environmental Audit, Review and Performance



Evaluation.

- The EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed

6 AUDITABLE OUTPUTS

The following items are outputs of this procedure:

- Training needs analysis and schedules in Individual Achievement Plans (IAPs);
- Training records;
- Minutes of Community Consultation Meetings/Forums (if conducted);
- External communications;
- Complaints management procedure; and
- Environmental Coordinators meeting minutes

7 DEFINITIONS

Term	Definition

8 REFERENCES

Reference No	Reference Title	Author
N/A	Environmental Protection Legislation	Aust Govt
N/A	Environmental Protection Legislation	Qld Govt
"B/D/11/39706"	Policy - Environment	CS Energy
Link to Manual	Environmental Legal Compliance Manual	CS Energy
"B/D/11/31090"	Procedure - CS-ENV-02 - Developing Environmental Planning	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/11/43851"	Procedure - CS-IM-02 - Crisis Management	CS Energy
"B/D/14/22838"	Procedure - CS-COMMS-00 - Media and Communications Guidelines	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 where it has been identified that there are changes in technology, legislation, standards, regulations 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.

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.