

CS ENERGY PROCEDURE

ENVIRONMENTAL INCIDENT MANAGEMENT CS-ENV-04

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
Original Issue				27/01/1999
Updated responsibilities				17/05/2000
New Section 3.4 General Environmental Duty				03/07/2000
Added diagram				28/08/2000
Added Review and Auditable outputs				17/11/2000
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EPA replaced with DERM; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.				6/07/2009
Document transferred to new CS Energy template, minor editing.	J Lafferty		R Hartigan	16/11/2011
Updated to reflect current business processes and address internal EMS audit recommendations	S Harabasz	R Hartigan	T Wiltshire	22/01/2016

Key Changes	Prepared By	Checked By	Approved By	Date
Updated the Incident and Complaints process	J Skillington	S Harabasz	B Monckton	26/02/2018
Updated to reflect current business processes and address internal EMS audit recommendations and findings	S Harabasz	S Verano	B Monckton	15/02/2019
Updated to reflect that environmental complaints are treated as incidents and included a reference to the duty to notify.	S Harabasz	T van den Berg	B Monckton	27/08/2021
Updated to reflect the integration of Consultation Management to complaints.	L Crawford	S Verano	B Monckton	29/03/2022

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1 PURPOSE

The purpose of this document is to outline the minimum requirements for establishing an environmental incident management process.

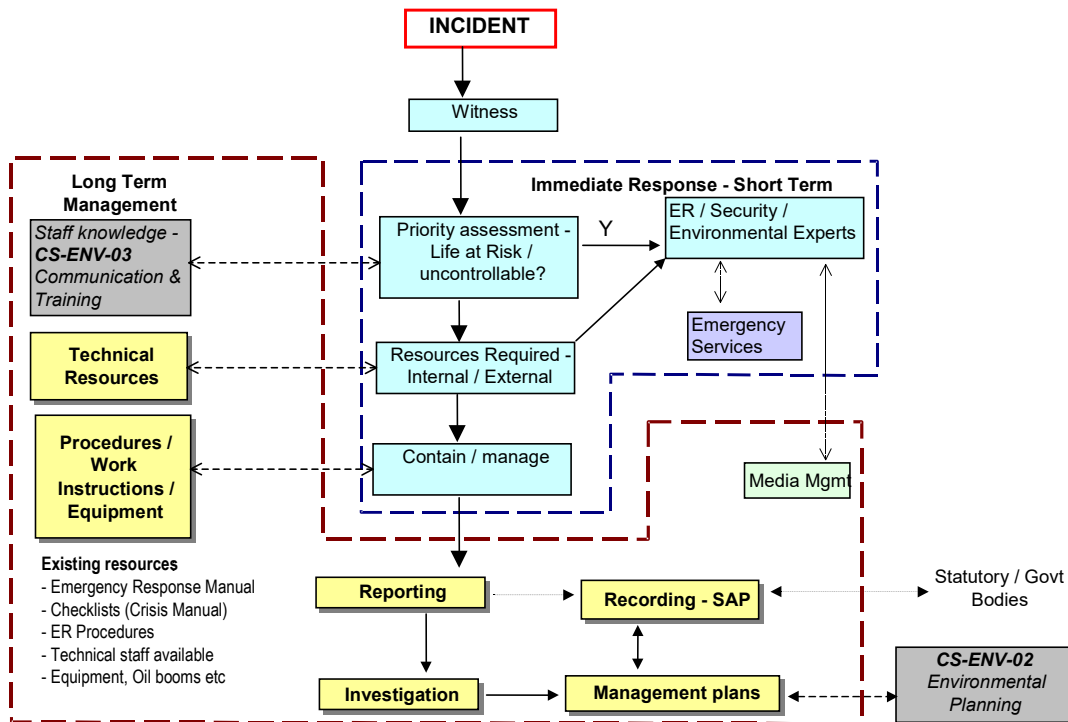


Figure EMSP-04: Environmental Incident Management Flow Diagram

2 SCOPE

This procedure applies to the management of environmental incidents occurring on or extending off site. Incidents include complaints from people external to the business.

3 ACTIONS

The Incident Management System comprises the following elements:

3.1 Incident Management Training

It is a requirement that staff are able to:

- Identify what is an environmental incident - refer to CS-ENV-11 - EMS Manual (B/D/11/31098), Section 8.1;
- Take appropriate immediate action to control an incident; and
- Know the reporting requirements.

Refer also to procedures *CS-IM-01- Learning from Incidents* (B/D/11/45318) which covers health, safety, environmental and operational incidents and *CS-IM-02 Crisis Management* (B/D/11/43851).

Information provided to staff must reflect the following hierarchy in their immediate response to an incident.

- Ensure Health & Safety first;

- Shut off the source if possible;
- Contain contaminants;
- Report; and
- Clean up.

3.2 Incident Management Resources and Documentation

Incident management processes should be appropriate to:

- The site;
- Scale of the environmental incident (i.e. Category 1 to 4);
- Resources available; and
- Geographical location and sensitivity of receiving environment.

Examples of resources, documentation and procedures are detailed below.

Resources and Documents

- Technical information on contaminants e.g. Safety Data Sheets, ChemAlert database, environmental effects, site specific disposal options.
- Site plans/maps showing relevant information e.g. drainage, hazardous substances locations and quantities.
- Contact information for emergency services and external specialists/resources.

Procedures/ Work Instructions

- Checklists (Action cards specific to an officer's role and responsibilities) shall be prepared that detail staff responsibilities, actions to be taken and notification requirements.
- (NB: Ensure that checklists cover staff such as security, operating staff, line management, technical specialists, media liaison officer)
- Procedures shall be prepared that detail site-specific response actions.

3.3 Corrective and Preventive Action Process

It is a requirement that a system be established to manage incidents to ensure that appropriate follow up action is completed with the aim of improving environmental performance. The elements of the system are:

- Reporting and recording;
- Investigation to identify root cause;
- Corrective actions including action plans; and
- Effectiveness of actions in preventing recurrence.

3.3.1 Reporting Incidents – Immediate Response

The minimum information to be collected or requested on an environmental incident should meet the requirements of the site's environmental authorities (licences) and may include:

- Witness name(s);
- Date and time of incident or when discovered;
- Description of the incident or complaint details; and

- Initial action taken to prevent impact, contain material or respond to complaint.

3.3.2 Incident Recording, Investigation and Long-Term Management

Once an incident has been controlled and initial information from witness recorded, the Environmental Business Partner is responsible for:

- Creating an entry in the Incident Management Database (IMD) including all known details of the incident as detailed in CS-IM-01- Learning from Incidents ([B/D/11/45318](#));
- Allocating an Investigation Leader to conduct an investigation to determine the root cause of the incident and determine actions to prevent recurrence of the incident;
- Allocating all identified actions and due dates to the applicable responsible persons; and
- Any specific statutory authority notification details.

Long-term management of an incident or the root cause of an incident is to be managed in accordance with the CS-ENV-02 - Developing Environmental Planning. Under this procedure long-term management is to be attributed to Environmental Issue Management Plans or Risk Management Plans.

3.3.3 Community Complaints

Community enquiries or complaints are generally received by Reception or Administration staff. If the complaint is environmental, the Reception or Administrator will forward the call to the Environmental Business Partner if possible, otherwise record the persons contact details and nature of the complaint. This contact information must be forwarded to the Environmental Business Partner as soon as possible.

The complaint is then recorded as an incident and managed as per the incident management system.

The Environmental Business Partner will contact the person making the complaint and record details of the complaint on the *Environmental Complaints / Requests for Information Form* (form S2258, TRIM [B/D/18/3388](#)). The following information must be recorded for all complaints:

- time, date and nature of complaint;
- type of communication (telephone, letter, personal etc.);
- name, contact address and contact telephone number of complainant (Note: if the complainant does not wish to be identified then "Not identified" is to be recorded).

For each complaint, the Environmental Business Partner is responsible for:

- Entering the complaint into the SAP Incident Management Database;
- Creating a TRIM folder for each complaint under EXTERNAL RELATIONS - PUBLIC FEEDBACK in the applicable CSE site folder and include the Incident Management Database (IMD) number in the title of the folder;
- Saving all applicable email / documents and investigation reports in the TRIM folder;
- Recording the incident and saving records of conversation with the stakeholder into Consultation Manager, which is CS Energy's stakeholder database management system.
- Recording the applicable TRIM folder in the SAP incident record and allocate the person responsible for investigating the complaint (Investigation leader).

The Investigation Leader is responsible for conducting an investigation and preparing a report including details and conclusions of the investigation undertaken and the agreed actions as a result of the complaint. The Investigation Leader must record each action together with the person responsible and due date for the action to be undertaken.

Only the Functional Site Coordinators and the person responsible for each action and can move the action to “completed” within the IMD. The time, date and identity of any person completing an action is recorded in the IMD and is considered to be an electronic signature.

3.3.4 Reporting of Incidents - External

Some environmental incidents or activities causing or threatening environmental harm are reportable to the Department of Environment and Science (DES). This may be either as a condition of the site environmental approvals or in accordance with Section 320 of the Environmental Protection Act. In such cases the Site Environmental Business Partner in consultation with the Head of Environment prepares the report which is authorised for dispatch to the DES by the Site General Manager.

All procedures relating to incident management will be reviewed after an incident where procedures are found to be deficient and any deficiency corrected.

3.4 General Environmental Duty

The Environmental Protection Act (Section 319) imposes a General Environmental Duty on all employees, namely that “a person must not carry out any activity that causes, or is likely to cause, environmental harm unless the person takes all reasonable and practicable measures to prevent or minimise the harm.”

If an incident does occur that may have caused or threatens material environmental harm, there is a duty to notify the administering authority and land owner or occupier.

CS Energy employees are authorised to take whatever action is necessary to meet their Environmental Duty.

Power Station operators have a specific duty to operate plant within environmental approval limits.

4 RESPONSIBILITIES

In addition to the responsibilities below, further responsibilities for environmental incident management are included in Section 6 of Procedure *CS-IM-01- Learning from Incidents* ([B/D/11/45318](#))

4.1 General Managers

- Approval and allocation of resources for incident management and close-out.

4.2 Line Managers

- Manage activities under their control to comply with policies, procedures and environmental approval limits.

4.3 Head of Environment

- Updating of procedure in accordance with changes in policy.
- Implementing requirements of this procedure.
- Providing technical advice / liaison with environmental regulators.

4.4 Site Environmental Business Partner

- Ensure that all incidents are entered into the Incident Management Database.
- Providing technical advice / liaison with environmental regulators.
- Review of site incident management procedures as required and after incidents.

4.5 Power Station Operators

- Operate plant within environmental approval limits.

4.6 Employees and Contractors

- Following site procedures including environmental procedures.
- General requirement to prevent environmental harm.
- Control and report incidents.

5 REVIEW

The following items are described in CS-ENV-07 - Environmental Audit, Review & Performance Evaluation:

- The EMS Audit Program encompasses the checking of this document;
- Incidents are reported and managed through the Incident Management Database.; and
- Incidents are collated and reported.

6 AUDITABLE OUTPUTS

The following items are outputs of this procedure:

- SAP – List of Environmental Incidents and status

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/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/11/31089	Procedure - CS-ENV-01 - Environmental Issue Identification	CS Energy
B/D/11/31090	Procedure - CS-ENV-02 - Developing Environmental Planning	CS Energy
B/D/11/31091	Procedure - CS-ENV-03 - Environmental Communication and Training Process	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation	CS Energy
B/D/11/30977	Procedure - CS-OHS-M-01 - Health and Safety Manual	CS Energy
B/D/11/45318	Procedure - CS-IM-01 - Learning from Incidents	CS Energy
B/D/11/43851	Procedure - CS-IM-02 - Crisis Management	CS Energy
B/D/12/14048	Procedure - CS-IM-03 - Emergency Response Plan	CS Energy
B/D/12/13849	Procedure - CS-IM-05 - Emergency Contacts Information	CS Energy
F/11/10946	Brisbane Office Crisis Action Cards	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.