

CS ENERGY PROCEDURE

GUIDELINES FOR CONTRACTOR ENVIRONMENTAL MANAGEMENT PLANS CS-ENV-08

Responsible Officer: Environmental Specialist
 Responsible Manager: Principal Environmental Specialist
 Responsible Executive: Executive General Manager Plant Operations

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CONTENTS

1	INTRODUCTION	3
2	SCOPE AND PURPOSE.....	3
3	CONTRACT MANAGEMENT PROCESS AND EMP	3
3.1	Stage 1: Define the Work.....	4
3.2	Stage 2: Commercial Engagement.....	4
3.3	Stage 3: Onboarding	4
3.4	Stage 4: Manage and Monitor Work	4
3.5	Stage 5: Review and close out	5
4	ENVIRONMENTAL MANAGEMENT PLAN (EMP) PREPARATION	5
4.1	Determine Scope of EMP.....	5
4.2	Assess Potential Environmental Impacts.....	5
4.3	Implementation.....	6
4.4	Revision and Update.....	6
5	EMP EVALUATION AND APPROVAL	6
6	ROLE AND RESPONSIBILITIES	7
6.1	CS Energy's Designated Lead	7
6.2	CS Energy's Site Environment and Stakeholder Business Partner	7
6.3	Contractor	7
7	EMP AUDITABLE OUTCOMES	7
8	DEFINITIONS	8
9	REFERENCES	9
10	RECORDS MANAGEMENT	9

1 INTRODUCTION

It is a requirement of CS Energy's Environmental Management System (EMS) that all contractors identify, evaluate and manage environmental risk associated with the supply and use of services and labour. This guideline aligns with [Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management \(09/22\) - CS Energy Registered \(B/D/13/34521\)](#).

The identification, evaluation and management of environmental risks should be considered from the Scope of Works development and implemented during the execution of the works. 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.

2 SCOPE AND PURPOSE

This guideline is applicable to all Contractors and CS Energy personnel tasked with managing contractors performing work on a CS Energy site, including OPEX and CAPEX projects of any size. It also applies to emergency works (see s5.3.1 for special requirements around emergency works). The contractor management process is detailed in [Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management \(09/22\) - CS Energy Registered \(B/D/13/34521\)](#).

The purpose of this procedure is two-fold:

- To guide the review, evaluation, approval and management of an EMP by CS Energy's Site Environment and Stakeholder Business Partner and CS Energy's Principal Representative nominated in the Contract with the Contractor; and
- To guide the preparation of an EMP.

3 CONTRACT MANAGEMENT PROCESS AND EMP

Contractor management at CS Energy helps to achieve business deliverables in a safe, cost effective, timely and environmentally responsible manner utilising external resources. Figure 1 shows how the EMS and the EMP are integrated into the contractor management stages process ([B/D/13/34521](#)).

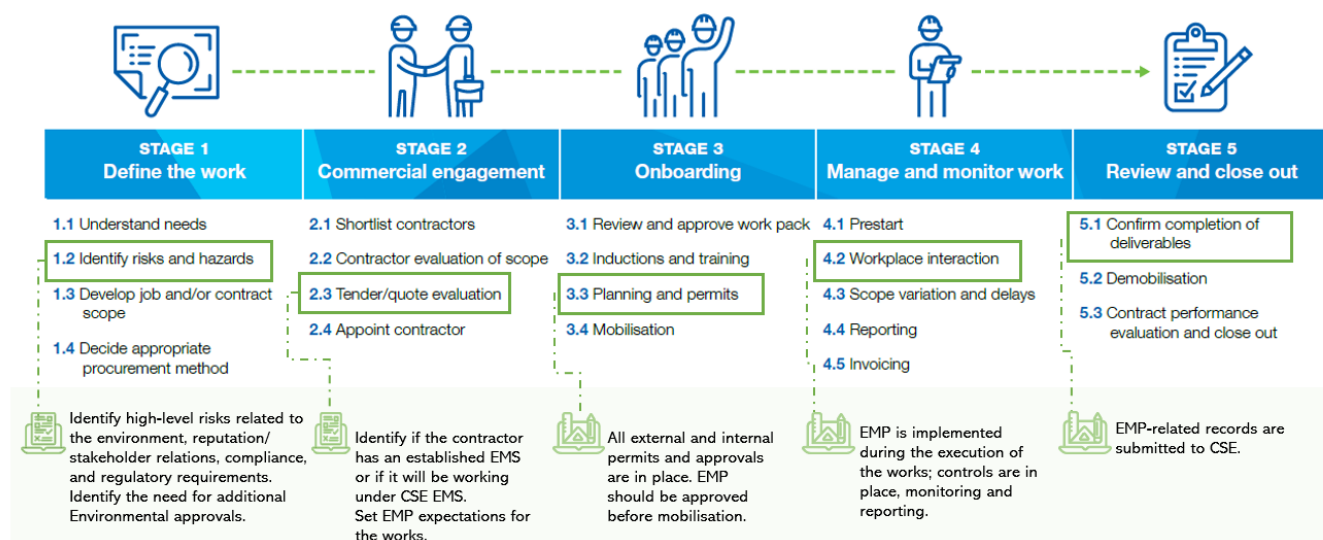


Figure 1. Contractor Management Stages, EMS and EMP integration.

3.1 Stage 1: Define the Work

This stage of the contractor management process involves a high-level identification of risk related to the proposed project scope. The CS Energy Enterprise Risk Management Framework [B/D/13/17881 - Risk Matrix (CS-RISK-01 / CS-RISK-03) - Risk Management Framework] and the CGR Insight system – Risk Assessment Module are tools to identify risk related to environment, reputation/stakeholder and compliance and regulatory requirements during the scope definition stage of any project.

This stage also assesses the need for any additional environmental approvals, agreements, licenses and permits from local Council and/or State Government Departments to allow delivery of the proposed scope of work. Such approvals may be necessary for the handling of regulated wastes, vegetation removal, taking wildlife, ground distribution of herbicides, contaminated land, works in road reserves, operational works and/or Cultural Heritage. Understanding if these additional items will be required assists in defining the scope of work and the associated risk profile to be considered. If uncertain, it is recommended that advice is sought from CS Energy's Site Environment and Stakeholder Business Partner. The Site Environment and Stakeholder Business Partner will seek further advice if necessary.

3.2 Stage 2: Commercial Engagement

During commercial engagement, it is important to evaluate the Contractor's EMS and its capability to fulfil all internal and external requirements, approvals and licence conditions.

Based on the established level of risk of the works or project and the type of commercial agreement, the Environment and Stakeholder Business Partner or Environment Specialist will determine:

- if the completion and successful implementation of a Job Safety Environmental Analysis (JSEA) is sufficient to meet the Contractor's environmental management requirements,
- if the Contractor should formulate an EMP in addition to task-specific JSEAs; and
- if alignment between CS Energy's expectations and the Contractor's EMP is required. IN this instance, CS Energy will work with the Contractor to ensure the Contractor can provide a project-specific EMP as soon as possible after the contract has been awarded (and prior to mobilisation). Where a project-specific EMP is to be prepared, it will be consistent with the CS Energy ISO 14001 EMS and will meet the relevant requirements of the *Environmental Protection Act 1994* and the *Planning Act 2016*. The purpose of the EMP for the project is to provide the framework for the contractor to:
 - be specific for the work to be undertaken for CS Energy;
 - achieve the implementation of the appropriate environmental practices to minimise the risk of environmental harm or nuisance;
 - ensure compliance with environmental legislation and CS Energy's licences and permits; and
 - outline environmental objectives and detail key performance indicators.

3.3 Stage 3: Onboarding

The Contractor will issue to CS Energy a project-specific EMP that will be reviewed by the Environment and Stakeholder Business Partner before mobilisation and approved by the CS Energy Representative.

3.4 Stage 4: Manage and Monitor Work

During delivery of the scope of work, there will be interactions between the Contractor and the CS Energy Representative to ensure compliant implementation of the EMP, as detailed on Section 4.3. As detailed in Section 4.4, the EMP may be reviewed and updated during delivery of the scope of work.

3.5 Stage 5: Review and close out

At completion of the scope of work, the CS Energy Representative will confirm completion of all deliverables.

4 ENVIRONMENTAL MANAGEMENT PLAN (EMP) PREPARATION

4.1 Determine Scope of EMP

The Contractor's EMP scope should detail the work and activities associated with the project. An EMP template is available from CS Energy, however, a Contractor is not obliged to use this template.

It is CS Energy's expectation that an EMP includes, as a minimum:

- Project description;
- Environmental objectives and key performance indicators;
- 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 site-specific controls;
- Approval and licensing requirements;
- Schedule of environmentally significant works;
- Environmental monitoring requirements;
- Incident management and corrective action procedures;
- EMP reporting process;
- Environmentally relevant document and record management;
- Environmental training required and evidence of this training;
- Change management procedure;
- Complaints handling procedure; and
- Emergency contacts and response.

4.2 Assess Potential Environmental Impacts

When preparing the EMP, the Contractor should consider the potential environmental risks by assessing relevant factors and identifying appropriate controls. Potential risks to consider include (but are not limited to):

- Types and quantities of hydrocarbons and chemicals, equipment and other materials being brought to the 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 potential presence of significant Cultural Heritage in the area, presence of protected vegetation / fauna in the area, the susceptibility of soils to erosion, and the likelihood of exposing contaminated soils;

- Possible non-conformances with site Environmental Authorities, Project approvals (e.g. Development approvals, council permits, etc); and
- Possible breaches of environmental legislation including but not limited to:
 - Environmental Protection Act 1994 and Regulations.
 - Environmental Protection Policies (Air, Water, Noise).
 - Planning Act 2016.
 - Aboriginal Cultural Heritage Act 2003.
 - Local Council planning and environmental laws.

4.3 Implementation

Works cannot commence until the EMP is approved by CS Energy Representative.

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 CS Energy Representatives.

4.4 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.

5 EMP EVALUATION AND APPROVAL

CS Energy will review evaluate, approve and audit the EMP, ensuring that it:

- Applies appropriate environmental management to a project/task;
- Identifies key environmental hazards and appropriate controls to manage these hazards;
- Complies with the site Environmental Authority and relevant environmental legislation, and is consistent with the CS Energy EMS; 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.

6 ROLE AND RESPONSIBILITIES

At commercial engagement, detailed roles and responsibilities will be defined for stakeholders relevant to the delivery of the activity or task. These must be reflected in the EMP.

The roles and their responsibilities will vary depending on the complexity of the activity or task. Typically, the roles and responsibilities described below are relevant to any activity or task completed on a CS Energy site. The roles and responsibilities described here align with [Procedure - CSE - CMP / OPS - CS-CMP-00 - Contractor Management \(09/22\) - CS Energy Registered](#) - Attachment 1 - Detailed Roles And Responsibilities ([B/D/13/34521](#)). The below roles are specific to the EMP.

6.1 CS Energy's Designated Lead

The CS Energy Designated Lead is required to:

- Ensure the EMP is approved prior to work commencing on site.
- Audit EMP compliance, performance and identify opportunities for improvement.

6.2 CS Energy's Site Environment and Stakeholder Business Partner

The CS Energy Site Environment and Stakeholder Business Partner is required to:

- Assess the hazards / risks associated with the work at the planning and scoping stage of the work / contract.
- Establish environmental criteria and evaluate the HSE submission of potential contractors (including pre-qualification requirements).
- Review the Contractor's EMP in the Contractor's work pack.
- Complete periodic reviews of HSE pre-qualification requirements as defined in the vendor management system or where triggered by scope creep, incident, or change in HSE system.
- Notify the CS Energy Principal's Representative that the EMP has been evaluated and requires approval prior to works commencing.

6.3 Contractor

The Contractor is required to:

- Develop the EMP and work with the site Environment and Stakeholder Business Partner 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.

7 EMP AUDITABLE OUTCOMES

The following items are outputs of this procedure:

- Environmental risk assessment;
- Environmental Management Plan (EMP); and
- Evidence of EMP implementation.

8 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.
Site Environment and Stakeholder Business Partner	CS Energy's site environmental resource with regards to the works and a key point of contact for the Contractor.

9 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>Planning Act 2016.</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

10 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.