



**Hutchison Ports Australia**

**2013**

# HSEQ Management System

Shorebird Management Sub-Plan - SICTL

Version 2



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Register of Amendments					
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# Shorebird Management Sub-Plan

## 1 Purpose

This Shorebird Management Sub-Plan (SBMSP) has been created as a means by which Sydney International Container Terminals (SICTL) can comply with the relevant conditions of the Instrument of Development Consent DA-494-11-2003-i listed in Schedule C – Terminal Operations (the Development Consent) and the EIS. The SBMSP is a component of the HSEQ5.1.7 Operational Environmental Management Plan (OEMP) – SICTL and as such is a Tier 3 document within the Hutchison Ports Australia HSEQ Management System.

This sub-plan is an example of the commitment of Hutchison Ports Australia (HPA) to comply with the Development Consent and work with external stakeholders co-operatively to achieve good operational outcomes. The indicative process of how OEMP sub plans control the operations of the SICTL terminal is shown below.

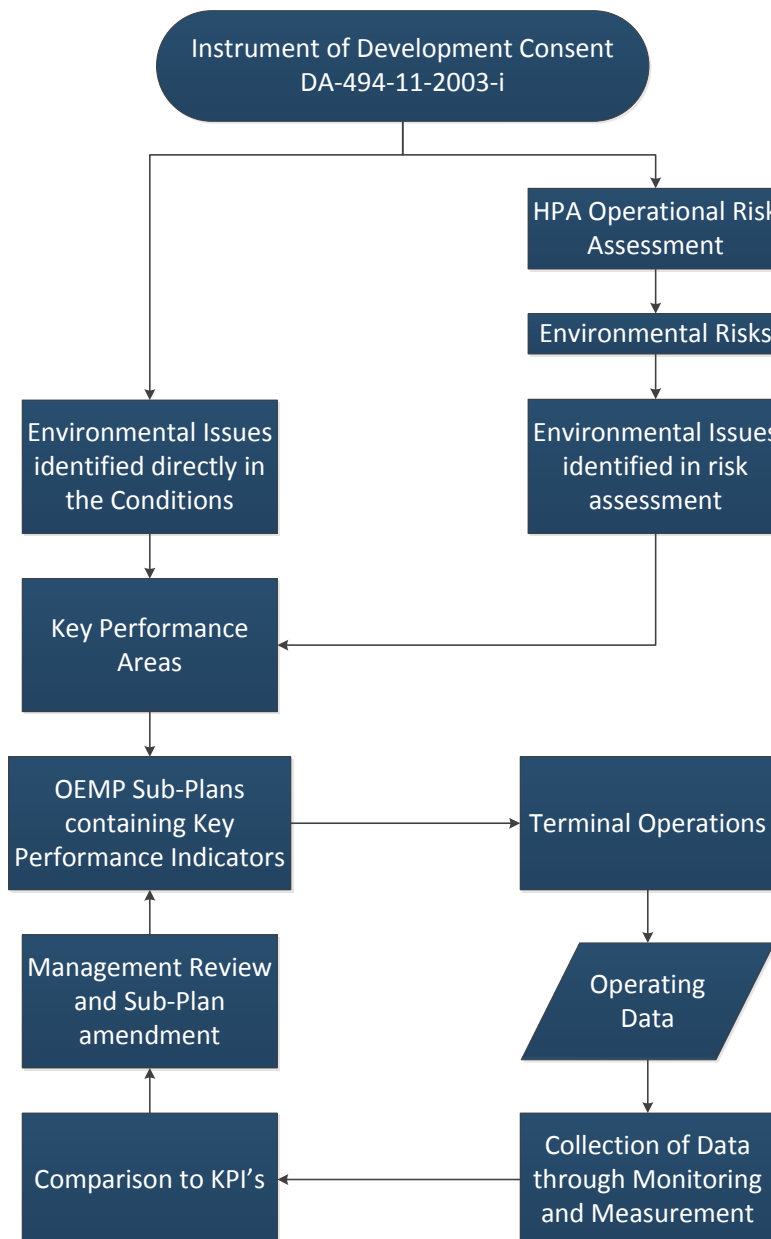


Figure 1 Illustration of how the KPIs and sub-plan control Operations



## 2 Objective of This Sub-Plan

The objective of this sub plan is to guide the direction of SICTL's operations so that operational staff can carry out their duties whilst remaining aware that their work may impact native shorebirds using Penrhyn Estuary. Through this awareness, SICTL can best manage foreseeable impacts successfully. Ultimately, awareness and management of impacts will lead to compliance with the Development Consent. SICTL will utilise this sub-plan in the following ways:

- as a management instrument so that good performance by SICTL and its contractors in the Aviation Operational Impacts Key Performance Area (KPA) can be assured;
- as an instrument that complements HPA's commercial agreements with shipping lines enabling SICTL to support the actions of vessels with the intent of compliance to the Development Consent (where the Development Consent applies to vessels directly);
- as a measure of compliance with the Development Consent in the form of a Key Performance Indicator (KPI) target and a KPI goal;
- as a description of what the KPI actually is and its context for measurement, and
- as a basis for consultation with external stakeholders in regards to managing the effect of SICTL on nearby shorebirds using Penrhyn estuary.

### 2.1 Environmental Issues Overview

The environmental issues that influence the operation of the SICTL terminal are either identified directly in the Development Consent or are the outcomes of an operational risk assessment carried out by Hutchison Ports Australia (HPA). In either case, the environmental issues are what SICTL will manage. The 10 issues identified in section 1.5.1 of the OEMP are:

- environmental management interface with work health and safety;
- training personnel in environmental management;
- quality of stormwater runoff/ separator tank discharges;
- odour and dust management;
- noise and traffic management;
- waste management;
- the handling and transit of chemicals and dangerous goods containers;
- storage of fuels on site;
- impacts on Sydney Airport
- the management of native and feral animals;
- energy usage. and
- community & complaints handling.

Independent issues or related issues may be grouped together and managed under Key Performance Areas.



## 2.2 Key Performance Areas Overview

KPAs are an important concept within environmental management because they describe unique and relevant fields of compliance, i.e. 'areas'. The KPAs identified in section 1.6.3 of the OEMP are:

- air quality;
- aviation operational impacts;
- noise and complaints;
- operational traffic;
- water quality;
- dangerous goods and hazardous substances cargo management;
- waste generation;
- **native and feral animal management**, and
- energy.

## 2.3 OEMP Sub-Plans Overview

The sub plans to the OEMP are the management instrument which will guide SICTL to achieve compliance in the KPAs. The OEMP sub plans identified in sections 1.6.3 and 4.2.1 of the OEMP are:

- the Air Quality Management Sub-Plan;
- the Aviation Operational Impacts Sub- Plan;
- the Bird Hazard Management Sub- Plan;
- the Noise Management Sub- Plan;
- the Operational Traffic Management Sub- Plan;
- the Stormwater Management Sub- Plan;
- the Handling of Dangerous Goods and Hazardous Substances Sub- Plan;
- the Waste Management On-Site Sub- Plan;
- the Water and Wastewater Management Sub- Plan;
- **the Shorebird Management Sub-Plan;**
- the Feral Animal management Sub-Plan, and
- the Energy Management Action Sub-Plan.

## 2.4 Key Performance Indicators Overview

A KPI is an objective and concise measure of one facet of operational performance managed by each sub-plan. By comparing operational data to KPI targets and goals, SICTL can assess its own performance and identify opportunities for improvement. Each OEMP sub-plan has at least one KPI. The context for all KPI's is per Twenty-foot Equivalent Unit (TEU) of throughput. In some instances where the KPI is expected to be low, it is measured for every thousand TEU throughput for convenience. The KPIs managed under this sub-plan are detailed in section 6.



### 3 Legislative Framework

#### 3.1 Applicable Legislation

The legislation that applies to the implementation of this sub-plan is listed below:

- Environment Protection and Biodiversity Conservation Act 1999 (Cth)
- Threatened Species Conservation Act 1995 (NSW)
- National Parks and Wildlife Act 1974 (NSW)
- Environmental Planning and Assessment Act, 1979 (NSW)

#### 3.2 Conditions of Development Consent

The Conditions of Development Consent are listed below and are taken from the Instrument of Development Consent DA-494-11-2003-i (NSW Department of Planning).

Although there are no Schedule C (Terminal Operations) conditions explicitly calling for the preparation of a Shorebird Management Plan, condition A 1.1 in the Development Consent decrees that the requirements of the EIS shall be complied with. The relevant portion of condition A 1.1 has been reproduced below:

Table 1: Conditions of Development Consent

Condition	Minister’s Condition of Approval
A 1.1	<p><b>Scope of Development</b></p> <p>The approved aspects of the development shall be carried out generally in accordance with:</p> <p>a) Development Application DA-494-11-2003-i, lodged with the Department on 26 November 2003.</p> <p>b) <i>Port Botany Expansion: Environmental Impact Statement</i> (ten volumes), prepared by URS Pty Ltd and dated November 2003;</p> <p>(other requirements under A 1.1 are not listed here)</p>

In addition to condition A 1.1, Part 2 of Annexure I in the Agreement for Lease lists the EIS requirements (under the heading Terrestrial Ecology) that SICTL is obliged to comply with. These requirements are listed in section 4.3 of the OEMP with references to this sub-plan.





## 4 Strategic Approach

### 4.1 Risk Identification

The risks identified by the Development Consent to be managed by this sub-plan are:

- the disturbance of shorebirds using Penrhyn Estuary through noise, lighting and flight path barriers, and
- the disturbance of shorebirds using Penrhyn Estuary through proximity to terminal operations and structures.

A detailed risk assessment and evaluation of control measures will be undertaken by SICTL prior to commencement to ensure the risks are controlled to be as low as reasonably practicable. The mitigation measures specified in this sub plan will be updated to correspond with ongoing changes to the Environmental Risk Assessment.

#### 4.1.1 Exclusions to the Scope of this Sub-Plan

Unless noted otherwise, this sub-plan does not cover:

- anything not listed in the Development Consent;
- any activities on board vessels;
- any actions by vessels (movements, noise, emissions etc)
- any pollution originating from vessels;
- refuelling (bunkering) of vessels;
- waste and sullage disposal from vessels;
- any activities in Botany Bay beyond the quay line of the SICTL terminal;
- any activities outside the lease area of the SICTL terminal;
- construction activities of future phases (covered in separate CEMP's), and
- any activities beyond the control or responsibility of HPA.

### 4.2 Potential Environmental impacts

There is the potential for disturbance of shorebirds using Penrhyn Estuary by light and noise impacts from a variety of emitters including:

- aircraft landing at Sydney Airport;
- road traffic travelling along Foreshore Rd;
- recreational boat traffic;
- other stevedore activities
- other Port Botany Lessees, and
- SICTL operations.

The potential impacts arising from SICTL operations have been generally mitigated through the design and arrangement of the terminal and the installation of a 4m high noise abatement barrier (constructed by NSW Ports, not SICTL) along the Northern edge of the new terminal. SICTL's lease area is exclusively on the South side of the noise abatement barrier where all operations will be carried out. Apart from sampling the discharge points originating from SICTL which lead to Penrhyn Estuary (covered under [HSEQ5.1.7f Pollutant Concentration Limits Sub-Plan](#), SICTL will have no other involvement or presence within the Estuary.



### 4.3 Potential Operational Impacts

SICTL anticipates the operation of the SICTL terminal will impact shorebirds using the Penrhyn Estuary in the following ways:

#### 4.3.1 Disturbance of Shorebirds by Light Impacts

Potential sources of disturbance may originate from:

- moving lights such as vehicle headlights from vehicles entering, exiting and moving around the terminal, and
- high mast lighting immediately adjacent to or spilling light into shorebird habitat

#### 4.3.2 Disturbance of Shorebirds by Noise Impacts

Transient loud noise originating from the terminal may frighten shorebirds and discourage the use of the Penrhyn Estuary habitat.

#### 4.3.3 Disturbance of Shorebirds by Flight Path Barriers

Flight barriers to shorebirds may act to confine their movements and stress the animals, flight barriers such as:

- Crane structures and container stacks, and
- terminal buildings.

#### 4.3.4 Disturbance of Shorebirds by Terminal Operations

The movements of terminal mobile plant and trucks close to the Estuary may serve to frighten shorebirds and discourage the use of the Penrhyn Estuary habitat.

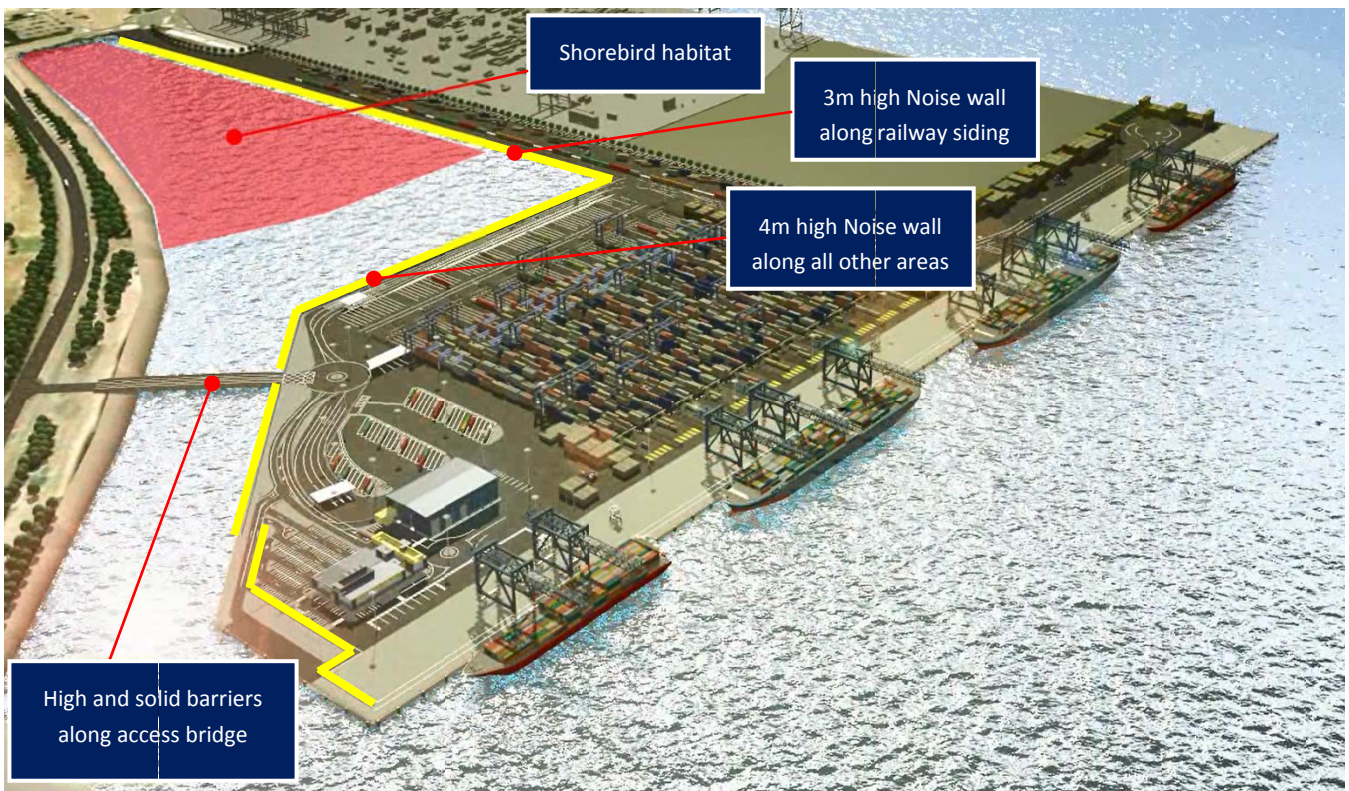
## 5 Implementation of This Sub-Plan

### 5.1 Operational Controls

#### 5.1.1 Noise Wall

The terminal is built with a noise wall along its northern edge as depicted below. The noise wall was designed in accordance with the acoustic modelling detailed in chapter 22 of the Port Botany Expansion Environmental Impact Statement (EIS) and is:

- 3 metres high when parallel to the railway siding, and
- 4 metres high along other areas of the terminal.



[Figure 2](#) Diagram showing the extent of the noise wall.

In accordance with the EIS:

- For the 4 metre high noise wall, the bottom 2 metres is solid (aerated concrete) and the upper 2 metres is translucent panels, and
- For the 3 metre high noise wall, the bottom 2 metres is solid (aerated concrete) and the upper 2 metres is translucent panels.

The noise wall is to work in conjunction with the solid concrete barriers along each side of the access bridge. Owing to this construction, the noise wall and bridge barriers are expected to:

- block light from moving vehicles entering, exiting and moving around the terminal;
- attenuate noise from vehicles and operations within the terminal;
- attenuate noise from trains, shunting and train loading activities;
- block and attenuate the majority of light spill from mast lighting within the terminal



The noise wall is not expected to become a flight path barrier as it is shorter (3m as opposed to 4m) nearest to the shorebird habitat. High mast lighting adjacent to the Penrhyn Estuary may be directed to shine away from the Estuary to further avoid light spill.

### 5.1.2 Controls on Flight Path Barriers

The design layout of the terminal has allowed for adequate set back between structures such as buildings and container stacks from the terminal boundary where it adjoins Penrhyn Estuary. Terminal buildings are a maximum of 3 storeys and are located at the Northwestern corner of the new terminal in accordance with the EIS so as to be less of a flyway barrier to shorebirds than if located closer to the Estuary. Container stacking areas are set back more than 100m from the edge of the Estuary and can only be stacked a maximum of five containers high (one less than the EIS provisions).

### 5.1.3 Controls on Disturbance of Shorebirds by Terminal Operations

A suitable buffer zone between operations areas and the Estuary has been designed into the layout of the terminal so as to separate the two and lessen the shorebird disturbance potential, consistent with the intent of the Penrhyn Estuary Habitat Enhancement Plan and 5 year monitoring program carried out by Sydney Ports Corporation. In the context of this section, terminal operations is defined as activities involving terminal plant. These activities are carried out more than 20 metres from the Estuary. Road access/egress and truck movements are permitted within the 20m buffer zone.

### 5.1.4 Controls on Disturbance of Shorebirds during Maintenance Activities

In conjunction with NSW Ports, SICTL will schedule maintenance activities related to terminal assets in Penrhyn Estuary such as drainage outlets or the noise wall to take place according to shorebird breeding and migratory seasonal habits such as between late March and early August to correspond with the period when most migratory shorebirds are on migration or at their northern hemisphere breeding grounds.

A site inspection will be undertaken by an avian ecologist prior to any maintenance works commencing to check for roosting birds.

### 5.1.5 Direct Management of Shorebirds within the SICTL Terminal

In the event that injured or juvenile shorebirds are found within the terminal alive, SICTL may engage an avian ecologist who can provide advice where required.

## 5.2 Training of personnel

The training of personnel on the requirements of this sub-plan occurs during the general terminal induction where an outline of shorebird management is delivered to all new workers. This training will be completed online prior to the new worker arriving at the terminal.

## 5.3 Monitoring

Routine monitoring of the potential impacts on shorebirds arising from operations at the terminal and the effectiveness of the controls implemented by SICTL is generally carried out by the HSEQ Officer who is supported by the general SICTL workforce. Other sources of monitoring to supplement this resource are SICTL wharf personnel reporting impacts to the HSEQ Officer.

The results of monitoring will be logged and actioned (including implementing light spill mitigation such as shielding or screening or engaging an avian ecologist) by the HSEQ Officer in accordance with this sub-plan.



## 6 Performance Expectations

The singular measure of how well this sub-plan is implemented and the effectiveness of the control measures described in section 5.1 is the number of shorebird management events involving SICTL. This ‘cover-all’ approach is deemed the most suitable for quantifying this Key Performance Indicator (KPI). The KPI is described in the table below.

Table 2: Management of Key Performance Areas

Key Performance Areas	Key Performance Indicators	Goal
Native and Feral Animal management	The number of shorebird management events per 100,000 TEU	Zero per 100,000 TEU

SICTL aims to meet this KPI goal through proactive management of its operations. The goal adopted by SICTL under this sub-plan is for no shorebird management events attributed to the operation of the SICTL Terminal.

### 6.1 Opportunities for Improvement

Under this sub-plan opportunities for improvement will be identified by the HSEQ Officer during general inspections of the terminal and inspections of the implemented controls. Additionally stakeholders can raise issues directly with SICTL where the disturbance or disruption of shorebird movements has been observed or is expected. These will be treated as opportunities for improvement by the HSEQ Officer and rectified within agreed timeframes. All such opportunities for improvement will be reported in accordance with the HSEQ2.2.1 Hazard and Improvement Opportunity Reporting Procedure using the HSEQ2.2.1.1 Hazard and Improvement Report Form and registered on the HSEQ Information Management System.

#### 6.1.1 Management of Complaints or Common Issues involving Neighbouring Stevedores

The SICTL HSEQ Officer or the Environmental and Safety Compliance Engineer will investigate the complaint or the shorebird management issue in accordance with the process outlined in section 4.6.4 of the OEMP. However, in cases where the findings of the investigation (Step 3) prove that the complaint was caused by a combined effect of the actions by SICTL and another Port Botany lessee (for example, activities carried out near the boundary between SICTL and Patricks Stevedores on the Southern end of the Terminal known as ‘The Knuckle’) then SICTL will formally notify the complainant with these findings and interface with the other lessee via the Terminal Manager using the below process:

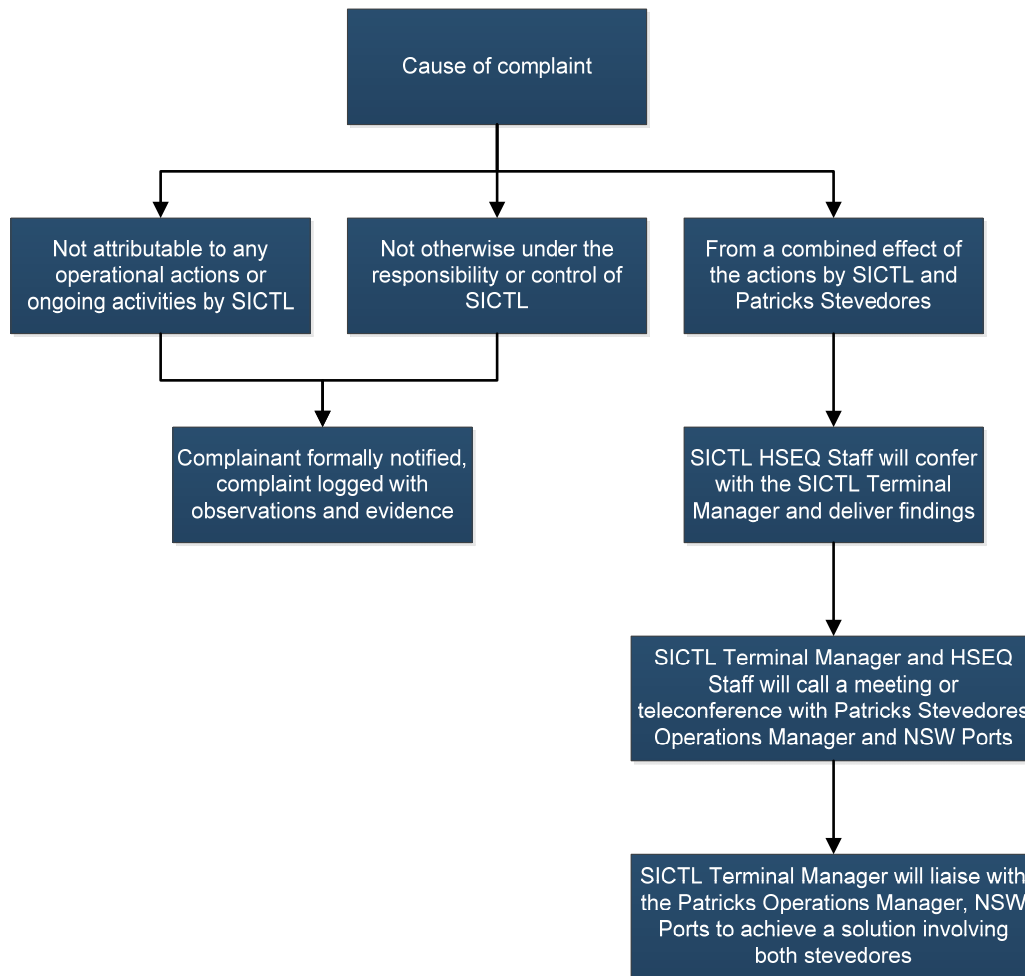


Figure 3 The process of managing complaints involving organisations other than or in addition to SICTL.

SICTL will formally notify the complainant if the findings of the investigation show that SICTL was not responsible. In the event that a shared responsibility exists, SICTL will call a meeting or a teleconference between NSW Ports and Patricks Stevedores where a collaborative solution can be achieved that satisfies the complainant and the operational needs of both stevedores. The SICTL Terminal Manager will be the primary interface with the Operations Manager for Patricks Stevedores in this situation.

## 6.2 Documentation and Record Keeping

The Tier 4 documents that come under this sub-plan are:

- HSEQ2.2.1.1 Hazard and Improvement Report Form;
- the complaints register or the stakeholder management software, and
- the incident register.

These documents will be retained for traceability and will be included in the OCCC quarterly complaints report and the Annual Environmental Management Report (AEMR). They will be completed by the HSEQ Officer and will be uploaded into SICTL’s internal document management system, Sharepoint. In line with HPA’s reporting requirements, the complaints and incidents data will be collated and entered into a database graphing trends over time. Sections of these graphs depicting different time periods will be included in the relevant reports.



### **6.2.1 Reporting Obligations**

The raw data that is captured on the Tier 4 documents will go directly into the AEMR, the actual complaint reports with the times, dates, photos and follow up will go into the AEMR as attachments. A description of the problem and the rectification will be necessary for the AEMR.

The Aviation Operational Impacts KPI will be reviewed monthly by the HSEQ department so that trends and statistics can be included in the 6-monthly internal reports and the AEMR. The source of this information is the complaints register or database software employed by SICTL.



## 7 Responsibility, Accountability and Authority

### 7.1 SICTL as tenant

SICTL retains ultimate responsibility for implementing this sub-plan. SICTL has adopted a shared responsibility approach where all members of the SICTL terminal workforce are expected to meet the requirements of this sub-plan and be aware of the potential effects of their work on Sydney Airport. All staff are made aware of this responsibility during the SICTL induction and in the regular toolbox meetings and prestart talks. The HSEQ team provides the necessary expertise, guidance and support.

#### 7.1.1 HSEQ Officer

The HSEQ Officer is part of the HSEQ Management team and is the primary point of contact at the Terminal who advises the management team and the operations staff about compliance with this sub-plan. Other responsibilities include:

- general surveillance of terminal operations to detect the potential for impacts on Sydney Airport;
- advise on control measures required to minimise the attraction of bird species that pose a risk to aircraft movements, and
- interface with the SACL Airfield Operations Co-ordinator to manage any bird hazards originating from the SICTL terminal which affect Sydney Airport as they arise.

The SICTL Environmental Representative can also undertake these functions.

#### 7.1.2 Environmental and Safety Compliance Engineer

The Environmental and Safety Compliance Engineer is also a part of the HSEQ Management Team who supports the HSEQ Officer by advising on the legislative and Development Consent requirements applicable to operations. Other responsibilities include:

- measuring operational data, assessing trends and facilitating review;
- setting KPI's and generating reports outlined in section 2.2 of the OEMP
- authoring and amending the OEMP and sub-plans, and
- liaising with SICTL management and external stakeholders to determine compliance requirements.

#### 7.1.3 National HSEQ Manager (Environmental Representative)

The National HSEQ Manager is responsible for giving overall guidance to the operational staff, HSEQ Management team and SICTL management on the HSEQ Management System which includes the OEMP and its sub-plans. The National HSEQ Manager is also responsible for ensuring adequate HSEQ resources are available to SICTL. Currently, the National HSEQ Manager is the approved Environmental Representative.

#### 7.1.4 Terminal Manager

The Terminal Manager is the central point of co-ordination between the HSEQ Officer and the general operational staff such as Shift Managers, Plant Operators and shipping lines. The Terminal Manager controls all operations of the SICTL terminal and ensures that the HSEQ resources are being used effectively.

#### 7.1.5 Work Crews and Plant Operators

The SICTL workforce is responsible for understanding the purpose of this sub-plan and the controls specified in it. Working together with the HSEQ Officer, the workforce will implement this sub-plan in their daily work activities.





## 8 Identification of Stakeholders

### 8.1.1 Internal Stakeholders

Internal stakeholders are involved with the operation of the SICTL terminal in some way and have an interest in the successful implementation of the controls listed in section 5.1. Most internal stakeholders are under the direction of Hutchison Ports Australia, a list is given below:

- HPA Corporate;
- HSEQ Department ;
- SICTL Management at the terminal;
- SICTL Maintenance Department;
- Operations Personnel ;
- Contractors, and
- Customers (Shipping Lines).

### 8.1.2 External Stakeholders

External stakeholders are groups or organisations who are affected by or involved with the operation of the SICTL terminal through consultation, communication or approval. Most external stakeholders are government organisations, a list is given below:

- The local community;
- The Operational Community Consultative Committee;
- Randwick City Council;
- Botany Bay City Council;
- NSW Ports;
- Sydney Ports Corporation;
- NSW Roads and Maritime Services;
- NSW Department of Planning and Infrastructure;
- NSW Office of Environment and Heritage/ EPA;
- Sydney Airport Corporation Limited;

## 8.2 Consultation with Stakeholders

### 8.2.1 Ongoing consultation

SICTL will consult with the various stakeholders in different situations where their involvement is appropriate and will cultivate a pro-active and reactive relationship for dealing with complaints. Complaints from stakeholders will be handled in accordance with section 4.6.4 and 4.6.5 of HSEQ5.1.7 Operational Environmental Management Plan.



### 8.2.2 Key Personnel Contact Details – SICTL

Name	Position	Contact number
Toll Free Hotline	SICTL Community Information Line	1800 472 888
George Stinson	HSEQ Officer, SICTL	0448 343 963
John Ieroklis	Environmental and Safety Compliance Engineer	0458 009 650
Trevor Ballantyne	National HSEQ Manager, HPA and Environmental Representative	0420 961 877
Keith Glass	Terminal Manager, SICTL	0477 004 262

## 9 Referenced Documents

- Instrument of Development Consent DA-494-11-2003-i - Schedule C Terminal Operations (NSW Department of Planning)
- Port Botany Expansion Environmental Impact Statement, URS Australia, 2003
- Penrhyn Estuary Habitat Enhancement Plan and five year monitoring program – Sydney Ports
- HSEQ1.1 HSEQ Policy Statement
- HSEQ2.2.1 Hazard and Improvement Opportunity Reporting Procedure
- HSEQ5.1.7 Operational Environmental Management Plan (OEMP) – SICTL
- HSEQ11.4 Compliance Auditing Policy
- HSEQ11.4.1 Compliance Auditing Procedure



## 10 Review and Auditing of this Sub-Plan

The review and amendment of this sub-plan will be in accordance with sections 5.2 and 5.4 of the OEMP which emphasises the Environmental Risk Assessment as the 'driver' of the review process. Drawing upon the Environmental Risk Assessment for guidance on the depth of the review will help SICTL achieve the following:

- fulfilment of SICTL's commitment to continuous improvement as noted in the [HSEQ1.1 HSEQ Policy Statement](#);
- Rectification of operational or system deficiencies identified during workplace inspections through a holistic and thorough approach;
- Transparent and straightforward auditing of HPA's systems and processes;
- changes to operations directed by management upon review of activities, incidents, monitoring data, AEMRs and KPIs can be reflected in this sub-plan, and
- Supporting SICTL and HPA's competitive market position by implementing beneficial industry trends in environmental best practice.

Detailed provisions for auditing SICTL's environmental management system such as audit scope, depth, frequency and distribution of findings are explained in section 5.2 of the OEMP. Auditing of this Sub-Plan shall be in accordance with:

- condition C 4.5 of the Development Consent;
- section 5.2 of the OEMP;
- [HSEQ11.4 Compliance Auditing Policy](#), and
- [HSEQ11.4.1 Compliance Auditing Procedure](#)

This sub-plan will be included in the scope of OEMP Tier 3 audits and all Annual Independent Environmental Audits.