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CS ENERGY PROCEDURE FOR GUIDELINES FOR CONTRACTOR ENVIRONMENTAL MANAGEMENT PLANS CS-ENV-08

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				12/02/2002
Owner title; site H&S officer title				06/06/2005
Inclusion of new Sections 5 - Review and 6 - Auditable Outcomes				19/04/2006
Update organisational titles.				06/07/2009
Remove reference to Health and Safety Management Plans and focus on the requirements for Environmental Management Plans.				06/06/2011
Document transferred to new CS Energy template	J Lafferty		R Hartigan	17/11/2011
Update Risk Management Framework	J Lafferty		R Hartigan	27/04/2012
Updated to reflect current business processes and address internal EMS audit recommendations	S Harabasz	R Hartigan	T Wiltshire	22/01/2016
Updated to reflect current business processes and address internal EMS audit recommendations and findings	S Harabasz	S Verano	B Monckton	15/02/2019



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1 INTRODUCTION

An Environmental Management Plan (EMP) is a project-specific plan developed to ensure that appropriate environmental management practices are followed to minimise the risk of environmental harm or nuisance, and to ensure compliance with environmental legislation and CS Energy's commitment to environmental management. It is a requirement of the CS Energy Power Station Site Conditions Procedure CS-SCP-609 – Site Conditions that an EMP be prepared and approved before undertaking contracted works at sites owned, operated and maintained by CS Energy.

2 PURPOSE AND SCOPE

The purpose of this procedure is two-fold:

- To provide guidance for the preparation of an EMP for contractors undertaking works at CS Energy sites, in order to meet the requirements of Section 7.21 of CS-SCP-609.
- To provide guidance for the evaluation and management of an EMP by the Site Environmental Business Partner and the Contract's Principal's Representative, generally a CS Energy Contract Administrator or Supervisor.

This procedure is applicable to all Contractors and CS Energy personnel responsible for evaluating environmental documentation associated with contracts taking place at sites owned, operated or maintained by CS Energy.

3 ENVIRONMENTAL MANAGEMENT PLAN (EMP) PREPARATION

3.1 Assess Potential Environmental Impacts

For each step of the work task, consider the potential risks to the environment by assessing factors including:

- Types and quantities of hydrocarbons and chemicals, equipment and other materials being brought to site;
- Types and quantities of wastes likely to be produced;
- Likely receptors if chemicals or wastes are spilled;
- Possible impacts on air quality, noise generation, water quality (including stormwater), weed control, nearby residents and road users;
- If earthworks are involved, the susceptibility of soils to erosion, the likelihood of exposing contaminated soils and/or items of Cultural Heritage significance;
- Possible non-conformances with site Environmental Authorities; and
- Possible breaches of environmental legislation including but not limited to:
 - Environmental Protection Act 1994 and Regulations.
 - Environmental Protection Policies (Air, Water, Noise).
 - Sustainable Planning Act 2009.
 - Aboriginal Cultural Heritage Act 2003.
 - Local Council planning and environmental laws.

3.2 Assess Need for Additional Environmental Approvals

Assess the need for any additional environmental approvals, licenses and permits from local Council and/or State Government Departments such as the Department of Environment and Science (DES). Such approvals may be necessary for the handling of regulated wastes, vegetation removal, contaminated land, operational works and/or Cultural Heritage. If uncertain, it is recommended to seek advice from the Site Environmental Business Partner via your CS Energy Contract Administrator. If necessary, the Site Environmental Business Partner will seek legal advice on particular legislative matters to assist the environmental approval process.

3.3 Determine Scope of EMP

The scope of an EMP will vary depending on the scale and nature of a project. It is recommended that each potential environmental risk is assessed in accordance with the CS Energy Enterprise Risk Management Framework [B/D/13/17881 - Risk Matrix (CS-RISK-01 / CS-RISK-03) - Risk Management Framework]. This assessment should be conducted in consultation with your CS Energy Contract Administrator.

If all potential environmental impacts are assessed as **low risk**, then the completion and successful implementation of a Job Safety Environmental Analysis (JSEA) is sufficient to meet the contractor's environmental management requirements, sufficient to the conditions of contract.

If there are one or more environmental impacts assessed as **moderate, significant or high risk**, then an Environmental Management Plan is to be formulated in addition to task-specific JSEAs. A template is available, however, a contractor is not necessarily obliged to use the template, provided their EMP content includes, as a minimum:

- Project description;
- Environmental management structure and responsibility;
- Risk assessment for applicable environmental factors (air, noise, water, dust, waste, flora, fauna, contaminated soils, sediment and erosion control and cultural heritage);
- Environmental management activities and controls;
- Approval and licensing requirements;
- Schedule of environmentally significant works;
- Environmental monitoring requirements;
- Incident management and corrective action procedures;
- Reporting process;
- Environmental training;
- Complaint handling procedure; and
- Emergency contacts and response.

3.4 Implementation

Works cannot commence until the EMP is approved by the CS Energy Contract Administrator. All staff members working under the given contract are expected to be aware of the EMP and its requirements.

EMP implementation will be subject to audits and inspections by the CS Energy Contract Administrator, Site Environmental Business Partner or other representatives of CS Energy as authorised by the Contract Administrator.

3.5 Revision and Update

The EMP is a living document that focuses on continual improvement and as such may need to be revised and updated. The timing of review and possible update will depend on the nature and scale of the project or task. It is generally advised that a review take place when:

- There is a change in project scope;
- An environmental incident has occurred;
- There is a need to improve performance in an area of likely environmental impact; and/or
- At the request of a CS Energy Representative.

If changes are made, it is recommended that reasons for making the changes are documented and copies of the previous version kept for reference.

4 EMP EVALUATION AND APPROVAL

It is the role of the Contract Administrator to evaluate, approve and audit the implementation of the EMP, ensuring that it:

- Applies best practice environmental management to a project/task;
- Complies with the site Environmental Authority and relevant environmental legislation, and is consistent with the CS Energy Environmental Management System; and
- Achieves an overall reduction in the risk of environmental harm and incident occurrence to a level considered 'acceptable' under the CS Energy Enterprise Risk Management Framework.

EMP evaluation and approval occurs initially before the onset of works and also periodically throughout the project in order to ensure compliance and identify opportunities for continual improvement. It is strongly recommended that the Contract Administrator liaise with the Site Environmental Business Partner when evaluating the EMP.

Copies of all EMPs (including originals and updates) should be filed in TRIM and forwarded to the Site Environmental Business Partner and maintained onsite for reference with other contractual documents.

5 RESPONSIBILITIES

5.1 Principal's Representative

- Assess the hazards / risks associated with the work at the planning and scoping stage of the work / contract, in conjunction with the Contractor and Site Environmental Business Partner.
- Ensure the Environmental Management Plan is approved prior to work commencing on site.
- Audit EMP compliance and identify opportunities for improvement.

5.2 Contractor

- Provide the Environmental Management Plan as requested by the Principal's Representative prior to work commencing on site.
- Continually identify opportunities for improvement.

6 AUDITABLE OUTCOMES

The following items are outputs of this procedure:

- Environmental risk assessment;
- Job Safety and Environmental Analysis (JSEA);
- Environmental Management Plan (EMP); and
- Evidence of EMP implementation.

7 DEFINITIONS

Term	Definition
Contractor	Any service provider subject to the CS Energy Power Station Site Conditions (CS-SCP-609). Examples include trade service providers (plumber, fitter, scaffolder), cleaners, and building and construction contractors.
Environmental Harm	Any adverse, or potential adverse effect (whether temporary, permanent and of whatever magnitude, duration or frequency) on an environmental value, and includes environmental nuisance.
Environmental Management Plan (EMP)	A project-specific plan developed to ensure that appropriate environmental management practices are followed while undertaking contract works to minimise the risk of environmental harm and to ensure compliance to the CS Energy Environmental Management System and legislative obligations.
Environmental Management Systems (EMS)	The part of an organisation's overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the Environmental Policy.
Environmental Nuisance	Unreasonable interference or likely interference with an environmental value caused by: noise, dust, odour, light; an unhealthy, offensive or unsightly condition because of contamination; or another way prescribed by regulation.
Environmental Policy	Statement by an organisation of its intentions and principles for environmental performance.
Environmental Value	A quality or physical characteristic of the environment that is conducive to ecological health or public amenity or safety; or another quality of the environment identified and declared to be an environmental value under an Environmental Protection Policy or Regulation.
Principal's Representative	Also known as the CS Energy Representative; is the person appointed by CS Energy to supervise the operation of a contract.

8 REFERENCES

Reference No	Reference Title	Author
Web Link	<i>Environmental Protection Act 1994 and Regulations</i>	Qld Govt
Web Link	Environmental Protection Policies (Air, Water, Noise)	Qld Govt
Web Link	<i>Sustainable Planning Act 2009.</i>	Qld Govt
Web Link	<i>Aboriginal Cultural Heritage Act 2003</i>	Qld Govt
Web Link	Aboriginal Cultural Heritage Act 2003 Duty of Care Guidelines (2004)	Dept Env & Resource Mgmt
Web Link	Guideline for the Preparation of Environmental Management Plans (2004)	Aust Govt
SAI Global Link	AS/NZS ISO 14001:2004 Environmental management systems – Requirements with guidance for use.	Standards Aust
SAI Global Link	Australian Standard 1055.1: Acoustics - Description and Measurement of Environmental Noise - Part 1-3.	Standards Aust
Web Link	Soil Erosion and Sediment Control: Engineering Guidelines for Queensland Construction Sites	Qld Div, Institution of Engineers, Aust
N/A	Local council planning and environmental laws.	N/A
B/D/16/2453	Environmental Legal Compliance Manual – Volume 1	CS Energy
B/D/16/2454	Environmental Legal Compliance Manual – Volume 2	CS Energy
B/D/12/63934	Standard - CS-RISK-01 - Risk and Compliance Management Framework	CS Energy
B/D/13/11406	Procedure – CS-RISK-03 – Enterprise Risk Management Guideline	CS Energy
B/D/13/17881	Attachment - Risk Matrix - Risk Management Framework	CS Energy
B/D/11/28673	Procedure - CS-SCP-609 - Site Conditions	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.

10 ATTACHMENTS 1 - ENVIRONMENTAL RISK ASSESSMENT

Risk is assessed in accordance with the CS Energy Enterprise Risk Management Framework [B/D/13/17881 - Risk Matrix (CS-RISK-01 / CS-RISK-03) - Risk Management Framework], as follows:

Level of risk calculator		1. Minor	2. Low	3. Medium	4. Major	5. Severe	6. Catastrophic
Likelihood scale	Almost certain One (1) year The event and recorded consequence is expected to occur at least once per year. >	1. Low	2. Moderate	3. Significant	4. High	4. High	4. High
	Likely Five (5) years Expected to occur at least once every 5 years or 20% to 50% probability per year.	1. Low	2. Moderate	3. Significant	3. Significant	4. High	4. High
	Possible Twenty five (25) years Expected to occur at least once every 25 years or 4% to < 20% probability per year.	1. Low	1. Low	2. Moderate	3. Significant	3. Significant	4. High
	Unlikely One hundred (100) years Expected to occur at least once every 100 years or 1% to < 4% probability per year.	1. Low	1. Low	1. Low	2. Moderate	3. Significant	3. Significant
	Rare Less frequently than once in one hundred (100) years. Less than 1% probability per year.	1. Low	1. Low	1. Low	1. Low	1. Low	2. Moderate