



Hutchison Ports Australia

2013

HSEQ Management System

Air Quality Management Sub-Plan - SICTL

Version 2



Telephone 02 8268 8000

Fax 02 9269 0717





Document Control:

Document control shall be in accordance with the HPA Document Control and Records Management Policy (HSEQ9.1) and the Document Control & Information Management Procedure (HSEQ9.1.1), ensuring that:

- An up to date version of this HSEQ Management System document is maintained;
- Records of superseded versions of the document are retained for a minimum of 7 year; and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	19 June 2013	First draft	John Ieroklis	Trevor Ballantyne
Draft 1	All	10 July 2013	Consultation Draft	John Ieroklis	Trevor Ballantyne
1	All	1 August 2013	External stakeholder consultation comments incorporated	John Ieroklis	Trevor Ballantyne
2	All	30 August 2013	DP&I comments incorporated	John Ieroklis	Trevor Ballantyne

A person using Hutchison Ports Australia documents or data accepts the risk of:

- Using the documents or data in electronic form without requesting and checking them for accuracy against the original hard copy version; and
- Using the documents or data for any purpose not agreed to in writing by Hutchison Ports Australia

This document is Copyright, other than for the purposes of and subject to the provisions of the Copyright Act, no part of it may be reproduced in any form or by any process without the prior permission of Hutchison Ports Australia

The information contained in this manual is Confidential and is not to be used or disclosed to any person without the prior approval of Hutchison Ports Australia



1 Purpose..... 5

2 Objective..... 6

2.1 Environmental Issues Overview 6

2.2 Key Performance Areas Overview..... 7

2.3 OEMP Sub-Plans Overview..... 7

2.4 Key Performance Indicators Overview..... 7

3 Legislative Framework 8

3.1 Applicable Legislation..... 8

3.2 Conditions of Development Consent 8

4 Strategic Approach..... 9

4.1 Risk Identification..... 9

4.1.1 Exclusions to the Scope of this Sub-Plan..... 9

4.2 Potential Environmental impacts..... 9

4.3 Potential Operational Impacts 9

4.3.1 Odours from the On-Site Fuel Storage Area 9

4.3.2 Odours from Hazardous Freight/ Dangerous Goods..... 9

4.3.3 Emissions from Operational Plant, Machinery and Equipment to Air 10

4.3.4 Dust Emissions 10

5 Implementation of This Sub-Plan 11

5.1 Operational Controls..... 12

5.1.1 Control of Odours from the On-Site Fuel Storage Area 12

5.1.2 Control of Odours from Hazardous Freight/ Dangerous Goods 12

5.1.3 Control of Emissions from Operational Plant, Machinery and Equipment to Air 12

5.1.4 Control of Dust..... 12

5.2 Training of personnel 13

5.3 Monitoring and Response 13

6 Performance Expectations 14

6.1 Opportunities for Improvement 14

6.1.1 Management of Complaints or Common Issues involving Neighbouring Stevedores..... 14

6.2 Documentation and Record Keeping 15

6.2.1 Reporting Obligations 16

7 Responsibility, Accountability and Authority..... 17

7.1 SICTL as Tenant 17

7.1.1 HSEQ Officer..... 17

7.1.2 Environmental and Safety Compliance Engineer 17

7.1.3 National HSEQ Manager (Environmental Representative) 17

7.1.4 Terminal Manager..... 17

7.1.5 Work Crews and Plant Operators 17

8 Identification of Stakeholders 18

8.1.1 Internal Stakeholders 18

8.1.2 External Stakeholders 18



8.2 Consultation with Stakeholders 18

8.2.1 Ongoing consultation 18

8.2.2 Key Personnel Contact Details - SICTL..... 19

9 Referenced Documents 19

10 Review and Auditing of this Sub-Plan..... 20



Air Quality Management Sub-Plan

1 Purpose

This Air Quality Management Sub-Plan (AQMSP) has been created as a means by which Sydney International Container Terminals (SICTL) can comply with the relevant conditions outlined in the Instrument of Development Consent DA-494-11-2003-i listed in Schedule C – Terminal Operations (the Development Consent). The AQMSP is a component of the HSEQ5.1.7 Operational Environmental Management Plan (OEMP) – SICTL and as such is a Tier 3 document within the Hutchison Ports Australia (HPA) Health, Safety, Environment and Quality (HSEQ) Management System. This sub-plan is an example of the commitment of HPA to comply with the Development Consent and work with external stakeholders co-operatively to achieve good operational outcomes. The indicative process of how OEMP sub plans control the operations of the SICTL Terminal is shown below.

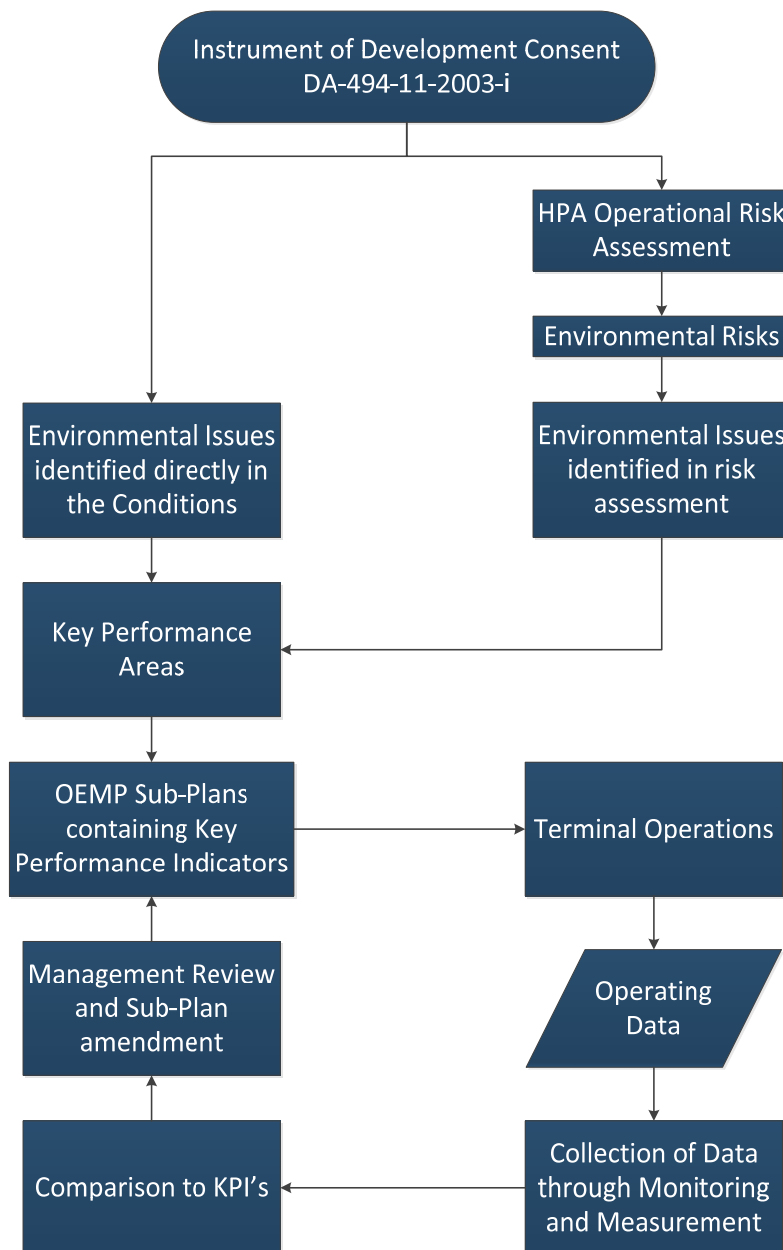


Figure 1 Illustration of how the KPAs and sub-plan control Operations



2 Objective

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

- as a management instrument so that good performance by SICTL and its contractors in the Air Quality Key Performance Area (KPA) can be assured;
- as an instrument that complements HPA's commercial agreements with Shipping Lines enabling SICTL to support the actions of vessels with the intent of compliance to the Development Consent (where the Development Consent applies to vessels directly);
- as a measure of compliance with the Development Consent in the form of a Key Performance Indicator (KPI) target and a KPI goal;
- as a description of what the KPI actually is and its context for measurement;
- as a basis for consultation with relevant stakeholders in regards to minimising or eliminating air quality impacts, and
- as a tool for promoting an ongoing relationship between the relevant stakeholders and SICTL so that any operational problems can quickly be solved.

2.1 Environmental Issues Overview

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

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

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



2.2 Key Performance Areas Overview

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

- **air quality;**
- aviation operational impacts;
- noise and complaints;
- operational traffic;
- water quality;
- Dangerous Goods and Hazardous Substances cargo management;
- waste generation;
- native and feral animal management, and
- energy.

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

2.3 OEMP Sub-Plans Overview

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

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

2.4 Key Performance Indicators Overview

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



3 Legislative Framework

3.1 Applicable Legislation

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

- Protection of the Environment (Operations) Act 1997 (NSW)
- Environmental Planning and Assessment Act, 1979 (NSW)

3.2 Conditions of Development Consent

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

Table 1: Conditions of Development Consent

Condition	Conditions of Development Consent
C2.1	<p>Odour</p> <p>The development shall be undertaken so as not to permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997 to be emitted beyond the boundary of the site.</p>
C2.2	<p>Dust Emissions</p> <p>All activities shall be undertaken in a manner that minimises or prevents dust emissions from the site, including wind-blown and traffic generated dust. All activities undertaken on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, all practicable dust mitigation measures, including cessation of relevant works, as appropriate, shall be identified and implemented such that emissions of visible dust cease.</p>
C2.3	<p>All trafficable and vehicle manoeuvring areas shall be maintained at all times in a condition that minimises the generation and emission of dust.</p>
C2.4	<p>All vehicles entering or leaving the site carrying a load must be covered or otherwise enclosed at all times, except during loading and unloading, to minimise the generation and emission of dust.</p>



4 Strategic Approach

4.1 Risk Identification

The risks identified by SICTL to be managed by this sub-plan are:

- Any odours originating from the Terminal;
- Any dust originating from the Terminal;
- The condition of manoeuvring areas for vehicles, and
- Dust originating from vehicles.

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

4.1.1 Exclusions to the Scope of this Sub-Plan

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

- not listed in the Development Consent;
- on board vessels;
- and actions by vessels (movements, noise, emissions etc)
- in Botany Bay beyond the quay line of the SICTL Terminal;
- outside the lease area of the SICTL Terminal;
- exhaust emission from Carrier's trucks or trains to air;
- of future construction phases (covered in separate CEMP's), and
- beyond the reasonable control or responsibility of HPA.

4.2 Potential Environmental impacts

Under this sub-plan there are no impacts on the natural environment or alterations of any ecosystems.

4.3 Potential Operational Impacts

SICTL anticipates the operation of the SICTL Terminal will impact air quality in the following ways:

4.3.1 Odours from the On-Site Fuel Storage Area

The on-site fuel storage tank is equipped with breather pipes to allow for the ventilation of diesel fumes. The impact of diesel odours during fuel storage, refuelling of plant and replenishment of the tank are not expected to create an air quality impact because of the quick dissipation of such odours.

4.3.2 Odours from Hazardous Freight/ Dangerous Goods

Under the International Maritime Dangerous Goods Code it is the responsibility of the exporter to containerise their Dangerous Goods (DG) products with due regard for any hazardous fumes or offensive odours which they emit. Most Dangerous Goods are usually shipped in sealed containers however some are in ventilated containers so that fumes do not accumulate and overpressurise the container. The air quality impacts of these odours are not expected to be significant given that:

- The proportion of DG cargo within the total amount of cargo handled in Port Botany is only 4% as stated in the EIS;



- The nearby industries of the Amcor Paper Mill, Orica and the Port Botany Caltex Terminal also generate odours which have previously been documented to affect the local area, and
- The majority of the DG cargo handled is packaged and/ or in sealed containers.

4.3.3 Emissions from Operational Plant, Machinery and Equipment to Air

The SICTL Terminal will feature a combination of electric and diesel plant, machinery and equipment (assets) used in the general operation of the terminal and for maintenance activities including:

- Site vehicles (utes, yard trucks);
- Reach stackers;
- Shuttle carriers, and
- Small plant (forklifts, elevating work platforms).

It is expected that emissions from these assets will have little impact on the local air quality given the surroundings are main roads, other industry and Sydney Airport. The site vehicles and plant used by SICTL will have the necessary emission control devices and systems fitted by the manufacturers. The Quay Cranes and Automated Stacking Cranes used within the Terminal are electrically driven and do not produce any emissions to air.

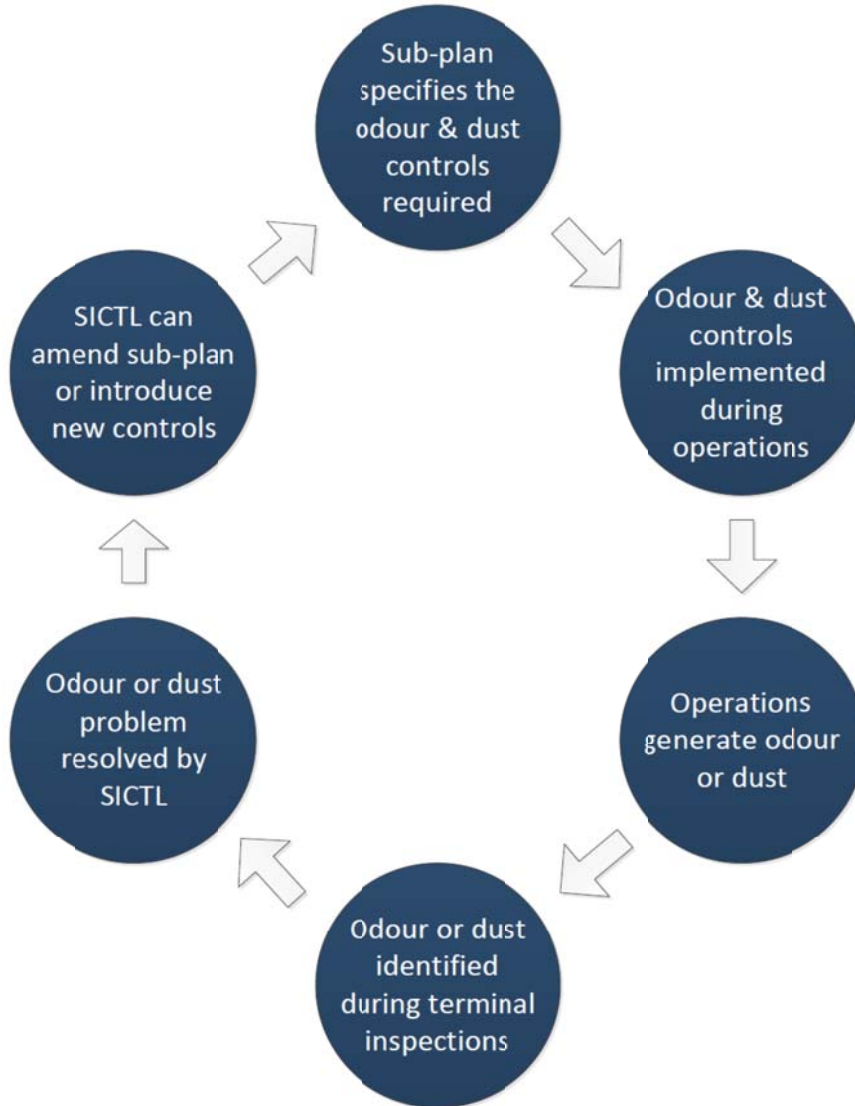
4.3.4 Dust Emissions

Dust emissions are not anticipated from any operational activities undertaken at the terminal for the following reasons:

- The SICTL Terminal does not handle any dry bulk cargo such as grain or ore, which generate dust when it is stockpiled or loaded onto ships;
- Trucks that service the terminal will only carry freight in containers and thus do not need their loads to be covered;
- Break-bulk or out-of-gauge cargo does not have the potential to generate dust;
- all container storage areas are constructed from concrete slab or are otherwise erosion stabilised (gravel or sprayed seal);
- all internal roads and apron areas are paved with either concrete or asphalt and do not require erosion maintenance;
- Overall, the quantity of disturbed ground within the terminal is nil.

5 Implementation of This Sub-Plan

The implementation of this sub-plan will follow a closed-loop approach developed to suit the nature of the Development Consent (listed in section 3.2) that are related to Air Quality Management. This method is an extension of the process shown in figure 1 and has the primary objective of minimising or eliminating the air quality impacts from the Terminal in compliance with the the Development Consent. The closed-loop is explained diagrammatically below:



[Figure 2](#) Closed-loop operations of this sub-plan.

The range of controls specified in section 5.1 of this sub-plan will be applied to the operations of the terminal by SICTL. Routine terminal inspections will be undertaken as a means of confirming the effectiveness of the odour and dust control measures and to detect any compliance issues. These observations will be documented and reviewed by the HSEQ department where the operational activities will also be assessed against the data. Changes to operations, plant or maintenance can be made or additional controls implemented by SICTL depending on the severity of the issue.



5.1 Operational Controls

Details of the overall management methods and procedures that will be implemented to control odour and dust from the SICTL Terminal are explained in this section. The controls correspond with the potential operational impacts raised in section 4.3.

5.1.1 Control of Odours from the On-Site Fuel Storage Area

The diesel odours originating from the on-site fuel storage area are not expected to impact the local air quality. Notwithstanding, the on-site fuel storage area will be located far from the boundaries of the SICTL Terminal. The intent of this control is for the concentration of any diesel odours to have dissipated before they are carried beyond the boundaries of the terminal. Additionally, the breather pipes of the fuel storage tank are fitted with filters to prevent contamination of the fuel. These filters also help to minimise odour impacts.

5.1.2 Control of Odours from Hazardous Freight/ Dangerous Goods

There will be designated Dangerous Goods storage areas within the SICTL Terminal where spill containment systems are fitted. These areas are separated from the boundary of the terminal by the internal service roads and the landside exchange which allow for any odours to dissipate before they reach the boundary.

In the event of dangerous goods being spilled, odours may be controlled by the application of absorbent materials which stabilise the spilled liquid. Additionally, the Dangerous Goods spill containment area is located on the far end of the SICTL Terminal, away from residential receptors.

5.1.3 Control of Emissions from Operational Plant, Machinery and Equipment to Air

The necessary emission control devices will be fitted to the operational plant and vehicles used by SICTL by the manufacturers. The continued operation of these devices will be checked by every plant operator as part of the pre-start check for each item of plant and referred to the SICTL maintenance personnel if repairs or replacements are required. The SICTL maintenance department will service operational plant and vehicles in-house at scheduled intervals and will ensure that any manufacturer-fitted emission control devices or systems are working adequately.

5.1.4 Control of Dust

Although dust is not anticipated from operational activities, future stages of the SICTL terminal will be under construction adjacent to the SICTL terminal when the terminal opens in late 2013. The control of dust in construction areas is managed by the Construction Environmental Management Plans relevant to these areas and is outside the scope of this document. SICTL will however arrange for the suppression of deposited dust by the following methods:

- Regular sweeping of internal roads using road sweeper trucks operating within the SICTL Terminal, and/ or
- Regular spraying of areas within the terminal using water spray trucks operating within the SICTL Terminal.



5.2 Training of personnel

The training of personnel on the requirements of this sub-plan occurs during the general terminal induction where an outline of air quality management is delivered to all new workers. This training will be completed online prior to the new worker arriving at the terminal. Further detailed training may be delivered to workers undertaking the level 2, 3 and 4 environmental training under section 2.3 of the HSEQ5.1.7 Operational Environmental Management Plan (OEMP) – SICTL.

5.3 Monitoring and Response

Given the operating conditions explained in previous sections, the overall opportunity for odour and dust generation from the SICTL Terminal is very low. In addition, the surroundings of the SICTL Terminal being construction areas, neighbouring stevedores and nearby industry each emitting their own odours and dust in a variety of environmental conditions make the isolation of SICTL’s contribution impractical.

Based on this assessment, SICTL believes that the value of monitoring would not deliver any realistic benefit.

A more effective method of monitoring is in the diligence of all operational staff and operators to identify odour and dust sources within the terminal. This approach will be augmented through regular terminal inspections by the HSEQ Officer and/ or the Environmental & Safety Compliance Engineer. These observations (and their subsequent rectification) will be documented and reported.

The air quality observations of odour and dust will be compiled by the Environmental & Safety Compliance Engineer who will analyse and graph the results showing trends over time. This graph will be reviewed by the HSEQ department on an ongoing basis and will be distributed in accordance with the below diagram, section 6.2.1 provides more information on reporting obligations:

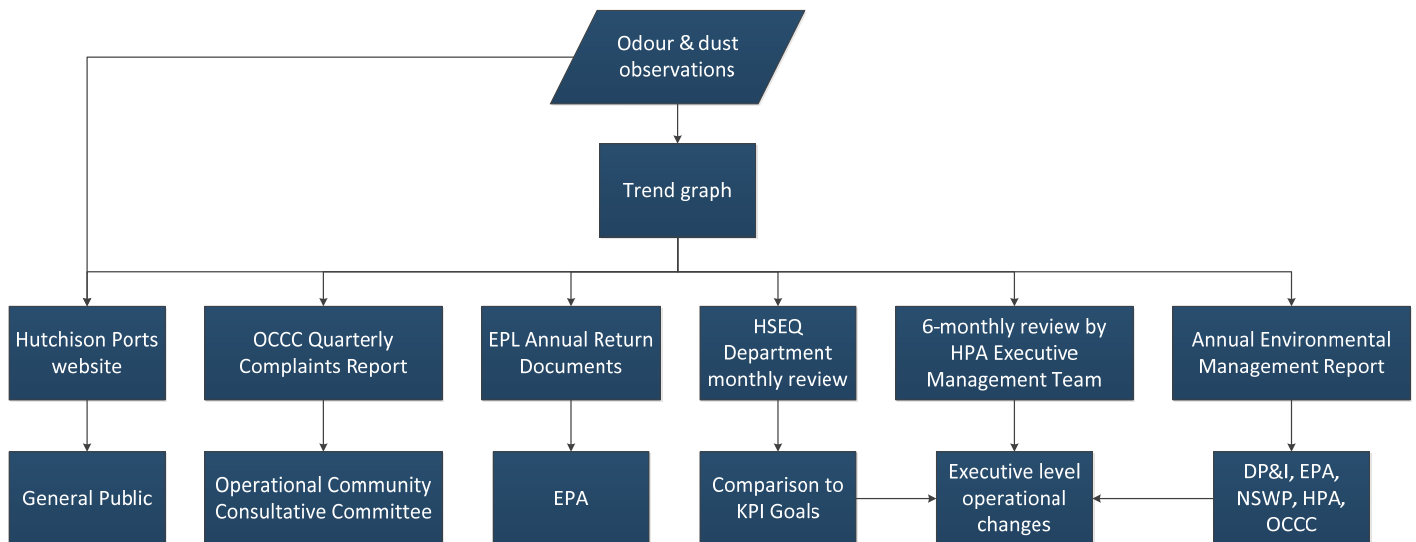


Figure 3 Illustration showing the how the monitoring results are used.



6 Performance Expectations

The measure of how well this sub-plan is implemented and the effectiveness of the control measures described in section 5.1 is the number of air quality complaints returned by residents. This ‘cover-all’ approach is deemed the most suitable for quantifying this Key Performance Indicator (KPI). The KPI is described in the table below.

Table 2: Management of Key Performance Areas

Key Performance Areas	Key Performance Indicators	Goal
Air Quality	Air quality, expressed as the number of community complaints per 100,000 TEU	Zero per 100,000 TEU

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

6.1 Opportunities for Improvement

Under this sub-plan opportunities for improvement of operational practices and controls will be identified by the HSEQ Officer and Environmental and Safety Compliance Engineer during regular inspections of the terminal, inspections of the control measures, analysis of observations and consultation with the workforce. Additionally the community, Patricks Stevedores or the Operational Community Consultative Committee (OCCC) can raise issues directly with SICTL that affect the local air quality. These will be treated as opportunities for improvement by the HSEQ Officer or the Environmental and Safety Compliance Engineer and be rectified within agreed timeframes. All such opportunities for improvement will be reported in accordance with the HSEQ2.2.1 Hazard and Improvement Opportunity Reporting Procedure using the HSEQ2.2.1.1 Hazard and Improvement Report Form and registered on the HSEQ Information Management System.

6.1.1 Management of Complaints or Common Issues involving Neighbouring Stevedores

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

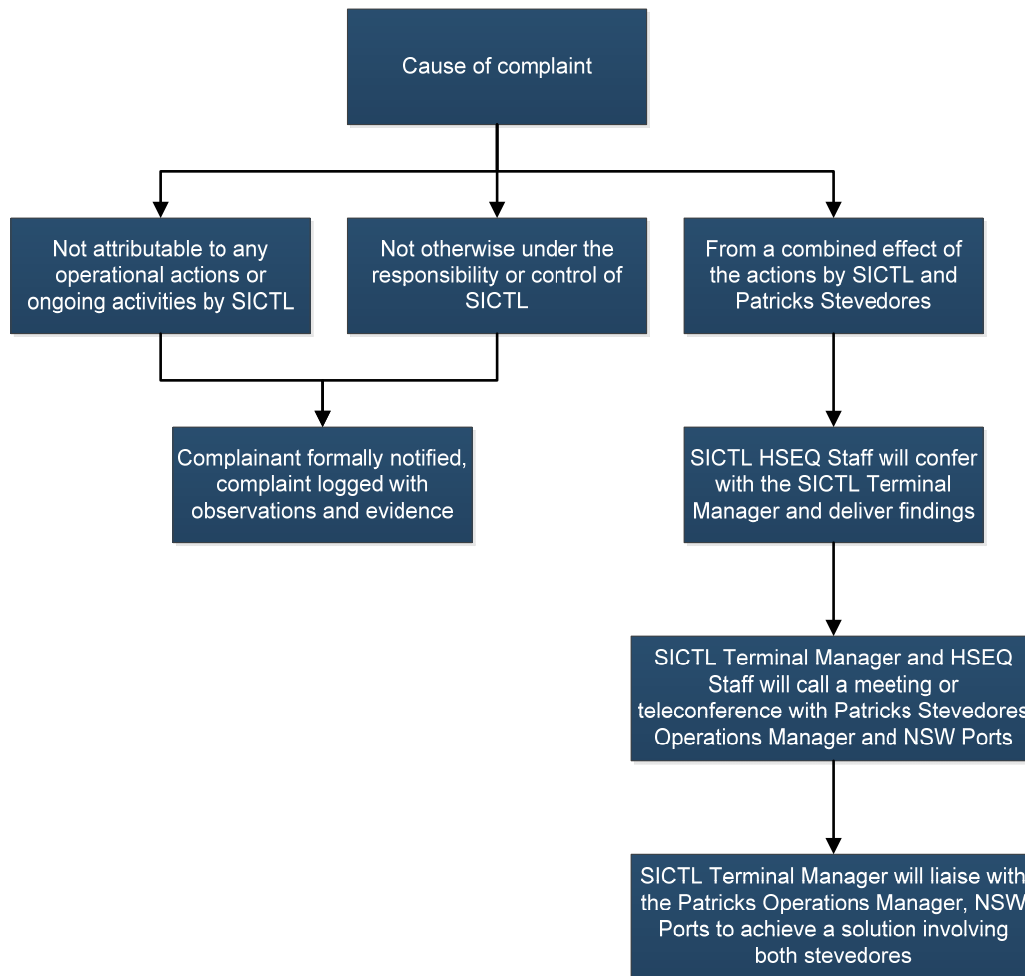


Figure 4 The process of managing complaints involving organisations other than or in addition to SICTL.

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

6.2 Documentation and Record Keeping

SICTL will retain all records of odour and dust observations for traceability. Additionally, the Tier 4 documents that come under this sub-plan are:

- HSEQ2.2.1.1 Hazard and Improvement Report Form
- the complaints register generated by the stakeholder management software

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



6.2.1 Reporting Obligations

Further to section 5.1.8 the monitoring, mitigation, complaints and response information arising from this sub-plan will be reported by SICTL in the following:

- The internal reporting documents provided to the six-monthly operational review by the HPA Executive Management Team
- The Annual Environmental Management Report
- Environmental Protection Licence Annual Return Documents
- Operational Community Consultative Committee Quarterly Complaints Report
- Hutchison Ports Website

The raw data that is captured on the complaints register will go directly into the AEMR together with copies of the complaint reports including times, dates, photos and follow up.

The Air Quality KPIs will be reviewed monthly by the HSEQ department so that trends and statistics can be included in the 6-monthly internal reports and the AEMR. The source of this information is the observation documents and the complaints register or database software employed by SICTL.



7 Responsibility, Accountability and Authority

A comprehensive list of responsibilities, accountabilities and authorities is provided in section 2.1.2 of the HSEQ5.1.7 Operational Environmental Management Plan.

7.1 SICTL as Tenant

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

7.1.1 HSEQ Officer

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

- general surveillance of operations to detect the potential for impacts on nearby residents;
- advise on control measures required to mitigate impacts on nearby residents, and
- interface with the OCCC to manage any impacts originating from the Terminal which affect nearby residents as they arise.

The SICTL Environmental Representative can also undertake these functions.

7.1.2 Environmental and Safety Compliance Engineer

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

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

7.1.3 National HSEQ Manager (Environmental Representative)

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

7.1.4 Terminal Manager

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

7.1.5 Work Crews and Plant Operators

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



8 Identification of Stakeholders

8.1.1 Internal Stakeholders

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

- HPA Corporate (the Executive Management Team);
- HSEQ Department;
- SICTL Environmental Representative;
- SICTL Management at the Terminal;
- SICTL Maintenance Department;
- Operations Personnel;
- Contractors, and
- Customers (Shipping Lines).

8.1.2 External Stakeholders

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

- Patricks Stevedores/ other Port Botany leasees;
- The local community;
- The Operational Community Consultative Committee;
- Randwick City Council;
- Botany Bay City Council;
- NSW Ports;
- Sydney Ports Corporation and Harbour Master;
- Sydney Airport Corporation Limited;
- NSW Roads and Maritime Services;
- NSW Department of Planning and Infrastructure, and
- NSW Office of Environment and Heritage/ EPA.

8.2 Consultation with Stakeholders

8.2.1 Ongoing consultation

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



8.2.2 Key Personnel Contact Details - SICTL

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

9 Referenced Documents

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



10 Review and Auditing of this Sub-Plan

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

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

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

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

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