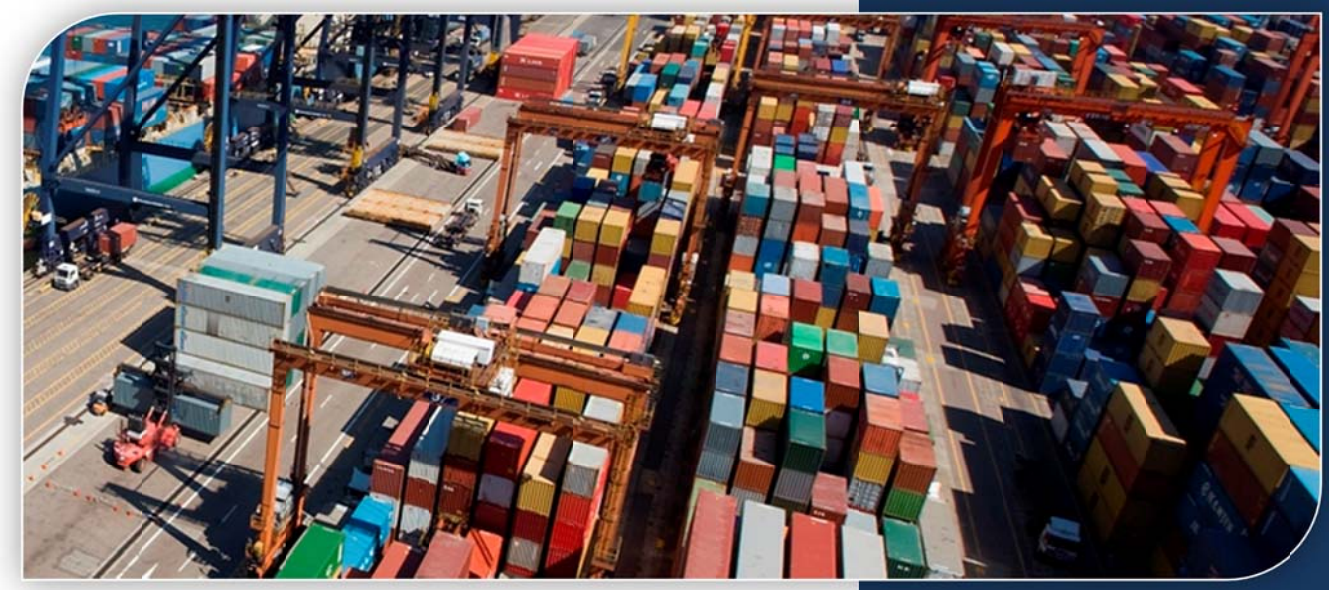
Hutchison Ports Australia

2013

HSEQ Management System

Operational Environmental Management Plan - SICTL

Version 3



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- Records of superseded versions of the document are retained for a minimum of 7 year; and
- Current version of the document is readily available to all Managers, Employees and Key Stakeholders.

Register of Amendments					
Ver No	**Page no**	**Date**	**Description of amendments**	**Prepared by**	**Approved by**
DRAFT 0	All	18 April 2013	Consultation Draft – internal	John Ieroklis	Trevor Ballantyne
DRAFT 1	All	13 May 2013	Consultation Draft – external	John Ieroklis	Trevor Ballantyne
1	All	31 July 2013	External stakeholder consultation comments incorporated	John Ieroklis	Trevor Ballantyne
2	All	3 September 2013	DP&I comments incorporated	John Ieroklis	Trevor Ballantyne
3	8	12 Sept 2013	Section 1.3.1 rewritten and updated, all page numbers changed	John Ieroklis	Trevor Ballantyne

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Operational Environmental Management Plan

1 Overview of Terminal Operations

1.1 Introduction to Port Botany SICTL Terminal and Background to Hutchison Ports Australia

In 2009, Hutchison Port Holdings (HPH), the world's leading port developer, investor and operator signed an agreement with the New South Wales State Government providing HPH with a 30-year lease on 45-hectares of newly reclaimed land in Sydney's Port Botany destined to become Sydney's newest freight terminal. This terminal is the second port infrastructure project in Australia funded by HPH as part of its $700 million investment in Australian Ports. Hutchison Ports Australia (HPA) is the wholly owned subsidiary of HPH and the parent company of Sydney International Container Terminals (SICTL), the entity that will manage the new terminal.

Port Botany is the State's premier port and Australia's second largest international container port. The new terminal is an integral part of the Port's expansion program, which is needed to ensure this major port continues to meet the growing demand for container traffic in the 21st Century. Operations are due to begin in late 2013 and when fully operational will have a total capacity of more than 1 million, Twenty-foot Equivalent Units (TEU) per annum. The terminal will operate four shipping berths with a 1,300 metre quay.

Automated stacking cranes are being introduced into the port for the first time and will be a prominent feature of the new terminal. Use of the cranes provides greater on-site container capacity to manage peak demands, improved security and greater employee safety. Importantly, the terminal will be connected by a dedicated rail freight service to Hutchison Logistics Australia's intermodal terminal at Enfield, 18 kilometres south west of the port. This will greatly reduce the reliance on road transport and help overcome road congestion issues near the port.

Main Features

- 45 hectares reclaimed land;
- 1300 metres of quay line;
- four vessel berths;
- 16.4 metres depth alongside;
- two 750 metres rail sidings, able to expand to 4 railway sidings;
- capacity 1 Million+ TEUs (at full operation);
- seven Post-Panamax Quay Cranes, eleven Automated Stacking Cranes;
- an on-site empty container storage facility.

When fully operational, the new terminal will increase the overall capacity of Port Botany by 50 per cent, providing importers, exporters and shipping lines with more choice and better service in ship-to-shore freight management, thus adding value to the Australian economy.

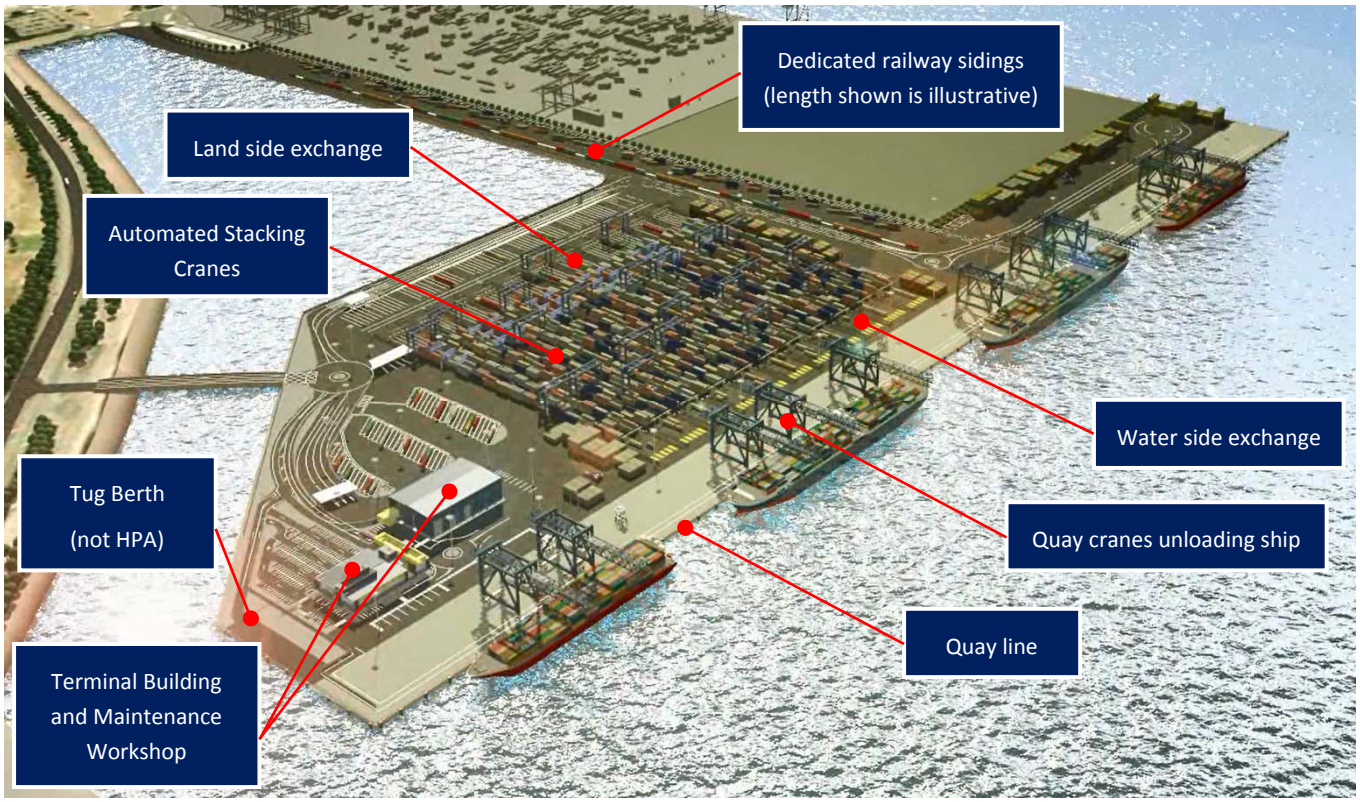

Figure 1 Illustration of the SICTL terminal during operation, looking South East.

1.2 Acronyms and Glossary

Term	Description
AEMR	The Annual Environmental Management Report
Development Consent	Instrument of Development Consent DA-494-11-2003-i.
DG	Dangerous Goods.
DP&I	The NSW Department of Planning and Infrastructure.
EIS	Environmental Impact Statement.
Exchange pad	An area of the terminal where forklifts and reachstackers can manage Out-of-Gauge, Dangerous Goods, non-containerised (break-bulk), rail cargo and empty containers.
HLA	Hutchison Logistics Australia (a sister company to SICTL)
HSEQMS	Health, Safety, Environment and Quality Management System.
NSWP	New South Wales Ports
OCCC	The Operational Community Consultative Committee
OEH	The NSW Office of Environment and Heritage.
OEMP	Operational Environmental Management Plan. A Tier 3 document within the HSEQMS outlining the requirements, methods and goals of environmental management during the operation of the SICTL terminal.
Quay crane (QC)	A crane purpose-built for the loading and unloading of cargo from ships which is mounted on rails on the wharf and can move along the wharf on these rails.
Reachstacker	An item of plant used to pick up and carry containers with its telescopic arm and spreader. Used to handle OOG cargo, rail cargo and any containers not travelling through the ASC area.
RMS	The NSW Roads and Maritime Services.
Shuttle carrier (ShC)	An item of mobile plant used to transport containers from the quay cranes to the ASC stacks or to the exchange pads, capable of stacking containers two-high.
Spreader	A device used by quay cranes, shuttle carriers or reachstackers which enables these machines to lift and carry containers safely.
TEU	Twenty-foot Equivalent Unit, the accepted measure of container throughput and equal to one 20-foot (6.1m) long container. One 40-foot container is equals 2 TEU.

1.3 Operational Overview

1.3.1 Phases of Operational Commencement

The SICTL terminal will become progressively operational over five phases outlined below. The commencement process is volume-driven and will be adjusted to meet operational demands.

Phase 1 – October 2013 to March 2014:

- temporary office sheds established on the North end of the quay until the terminal office building is completed;
- containers stacked on the quay until the Automated Stacking Crane (ASC) stacks are commissioned;
- the maintenance building is due for completion October-November 2013;
- the terminal office building is due for completion March 2014;
- berths 1 and 2 commissioned;
- Quay Cranes (QCs) 1 - 4 installed and commissioned;
- ASC stacks 1 – 3 due for opening in December 2013;
- the first shuttle carriers, reach stackers and small plant delivered.
- the new railway sidings due for completion February 2014;
- freight trains begin service to the SICTL terminal, and

Phase 2 – 2014:

- ASC stacks 4 and 5 opened, and
- additional shuttle carriers delivered.

Phase 3 – 2016 - 2017:

- ASC stacks 6, 7 and 8 opened;
- Quay Crane 5 installed and commissioned;
- additional shuttle carriers delivered, and
- berth 3 commissioned.

Phase 4 – 2018 - 2019:

- ASC stacks 9, 10 and 11 opened;
- Quay Cranes 6 and 7 installed and commissioned, and
- additional shuttle carriers delivered.

Phase 5 – 2021 - 2022:

- ASC stacks 12 and 13 opened;
- Quay Cranes 8, 9 and 10 installed and commissioned;
- additional shuttle carriers delivered, and
- berth 4 commissioned.

1.3.2 Predicted Throughput and Contribution to Port Botany Operations

The SICTL terminal is expected to process approximately 39,000 TEU within the final quarter of 2013 using the first two berths and first four cranes. Over time this will increase as an additional two berths and four cranes are commissioned. When fully operational, the SICTL terminal will handle approximately 1.3 million TEU per annum of the 3.2 million annual TEU predicted to transit through Port Botany.

1.3.3 The Surrounding Environment

SICTL is one of three stevedoring companies to occupy Port Botany, the other two are Patrick Stevedores and DP World who have existing leases at Brotherson Dock. The general area surrounding the SICTL terminal is comprised mainly of industrial and some residential areas within Botany itself. Sydney International Airport is located to the West of the SICTL terminal.

The surrounding natural environment is the Penhryn Estuary and Botany Bay which are sensitive to environmental impacts from Port Botany as a whole.

1.4 Purpose

This Operational Environmental Management Plan (OEMP) has been created as a means by which Sydney International Container Terminals Limited (a subsidiary of Hutchison Ports Australia) can manage the environmental risks associated with operating the new terminal and to comply with the relevant conditions of the Conditions of Development Consent. The Instrument of Development Consent DA-494-11-2003-i, (referred to throughout this document as the Development Consent) sets out the conditions under which the SICTL terminal is permitted to operate and is a major influence on the content of this document and its sub-plans.

This OEMP is an example of the commitment of Hutchison Ports Australia and Sydney International Container Terminals Pty Limited to comply with the Development Consent and manage its environmental risks proactively to achieve good operational outcomes. The documentation comprising the OEMP and the Sub-Plans is outlined in figure 2.

Figure 2 SICTL Environmental Management Documents.

1.5 OEMP Context and Scope

The design of the HSEQ Management System has Eleven (11) Key Elements arranged into four (4) tiers of documentation. Each tier of documentation sets the direction of the level below and provides support to the tier above, they are;

Tier 1 The HSEQ Management Systems Manual
Tier 2 Policies and Framework Documents
Tier 3 Plans, Procedures and Guidelines
Tier 4 Supporting Documentation i.e. forms, checklists, reports

Within this management system architecture, the OEMP belongs within Tier 3.

The Eleven Key Elements of the HSEQ Management System are;

HSEQ1 Leadership, Commitment, Planning and Responsibility
HSEQ2 Risk Management
HSEQ3 Human Resources, Training and Competency
HSEQ4 Engineering Control
HSEQ5 Operational Control
HSEQ6 Asset Management
HSEQ7 Procurement, Agreements and Contractor Management
HSEQ8 Incident Management and Complaints Handling
HSEQ9 Document and Records Management and Information Technology
HSEQ10 Emergency Management and Security Arrangements
HSEQ11 Monitoring, Review and Improvement

Within these Key Elements, the OEMP belongs to HSEQ5 – Operational Control, whereby all environmental operations of the SICTL terminal will be controlled by this plan so as to comply with the Development Consent.

The scope of this OEMP applies to all of the activities involved in the operation of the SICTL terminal. All Environmental Management Sub-Plans are identified as Tier 3 documents which diversify and strengthen the OEMP by addressing each area of environmental risk separately and specifically.

HPA intends to achieve certification of this Environmental Management System/ OEMP through a formal certification and surveillance audit program undertaken by an independent accredited certification body. The scope of the certification will seek to demonstrate compliance with the requirements of AS/NZS ISO 14001:2004 Environmental management systems – Requirements with guidance for use. HPA aims to achieve this certification by year end 2016.

1.5.1 Actual or Potential Environmental Issues

The Actual and potential environmental issues relevant to the operations of the SICTL terminal have been identified through the analysis of activities to be undertaken at the terminal and are the issues that will be managed by the OEMP sub-plans. Targeted management of these issues by the OEMP sub-plans and controls combined with objective measurement of its effectiveness by the KPI's provides for a closed-loop management and reporting process. This OEMP and its sub-plans seeks to address:

- 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.

1.5.2 Exclusions to the Scope of this OEMP

Unless noted otherwise, this OEMP 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.

1.6 Objectives of this OEMP

This document aims to provide a management framework for HPA and SICTL to control the SICTL terminal operations with regard to the environment, legislative framework and the Conditions of Development Consent. It will achieve this by:

- identifying all statutory obligations that SICTL is required to fulfil in relation to operation of the terminal, including all consents, licences, approvals and consultations;
- describing any relevant staging or phasing of the commencement of operations within the SICTL terminal envelope and any relevant timeframes;
- clearly outlining what aspects of environmental management, monitoring and reporting would be undertaken by SICTL or jointly with other operators within the SICTL terminal area;
- including a description of the roles and responsibilities for all key employees involved in the operation of the SICTL terminal;
- including overall environmental policies and principles to be applied to the operation of the SICTL terminal;
- including specific consideration of measures to address any requirements of the NSW DP&I, NSW OEH, Botany Bay and Randwick City Councils during operation;
- detailing standards and performance measures to be applied to the SICTL terminal and a means by which environmental performance can be periodically reviewed and improved, where appropriate;
- detailing HPA's policy on Environmental Management to ensure that environmental performance goals are met;
- including the Management Plans (sub-plans) relevant to operation, including the environmental monitoring requirements relevant to operation, and
- being made available for public perusal after the approval of the Director General.

1.6.1 Compliance with the Conditions of Development Consent

This OEMP has been created to enable HPA to fulfil Schedule C of the Instrument of Development Consent DA-494-11-2003-i. The Development Consent Pre-Operational Compliance Report – SICTL contains a cross-reference matrix where the conditions in schedule C of the Development Consent are referenced to sections of the environmental management documentation.

1.6.2 Compliance with Legislation

Environmental legislation that is potentially relevant to the operation of the SICTL terminal is listed below and should be consulted regarding the need for additional approvals if the conditions or operations change. Additional legislation is contained in section 3.1 of each sub-plan.

1.6.2.1 Environmental Planning Legislation

Environmental Planning and Assessment Act, 1979
Roads Act, 1993 (NSW)

1.6.2.2 Conservation & Heritage Legislation

Threatened Species Conservation Act, 1995 (NSW)
Water Act, 1912 (NSW)
Environmental Protection & Biodiversity Conservation Act, 1999 (Cth)
National Parks and Wildlife Act, 1974 (NSW)
Water Management Act, 2000 (NSW)

1.6.2.3 Pollution & Waste Management Legislation

Protection of the Environment Operations Act, 1997 (NSW)
Pesticides Act, 1999 (NSW)
Waste Avoidance and Resource Recovery Act, 2001 (NSW)

1.6.2.4 Hazardous Substances

Environmentally Hazardous Chemicals Act, 1985 (NSW)
Work Health and Safety Act 2011 (NSW)

1.6.3 Operational Key Performance Areas and Indicators

Key Performance Areas (KPAs) are an important concept within environmental management because they describe discrete fields of compliance, i.e. 'areas' and can be used to benchmark and compare business activities or business units. KPAs can be viewed as categories where similar environmental issues (identified in the Development Consent or the operational risk assessment) can be grouped. The 7 Key Performance Areas (KPAs): identified for the operation of the SICTL terminal 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.

Each KPA is managed by a relevant sub-plan to this OEMP and is measured by a Key Performance Indicator (KPI). KPIs communicate a concise measurement of compliance to the OEMP and to the conditions of the Development Consent. In order to quantify the KPIs of a particular industry, KPIs are expressed in terms of units of production output. A container terminal's production is measured in the number of containers handled in one year. A universal unit of measurement within the shipping industry that is applied to different sizes of intermodal container is the 'TEU' or Twenty-foot Equivalent Unit – corresponding to one 20-foot (6m) container. This unit (rather than tonnage) is the preferred basis for shipping and logistics calculations and descriptions worldwide because it relates to tangible container 'traffic'. Modern container terminals operating multiple berths commonly handle in excess of one million TEU per annum. For convenience, most of the KPIs adopted under this OEMP are per 100,000 TEU of throughput.

In terms of these environmental KPIs, the throughput TEU is primarily to show the significance of the KPI within an annual operational context and to enable direct comparison to KPI Goals, between reporting periods, between different terminals and dissimilar business units. Additionally, measuring KPIs against throughput gives SICTL the opportunity to integrate environmental obligations with operational and business performance.

Table 1: Management of Key Performance Areas

Key Performance Areas	OEMP Sub-Plan	Key Performance Indicators	KPI Goals
Air Quality	Air Quality Management Sub-Plan	Dust and odour complaints, expressed as the number of **community complaints per 100,000 TEU**	Zero per 100,000 TEU
Aviation Operational Impacts	Aviation Operational Impacts Sub- Plan	Airport-related complaints including light-spill, radar interference; expressed as the number of **aviation complaints per 100,000 TEU**	Zero per 100,000 TEU
	Bird Hazard Management Sub- Plan	The number of times problem birds need to be actively managed at the SICTL terminal, expressed as the number of **bird hazard management events per 100,000 TEU**	Zero per 100,000 TEU
Noise and Complaints	Noise Management Sub- Plan	Noise disturbance, expressed as the number of **community complaints or exceedances of the noise limits specified in Development Consent Condition C 2.6 during monitoring per 100,000 TEU** Note: The noise limits specified in condition C 2.6 of the Development Consent are in section 3.2 of the Noise Management Sub-Plan.	Zero per 100,000 TEU
Operational traffic	Operational Traffic Management Sub- Plan	Traffic noise disturbance and traffic impacts such as congestion or trucks parking in residential streets, expressed as the number of **traffic-related community complaints per 100,000 TEU**	Zero per 100,000 TEU
Water Quality	Stormwater Management Sub- Plan	Number of times the Pollutant Concentration Limit is exceeded, expressed as **pollution events per 100,000 TEU**	Zero per 100,000 TEU
Dangerous Goods and Hazardous Substances Cargo Management	Handling of Dangerous Goods and Hazardous Substances Sub- Plan	Number of liquid spills or gas leaks during the handling of dangerous goods and hazardous substances, expressed as the **number of incidents per 100,000 TEU of Dangerous Goods and Hazardous Substances cargo handled** **Number of exceedances of the DG throughput limits specified in Development Consent Condition C 2.17 per 100,000 TEU of Dangerous**	Zero per 100,000 TEU Zero per 100,000 TEU

Key Performance Areas	OEMP Sub-Plan	Key Performance Indicators	KPI Goals
		Goods and Hazardous Substances cargo handled (Note: The DG throughput limits are those specified in condition C 2.6 of the Development Consent - also in tables 2 and 3 of the Handling of Dangerous Goods and Hazardous Substances Sub-Plan)	
Waste Generation	Waste Management On-Site Sub- Plan	Amount of solid waste generated and the amount of waste recycled expressed as **cubic metres of solid waste generated per TEU*** and **cubic metres of solid waste recycled per TEU***	TBA
		Amount of liquid waste generated and the amount of liquid waste recycled expressed as **litres of liquid waste generated per TEU*** and **litres of liquid waste recycled per TEU***	TBA
	Water and Wastewater Management Sub- Plan	The amount of potable water used per TEU, expressed in **kilolitres per TEU***	TBA
Native and feral animal management	Shorebird management Sub-Plan	The **number of shorebird management events per 100,000 TEU**	Zero per 100,000 TEU
	Feral Animal Management Sub-Plan	The **number of feral animal management events per 100,000 TEU**	Zero per 100,000 TEU
Energy	Energy Management Action Sub-Plan	Fuel consumption expressed in **litres per TEU***	TBA
		Carbon emissions, expressed in **kilograms of CO2 emitted per TEU***	TBA
		Electricity Consumption, expressed in **kilowatt hours per TEU***	TBA

KPIs marked with an asterisk * denote annual KPI goals set once operational data becomes available. HPA anticipates at least 12 months of operational data will be necessary to establish trends and quantify these goals (refer to relevant Sub-Plans for details).

1.7 The Hutchison Ports Australia Environment and Community Policy

Health Safety Environment and Quality Management System

Hutchison Ports Australia

HEALTH, SAFETY ENVIRONMENT AND QUALITY POLICY STATEMENT

Hutchison Ports Australia Pty Ltd (HPA) is committed to providing a workplace that is healthy, safe and environmentally sustainable, whilst delivering efficient and effective services to our customers. This commitment is embraced in our company core values and beliefs:

- Protecting the safety and wellbeing of every team member, contractor and site visitor is a fundamental tenet of the way we do business. We strive to foster a culture of safety, resilience and high reliability that focuses on the prevention of accidents, injuries and illness;
- The environment is important to us and the community within which we operate. We recognise our responsibility for limiting the environmental impact of our operation and undertake to promote initiatives that support greater environmental protection and preservation; and
- We value our customers and we are committed to providing a high value, efficient and effective service to satisfy their needs. We will continuously look to improve our operating and maintenance standards through methods of monitoring, measurement and review to ensure that we meet or exceed customers' expectations.

HPA expects an absolute commitment from everyone involved in our business activities to take responsibility and be accountable for ensuring compliance with this policy, our HSEQ Management Systems and applicable legislation.

The ultimate responsibility lies with the Chief Executive Officer who will ensure the organisation is resourced to enable implementation and continual improvement of the HSEQ Management System.

Through the application of HSEQ Management System, HPA will strive to consistently meet stakeholder expectation and deliver on our key commitments to:

- Continually pursue the goal of zero harm to people, assets and the environment ;
- Continuously improve our environmental footprint encompassing sustainable values, principles and practices, working towards an environmentally sustainable future;
- Eliminate hazards wherever possible, and where this cannot be achieved, manage risks at a level that is as low as reasonably practicable;
- Ensuring HSEQ is integral throughout the planning, design, construction, operation, maintenance and disposal of our assets;
- Compliance with applicable legislation, guidelines, codes, standards and relevant operational approval conditions and requirements;
- Providing information, instruction and training that is relevant to our team; and
- Communicate and consult with stakeholders to assist us to improve our business.

The Management Team will continuously promote and reinforce this commitment by being an exemplary role model and by assuring this policy is regularly reviewed, published and communicated.

Dr. Stephen Gumley
Chief Executive Officer

24 JAN 2013

SICTL BCT

Document Reference: HSEQ5.1.1 Document Title: HSEQ Policy Statement Version: 01

HSEQ Policy Statement

2 Environmental Management Governance

Section 1.6 of the HSEQ1.5.1 HSEQ Management Plan explains the basis for separate Operational Environmental Management Plans and their integration into the overall HSEQ Management System. Individual Operational Environmental Management Plans have been developed for each of HPA's operational sites as "sub" plans to the HSEQ1.5.1 HSEQ Management Plan. This OEMP is relevant to the SICTL terminal at Port Botany only. Additional OEMPs within the HSEQ System are:

- HSEQ5.1.6 Operational Environmental Management Plan – Brisbane Container Terminals
- HSEQ5.1.8 Operational Environmental Management Plan – Hutchison Logistics Australia

2.1 Responsibilities, Accountabilities and Authorities

2.1.1 Organisational Chart, HPA and SICTL

The HPA and SICTL organisational chart on the following page illustrates the structure and relationships between HPA and SICTL staff. Positions coloured green are directly involved with the implementation of the OEMP. Other positions within HPA will provide support to the SICTL operational team to achieve effective implementation of the OEMP and compliance with the Development Consent.

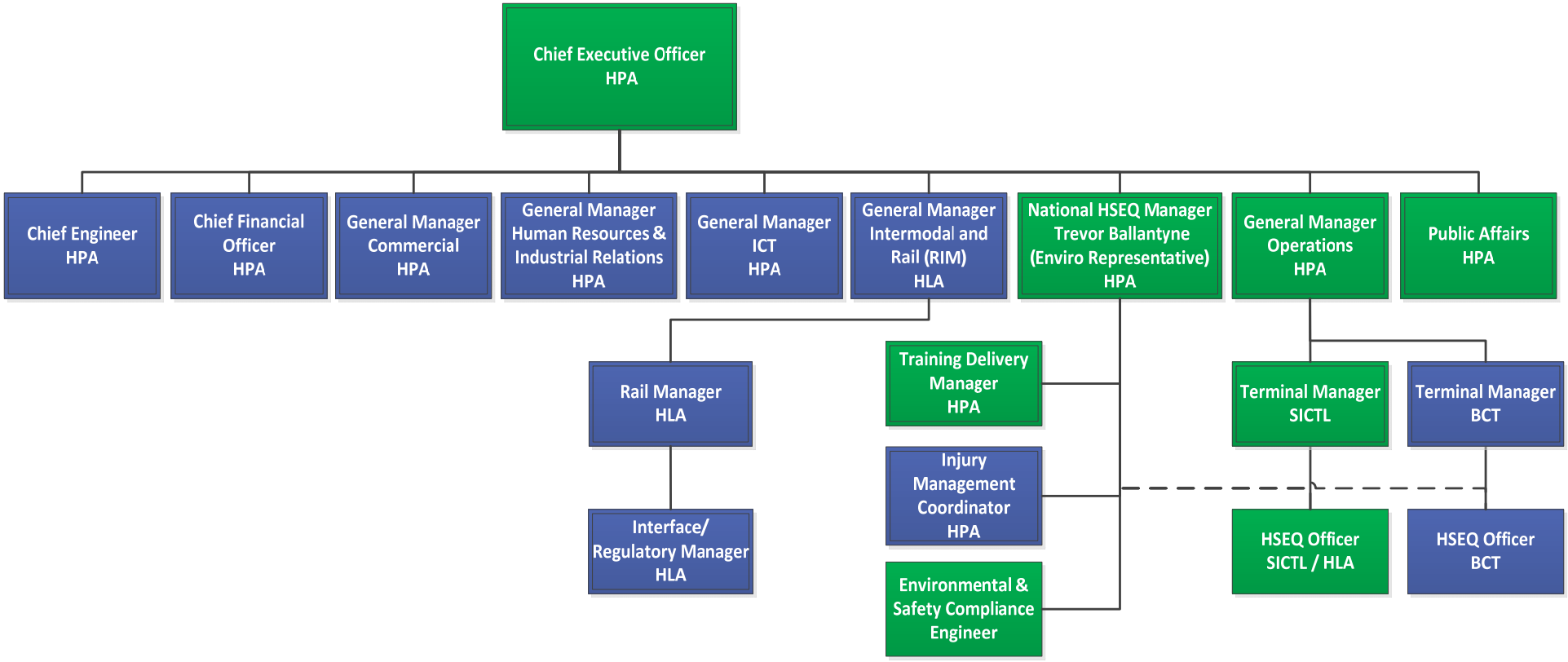

Figure 3 Illustration of the HPA Corporate Management Structure

2.1.2 Key Personnel Responsibilities

The successful implementation of and compliance with this OEMP is reliant on clearly defined responsibilities, accountabilities and authorities. This system of delegation ensures the objectives of this OEMP are achieved through a collaborative approach.

This section details the responsibilities, accountabilities and authorities of the operational management team. Additional information on the specific risk management responsibilities relevant to each position can be found in the documents HSEQ1.3 Management Responsibility and Accountability Policy and HSEQ1.2 Management Commitment Policy.

2.1.2.1 Chief Executive Officer, HPA

The Chief Executive Officer for Hutchison Ports Australia is responsible for the following:

- provide overall direction on HPA's policies to achieve compliance with the Development Consent;
- liaison with the National HSEQ Manager and Terminal Manager on environmental matters as required, and
- six-monthly and yearly review of all operating environmental data, improvement opportunities and subsequent remedial action and the corrective and preventative actions.

2.1.2.2 National HSEQ Manager (Environmental Representative)

This role is the nominated Environmental Representative as required under Schedule C of the Development Consent.

The National HSEQ Manager for Hutchison Ports Australia is responsible for the following:

Liaison with other members or the HSEQ team on environmental matters as required

- undertaking monthly review of all operating environmental data, improvement opportunities and subsequent remedial action and the corrective and preventative actions;
- providing assistance in the assessment of environmental improvement opportunities, including recommendations for corrective and preventative actions and the review of these actions;
- organising audits and to assist in insuring that any issues found as a result of an audit are dealt with in an appropriate and timely manner;
- acting as a 24-hour EPA contact, and
- attending the Community Consultative Committee Meetings as a representative of HPA.

In the capacity of Environmental Representative, the National HSEQ Manager for Hutchison Ports Australia is responsible for the following:

- to be nominated to and approved by the DP&I in accordance with Schedule C of the Development Consent
- acting as the primary contact point in relation to environmental performance of the terminal operations;
- all Management Plans and Monitoring Programs required under the Development Consent and all other licences and approvals relating to the environmental performance and impacts of the terminal operations;
- considering and advising on matters specified in the Development Consent and all other licenses and approvals relating to the environmental performance and impacts of the terminal operations;

- the management of procedures and practices for receiving and responding to complaints and inquiries in relation to the environmental performance of the terminal operations;
- required to facilitate an induction and training program for relevant persons involved with the terminal operations;
- given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur;
- monitoring deficiencies in environmental control strategies and implementation of controls, Managing their resolution and controlling further work activities until deficiencies are rectified;
- ensuring the implementation of the OEMP on a day to day basis through the direction of Shift Managers and work crews;
- monitor operations against the OEMP to evaluate compliance with the Development Consent, including at a minimum weekly terminal inspections;
- acting as a 24-hour EPA contact;
- maintenance of register of environmental complaints and the subsequent remedial action;
- reporting on environmental incidents, and
- attending the Community Consultative Committee Meetings as a representative of HPA.

2.1.2.3 Environmental and Safety Compliance Engineer

The Environmental and Safety Compliance Engineer for Hutchison Ports Australia is responsible for the following:

- supporting the HSEQ Officer and Terminal Management by advising on the legislative and Development Consent requirements applicable to operations;
- measuring operational data, assessing trends and facilitating review;
- setting KPI's and preparing the reports outlined in this OEMP;
- reporting on improvement opportunities, incidents and subsequent corrective actions;
- providing assistance in the assessment of environmental improvement opportunities, including recommendations for corrective and preventative actions and the review of these actions;
- ensuring the implementation of the OEMP on a day to day basis;
- authoring and amending the OEMP and sub-plans, and
- liaising with SICTL management and external stakeholders to determine compliance requirements.

2.1.2.4 Training Delivery Manager

The Training Delivery Manager for Hutchison Ports Australia is responsible for the following:

- working together with the Environmental Representative to develop appropriate environmental training for operations personnel;
- assisting in the delivery of the environmental awareness training program, if required;
- ensure training/induction of personnel is carried out and that staff operate in an environmentally responsible manner, and
- keeping training records for all personnel having completed the environmental awareness training program and induction.

2.1.2.5 HSEQ Officer

The HSEQ Officer for Sydney International Container Terminals Limited is responsible for the following:

- monitoring daily work routines so that environmental protection requirements are communicated to all personnel and contractors working within the SICTL terminal;
- assist in verification of environmental measures as requested by the Terminal Manager;
- monitoring deficiencies in environmental control strategies and implementation of controls, Managing their resolution and controlling further work activities until deficiencies are rectified;
- report on environmental incidents;
- ensuring the implementation of the OEMP on a day to day basis through the direction of Shift Managers and work crews;
- monitor operations against the OEMP to evaluate compliance with the Development Consent, including at a minimum weekly terminal inspections;
- acting as a 24-hour EPA contact;
- maintenance of register of environmental complaints and the subsequent remedial action;
- the authority to stop work processes to prevent environmental non-conformances from occurring;
- report on environmental incidents;
- ensure work instructions reflect the requirements of the OEMP and Sub-Plans, and
- toolbox environmental issues to personnel under their supervision.

2.1.2.6 Public Affairs

The Public Affairs Manager for Hutchison Ports Australia is responsible for the following:

- guide and assist the operational team on the use of HSEQ1.7 Media Community and Government Relations Policy;
- working with the NHSEQ Manager and the Terminal manager for the management of community issues involving any media or public interface, and
- assisting the operational team in matters of community consultation and engagement, as required.

2.1.2.7 General Manager, Operations

The General Manager, Operations for Hutchison Ports Australia is responsible for the following:

- liaison with the National HSEQ Manager and Terminal Manager on environmental matters as required;
- six-monthly and yearly review of all operating environmental data, improvement opportunities and subsequent remedial action and the corrective and preventative actions;
- promoting HPA's policies and be responsible for their implementation;
- ensuring that the operational team understands and implements the requirements of the OEMP during operations;
- the authority to stop work processes to prevent environmental non-conformances from occurring;
- ensuring the provision of adequate environmental training to all staff, subcontractors and visitors to the site;
- monitoring operations against the OEMP to evaluate compliance with the Development Consent, and
- ensuring all incidents are reported to HPA, DP&I and EPA, and terminal documentation is maintained in accordance with the OEMP.

2.1.2.8 Terminal Manager

The Terminal Manager for Sydney International Container Terminals Limited is responsible for the following:

- promoting HPA's policies and be responsible for their implementation;
- ensuring that the operational team understands and implements the requirements of the OEMP during operations;
- the authority to stop work processes to prevent environmental non-conformances from occurring;
- ensuring the provision of adequate environmental training to all staff, subcontractors and visitors to the site;
- monitoring operations against the OEMP to evaluate compliance with the Development Consent;
- acting as a 24-hour EPA contact, and
- ensuring all incidents are reported to HPA, DP&I and EPA, and terminal documentation is maintained in accordance with the OEMP.

2.1.3 Key Personnel Contact Details

The contact details for the key personnel described under section 2.1 of this OEMP can be found in the document HSEQ5.1.7.1 OEMP Personnel Contact Details (a Tier 4 document).

2.1.4 Consultation and Communication

Communication between the different personnel responsible for implementing the OEMP is the key to achieving good environmental outcomes and compliance in all areas of operations. Figure 2 (in section 2.1.1) shows the different delegation paths and reporting relationships that exist within the operational team. It is through these paths that communication and consultation is most effective.

In addition, the HSEQ3.20 Workplace Consultation and Communication Policy and the HSEQ3.20.1 Workplace Consultation and Communication Procedure will guide consultation with the workforce on environmental issues within the site inductions, toolbox talks, prestart meetings, environmental awareness training and risk assessment activities.

2.2 Reporting and Records

During the operation of the SICTL terminal, it is necessary to record and communicate key data to various stakeholders at various time intervals through the year. The following table summarises the different types of environmental reporting.

Table 2: Summary of reporting obligations

Frequency	Reporting	Recipient
As directed by DP&I	An Update Report detailing compliance with all or any part of the conditions of consent.	DP&I, NSW Ports
Within 14 days of an OCCC Meeting	The minutes of the Community Consultative Committee meeting.	HPA/ NSW Ports website
Within 1 month of an OCCC Meeting	The minutes of the Community Consultative Committee meeting and any responses to the Committee's recommendations	DP&I, NSW Ports
Immediately upon becoming aware of an incident.	Verbal notification of a pollution incident where material harm to the environment is caused or threatened.	EPA NSW Ports (within 2 hours) SPC (where relevant)
Within 12 hours of becoming aware of an incident.	Notification of an incident with actual or potential significant off-site impacts on people or the biophysical environment.	DP&I
Within 24 hours of any environmental of pollution incident.	Full written details of the environmental or pollution incident.	NSW Ports
Within 7 days of the date on which an incident occurred.	Full written details of the incident with actual or potential significant off-site impacts on people or the biophysical environment.	DP&I, EPA
Upon receiving a complaint.	Provide initial feedback and acknowledgement: • immediately for complaints lodged by phone or in person; • within 24 hours for complaints received by other means.	Complainant
Within 2 hours of receiving a complaint.	Verbal notification that a complaint has been lodged with SICTL about any environmental issue, including pollution.	NSW Ports

Frequency	Reporting	Recipient
Within 12 hours of receiving a complaint.	A written report detailing the complaint and action taken to alleviate or rectify the problem and the timing of such actions.	NSW Ports
Monthly	Operational data from KPA's for the month collected and reviewed by HSEQ department, data compared with KPI's.	HSEQ department
3-monthly	Quarterly Complaints Report outlining details of complaints received.	DP&I, OCCC, NSW Ports and OEH (if required)
6-monthly	Operational data from KPA's for previous 6 months collated and KPI's generated.	HPA, OCCC, NSW Ports and HPA website
Yearly	Annual Environmental Management Report (AEMR).	HPA, DP&I, OCCC, NSW Ports, OEH (if required), HPA website/ NSWP website for public perusal
Yearly	Annual Return Documents	EPA, NSW Ports
Within 14 days of receiving monitoring results	Monitoring results (if required under an EPL)	HPA website/ NSWP website for public perusal
Each Environmental Audit	Audit report (First environmental audit to be carried out within 12 months of commencement and then as per the schedule in section 5.2.5)	HPA, OCCC, NSW Ports, HPA website/ NSWP website

2.2.1 Corporate Reporting

The environmental performance data collected each month will be reviewed by the HPA HSEQ department for any non-compliance or concerning trends. Operational-level improvements can be recommended, developed, implemented and evaluated using this data.

Every six months the monthly data will be reviewed by the HPA executive management team so that key decision makers are aware of the environmental performance of the SICTL terminal over an appropriate time period. Trends in the monthly data over time can be understood and appreciated. This review will also provide opportunities for management to identify strategic-level improvements to HPA's business.

An Annual Environmental Management Report (AEMR) will be created every twelve months of operation for review by the executive management team and for submission to DP&I in compliance with the Development Consent. The AEMR will be made available to the public through the HPA and/ or NSWP websites and will deliver commentary on the environmental performance of the SICTL terminal during the previous twelve months of operation.

2.2.2 Collection of Operational Data

Information collected each month for inclusion into the AEMR will include:

- a general overview of Terminal operations including;
    - recorded TEU throughput;
    - the number of vessels loaded/ unloaded;
    - the proportions of cargo moved by rail or road;
    - the hourly and daily numbers of trucks serviced:
    - the proportion of total throughput that was DG cargo handled by SICTL expressed as TEU;
    - the proportions of different classes of DG cargo handled by SICTL and the breakdown in tonnages, TEU and package sizes for the previous five years;
    - the status and numbers of operational plant in service;
        - the number of quay cranes operating;
        - the number of ASCs operating;
        - the number of shuttle carriers operating;
        - the number of reachstackers operating;
        - the number of forklifts operating;
    - the number of trucks loaded/ unloaded;
    - the number of freight trains loaded/ unloaded;
- results of any air monitoring;
- reports and results from any noise monitoring;
- any general enquiries/ complaints/ comments received from the public;
- any complaints received from SACL;
- the environmental Key Performance Indicators;
    - any dust or odour related complaints, expressed as the number of community complaints per 100,000 TEU;
    - any airport-related complaints including light-spill, expressed as the number of aviation complaints per 100,000 TEU;
    - the number of times problem birds need to be actively managed at the SICTL terminal, expressed as the number of bird hazard management events per 100,000 TEU;

- any noise disturbance, expressed as the number of community complaints or exceedances of the noise limits specified in Development Consent condition C 2.6 during monitoring per 100,000 TEU (Note: The noise limits specified in condition C 2.6 of the Development Consent are in section 3.2 of the Noise Management Sub-Plan);
- traffic noise disturbance and traffic impacts such as congestion or trucks parking in residential streets, expressed as the number of traffic-related community complaints per 100,000 TEU;
- the number of times the Pollutant Concentration Limit is exceeded, expressed as pollution events per 100,000 TEU;
- the number of liquid spills or gas leaks during the handling of dangerous goods and hazardous substances, expressed as the number of incidents per 100,000 TEU of Dangerous Goods and Hazardous Substances cargo handled;
- the number of exceedances of the DG throughput limits specified in Development Consent Condition C 2.17 per 100,000 TEU of Dangerous Goods and Hazardous Substances cargo handled (Note: The DG throughput limits are those specified in condition C 2.6 of the Development Consent - also in tables 2 and 3 of the Handling of Dangerous Goods and Hazardous Substances Sub-Plan)
- the amount of solid waste generated and the amount of this waste recycled expressed as cubic metres of solid waste generated per TEU and cubic metres of solid waste recycled per TEU;
- the amount of liquid waste generated and the amount of this waste recycled expressed as litres of liquid waste generated per TEU and litres of liquid waste recycled per TEU;
- the amount of potable water used per TEU, expressed in kilolitres per TEU;
- the number of times a shorebird has had to be managed, expressed in the number of shorebird management events per 100,000 TEU;
- The number of times a feral animal has had to be managed within the SICTL terminal per 100,000 TEU;
- total fuel consumption expressed in litres per TEU;
- total carbon emissions, expressed in kilograms of CO2 emitted per TEU, and
- total electricity consumption, expressed in kilowatt hours per TEU;

The collected information will be graphed so that trends and proportions can be identified and understood in the appropriate context. Most of the above information can be collected from the Network Control System for the terminal infrastructure and the ‘nGen’ Terminal Operating System for all freight. These two sources of information will be supplemented by other sources including logbooks, utility bills, meter readings, invoices and register entries, a summary of the sources of information is in table 3.

Table 3: Summary of data sources

Key Performance Area	Key Performance Data	Source
All	TEU throughput Numbers of plant, vessels, trains serviced Modal share	'nGen' Terminal Operating System
Air Quality	Air quality complaints	Complaints register or database software
Aviation Operational Impacts	Aviation complaints and bird hazard management events	Complaints register or database software
Noise and Complaints	Noise complaints Exceedances during monitoring	Complaints register or database Software Periodic noise monitoring program
Operational traffic	Truck noise or traffic impacts complaints	Complaints register or database software
Water Quality	Pollution events	Network Control System Incident register
Dangerous Goods and Hazardous Substances Cargo Management	Number of incidents TEU of Dangerous Goods and Hazardous Substances cargo handled	Incident Register 'nGen' Terminal Operating System
Waste Generation	Cubic metres of solid waste generated Cubic metres of solid waste recycled Litres of liquid waste generated Litres of liquid waste recycled	Invoice information
	Kilolitres of potable water used	'WaterUP' Water management system Utility Bill
Native and feral animal Management	Number of shorebird management events	Incident Register
	Number of feral animal management events	Incident Register
Energy	Litres of fuel consumed Kilograms of CO_2 emitted Kilowatt hours	Invoice information On-site metering Calculated Network Control System/ meters Utility bill

2.2.3 Environmental Protection Licence Annual Return Documents

SICTL will submit the Annual Return Documents to the EPA no later than 60 days after the end of each reporting period. The Annual Return Documents will comprise:

- a statement of compliance, and
- a monitoring and complaints summary.

2.2.4 Conditions of Development Consent Reporting

HPA will prepare and submit an Annual Environmental Management Report (AEMR) to DP&I in compliance with the Development Consent and will:

- detail compliance with the Development Consent;
- contain a copy of the the SICTL terminal complaints register (for the preceding twelve-month period, exclusive of personal details) and details of how these complaints were addressed and resolved;
- include a comparison of the environmental impacts and performance predicted in the EIS and additional information documents provided to DP&I and the Commission of Inquiry;
- detail results of all environmental monitoring required under the Development Consent and other approvals, including interpretations and discussion by a suitably qualified person;
- contain a list of all occasions in the preceding twelve-month period when environmental performance goals have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident;
- be prepared within twelve months of the commencement of operation, and every twelve months thereafter;
- be approved by DP&I each year, and
- be made available for public inspection.

2.2.5 Reporting Improvement Opportunities

Improvement opportunities are identified through observations/ inspections of current operations that can be improved to produce better outcomes, engineering design reviews or as a consequence of non-conformances documented through the HSEQ Management System audit program. All Improvement Opportunities will be recorded on the HSEQ2.2.1.1 Hazard and Improvement Report Form and submitted to HPA.

2.2.6 Internal Classification and Reporting of Incidents

During the operational period of the SICTL terminal, environmental incidents will be identified, categorised, reported and investigated in accordance with HSEQ8.1.2 Incident Investigation Guidelines. Incidents are categorised into three groups based on their severity:

- Category 1 – Low severity, reported using the HSEQ8.1.1.1 Incident Report Form
- Category 2 – Medium severity , reported using the HSEQ8.1.1.1 Incident Report Form and investigated using the HSEQ8.1.1.2 Level 2 Investigation Report
- Category 3 – High severity, reported using the HSEQ8.1.1.1 Incident Report Form and investigated using the HSEQ8.1.1.4 Investigation Terms of Reference Form and the HSEQ8.1.1.3 Level 3 Investigation Report

2.2.6.1 Category 1 – Incident (Low)

An incident which causes either very minor or no environmental or community impact, minor damage or disruption to operations:

- an incident causing minor financial loss (less than $5000);
- an incident resulting in damage to HPA assets (less than $5000) resulting in minor disruption to operations (e.g. period of less than 3 hours);
- an incident resulting in property damage or loss of less than $5,000, and/ or
- an environmental incident such as an Insignificant spill to land that is contained with little or no harm to local environment

2.2.6.2 Category 2 – Incident (Medium)

An incident which causes limited or short lived environmental or community impact, moderate damage or disruption to operations:

- an incident causing moderate financial loss (over $5000 up to $10000);
- an incident resulting in damage to HPA assets (over $5000 up to $10000) resulting in moderate disruption to operations (e.g. period of more than 3 hours);
- an incident resulting in property damage or loss of over $5000 up to $10000;
- any incident involving a third party (contractor, client, customer);
- an environmental incident such as a minor spill to water or moderate spill to land or that is contained with little to medium term harm to local environment, a Tier 3 offence under the POEO Act, and/ or
- a repeated pattern of Category 1 incidents.

2.2.6.3 Category 3 – Incident (High)

An incident which causes serious environmental or community impact.

- an incident where it is a reasonable to anticipate that HPA may be involved in legal proceedings such as a Tier 1 or Tier 2 offence under the POEO Act;
- an incident that is a notifiable incident;
- an incident which requires notification to Regulatory Bodies such as the EPA;
- an incident causing major financial loss (over $10000);
- an incident resulting in damage to HPA assets (over $10000) resulting in major disruption to operations;
- an incident resulting in property damage or loss of over $10000;
- an incident involving third party property damage or loss over $10,000;
- an environmental incident such as a major spill to water or to land or that cannot be contained with HPA assets and could result in medium to long term harm to local environment;
- a repeated pattern of Category 2 incidents, and/ or
- an incident that is likely to attract media attention.

Where an incident is likely to attract media attention or have ramifications for HPA (that may be disproportionate to the actual nature of the incident), then these must be treated as a Category 3 incident. The HPA CEO, the HPA Public Relations Manager and NSW Ports should always be informed of any situations where there may be media interest.

While every endeavour should be made to attend the incident scene as soon as possible in order to commence the investigation (or immediately as in the case of a Category 3 incident), it is understandable that in some circumstances this may not always be practicable.

For this reason the responding manager is to complete a Level 1 Investigation as the initial report to gather evidence and photographs and identify witnesses.

2.2.7 External Reporting of Incidents

HPA is obliged to notify and report incidents occurring or originating within the SICTL Terminal to the appropriate regulatory organisations within the timeframes prescribed in NSW legislation, Lease Conditions and the Development Consent. Unless noted otherwise, incidents that occur beyond the limits of the SICTL Terminal (including on board ships berthed at the SICTL terminal) are outside the scope of the OEMP. HPA's protocol for external notifications is described in the document HSEQ8.1.1 Incident Reporting Notification and Investigation Procedure. The protocol is summarised below.

2.2.7.1 Notification Protocol for Pollution Incidents

In the case of any pollution incidents where material harm to the environment is caused or threatened, formal notification and the order of precedence will follow the below protocol:

1. The HSEQ Officer becomes aware of an actual or potential environmental incident, or;
2. Any SICTL operations personnel become aware, to immediately notify the Yard Leader or Shift Leader who will notify the HSEQ Officer by telephone or UHF radio;
3. The HSEQ Officer will immediately notify the Terminal Manager by telephone or UHF radio;
4. The Terminal Manager will immediately direct the Shift Leader and/ or Yard Leader to mobilise resources to control the incident;
5. The Terminal Manager will confer with the National HSEQ Manager;
6. The Terminal Manager or member of the HSEQ team will notify the EPA immediately by telephone including the following information;
    a. Nature of the incident , origin, cause and the time of occurrence;
    b. Estimated pollution quantity and the nature of the pollutant;
    c. Details of SICTL's response actions and any Fire Brigade HAZMAT involvement;
    d. Verbal notification is to be followed up by a formal notification in writing;
7. The National HSEQ Manager, HSEQ Officer or Environmental & Safety Compliance Engineer will notify:
    a. other state agencies such as NSW Health (Local Public Health Unit), WorkCover, NSW Fire Brigade / HAZMAT, NSW Police Service, Local Council etc;
    b. NSW Ports will be notified within 2 hours of the incident;
    c. Sydney Ports Corporation will be notified if required;
    d. DP&I within 12 hours by telephone including the following information;
        i. Nature of the incident , origin, cause and the time of occurrence;
        ii. Estimated pollution quantity and the nature of the pollutant;
        iii. Details of SICTL's response actions and any Fire Brigade HAZMAT involvement;
        iv. Verbal notification is to be followed up by a formal notification in writing;

2.2.7.2 Reporting Protocol for Pollution Incidents

Following SICTL's verbal then written notification to the EPA, NSW Ports and DP&I, the Terminal Manager, National HSEQ Manager (or delegate) will submit a report containing full written details about the incident to:

- NSW Ports within 24 hours, and
- the EPA and DP&I within seven days of the date of the incident as per the Development Consent.

This will be in the form of a completed HSEQ8.1.1.1 Incident Report Form sent via email. If this is not practical due to factors such as ongoing investigations lasting longer than 24 hours or seven days, HPA will submit preliminary written details within the required time window and follow up with a full report when the investigation is complete. The HSEQ Manager must approve the release of all investigation reports to external organisations.

2.3 Environmental Training

2.3.1 Environmental Training Framework

The training framework that HPA will implement is a role-specific training system. This structure allows for different levels of training to be provided to relevant employees in different roles. The amount of exposure to environmental hazards and the involvement in environmental management is the criteria for selecting the training.

Table 4: Summary of Environmental Training Framework

Environmental Training Module	Relevant Employees
Environmental Training Level 1	All staff as part of the general site induction
Environmental Training Level 2	Wharf-side ground personnel, operators
Environmental Training Level 3	Maintenance personnel and contractors
Environmental Training Level 4	Shift Supervisors and Managers

A risk-based, modular training system affords HPA the flexibility to train targeted personnel exposed to different environmental hazards and levels of accountability. The training will focus on environmental compliance during general operations in accordance with the OEMP and anticipated incidents. HPA's training needs will be analysed by the Training Delivery Manager in consultation with the HSEQ Officer and the National HSEQ Manager in accordance with operational performance and staff turnover. General details on HPA's training systems are available in the documents HSEQ-RTO3.2 Training Delivery Strategy and HSEQ-RTO3.2.2 Training Delivery Plan – SICTL.

2.3.2 SICTL Environmental Training Modules

2.3.2.1 Environmental Training Level 1 (ETL1)

ETL1 is the environmental component of the SICTL terminal General Induction. This induction is compulsory for all personnel working within the SICTL terminal and is completed online prior to commencing work. ETL1 aims to ensure employees are aware of the OEMP and can recognise then communicate environmental incidents to relevant personnel. This training will also include:

- the HPA HSEQ Policy;
- the environmental issues relevant to the SICTL terminal and how they are managed;
- evacuation procedures;
- recognising actual or potential incidents, and
- reporting of incidents to the relevant personnel.

ETL1 is a pre-requisite for ETL2.

2.3.2.2 Environmental Training Level 2 (ETL2)

ETL2 is an intermediate training module primarily for ground-level wharf-side personnel and operators of plant. This training will form a part of the operational induction and includes theory and practical instruction and assessment. ETL2 aims to make relevant employees competent in identifying, reporting and managing environmental incidents such as spills from containers or leaking plant. This training will also include:

- plant refuelling operations;
- incident response;
- spill control, containment and clean up;
- protection of the terminal's drainage systems;
- the use of specialised spill equipment such as the bunded trailer;
- evacuation procedures;
- communication of actual or potential incidents to the relevant personnel, and
- information gathering for notification and future reporting.

ETL2 is a pre-requisite for ETL3.

2.3.2.3 Environmental Training Level 3 (ETL3)

ETL3 is a specialised training module primarily for maintenance personnel, service technicians and contractors. This training will form a part of the operational induction and includes theory and practical instruction and assessment. ETL3 aims to make relevant employees competent in identifying, reporting and managing ongoing environmental issues whilst undertaking workshop or in-situ service activities such as the cleaning of mechanical parts with solvents, servicing, repair, wash-down and refuelling of plant. This training will also include:

- recognising actual or potential issues,
- working within bunded areas;
- using portable spill-prevention devices such as portable spill bunds;
- managing damaged plant which may be leaking;
- chemical storage, and
- waste oil and solvent collection, storage, transfer and disposal.

ETL3 is a pre-requisite for ETL4.

2.3.2.4 Environmental Training Level 4 (ETL4)

ETL4 is an advanced training module primarily for HSEQ Officers, Shift Supervisors and Managers. This training module will be completed and assessed online. ETL4 aims to make relevant employees competent in implementing response plans, co-ordinating resources to manage environmental incidents and notifying HPA Corporate and regulatory authorities. This training will also include:

- co-ordinating and directing resources for incident response;
- determining whether an incident can be managed internally by SICTL or if HAZMAT should be involved;
- involving HAZMAT and other emergency services if required;
- determining whether or not an incident is a notifiable event;
- communication of actual or potential incidents to the relevant personnel and HPA Corporate;
- internal reporting and investigation of incidents and complaints;implementing emergency response plans;
- notifying EPA and DP&I within the specified timeframes if required, and
- external reporting protocols to EPA and DP&I.

2.4 Emergency Controls and Response

The method of emergency control and response is applicable to the types of incidents likely to occur at SICTL. Broadly these have been identified as:

- Pollution incident within the terminal on land;
    - Plant leaking oil or fluids;
    - Containers damaged by plant then leaking fluids or solids;
    - Containers arriving damaged then leaking fluids or solids;
    - Managed substances overwhelming bunding;
- Pollution incident originating from the terminal affecting the water of Botany Bay;
    - Any pollution runoff from within the terminal;
    - Discharges above specified limits, and
    - Any solids or waste originating from the terminal entering the water.

The emergency control and response required to deal with these types of environmental incident will generally be co-ordinated through the Terminal Manager. All responses have the aim of minimising or preventing harm to people and the environment. A full explanation of SICTL emergency controls and responses is provided in the document HSEQ10.1.3 Emergency Response and Incident Management Plan - SICTL.

2.4.1 General Emergency Response Process

The general method for emergency response applies to environmental incidents involving compliance or pollution.

1. **D**anger - Perform a Quick Assessment
2. **R**escue – If safe to do so
3. **A**larm - Alert all Persons in the Immediate Area
4. **C**ontain – If safe and trained to do so
5. **E**vacuate

Protocol for notifying regulatory authorities is to be as described in section 2.2.7 of this OEMP. Refer to the HSEQ10.1.3 Emergency Response and Incident Management Plan - SICTL for further details.

2.4.2 24-hour Contact Personnel

The details for the 24-hour contact personnel that should be called in the event of an emergency or incident can be found in the document HSEQ5.1.7.1 OEMP Personnel Contact Details (a Tier 4 document). This document will also be displayed prominently in strategic places within the SICTL terminal upon commencement.

3 Approval and licensing

The DP&I is the consenting authority responsible for granting approval for SICTL to commence operations at the SICTL terminal. This section deals with the statutory approvals required.

3.1 Conditions of Development Consent

The document Development Consent Pre-Operational Compliance Report – SICTL details how the SICTL Environmental Management System documents comply with the conditions in Schedule C of the Development Consent.

3.2 Licences

SICTL has determined that the operation of the new terminal requires an Environmental Protection Licence under Part 3.2 of the Protection of the Environment Operations Act 1997 for 'General Chemical Storage' (Schedule 1 of the Act). An application to the NSW EPA has been made for an Environmental Protection Licence covering upto 5000kL of General Chemical Storage, the details will be included in this section once granted. The reporting requirements for the Annual Return Documents under the EPL are listed in section 2.2.3.

4 Implementation

4.1 Risk Management Framework

The Risk Management Framework is one of the eleven key elements of the HSEQ Management System, the intent of which is to embed a range of suitable guiding principles and practices that frames the way in which we seek to manage health, safety, environment and quality risks across the organisation, including risk based change management.

Risk management is a continuous, forward-looking process that is an important part of corporate, operational and technical engineering management processes. Risk management should address issues that could endanger achievement of critical objectives. A continuous risk management approach is applied to effectively anticipate and mitigate foreseeable risks that have critical impact on organisational success.

Effective risk management includes early and thorough risk identification through the collaboration and involvement of relevant stakeholders. Strong leadership across all relevant stakeholders is needed to establish a culture for the transparent disclosure and discussion of risk.

The primary document which guides risk analysis and management within HPA is the HSEQ2.1 Risk Management Framework. This is a Tier 2 document administrating risk management for all HPA business areas through the following instruments:

HSEQ2.1.1 Risk Assessment Procedure

HSEQ2.1.1.1 Risk Assessment Matrix

HSEQ2.1.1.2 Risk Assessment Tool

HSEQ2.1.1.3 Task Activity Risk Assessment Form

HSEQ2.1.1.4 Risk Assessment Register

Refer to HSEQ2.1 Risk Management Framework for risk management of environmental matters under this OEMP.

4.2 Management Sub-plans

4.2.1 Implementation through Sub-plans to this OEMP

The actual and potential environmental issues listed in section 4.1 will be managed by the Environmental Management Sub-Plans contained in section 8:

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

Responsibility for the implementation of these OEMP sub-plans is primarily with the Environmental & Safety Compliance Engineer and the the HSEQ Officer. The Environmental Representative is responsible for all management plans and monitoring programs. Other HPA employees will become involved in specific aspects of environmental management, namely those listed in sections 2.1.2, 2.1.3 and 2.3.2.

4.3 EIS Obligations and Additional Conditions (Agreement for Lease Annexure I, Part 2)

The table on the following pages is reproduced from Part 2 of Annexure I of the Agreement for Lease, note all references to SPC or Sydney Ports have been changed to NSW Ports.

Table 5: Compliance to EIS Obligations

Desired outcome	Mitigation Measures	Comments or Reference
General		
Establish environmental management procedures for the protection of the environment.	The Operator must ensure all environmental requirements required by the Approval and the Lease are addressed in the Construction and Operational Environment Management Plans (**EMPs**). The Operator must prepare high standard Construction and Operational EMPs as well as high standard procedures, method statements, inspection and test plans, checklists, monitoring systems, actioning systems and associated systems. The Construction and Operational EMPs must address the issues listed in Part 3 of this Annexure and include the following requirements: • Incident Management & Incident Reporting - NSW Ports must be notified verbally within 2 hours and in writing within 24 hours of any environmental or pollution incidents. • Complaints – NSW Ports must be notified verbally within 2 hours and in writing within 24 hours of receiving a complaint about any environmental issue, including pollution. A written report detailing the complaint and action taken to alleviate or rectify the problem and the timing of such actions is to be provided to NSW Ports. • Records – complete and comprehensive records are to be maintained to demonstrate compliance with the EMP. • Pesticide Use – NSW Ports has a Pesticide Use Notification Plan that is to be complied with together with any other relevant legislation and industry codes of practice in the event that pesticides are used by the Operator. • Reporting – monthly environmental reports are to be provided to NSW Ports during the construction phase. The content of the monthly environmental reports is as per item 6 of Part 3 of this	Refer to Development Consent Pre-Operational Compliance Report – SICTL for evidence of compliance with the Development Consent. Refer to section 4.3 and 4.5 of the OEMP for evidence of compliance with the EIS and the Agreement for Lease. Refer to the Sub-Plans to this OEMP (document numbers HSEQ5.1.7a – l). Refer to HSEQ10.1.3 Emergency Response Plan - SICTL for incident management. Refer to section 2.2, 2.2.7, 2.2.7.1 and 2.2.7.2 of this OEMP for incident reporting and complaints notification. Refer to section 4.6.4 for the complaints process. Refer to section 2.2 and 2.2.2 of this OEMP for information on Reporting and Records. SICTL will ensure contractors using pesticides comply with the NSW Ports Pesticide Use Notification Plan and any other relevant legislation and industry codes of practice. Construction phase reporting is beyond the scope of this document.

Desired outcome	Mitigation Measures	Comments or Reference
	Compliance Schedule. These reports are to be provided by the second Friday of the following month.	
Hydrology and Water Quality		
Minimise impacts on water quality to protect natural ecosystems.	Prepare and implement a Stormwater Management Plan for operations and incorporate into the Operational EMP. Management measures would include: • a first flush system to capture and treat sediment and contaminants from surface water runoff; and • treatment of surface water runoff from potential pollutant areas by a wastewater treatment system. Discharge of the first flush pollutants to sewer.	Refer to section 5.1.3 in HSEQ5.1.7f Stormwater Management Sub-Plan for details on SICTL's stormwater and separator systems.
	Treated first flush stormwater is not to be discharged into Penrhyn Estuary or the flushing channel. Any stormwater discharged into the Estuary must not create erosion of the estuarine / saltmarsh / sand flat habitats.	Discharge points are protected from scouring by rock armouring as per design.
	Monitor water quality from the on-site stormwater management system in accordance with the NSW EPA requirements and the *Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales* (EPA 1998).	Refer to section 5.3 in HSEQ5.1.7f Stormwater Management Sub-Plan for details on SICTL's water quality monitoring regime.
	Inspect the various stormwater devices including, the first flush system at the new terminal, and stormwater management devices along Penrhyn Road, monthly or as recommended by the supplier.	Refer to section 5.1.3 in HSEQ5.1.7f Stormwater Management Sub-Plan for details on SICTL's inspection and cleanout schedule.

Desired outcome	Mitigation Measures	Comments or Reference
Manage risk of water quality impacts from spills.	Ensure construction activities are conducted in a manner that minimises the potential for spills or leaks, including the regular inspection and maintenance of plant and equipment, providing bunding or similar spill containment structures for onsite fuel and oil storage. Contain and clean up any spills or leaks as quickly as possible.	Control of construction activities is beyond the scope of this document.
	Control and manage spills at the new terminal through the first flush system, stormwater lines and by spill response procedures.	Refer to section 5.1.4 in HSEQ5.1.7f Stormwater Management Sub-Plan for details on stormwater drainage on Dangerous Goods storage areas.
	Ensure onsite diesel storage facilities are protected with spill containment structures and warning systems.	Refer to section 5.1.8 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on on-site diesel storage and refuelling bunding systems.

Desired outcome	Mitigation Measures	Comments or Reference
Terrestrial Ecology		
Enhance shorebird habitat at Penrhyn Estuary and minimise disturbance to shorebirds.	Operations are to minimise disturbances (including noise, movement around the terminal and flight path barriers) to shorebirds in Penrhyn Estuary.	The noise barrier constructed by NSW Ports (comprised of a solid lower and translucent upper portion) satisfies this requirement. The height of the noise barrier has been designed to not act as a flight path barrier.
	Impacts of construction activities and operations on shorebirds using Penrhyn Estuary are to be monitored routinely and measures taken to address any potential adverse impacts. Monitoring and response measures are to be incorporated into the Construction and Operation Environmental Management Plans.	Refer to section 5.3 in HSEQ5.1.7j Shorebird Management Sub-Plan
	Screen moving lights such as vehicle headlights so that they do not shine into Penrhyn Estuary, including from vehicles entering, exiting and moving around the terminal. This may be achieved through the use of solid barriers and/or vegetation, subject to advice from an avian ecologist and approval by NSW Ports.	Refer to section 5.1.1 and figure 2 in HSEQ5.1.7j Shorebird Management Sub-Plan for details about the extent of the noise wall.
	Avoid use of high mast lighting immediately adjacent to shorebird habitat. Terminal lighting must not spill into Penrhyn Estuary or the flushing channel.	Refer to section 5.1.1 in HSEQ5.1.7j Shorebird Management Sub-Plan for details about the extent of the noise wall.
	The use of whistles / horns by trains on the rail line south of Botany Road is not permitted, to prevent disturbances to shorebirds in Penrhyn Estuary.	The rail line immediately South of Botany Rd (crossing Penrhyn estuary) as depicted in the EIS does not form part of the final Terminal design and has not been constructed. See figure 1 of this OEMP for the location of the

Desired outcome	Mitigation Measures	Comments or Reference
		rail siding. Refer to section 5.1.5 in HSEQ5.1.7d Noise Management Sub-Plan for details about the use of train horns.
	There is to be a buffer between Penrhyn Estuary and any terminal operations of at least 20m. Road access/egress is permitted within the 20m buffer zone.	Refer to sections 5.1.2 and 5.1.3 in HSEQ5.1.7j Shorebird Management Sub-Plan for details about buffer zones and setback.
	Prepare a shorebird management plan for the protection of shorebirds in Penrhyn Estuary	Refer to HSEQ5.1.7j Shorebird Management Sub-Plan
Minimise "boxing in effect" of shorebirds.	Ensure structures such as buildings and container stacks are set back from the edge of the new terminal where it adjoins Penrhyn Estuary. Terminal buildings are to be a maximum of 3 storeys and located at the north-western corner of the new terminal to be less of a flyway barrier to shorebirds than if located closer to the Estuary. Container stacks are to be set back at least 100m from the edge of the Estuary.	Refer to section 5.1.2 in HSEQ5.1.7j Shorebird Management Sub-Plan for details about buffer zones and setback.
Control of feral animals.	Prepare a Feral Animal Management Plan (FAMP) as part of the Construction and Operational EMP for the Port Botany Expansion. The FAMP would address fencing and the management of garbage and the need for further management actions.	Refer to HSEQ5.1.7k Feral Animal Management Sub-Plan

Desired outcome	Mitigation Measures	Comments or Reference
Traffic and Transportation		
Minimise traffic impacts.	Increase truck utilisation by improving port turnaround time, promoting backloading, and encouraging the use of high productivity vehicles such as B-Doubles.	Refer to sections 4.2 and 5.1.2 in HSEQ5.1.7e Operational Traffic Management Sub-Plan for details on SICTL's involvement in truck operations and the Port Botany Landside Improvement Strategy.
	Spread container traffic evenly throughout the proposed 24-hour operating period.	Refer to section 5.1.2 in HSEQ5.1.7e Operational Traffic Management Sub-Plan for details on operating hours.
	Operate road and rail servicing evenly over the 7-day week.	Refer to section 5.1.2 in HSEQ5.1.7e Operational Traffic Management Sub-Plan for details on operating hours. This condition is satisfied through the Agreement for Lease.
	Check that trucks arriving at the site before it opens are parked in designated holding areas and not on adjacent streets.	Control of construction activities is beyond the scope of this document.
	All truck marshalling/queuing is to occur within the Premises and must not extend outside the Premises.	Refer to section 5.1.2 and figure 5 in HSEQ5.1.7e Operational Traffic Management Sub-Plan for details on the truck marshalling area and internal truck capacity.
Minimise disruption to existing rail services.	Schedule rail construction work around rail operations as necessary to avoid disruption to existing port operations.	Control of construction activities is beyond the scope of this document.
Reporting	Provide to NSW Ports annually, the proportion of cargo transported to/from Port Botany by road and rail and the hourly and daily truck trips	Refer to section 2.2.2 of this OEMP for information on Reporting.

Desired outcome	Mitigation Measures	Comments or Reference
	to Port Botany.	
Air Quality		
Air Quality Management Plan	Prepare an Air Quality Management Plan as part of the Operational EMP to minimise air emissions into the atmosphere and odour impacts.	Refer to HSEQ5.1.7a Air Quality Management Sub-Plan
Noise		
General	Any recommendations made by the Rail Noise Working Group in relation to the design, construction and operation of the Terminal must be implemented as far as practical.	Refer to sections 8.1.2 and 8.2.1 in HSEQ5.1.7d Noise Management Sub-Plan for details on consultation with the Rail Noise Working Group.
Minimise noise impacts.	Erect a 4 m high noise barrier along the northern and eastern boundaries of the new terminal. The upper 2 m of the barrier would be constructed from a translucent material with a printed design to minimise "enclosure" of the Estuary but prevent birds from flying into it. The bottom 2m of the noise wall is to be solid to prevent penetration of light. The design of the noise barrier is to be undertaken with the advice of an avian ecologist and must be approved by NSW Ports.	The noise barrier constructed by NSW Ports (comprised of a solid lower and translucent upper portion) satisfies this requirement. Refer to section 5.1.2 and figure 4 in HSEQ5.1.7d Noise Management Sub-Plan for details about the extent of the noise wall.
	Conduct training to ensure construction workers are aware of noise issues and act to minimise noise where possible.	Control of construction activities is beyond the scope of this document.
	Consider noise emissions during selection of machinery for terminal operations.	Refer to section 5.1.3 in HSEQ5.1.7d Noise Management Sub-Plan for details about the selection of plant.

Desired outcome	Mitigation Measures	Comments or Reference
	Turn off audible safety alarms on terminal equipment, where possible and safe, between 10.00 pm and 6.00 am and replace with visual alarms.	Refer to section 5.1.3 in HSEQ5.1.7d Noise Management Sub-Plan for details about the selection of reversing alarms on plant that minimise noise impacts.
	Conduct operator awareness and training to reduce noise associated with cargo handling.	Refer to sections 5.1.3 and 5.2 in HSEQ5.1.7d Noise Management Sub-Plan for details about training of personnel.
Visual Impact Assessment		
Minimise visual impact.	The urban and landscape design is to comply with the requirements of the NSW Ports Visual Amenity Management Plan (VAMP) (refer Section 4 of the VAMP) and the NSW Ports Exempt & Complying Development Guidelines for Port Botany (dated December 2005 or as amended, augmented or replaced by NSW Ports)	This condition is satisfied through the design of the terminal.
	Container stacking height - Containers are to be stacked no more than six high (18 m) and would typically be three high (9 m).	Containers in the automated stacking area will be stacked no more than five high.
	Terminal Lighting – Lighting is to be focused on the terminal and designed to minimise light spill.	Refer to section 5.1.3 in HSEQ5.1.7b Aviation Operational Impacts Sub-Plan for details on terminal lighting.
	Materials and colours – Select materials and colours for the terminal deck, administration buildings, cranes and other vertically prominent equipment to minimise contrast and reflectivity.	This condition is satisfied through the design of the terminal.
	Planting palettes, signage and fencing are to comply with the requirements of the NSW Ports Exempt & Complying Development Guidelines for Port Botany (dated December 2005 or as amended,	This condition is satisfied through the design of the terminal.

Desired outcome	Mitigation Measures	Comments or Reference
	augmented or replaced by NSW Ports).	
	The Operator is to identify areas of the site to be landscaped, including car park areas and buffer zones.	This condition is satisfied through the design of the terminal.
Preliminary Hazard Analysis		
Reduce hazards and risks to people and the environment.	Handle containers carrying dangerous goods in accordance with the NSW Dangerous Goods (General) Regulations 1999 and Australian Standard 3846 (1998): *The Handling and Transport of Dangerous Goods in Port Areas* and monitor compliance.	The Dangerous Goods (General) Regulations 1999 (NSW) has been superseded by the Work Health and Safety Regulation 2011 (NSW). Refer to sections 3.2, 5, 5.1, 5.1.1 and 5.1.3 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on handling of DG containers.
	Develop an Occupational Health and Safety Plan to address the handling and transport of dangerous goods during the operation of the new terminal and monitor compliance.	Refer to section 11 in HSEQ5.1.1 Safety Critical Operations Procedures Manual
	Implement a notification system for the arrival or delivery of dangerous goods.	Refer to section 5.1.2 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on the Automated Terminal Operating System.
	Apply restrictions on the time dangerous goods are allowed to be held within the port.	This condition is satisfied through SICTL's mandatory compliance with the NSW Ports Dangerous Goods Guidelines. Refer to section 5.1.1 in HSEQ5.1.7g

Desired outcome	Mitigation Measures	Comments or Reference
		Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on general controls on DGs within the terminal.
	Separate various classes of dangerous goods by safe distances on the berth.	This condition is satisfied through SICTL's mandatory compliance with the NSW Ports Dangerous Goods Guidelines. Refer to section 5.1.1 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on controls on DGs within the terminal.
	Minimise risk of dropped containers through appropriate container handling equipment.	Refer to section 5.1.3 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on container top-lift systems.
	Employ suitable container loading/unloading, handling and stacking systems to minimise double handling and attendant risk of damaging containers.	Refer to section 5.1.3 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on controls on damage to containers by SICTL operational plant.
	Ensure the facility is fitted with adequate yard signage and warning systems for mobile equipment.	Refer to HSEQ5.1.1 Safety Critical Operations Procedures Manual
Reporting	Provide annual reports to NSW Ports on dangerous goods throughput including for each Class: tonnages, numbers of TEUs and package sizes.	Refer to section 2.2.2 of this OEMP for information on Reporting.

Desired outcome	Mitigation Measures	Comments or Reference
Bird Hazard		

Minimise attraction of birds species which may pose a risk to aircraft.	Develop a Bird Hazard Management Plan that considers:
	• measures to minimise the attraction of birds, especially high risk species such as Silver Gulls, Australian Pelicans and Australian White Ibises including:
	  • prevention of persistent ponding of water
	  • selection of lighting to minimise insect attraction
	  • minimising bird roosting sites eg. rooves of buildings.
	• use of deterrents to prevent the build up of birds;
	• exclusion of activities that attract birds in certain areas;
	• measures to minimise disturbance of birds at Penrhyn Estuary;
	• education about bird hazards; and
	• monitoring.
		Refer to section 5 in HSEQ5.1.7c Bird Hazard Management Sub-Plan

	Ensure construction areas are drained properly and any depressions retaining freshwater after rainfall are filled and levelled, where possible. Ensure any permanent pools of water have netting over the top.	Control of construction activities is beyond the scope of this document.
	Implement strict litter control in all areas including the use of adequate litter bins, signage and enforcement to ensure that food items or fish remains are not left at the site to attract birds. Litter bins are to be designed to be bird and vermin proof and be emptied on a regular basis.	Refer to section 5.1.1 in HSEQ5.1.7c Bird Hazard Management Sub-Plan for details on controls.

Desired outcome	Mitigation Measures	Comments or Reference
	Prevent the build up of birds in the new terminal through use of appropriate deterrent methods.	Refer to section 5 in HSEQ5.1.7c Bird Hazard Management Sub-Plan
	Monitor all areas of the terminal weekly, including after nightfall, to determine whether birds are attracted to the site to roost. Immediate bird deterrent action is to be implemented if roosting of birds are observed onsite.	Refer to section 5.3 in HSEQ5.1.7c Bird Hazard Management Sub-Plan for details on monitoring.
Education of the public about bird hazard.	Erect signs in at the new terminal to educate people about the problems associated with feeding birds close to the airport as well as ecological issues relating to bird health.	Refer to section 5.1.1 in HSEQ5.1.7c Bird Hazard Management Sub-Plan for details on controls.
	Erect signs to encourage people to place litter in the bins provided or take litter home for disposal.	Refer to section 5.1.1 in HSEQ5.1.7c Bird Hazard Management Sub-Plan for details on controls.
Emergency and Incident Management		
Effective spill containment and management.	Equip the new terminal with emergency response equipment, typically comprising absorbent materials, absorbent pads to block drainage points and protective equipment consisting of gloves, rubber boots, eye protection etc.	Refer to section 5.1.4 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on emergency response equipment.
	Contain oil spills through the new terminals' first flush system and by means of penstocks installed at the ends of stormwater lines. Following containment, the spill would be disposed of in an appropriate manner.	Refer to sections 4.3.4 and 5.1.6 in HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan for details on protection of the stormwater system. Refer to section 5.1.4 in HSEQ5.1.7f Stormwater Management Sub-Plan for

Desired outcome	Mitigation Measures	Comments or Reference
		details on the operation of the WaterUp system.
Water and Wastewater		
Establish management plan to conserve and manage water resources.	Prepare and implement a Water and Wastewater Resource Management Plan. This plan would include water minimisation strategies as well as monitoring and testing schedules for wastewater as required. The Plan is to be consistent with and reflect the requirements and principles of the Green Port Guidelines.	Refer to HSEQ5.1.7i Water & Wastewater Management Sub-Plan Refer to section 4.5 of this OEMP for SICTL's commitment to the Green Port Guidelines.
Reduce and/or reuse water.	Collect treated stormwater in water storage tanks to allow reuse for maintenance, washdown and irrigation purposes.	This condition is satisfied through the design of the terminal buildings.
	Install dual flushing toilets, minimal flow shower heads and regular maintenance to identify leaking or dripping taps and pipes.	Refer to section 5.1.1 in HSEQ5.1.7i Water & Wastewater Management Sub-Plan for details on controls on potable water used at the terminal.
Comply with wastewater disposal requirements and guidelines.	Empty portable toilet facilities on a regular basis by an appropriately licensed waste management contractor.	Control of construction activities is beyond the scope of this document.
	Discharge all sewerage and wastewater (trade waste) to the Sydney Water Corporation sewage system in accordance with a Trade Waste Agreement with Sydney Water Corporation.	Refer to sections 5.1.2 and 5.1.3 in HSEQ5.1.7i Water & Wastewater Management Sub-Plan for details on controls on wastewater at the terminal.

Desired outcome	Mitigation Measures	Comments or Reference
Waste		
Establish management plan for waste.	Develop and implement a Waste Management Plan for the construction and operational phase in accordance with the requirements of the *Waste Avoidance and Resource Recovery Act* 2001, the *Protection of the Environment Operations Act* 1997, the EPA's *Environmental Guidelines: Assessment, Classification & Management of Liquid & Non-Liquid Wastes* (1999), the Botany Bay DCP 29 and the *National Minimisation and Recycling Strategy.* The Plan is to be consistent with and reflect the requirements and principles of the Green Port Guidelines.	Refer to HSEQ5.1.7h Waste Management On Site Sub-Plan Refer to section 4.5 of this OEMP for SICTL's commitment to the Green Port Guidelines.
Implement resource management hierarchy – avoid, recover, dispose of waste.	Minimise construction waste that requires disposal by accurately calculating materials brought to the site and limiting materials packaging.	Control of construction activities is beyond the scope of this document.
	Return excess construction materials which are suitable for reuse to the supplier or store for future use.	Control of construction activities is beyond the scope of this document.
	Store construction wastes which are not suitable for reuse, but are able to be recycled, in dedicated and secure skips prior to recycling.	Control of construction activities is beyond the scope of this document.
	Store, in separate skips, construction wastes which cannot be recycled. The skips would be collected by a licensed waste contractor on a regular basis and transported for disposal to a licensed landfill or recycling facility.	Control of construction activities is beyond the scope of this document.
	Provide recycling facilities to maximise recycling of waste materials such as plastic and glass bottles/containers, aluminium cans and paper/cardboard. Separate bins are to be provided for food waste. All domestic waste is to be collected on a regular basis and transported off site for disposal to a licensed landfill or recycling facility.	Refer to sections 5.1.1 and 5.1.3 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on recycling and separate bins for recyclables.

Desired outcome	Mitigation Measures	Comments or Reference
	Recycle scrap metal, used parts, components and machinery where practicable.	Refer to section 5.1.3 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on recycling of scrap metal, used parts, components and machinery.
Comply with waste disposal requirements and guidelines.	Waste oils and fluids from maintenance activities would be collected and stored and would either be reused on site or removed by a licensed waste contractor.	Refer to section 5.1.3 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on recycling of oils etc
	Dispose quarantine waste in accordance with the requirements of NSW Ports, EPA and AQIS.	Disposal of quarantine waste is beyond the scope of this document.
	Inspect waste receptacles to ensure that they are not being overfilled and are being collected on a regular basis.	Refer to section 5.1.1 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on inspection and collection of bins.
	Inspect the construction site to evaluate the effectiveness of waste storage and collection practices.	Control of construction activities is beyond the scope of this document.
	Inspect any portable toilet facilities to ensure they are being emptied on a regular basis.	Control of construction activities is beyond the scope of this document.
	Monitor waste recycling and disposal procedures to ensure they are being complied with.	Refer to section 5.3 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on monitoring.
	Collect waste receptacles on a regular basis.	Refer to section 5.1.1 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on collection of bins.

Desired outcome	Mitigation Measures	Comments or Reference
	Inspect sites to evaluate the effectiveness of waste storage and collection practices.	Refer to section 5.3 in HSEQ5.1.7h Waste Management On Site Sub-Plan for details on monitoring.
Energy		
Energy conservation.	Develop an Energy Management Action Plan consistent with the energy conservation measures for commercial and industrial buildings as outlined in the City of Botany Bay Energy Efficiency Development Control Plan, July 2000. The Plan is to be consistent with and reflect the requirements and principles of the Green Port Guidelines.	HSEQ5.1.7l Energy Management Sub-Plan will be submitted to NSW Ports prior to commencing operations, this document does not form part of the Development Consent submission.
	Design energy efficient buildings and a terminal layout/facility that aims to achieve: • reduction of heating, cooling and lighting loads; • employing renewable energy sources; specifying efficient heating, ventilation air conditioning and lighting systems; • optimising building performance and system control strategies; • considering the reduction of heating and cooling requirements in design, location and building materials; • designing and configuring lighting for energy efficiency in office and industrial buildings; • maximising the use of solar power for signage, navigation aids and pedestrian lighting; • designing buildings to make best use of natural light and shade; and • designing roads and railway lines on the site to reduce transportation distances.	This condition is satisfied through the design of the terminal buildings.

Desired outcome	Mitigation Measures	Comments or Reference
	Use of energy efficient equipment. This would include: • where able, fitting energy intensive equipment with energy saving devices such as power factor regulators, harmonic filters, voltage regulators, and drive controls; • using energy efficient electrical appliances; • installing lighting control devices where appropriate and linking to photo electric dimming; and • providing sufficient energy metering and switching for energy management.	This condition is satisfied through the selection of the terminal equipment.
	Conserve energy through efficiency in work schedules and practice. This would include: • use of modern container yard management systems for the efficient stacking and retrieval of containers and to minimise ship waiting times; • road and rail transport scheduling to minimise energy use and wastage; • promoting the increase in rail mode share of container freight movement; • setting energy use and reduction targets for site operations; • switching off truck engines while these are waiting to access the site and while these are waiting to be loaded and unloaded; • switch off site office equipment and lights and use optimum lighting intensity for security and safety purposes; • Minimise equipment idle time and double handling of material; • throttling down and switching off idle equipment;	This condition is satisfied through the design of the terminal layout, systems, and selection of equipment, implementation of this OEMP and induction and toolbox talk training of personnel.

Desired outcome	Mitigation Measures	Comments or Reference
	• regular maintenance of all powered equipment to ensure optimum fuel consumption rates; • use energy efficient equipment where practical; • communication and education of energy conservation measures to port users and employees; and • monitoring energy conservation performance.	

4.4 Content of Environmental Management Plans - (Agreement for Lease Annexure I, Part 3)

Table 6: Compliance to Required Content of EMP's

Item	Requirement	Comments or Reference
1.	**INTRODUCTION**	
a.	Description of the construction works / operations, including environmental issues;	Sections 1.1, 1.3.3 and 1.5.1 of this OEMP and sections 4.1 and 4.3 of each sub-plan.
b.	Purpose of the EMP;	Section 1.4 of this OEMP.
c.	Objectives of the EMP	Section 1.6 of this OEMP.
d.	Scope of the EMP; and	Section 1.5 of this OEMP.
e.	EMP consultation process with agencies and approval process.	Sections 3 and 4.6 of this OEMP and sections 8 and 8.2.1 of each sub-plan.
2.	**PLANNING**	
a.	Environmental and legal obligations of the project. Related documentation required in the preparation of the EMP to ensure all environmental obligations are met including: • List of all environmental documents, including safeguards and conditions of approval; • all environmental obligations relevant to the operators Work ; • legislation, licences/permits/approvals and notifications and all associated conditions; • relevant compliance standards, including policies, guidelines, Australian Standards, criteria and other documents; and • those identified in NSW Ports Green Port Guidelines and including a completed checklist.	Sections 1.6.1 and 1.6.2 of this OEMP and section 3.1 of each sub-plan. Section 4.5 of this OEMP contains a completed Green Ports Guidelines Checklist.
b.	Assessment of environmental aspects and impacts and risks for the project, including:	Environmental Aspects and Impacts and Environmental

Item	Requirement	Comments or Reference
	• measures to avoid and/or control the occurrence of environmental impacts; • measures (where practicable and cost effective) to provide positive environmental offsets to unavoidable environmental impacts; and • assessment of all the environmental risks, including a site plan of all environmentally sensitive areas and environmental risk issues.	Risk Assessment will be submitted to NSW Ports prior to commencing operations.
c.	Supplementary Management Plans including: • a list of Sub Management Plans; • referencing and identification of linkages between the EMP and the Sub Management Plans; and • steps to ensure compliance with all Sub Management Plans and associated documents.	Sections 2.1 and 8 of this OEMP. References to sub-plans within text. Section 7 of each sub-plan.

Item	Requirement	Comments or Reference
3.	**IMPLEMENTATION AND OPERATION**	
a.	On-site structure, responsibilities and authorities (for Lessees, Sub Contractors and Service Authorities and owners) including: • EMP supervision and document control; • assignment of responsibility, authority, accountability and reporting for planning, approving, implementing, maintaining, assessment, monitoring, recording and rectification for the EMP, Sub Management Plans and environmental controls; • responsibilities for design that ensure construction and operational impacts are minimised and environmental obligations are met; • the role of the Environmental Manager; and • Quality Plan.	Section 2.1 of this OEMP and section 7 of each sub-plan.
b.	Resources (materials/labour) needed to develop design solution and implement and maintain environmental control measures during all stages of the construction / operation.	Sections 5.1 and 5.2 of each sub-plan.
c.	Environmental control measures and procedures including: i. Environmental control measures; ii. Management Plans, environmental procedures and work method statements or other systems; iii. effective and timely installation of environmental control measures; iv. procedures that ensure environmental control measures meet all project environmental obligations; and v. routine maintenance of controls	Sections 5.1 and 7 of each sub-plan.

Item	Requirement	Comments or Reference
d.	Training, awareness and competence (for Operator and Sub Contractors) including: i. induction training; ii. Environmental awareness training; iii. toolbox training; iv. education and training on the significance of waterways for all staff involved in construction; v. communication and consultation procedures, including community consultation; external stakeholders; and complaints register.	Section 2.3 of this OEMP and section 5.2 of each sub-plan.
e.	Incident and emergency planning, preparedness and response including: vi. a list of the Operator's and subcontractor's key incident and emergency response personnel showing responsibilities and contact details including all-hours telephone numbers: vii. details of emergency services (including ambulance, fire brigade, spill clean-up services); viii. details of containment measures to be taken in the event of emergency situations that may arise during the work under the lease; and ix. procedures to ensure that lessons learnt from incidents are incorporated into the EMP.	Section 2.4 of this OEMP, HSEQ5.1.7.1 OEMP Personnel Contact Details and HSEQ10.1.3 Emergency Response Plan
f.	Records of environmental activities.	Section 5 of each sub-plan.
g.	Document and data control, including: x. general, including preparation, review, approval and distribution; xi. storage and access to all environmental documents, references and plans; and xii. reporting to NSW Ports and relevant Authorities.	Page 2 of this OEMP and each sub-plan. OEMP and sub-plans will be uploaded to the HPA website upon commencement. Section 2.2 of this OEMP.

Item	Requirement	Comments or Reference
4.	**COMPLIANCE**	
a.	Measures and checklists that ensure all environmental requirements are addressed.	
b.	Inspection and surveillance systems and actioning for inspection/surveillance reports that ensure problems are quickly identified and resolved.	Section 5 of each sub-plan.
c.	Systems so that all Operator audits are completed as required and all audit Corrective Action Requests, Observation of Concerns and other audit actions are commenced.	Section 5.2 of this OEMP and section 10 of each sub-plan.
d.	Environmental monitoring program, including: • timing, frequency, locations and responsibility of monitoring; and • actioning systems so that environmental monitoring information is used to resolve identified problems effectively and quickly.	Section 5 of this OEMP and section 5.3 of each sub-plan.
e.	Project compliance monitoring systems, including: • systems for compliance assessment of environmental obligations • reports provided to Department of Planning; • audit reports; • measures to ensure prompt and effective resolution of agency, Council, Stakeholder, Community and NSW Ports' environmental issues.	Section 5 of this OEMP.
f.	Non-conformance, preventive and corrective action systems that quickly and effectively address non-conformances and observations.	Section 5.3 of this OEMP.
g.	Systems for prompt actioning of NSW Ports, Environmental Manager issues, requirements, report and audits.	Section 2.2.7 of this OEMP.

Item	Requirement	Comments or Reference
5.	**REVIEW AND IMPROVEMENT OF EMP AND SUB MANAGEMENT PLANS**	
a.	Description of the review/improvement process of the EMP and Sub Management Plans including allocation of responsibility and register of issues.	Section 5 of this OEMP and section 5.3 of each sub-plan.
b.	Frequency of review/improvement of the EMP/ Sub Management Plans.	Section 5 of this OEMP and section 5.3 of each sub-plan.
c.	How changes in environmental documents are identified and forwarded to relevant personnel.	Section 5 of this OEMP and section 5.3 of each sub-plan.
6.	**REPORTING**	
a.	Environmental reports are to include details on: All cases of non-compliance with environmental obligations, licences, permits approvals and the like;	To be provided to NSWE Ports during operations and when required.
b.	All cases on non-compliance with the EMP;	See item 6a
c.	Actions resulting from all environmental inspections and audits;	See item 6a
d.	Any failure to address low/high monitoring levels (as appropriate) or monitoring exceedances;	See item 6a
e.	Actioning and reporting of all incidences;	See item 6a
f.	Actions taken to address non-conformances or preventative actions;	See item 6a
g.	The frequency of environmental checklists and actioning concerns;	See item 6a
h.	Any Environmental Manager, or NSW Ports issue not addressed after two months;	See item 6a
i.	Immediate verbal reports (followed up in writing) following any incidents, non-compliance,	See item 6a

Item	Requirement	Comments or Reference
	approvals breach, complaints or where management actions required to avoid potential non-compliance / approval breach. Reports are to identify the issue/complaint as well as responses and actions taken or to be taken and the timing of such actions;	
j.	Progress reports on the status of achievement of obtaining approvals, including compliance conditions, licences and permits required (with documentation showing satisfaction of requirement to be included in the report, including correspondence and confirmation from relevant Authorities), and identification of items that are outstanding and the timeframe for completion; and	See item 6a
k.	Monitoring data, results and analysis.	See item 6a
7.	APPENDICES	
a.	Environmental Obligations Table (by issues such as fauna, flora, water quality, etc.) including obligations, responsibility and timing/frequency.	To be provided to NSW Ports before operational commencement.
b.	Associated Sub Management Plans.	Refer to section 8 of this OEMP.
c.	Associated Environmental Works Method Statements/Procedures.	Refer to section 5 of Sub-Plans.
d.	Licences/Approvals/Permits/Notifications.	Refer to section 3 of this OEMP.
e.	Inspection and Test Plan Checklists.	To be provided to NSW Ports before operational commencement.
f.	Emergency Procedures and Emergency Contacts.	Refer to section 2.4.1 of this OEMP Refer to HSEQ10.1.3 Emergency Response Plan Refer to HSEQ5.1.7.1 OEMP Personnel Contact Details

4.5 Commitment to Green Port Guidelines

Consistent with the intent of Hutchison Ports Australia's HSEQ Policy, SICTL has a commitment to the Green Ports Guidelines (GPG) published by NSW Ports. These guidelines encourage port developers and operators to adopt sustainable business approaches and encourage innovation in design and operation through resource selection and environmental quality. The guidelines cover the following areas:

- Resource selection:
    - Materials selection;
    - Waste Management;
    - Water Consumption;
    - Energy Use;
    - Transportation;
- Environmental quality;
    - Indoor environment;
    - Emissions;
    - Water quality;
    - Land use, and
    - Environmental management.

SICTL's commitment to the GPG can be assessed by the table below. Items not applicable to the 'operation' stage of development have been addressed as N/A. Similarly, Suggested Measures listed in the GPG that are also not applicable to the 'operation' stage of development have been omitted.

The 'operation' stage of development is defined in the GPG and is specified for each item.

Table 7: Green Port Guidelines Checklist

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
	MATERIALS SELECTION			
R1	Reduce the quantity of new materials being used by reusing materials or by utilising recycled materials.	N/A	Building materials are not applicable to the 'operation' stage of development.	N/A
R2	Encourage environmentally friendly production of materials.	N/A	Production of materials is not applicable to the 'operation' stage of development	N/A
E3	Specify materials that have minimum embodied energy and environmental impact.	N/A	Specification of materials is not applicable to the 'operation' stage of development	N/A
R4	Consider the end of life of materials and the whole building, design for deconstruction.	N/A	Life cycle assessments of materials are not applicable to the 'operation' stage of development	N/A
	WASTE MANAGEMENT			
W1	Minimise the generation of wastes.	Yes	Implement a Waste Management Plan including identification of opportunities to reduce the amount of waste being disposed of at landfill. Instruct contractors and suppliers to minimise packaging and select materials with less packaging.	HSEQ5.1.7h Waste Management On Site Sub-Plan
W2	Facilitate recycling to reduce the amount of waste going to landfill.	Yes	Provide a dedicated storage area for the the separation, collection and recycling of waste with good access for all building occupants and for collection by recycling companies. Recycle paper/ cardboard, glass, PET plastic and	HSEQ5.1.7h Waste Management On Site Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
			aluminium cans. Recycle green waste (for example by chipping and mulching on site). Monitor quantities (volume and/ or weight) of waste recovery.	
W3	Ensure the safe storage and handling of hazardous wastes.	N/A	Hazardous wastes are not applicable to the 'operation' stage of development	N/A
	WATER CONSUMPTION			
H1	Reduce consumption of potable water internally.	Yes	Install water efficient fixtures and fittings (AAA rating system or above) such as toilets, urinals, showerheads, taps, hoses and basins. Infrared or waterless urinals could also be considered. Purchase water efficient appliances (AAA rating system or above) such as dishwashers and washing machines. Reduce potable water demand through the efficient use/avoidance of evaporative or water cooling tower systems. Alternatively recycled water (treated rainwater) could be used for the cooling tower make up. Ensure that the water source is suitable and that the sustainable yield has been calculated for any water extracted from the ground.	HSEQ5.1.7i Water & Wastewater Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
H2	Manage and monitor water usage and any leaks.	Yes	Install water sub-meters for all major water uses in the building, such as cooling towers, irrigation and washdown and hot water services plus separate tenancies. Monitor main and sub-meters to detect leaks.	HSEQ5.1.7i Water & Wastewater Management Sub-Plan
H3	Reduce the quantity of potable water used for landscape irrigation.	Yes	Use native (local) plants for landscaping and xeriscaping to reduce irrigation water demand. Source irrigation water from on-site rainwater collection or recycled site water (such as greywater). Provide and maintain a water efficient irrigation system comprising subsoil drip systems and automatic timers with rainwater or soil moisture sensor override systems.	HSEQ5.1.7i Water & Wastewater Management Sub-Plan
H4	Treat water on-site and reuse the treated water to reduce demand on the local potable water supply and the demand on the local infrastructure.	Yes	Provide a rainwater harvesting system (rainwater tank) and use rainwater to reduce consumption of potable water. Provide a greywater collection and treatment system. Reuse treated greywater. Provide on-site blackwater treatment where appropriate and reuse a substantial proportion of treated water.	HSEQ5.1.7i Water & Wastewater Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
	ENERGY USE			
E1	Reduce energy consumption and hence greenhouse gas emissions.	Yes	Provide shading and insulation for refrigerated containers. 'Heat stop' paint could also be used to coat the refrigerated containers. Use and maintain low energy and energy efficient terminal and operational equipment (may require retrofits such as diesel oxidation catalysts) and ensure equipment turns off when not required. Use and maintain low energy and energy efficient appliances (such as fridges, fans and printers) and ensure appliances turn off when not required. Use energy efficient light bulbs or compact fluorescent lights.	HSEQ5.1.7l Energy Management Sub-Plan
E2	Manage the use of energy to minimise consumption.	Yes	Perform comprehensive pre-commissioning, commissioning and quality monitoring of building services performance. Provide electrical sub metering for separate energy uses such as car parks, chillers, air handling fans, lifts and common area lighting and power plus separate tenancies. Monitor main and sub-meters. Investigate using water source heat rejection (e.g. via the harbour) instead of dry air coolers.	HSEQ5.1.7l Energy Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
E3	Source energy from renewable sources.	Yes	Purchase renewable or 'green' energy for use on-site.	HSEQ5.1.7l Energy Management Sub-Plan
E4	Source energy from alternate energy sources and use less greenhouse intensive fuels (in particular limit diesel use).	Yes	Use on-site energy supply (e.g. Combined Heat and Power (CHP)). Use alternative cleaner and less greenhouse intensive fuels for cargo handling equipment, vehicles and other operational requirements (e.g. liquefi ed propane gas (LPG), liquefi ed natural gas (LNG), compressed natural gas (CNG), fuel cells and biofuel). Provide shore-to-ship power connections (cold ironing).	HSEQ5.1.7l Energy Management Sub-Plan
	TRANSPORTATION			
T1	Encourage the use of alternative modes of transport by employees, in order to reduce the amount of inefficient/ individual car travel and therefore greenhouse gas emissions.	No	Provide a bus (or other) link to nearby train/bus/ ferry stations. Implement a car share plan for employees/ contractors. Provide facilities to reduce business travel such as videoconferencing/ teleconferencing.	N/A
T2	Reduce greenhouse gas emissions from operational vehicles and equipment.	Yes	Select environmentally friendly fuels (such as LPG or hybrid) and/or energy efficient vehicles and equipment. Coordinate trucks to avoid unnecessary truck	HSEQ5.1.7e Operational Traffic Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
			movements and idling. Investigate opportunities to maximise the transport of freight via rail (intermodal – on-dock or near-dock) or water (rather than by road).	
	INDOOR ENVIRONMENT			
IE1	Improve the quality of indoor air to protect the health of employees and enhance productivity.	Yes	Control humidity in workspaces and ductwork. Introduce living plants in workspaces. Minimise the use of cleaning and maintenance chemicals and pesticides and use low-irritant or non-chemical versions. Provide separate dedicated areas with monitoring and exhaust systems for quarantine gases.	HSEQ5.1.7a Air Quality Management Sub-Plan
IE2	Optimise daylighting and make best use of artificial lighting to assist eye health and productivity.	No	Design of lighting systems is not applicable to the 'operation' stage of development	N/A
IE3	Provide optimum acoustical environment for productivity and to prevent ear damage.	No	Design of acoustical environment is not applicable to the 'operation' stage of development	N/A

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
	EMISSIONS			
EM1	Protect the ozone layer and reduce the potential for global warming.	Yes	Avoid using Ozone Depleting Substances (ODS) such as refrigerants or insulants. Minimise the Global Warming Potential (GWP) for refrigerants and other chemicals. Implement a refrigerant and/or vapour leak detection system in high-risk areas and/ or contain refrigerants/ vapours in an airtight enclosure. Implement a vapour recovery system.	HSEQ5.1.7a Air Quality Management Sub-Plan HSEQ5.1.7e Operational Traffic Management Sub-Plan
EM2	Limit the generation of air pollutants and ensure that they are emitted away from sensitive receptors.	Yes	Implement dust (and other airborne particle) mitigation measures during construction and operation. Include earthworks, site haul roads and public roads. Employ measures for the clean-up of any spills. Consider potential sources of air pollution from operations and implement measures to control these (such as scrubbers). Ensure any emission stacks are located away from sensitive receptors. Monitor dust levels and other air pollutants during construction and operation (such as dust during construction and CO_2 for closed car parks). Implement a maintenance schedule for plant and equipment to ensure that they are operating to	HSEQ5.1.7a Air Quality Management Sub-Plan HSEQ5.1.7e Operational Traffic Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
			appropriate standards.	
EM3	Minimise odours.	Yes	Prevent odour pollution from construction and operations. Monitor odours regularly.	HSEQ5.1.7a Air Quality Management Sub-Plan
EM4	Minimise noise nuisance.	Yes	Implement noise reduction measures for forklifts, ships, trucks and other vehicles/ machinery (such as insulation, alternative reversing alarms, back loading, on site queuing and 'engine off' policies). Monitor noise levels during construction and operation.	HSEQ5.1.7d Noise Management Sub-Plan
EM5	Avoid light spill into night sky or neighbouring properties/ areas.	Yes	Ensure that no direct beam of light is directed beyond the site boundaries or upwards without falling directly on a surface with the explicit purpose of illuminating that surface. Use enclosed light fittings designed to minimise the spread of light above the horizontal.	HSEQ5.1.7b Aviation Operational Impacts Sub-Plan HSEQ5.1.7j Shorebird Management Sub-Plan
EM6	Avoid accidental contact with hazardous or poisonous goods.	Yes	Separate hazardous goods and poisons during construction and operation.	HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
	WATER QUALITY			
HQ1	Manage stormwater to reduce peak stormwater flows and protect water quality.	Yes	Design, provide and maintain appropriate drainage so rainwater runoff does not flow directly to surface waterbody. Implement a stormwater treatment system.	HSEQ5.1.7f Stormwater Management Sub-Plan
HQ2	Manage water quality to protect the harbour and other water bodies.	Yes	Identify potential sources of land-based water pollution such as truck washing, waste and cargo/oil transfers. Implement and maintain measures to minimise these (e.g. oil separators and gross pollutant traps). Provide containment for any spillage, including bunding and appropriate storage of liquid materials. Provide emergency spill kits (including bunds and clean up material) and provide training in how to use them. Implement a water quality monitoring program. Manage ballast water discharge to avoid introducing non indigenous aquatic organisms. Avoid dumping rubbish, chemicals or untreated sewage, greywater and oily bilge at sea and ensure high standard marine sanitation devices are used and maintained. Avoid toxic anti-fouling paints.	HSEQ5.1.7f Stormwater Management Sub-Plan

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
HQ3	Prevent damage from potential flood events and water table changes.	No	Design of drainage systems is not applicable to the 'operation' stage of development	N/A
	LAND USE			
L1	Encourage the redevelopment of sites that have previously been developed and remediate contaminated land.	N/A	Redevelopment and site selection is not applicable to the 'operation' stage of development	N/A
L2	Use landscaping to enhance biodiversity and conserve and create habitat for flora and fauna.	N/A	Design and specification of landscaping is not applicable to the 'operation' stage of development	N/A
L3	Enhance visual amenity.	N/A	Design of visual amenity is not applicable to the 'operation' stage of development	N/A
L4	Avoid impact on identified heritage items.	N/A	Heritage issues are not applicable to the 'operation' stage of development	N/A

Item No.	Purpose/ Criteria	Has item been addressed?	How has it been addressed?	Reference
	ENVIRONMENTAL MANAGEMENT			
M1	Maintain good relationships with stakeholders and respond to any complaints.	Yes	Identify and consult with stakeholders about environmental issues. Implement a formal public complaints procedure. Prepare a Traffic Management Plan (TMP) to minimise impacts on vehicle and pedestrian traffic.	This OEMP
M2	Provide a framework for identifying, managing and minimising environmental impacts and maximising environmental benefits.	Yes	Implement a site specific Environmental Management Plan (EMP). Implement an Environmental Management System (EMS) accredited to ISO 14001. Comply with relevant planning and environmental legislation. Encourage innovation in environmental management across all aspects of planning, development and operations.	This OEMP and sub-plans
M3	Educate developers, tenants and employees about ESD and how to improve sustainability.	Yes	Provide a facilities/ building guide and training for occupants on minimising environmental impacts.	This OEMP and General Terminal Induction

4.6 Community Consultation and Complaints Management

4.6.1 The Operational Community Consultative Committee

The primary mechanism used by SICTL to interface with the community is the Operational Community Consultative Committee (OCCC). Consultation will be in accordance with the HSEQ1.6 Community Engagement and Consultation Policy. Following agreement between its members during meeting number 43 on 12 February 2013, the Construction Phase Community Consultative Committee agreed to form into the Operational Community Consultative Committee and received approval from DP&I on the 23 May 2013. The OCCC includes the following members:

- two representatives from SICTL (including the Environmental Representative), approved by DP&I;
- one representative from Botany Bay City Council, approved by DP&I;
- at least 3 representatives from the local community, approved by DP&I, and
- one chairperson, approved by DP&I.

The Committee will meet at least four times each year and will review and provide advice on the environmental performance of the SICTL terminal, including any construction or environmental management plans, monitoring results, audit reports or complaints.

4.6.2 Obligations of SICTL at the OCCC Meetings

Meetings will be held in a meeting room of the SICTL terminal building or a facility provided by NSW Ports. The National HSEQ Manager and the Environmental & Safety Compliance Engineer will attend and provide the OCCC with regular information on the environmental performance and management of the SICTL terminal. Site inspections of the SICTL terminal may be organised through these meetings if required. SICTL will take minutes of these meetings and make these minutes available on the HPA/ NSWP website within 14 days of the meeting, or as agreed with the OCCC. A copy of the minutes of each OCCC meeting and any responses to the OCCC's recommendations will be forwarded to the DP&I within one month of the each meeting.

4.6.3 Publicly Available Information and Complaints Lodgement

All audit, monitoring, management and reporting documents required under the Development Consent will be made publicly available on the HPA website. The results of monitoring received from consultants will also be uploaded to the HPA website within 14 days of receipt. Public comments, inquiries and complaints can be received by the following means:

- in Person at either the **HPA Sydney Office** or at the **SICTL terminal building at Gate 150-160 Foreshore Rd Banksmeadow**;
- by mail, sent to **Sydney International Container Terminals Pty Ltd, Level 19, BT Tower 1 Market Street, Sydney NSW 2000** or the PO Box established once the terminal building is operational (TBC);
- by phone on the HPA complaints 1800 telephone number **1800 472 888**, or
- by email, enquiries@hutchsionports.com.au

The above details will be publicised on the HPA website http://www.hutchisonports.com.au under the 'Contact' page and also in newsletters and newspaper articles.

4.6.4 Complaints Management and Information Gathering

This section describes the approved process of complaint management by SICTL. An overview of the complaints management and investigation process is outlined below:

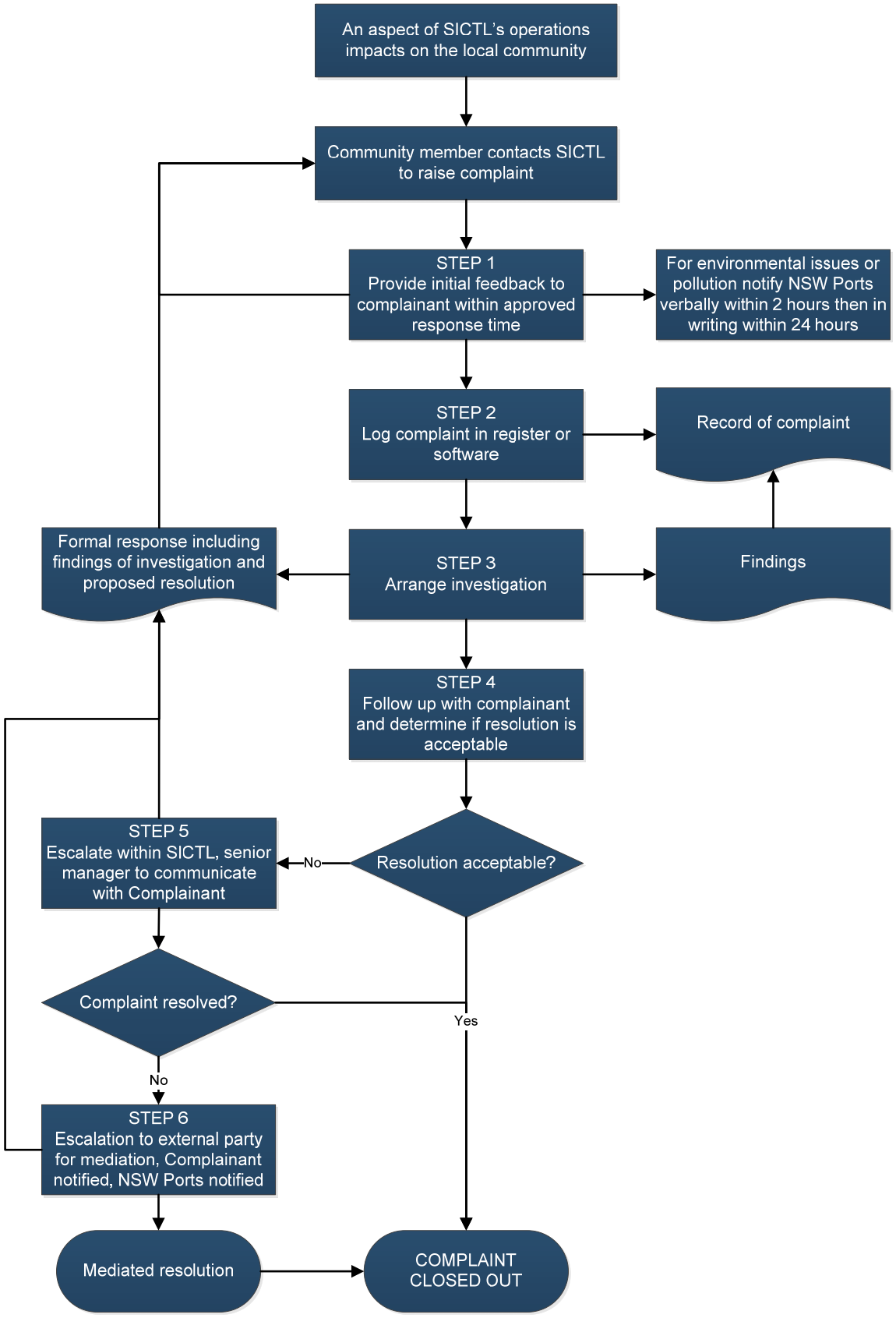

Figure 4 The process of complaint management.

The complaints management process is comprised of six steps which aim to ensure beneficial resolution following a complaint lodged with SICTL. Other stakeholders can also lodge complaints with SICTL, the process followed will be the same:

Step 1: SICTL will receive the complaint and provide initial feedback and acknowledgement to the Complainant. This initial feedback will be within the following timeframes:

- (verbal) immediately for complaints lodged by phone or in person with a written follow-up within 2 hours (email or fax);
- (in writing) within 24 hours for complaints received by other means, and
- In the event of a complaint about an environmental issue or pollution, SICTL will verbally notify NSW Ports within 2 hours of receiving the complaint and then in writing within 24 hours.

Step 2: SICTL will log the complaint in the complaints register (or database software) and will capture the following information;

- the date and time of the comment, enquiry or complaint;
- the means by which the comment, inquiry or complaint was made (telephone, fax, mail, email or in person);
- any personal details of the commenter, enquirer or complainant that were provided, if no details were provided a note to that effect;
- the nature of the complaint;
- any actions taken by SICTL in relation to the comment, inquiry or complaint;
- If no action was taken by SICTL in relation to the comment, inquiry or complaint, the reasons why no action was taken, and
- any follow up actions with the date and time of follow up communications to the commenter, enquirer or complainant.

Step 3: SICTL will arrange an investigation to determine the cause of the complaint and if this cause is a product of SICTL's actions or under SICTL's responsibility. The HSEQ Officer or the Environmental & Safety Compliance Engineer will conduct an investigation in conjunction with the Terminal Manager and/ or National HSEQ Manager. The operations underway at the time of the complaint will be reviewed in order to identify the cause. The investigation may collect information through the following sources:

- Speaking with the workforce, plant operators, shift managers and yard managers about the activities underway at the time of the complaint;
- Review of shift manager's diary entries or prestart forms for information;
- Review of operations against the documented and approved work methods to be followed:
- Review of work records/ logged entries within the Terminal Operating System which controls the movement of freight within the terminal;
- Review of records of when trucks or ships were being serviced at the time of the complaint;
- Review of any relevant maintenance records for plant;
- Review of environmental conditions at the time of the complaint from weather records online;
- Review of monitoring data, if available, and
- Advice from independent consultants, if required

The findings of the investigation will contain the above cause data and then include a proposed resolution which will satisfy the complainant and SICTL's operational needs and alternative resolution options which may be implemented if the preferred option is not practicable. The findings, proposals and the resolution (including

any resolutions already implemented) will be communicated to the complainant in writing. In situations where the complaint was caused by:

- Actions not attributable to any operational actions or ongoing activities by SICTL;
- Actions not otherwise under the responsibility or control of SICTL, or
- A combined effect of the actions by SICTL and another Port Botany lessee such as Patricks Stevedores

Refer to section 4.4.5.

Step 4: SICTL will arrange for follow up with the complainant within an agreed timeframe (relative to the complaint and the resolution) to collect feedback on the effectiveness of the resolution.

Step 5: If the resolution is not acceptable to the complainant, SICTL will escalate the matter internally whereby a senior-level manager (Terminal Manager, Operations Manager or National HSEQ Manager) will contact the complainant and discuss the issue including existing or further resolution options. At this stage:

- a negotiated resolution which will satisfy the complainant and SICTL's operational needs can be implemented;
- if the senior manager and the complainant do not agree on a negotiated resolution, the senior manager will offer the Complainant the opportunity for external mediation, and
- if the Complainant elects mediation, SICTL will respond to the Complainant in writing advising them of the details of the mediation venue and appointment.

Step 6: SICTL will arrange mediation by an impartial external party. SICTL will fund the mediation process and accept the mediated solution. The outcome of the mediation will be communicated to the Complainant in writing by SICTL. The mediation will be documented and all documents from this and the previous five steps will be included in the record of the complaint.

A Quarterly Complaints Report will be prepared by the HSEQ department outlining each complaint received within the previous three-month period. The relevant portion of the complaints register will be attached to each report, in addition to the circumstances of each complaint, any actions HPA undertook to resolve each complaint, follow up actions and trends over time. Each Quarterly Complaints Report will be submitted to the OCCC, DP&I and the EPA where relevant and published on the HPA website (with personal information omitted).

4.6.5 Management of Complaint or Common Issues involving Neighbouring Stevedores

The SICTL HSEQ Officer or the Environmental and Safety Compliance Engineer will investigate the complaint in accordance with the process outlined in section 4.4.4. In cases where the findings of the investigation (Step 3) prove that the complaint was caused by actions:

- Not attributable to any operational actions or ongoing activities by SICTL;
- Not otherwise under the responsibility or control of SICTL, or
- From 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')

SICTL will formally notify the complainant with these findings and interface with the other lessee via the Terminal Manager using the below process:

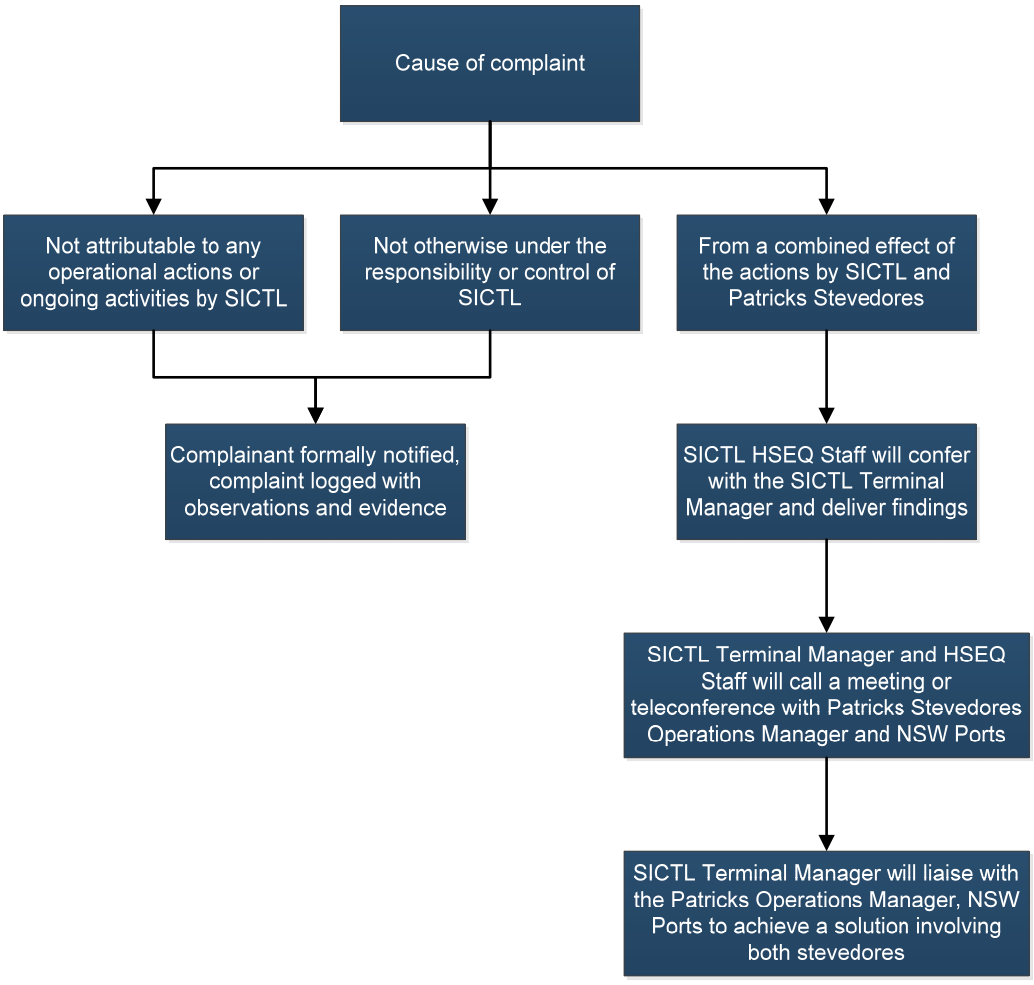

Figure 5 The process of managing complaints involving organisations other than or in addition to SICTL.

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.

5 Monitor, Review and Audit

5.1 Environmental Monitoring

Generally, the environmental monitoring of the SICTL terminal operations will be carried out by the Environmental & Safety Compliance Engineer in conjunction with the Environmental Representative through regular terminal inspections, monitoring programs and general surveillance of operations. Further details of monitoring are provided in section 5.3 of each sub-plan. The OEMP sub-plans are the primary instruments controlling monitoring and reporting of results.

5.2 Auditing of Environmental Systems

Auditing of HPA's environmental systems will fit into the larger picture of company-wide Health, Safety, Environment and Quality Management Systems (HSEQMS) audits as covered by the documents HSEQ11.4 Compliance Auditing Policy and HSEQ11.4.1 Compliance Auditing Procedure. Annual independent environmental audits are also required in condition C 4.5 in the Development Consent and are covered under section 5.2.3. Once completed, audit reports will be made publicly available on the HPA website.

5.2.1 Intent of an Audit

The purpose of environmental systems auditing is to review the OEMP and its sub-plans as a business system and as a business process. This will be achieved by checking the compliance of operations and HPA's use of the system against various criteria such as the requirements/ procedures of the OEMP and legislation. Since the OEMP was required in the Development Consent, compliance is mandatory. The outcomes of each audit will either confirm that terminal operations comply with the OEMP or that improvement is required.

5.2.2 Internal Audits

An internal audit is a review of HPA's environmental systems by an employee of HPA. Internal audits will be used as an in-house check of compliance, the report of which will be submitted to HPA Corporate for management review. The internal audit report will also be submitted to the Community Consultative Committee in accordance with the HSEQ1.6 Community Engagement and Consultation Policy. The frequency of internal audits is shown in section 5.2.7. Internal audits of HPA's environmental systems fall into three categories:

- systems audit;
- records audit, and
- process audit.

Systems audits focus on the documentation within the OEMP (Tier 3) and assess whether the environmental management system is adequate or comprehensive enough to comply with the Development Consent. Records audits focus on the documentation created by this system (Tier 4) as an indicator of how much the system is being implemented and how well the system as a whole is working. Process audits rely on observations of the operational processes at the SICTL terminal to assess compliance with the OEMP (physical implementation).

5.2.3 External Audits (Annual Independent Environmental Audits)

An external audit is a review of HPA's environmental systems by an independent auditor external to HPA but at HPA's cost. HPA will appoint an auditor or an audit team who is approved to the DP&I and who will check HPA's operational compliance with the Development Consent. An external audit (as required by condition C 4.5 of the Development Consent) will be conducted within twelve months of the terminal commencing operations and then once every twelve months thereafter. The external audits are specified in the Development Consent and will be made publicly available and also submitted to the Community Consultative Committee in accordance with the HSEQ1.6 Community Engagement and Consultation Policy. External audits have the following aims:

- be carried out in accordance with ISO 14010 - Guidelines and General Principles for Environmental Auditing and ISO 14011 – Procedures for Environmental Auditing;
- assess compliance with the requirements of the Development Consent and other licences and approvals that apply to the operation of the SICTL terminal;
- assess operations against the predictions made and the conclusions drawn in the development application, EIS, additional information and Commission of Inquiry material, and
- review the effectiveness of the environmental management of the SICTL terminal, including any environmental impact mitigation works.

5.2.4 Scope and Depth of Audits

Both scope and depth will be defined prior to each environmental audit and agreed between the auditor and HPA in writing.

The scope of each environmental audit would focus on the OEMP and its sub-plans. The scope has been intentionally narrowed because the OEMP is only one part of the HSEQMS. Environmental auditing, and specifically external audits where the audit reports will be submitted to the DP&I and made public will only be relevant to this one part of the HSEQMS, not the whole. Notwithstanding, auditing of environmental systems can come under the scope of a broader HSEQMS audit where the entire system or only the Operational Control Key Element (as described in section 1.5) in examined.

The amount of detail that is to be reviewed (described as the 'depth' of the audit) refers to the different tiers of documentation that are equal to and under the OEMP. As described in section 1.5 the tiers of documentation in the HSEQMS are:

Tier 1 The HSEQ Management Systems Manual

Tier 2 Policies and Framework Documents

Tier 3 Plans, Procedures and Guidelines

Tier 4 Supporting Documentation i.e. forms, checklists, reports

Within this management system architecture, the OEMP and its sub-plans belong to Tier 3, thus an environmental audit of the OEMP will only cover tier 3 and tier 4. Higher tiers are outside the scope of this OEMP and are audited by other means.

5.2.5 Audit Schedule and Frequency

The schedule of system, record and process audits is shown below with the frequency for each type listed in the middle column, the document HSEQ11.4.1 Compliance Auditing Procedure provides further guidance on overall audit planning. Audits can also be conducted at any time at the discretion of the National HSEQ Manager.

Table 8: Summary of Auditing Schedule and Frequency

Audit Area	Frequency	Auditor
Systems • **OEMP and sub-plans**	Within 12 months of commencement of operations then every 12 months thereafter	Internal and External
Records • **Reporting** • **Notifications** • **Complaints** • **Environmental Training** • **Sub-Plan documents** • **Tier 4 documents under this OEMP**	Within 12 months of commencement of operations then every 6 months thereafter	Internal
Processes • **Collecting Operational Data** • **Emergency response** • **Environmental Training** • **Environmental Monitoring**	Within 12 months of commencement of operations then every 6 months thereafter	Internal

5.3 Improvement Opportunities

5.3.1 Control of Non-Conformity

Improvement opportunities are identified through observations/ inspections of current operations that can be improved to produce better outcomes. This includes engineering design reviews and non-conformances documented through audits. The personnel concerned with environmental management identified in section 2.1 will provide assistance in the assessment of environmental improvement opportunities, including recommendations for corrective and preventative actions and the review of these actions.

Improvement opportunities identified during the operation of the SICTL terminal will be allocated a priority by the HSEQ Officer or Environmental Representative. Based on this priority, the improvement will be actioned within an agreed time frame. If the improvement can be actioned immediately the relevant supervisor will ensure the improvement works are implemented. If the deficiency cannot be rectified immediately, the incident will be reported to the Terminal Manager and/ or HSEQ Officer where the HSEQ2.2.1.1 Hazard and Improvement Report Form will be completed and submitted to HPA, reporting will be in accordance with section 2.2.5. Closed-loop reporting will be performed to ensure that the outcomes or data recorded in EQ2.2.1.1 Hazard and Improvement Report Form are used within HPA by being included in registers, safety notices, toolbox talks, or learnings for when developing future work methods.

5.4 OEMP Review and Continuous Improvement

Continuous improvement of the OEMP and the Sub-Plans aims to ensure:

- That the OEMP remains current with SICTL's operations and audits;
- The OEMP is amended in lockstep with any changes to HSEQ system requirements;
- The relevant accreditation can be demonstrated and maintained, and
- SICTL promotes a proactive management philosophy that evolves the OEMP in order to manage emerging issues.

The assessment of environmental risks detailed in the Environmental Risk Assessment is one of the catalysts that drive the review of the OEMP and supporting Sub-Plans in the pursuit of the above aims. As these environmental management documents are the tools used by SICTL to manage its environmental risks it is prudent to implement the guidance offered by the Environmental Risk Assessment.

Broadly, the OEMP will be reviewed in accordance with the HSEQ11.5 Management Review Policy and the HSEQ11.5.1 Management Review Procedure.

5.4.1 Commitment to Continuous Improvement

The document HSEQ1.1 HSEQ Policy Statement states HPA's commitment to continuous improvement of our operations so that our impact on the environment is lessened over time. The advantage of operating in this way is that opportunities for commercial benefit can be realised and implemented, thus positively contributing to the competitiveness of the business. This OEMP is one of the tools that HPA uses to achieve this aim. Other methods which help achieve continuous improvement are listed below.

5.4.2 Workplace Inspections

The fundamental method of keeping track of our operations and identifying opportunities for improvement is HSEQ inspections of the SICTL terminal. These inspections will be conducted primarily by the HSEQ Officer. The environmental impacts of the general running of the terminal will be scrutinised during each inspection and issues identified will be documented, photographed and discussed with other members of the HSEQ team and Terminal Management. Improvements can then be developed and implemented. Inspections of the terminal will occur at least weekly.

5.4.3 Continuous Improvement by Documenting Opportunities for Improvement

Documenting the opportunities for improvement in accordance with the HSEQ2.2.1 Hazard and Improvement Opportunity Reporting Procedure and the HSEQ2.2.1.1 Hazard and Improvement Report Form provides for traceability and proof that HPA observes and investigates its own operations with a view for improvement. The control of non-conformities arising from audits, incidents or routine inspections will be documented in full so as to comply with legal and procedural requirements. Aside from communicating the details, this documentation can be used in future scenarios such as training or decision-making so that learning and experience from these opportunities can be implemented for the company's and employee's benefit.

5.4.4 Continuous Improvement through Auditing

The information collected during each audit and the measurement of how well the HSEQ system is being implemented are most important as they dictate how much improvement is required and in specific areas. HPA will use these results to drive the continuous improvement process with the goal of total compliance. Additional benefits derived from audits include:

- insight into how the SICTL terminal's environmental management is functioning alongside other areas;

- identifying areas where communication between the different departments of HPA should improve;
- confirmation at HPA Corporate and DP&I that the environmental management system is functioning effectively;
- the incorporation of improvement suggestions from internal auditors who are familiar with HPA, and
- opportunities for improved productivity or efficiency of operations.

5.4.5 Continuous Improvement through Management Review

All operating and environmental data collected by HPA during the operation of the SICTL terminal, including information on current activities, incident investigations and root causes, operational Environmental Data, AEMRs and KPIs will be scrutinised by the HSEQ department and HPA Executive Management Team so that all levels of management are aware of the ongoing environmental performance of the terminal. This will allow for discussion and consultation so that improvements can be implemented by management, in certain cases in direct response to incidents. At other times, involvement from upper-level management may expediate the implementation of improvements.

5.4.6 Continuous Improvement by Adopting Beneficial Industry Trends and Best Practice

The shipping and stevedoring industries naturally have a concern and involvement in national and international industry trends due to global competition and a worldwide customer base. This has led to awareness of how competitors are operating in other parts of the world. Beneficial industry trends and best practice will be considered by HPA as another method of continuous improvement and competent HSEQ management.

6 Supporting Documentation and Records

HSEQ5.1.7.1 OEMP Personnel Contact Details

All Tier 4 documents under the sub-plans to this OEMP.

7 Referenced Documents

Instrument of Development Consent DA-494-11-2003-I - Schedule C Terminal Operations (NSW Department of Planning)

Development Consent Pre-Operational Compliance Report – SICTL

HSEQ1.1 HSEQ Policy Statement

HSEQ1.2 Management Commitment Policy

HSEQ1.3 Management Responsibility and Accountability Policy

HSEQ1.5.1 HSEQ Management Plan

HSEQ1.6 Community Engagement and Consultation Policy

HSEQ1.7 Media, Community and Government Relations Policy

HSEQ2.1 Risk Management Framework

HSEQ2.1.1 Risk Assessment Procedure

HSEQ2.1.1.1 Risk Assessment Matrix

HSEQ2.1.1.2 Risk Assessment Tool

HSEQ2.1.1.3 Task Activity Risk Assessment Form

HSEQ2.1.1.4 Risk Assessment Register

HSEQ2.2.1 Hazard and Improvement Opportunity Reporting Procedure

HSEQ2.2.1.1 Hazard and Improvement Report Form

HSEQ3.20 Workplace Consultation and Communication Policy

HSEQ3.20.1 Workplace Consultation and Communication Procedure

HSEQ5.1.1 Safety Critical Operations Procedures ManualHSEQ5.1.7.1 OEMP Personnel Contact Details

HSEQ5.1.7a Air Quality Management Sub-Plan

HSEQ5.1.7b Aviation Operational Impacts Sub-Plan

HSEQ5.1.7c Bird Hazard Management Sub-Plan

HSEQ5.1.7d Noise Management Sub-Plan

HSEQ5.1.7e Operational Traffic Management Sub-Plan

HSEQ5.1.7f Stormwater Management Sub-Plan

HSEQ5.1.7g Handling of Dangerous Goods and Hazardous Substances Sub-Plan

HSEQ5.1.7h Waste Management On Site Sub-Plan

HSEQ5.1.7i Water & Wastewater Management Sub-Plan

HSEQ5.1.7j Shorebird Management Sub-Plan

HSEQ5.1.7k Feral Animal Management Sub-Plan

HSEQ5.1.7l Energy Management Action Sub-Plan

HSEQ5.1.7.1 OEMP Personnel Contact Details

HSEQ8.1.1 Incident Reporting Notification and Investigation Procedure

HSEQ8.1.1.1 Incident Report Form

HSEQ8.1.1.2 Level 2 Investigation Report

HSEQ8.1.1.3 Level 3 Investigation Report

HSEQ8.1.2 Incident Investigation Guidelines

HSEQ8.1.1.4 Investigation Terms of Reference Form

HSEQ9.1 HPA Document Control and Records Management Policy

HSEQ9.1.1 Document Control & Information Management Procedure

HSEQ10.1.3 Emergency Response and Incident Management Plan - SICTL

HSEQ11.4 Compliance Auditing Policy

HSEQ11.4.1 Compliance Auditing Procedure

HSEQ11.5 Management Review Policy

HSEQ11.5.1 Management Review Procedure

HSEQ-RTO3.2 Training Delivery Strategy

HSEQ-RTO3.2.2 Training Delivery Plan – SICTL.

8 Environmental Management Sub-plans to this OEMP

OEMP Sub-plans are attached.