



Hutchison Ports Australia

2013

HSEQ Management System

Bird Hazard Management Sub-Plan - SICTL

Version 2



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Register of Amendments					
Ver No	Page no	Date	Description of amendments	Prepared by	Approved by
Draft 1	All	17 May 2013	Consultation Draft	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 and Sydney Airport comments incorporated	John Ieroklis	Trevor Ballantyne

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Bird Hazard Management Sub-Plan

1 Purpose

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

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

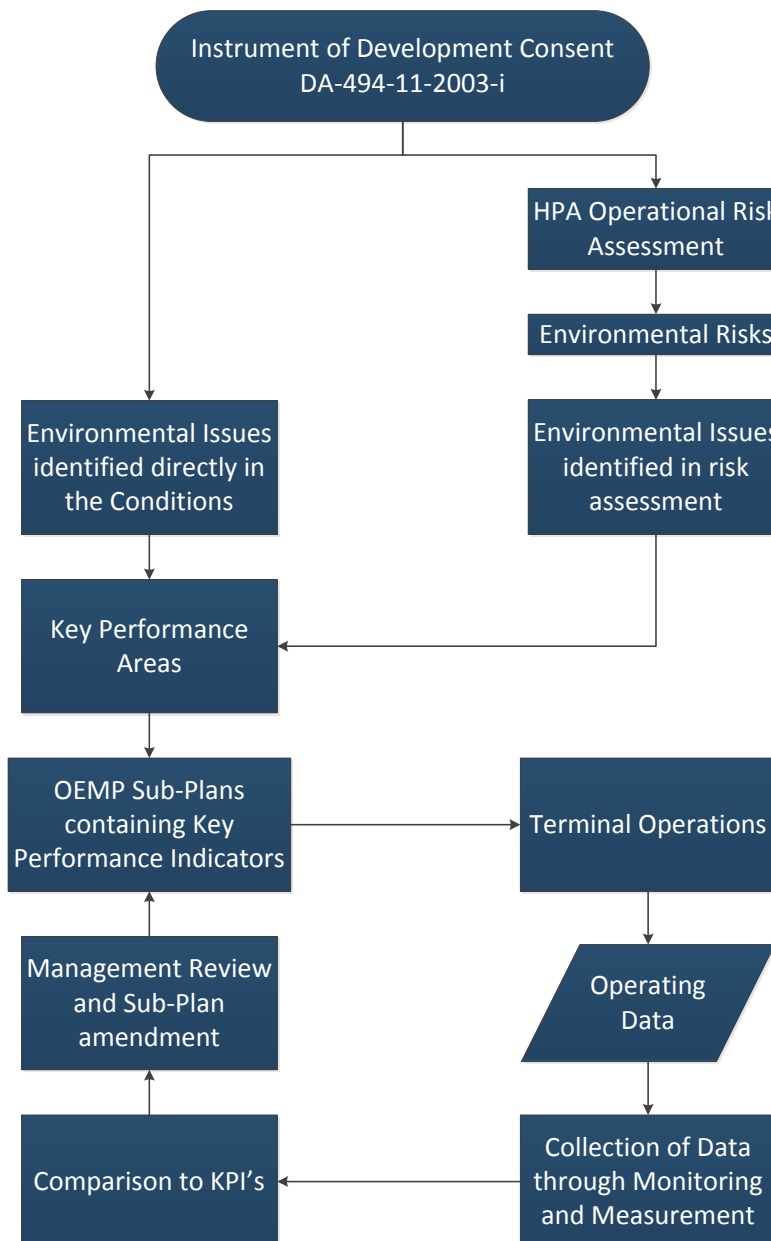


Figure 1 Illustration of how the KPIs and sub-plan control Operations



2 Objective of This Sub-Plan

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

- as a management instrument so that good performance by SICTL and its contractors in the Aviation Operational Impacts Key Performance Area (KPA) can be assured;
- as an instrument that complements HPA's commercial agreements with shipping lines enabling SICTL to support the actions of vessels with the intent of compliance to the Development Consent (where the Development Consent applies to vessels directly);
- as a measure of compliance with the Development Consent in the form of a Key Performance Indicator (KPI) target and a KPI goal;
- as a description of what the KPI actually is and its context for measurement;
- as a basis for consultation with Sydney Airport Corporation Limited (Sydney Airport), the Commonwealth Department of Transport & Infrastructure (DoT&I), Botany Bay City Council (BBCC) and Randwick City Council (RCC) in regards to minimising the attraction of bird species that pose a risk to aircraft movements, and
- as a tool for promoting an ongoing relationship between Sydney Airport and SICTL so that any operational problems can quickly be solved directly between the two organisations.

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 (including managing bird hazards);**
- 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:

- Civil Aviation Regulations, 1988 (Cth)
- Civil Aviation Safety Regulations, 1998 (Cth)
- Environment Protection and Biodiversity Conservation Act 1999 (Cth)
- Threatened Species Conservation Act 1995 (NSW)
- National Parks and Wildlife Act 1974 (NSW)
- Environmental Planning and Assessment Act, 1979 (NSW)

3.2 Conditions of Development Consent

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

Table 1: Conditions of Development Consent

Condition	Conditions of Development Consent
C2.25	<p>Bird Hazard Management Plan</p> <p>Prior to operations, the Applicant shall develop a Bird Hazard Management Plan to minimise the attraction of bird species that pose a risk to aircraft movements. The plan is to be prepared in consultation with the Department of Transport and Regional Services, Sydney Airport Corporation, and Botany and Randwick Councils. The Plan must be approved by the Director-General prior to the commencement of operations.</p>

N.B: The Department of Transport and Regional Services is now known as the Department of Transport and Infrastructure (DoT&I).



4 Strategic Approach

4.1 Risk Identification

The risk identified by the Development Consent to be managed by this sub-plan is attraction of bird species that pose a risk to aircraft movements;

- large birds such as cormorants, pelicans, ibis, and
- birds with flocking or aggregation behaviours such as gulls, terns, cockatoos and ravens.

A detailed risk assessment and evaluation of control measures will be undertaken by SICTL prior to commencement to ensure the risk of attracting these species is controlled to be as low as reasonably practicable. The risk assessment will be made available to Sydney Airport for review as part of this process. The mitigation measures specified in this sub plan will be updated to correspond with ongoing changes to the Environmental Risk Assessment.

4.1.1 Exclusions to the Scope of this Sub-Plan

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

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

4.2 Potential Operational Impacts

4.2.1 Bird Attraction to the SICTL terminal

It is expected that birds may be attracted to the SICTL terminal through the following mechanisms:

- in the vicinity of rubbish collection areas and open bins where birds can pick food scraps opportunistically;
- littering by SICTL staff where small items of rubbish or food scraps are thrown on the ground, thrown out of vehicles or into Botany Bay, presenting a food opportunity for birds;
- ponding of surface water on the terminal hardstand area becoming a 'bird bath' where birds can come to drink;
- the structures of quay cranes providing an opportunity for birds to make nests (not expected as the cranes are not suitable nesting areas);
- rooves and gutters of terminal buildings providing an opportunity for birds to make nests;
- in quiet areas of the terminal where there is little or no staff or vehicle movement providing an opportunity for birds to gather, and
- terminal lighting attracting insects which are food for birds.



4.2.2 Bird Attraction to Container Ships

Although container ships are not a favourable attraction for birds, it is possible whilst at sea. When disoriented or tired, birds may land on ships at sea to recover. There is a small risk of ships bringing birds into Botany Bay that have remained on board in large numbers (especially after bad weather). The management of birds on ships is the crews' responsibility but may pose a risk to the movement of aircraft through the following mechanisms:

- large groups of birds remaining on board ships until berthing, then flying off;
- the attraction of birds to the rubbish disposal areas on ships usually located behind the bridge structure where birds can pick food scraps opportunistically;
- littering into Botany Bay by ships crews presenting a food opportunity for fish and therefore birds;
- shipboard lighting (deck lights) attracting insects which are food for birds, and
- the superstructures of ships for example, mast arms and handrails.



5 Implementation of This Sub-Plan

5.1 Operational Controls

5.1.1 Controls to Minimise Bird Attraction to the SICTL terminal

SICTL will adopt measures as far as reasonably practical to discourage bird attraction to the SICTL terminal.

These would include:

- enclosure of rubbish collection areas/ use of closed bins to reduce the risk of this bird attractant;
- regular collection of bins to prevent bins from overflowing, this will minimise the attractant;
- control of littering by SICTL personnel through inductions and toolbox talks, surveillance of litter by all SICTL employees and HSEQ officer on a daily basis;
- SICTL personnel and Carrier's truck drivers advised to not eat meals in the general terminal areas – SICTL personnel to eat meals in the terminal building and Carrier's truck drivers to eat meals in the Driver's Amenities Building or in the cabs of their trucks;
- control of littering by erecting signage within the terminal and the installation of adequate (enclosed) litter bins;
- discouragement of bird feeding by erecting signage within the terminal (including the truck marshalling area and balcony areas of buildings) and through inductions and toolbox talks;



[Figure 2](#) An example of the signage proposed to discourage the feeding of birds.

- surveillance of surface water ponding on the terminal hardstand area by SICTL staff and the HSEQ Officer after rain. The ponded water is to be removed/ managed by SICTL within 24-hours by:
 - the use of vacuum truck, or;
 - having maintenance personnel sweeping away shallow ponded water with brooms or squeegees, or
 - the addition of drainage systems/ modification to the existing drainage system for persistent ponding.
- inspections of the structures of quay cranes at least once per week by the crane operator/ HSEQ Officer to check for nests, any nests discovered will be fully removed from the crane. SICTL will apply to the National Parks and Wildlife Service for permission to destroy any eggs;
- the design of rooves and gutters of terminal buildings to deny birds the opportunity to make nests;
- installation of bird deterrents such as predator mannequins, netting, tape, bio-acoustics (natural predator calls) in quiet areas of the terminal where there is little or no staff or vehicle movement to deny any opportunity for birds to gather, and
- the engagement of a specialist lighting consultant to provide advice to SICTL on tinting or filtering of terminal lighting to deter insects which are food for birds. The lighting specifications for the SICTL



terminal will be communicated to the SICTL Maintenance department so replacement light bulbs or fittings will have the same characteristics as those specified in the design;

- the engagement of a consulting avian ecologist to provide advice to SICTL on active management methods such as flock dispersal, nest removal, use of trained predators etc
- The implementation of active management programs for persistent problem bird species;
- no bird-attracting cargo (such as livestock or bulk grain) handled at the SICTL Terminal.
- regular liaison between the SICTL Environmental Representative and the Sydney Airport Wildlife Management Group, and
- co-ordination of dispersal or harassment (or any other method of bird removal) with Sydney Airport.

5.1.2 Controls to Minimise Bird Attraction to Cargo Ships

SICTL will adopt measures as far as reasonably practical to ensure that bird-attraction on board ships is minimised by liaising with the shipping line/ Master of each vessel so that:

- there are no large groups of birds present on board ships before berthing
- ships crew do not feed birds or engage in fishing activities from the vessel while berthed, and
- minimising ship board lighting while berthed to the amount required to allow safe work.

These controls are facilitated through SICTL's service agreement with each Shipping Line.

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 the bird hazard 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 on the effects on airport operations may be delivered to workers undertaking the level 2 and level 4 environmental training under section 2.3 of the HSEQ5.1.7 Operational Environmental Management Plan (OEMP) – SICTL.



5.3 Monitoring

SICTL will monitor the following aspects of bird hazard management within all areas of the SICTL Terminal:

- Potential bird attractants such as litter, overflow of rubbish collection areas, ponding of water;
- Bird roosting behaviours (building of nests);
- The presence of birds with flocking or aggregation behaviours such as gulls, terns, cockatoos and ravens;
- The presence of large birds, such as cormorants, pelicans, ibis, and

SICTL will interface with the Sydney Airport Airfield Operations Co-ordinator to manage any bird hazards originating from the SICTL terminal with the potential to affect Sydney Airport. Monitoring of the above issues is primarily carried out by the HSEQ Officer/ Environmental & Safety Compliance Engineer supplemented by the awareness of the general SICTL workforce for ongoing monitoring.

Other sources of monitoring to supplement this resource are:

- SICTL wharf personnel reporting impacts to the HSEQ Officer such as detection of roosting birds;
- SICTL Crane operators reporting the presence of roosting birds on the Quay Cranes;
- Complaints from pilots or Airservices relayed through Sydney Airport to SICTL;

The results of monitoring and the mitigation measures implemented 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 so that the effectiveness of mitigation controls can be assured and will be distributed in accordance with the below diagram, section 6.2.1 provides more information on reporting obligations:

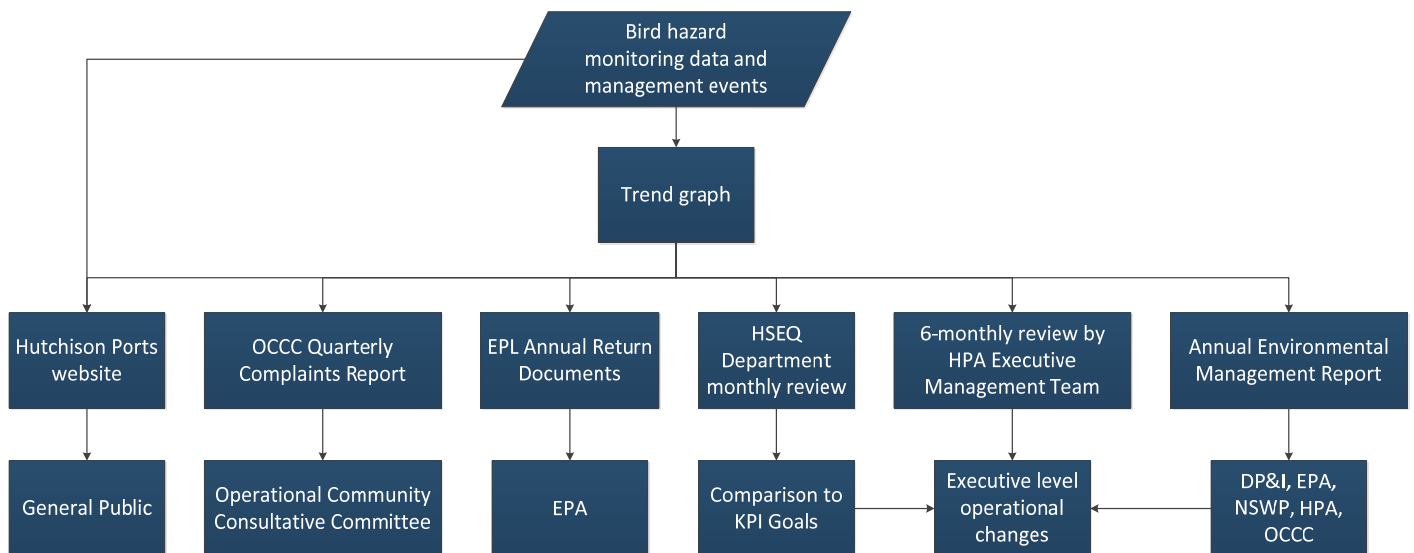


Figure 3 Illustration showing the how the monitoring results are used.



6 Performance Expectations

The singular measure of how well this sub-plan is implemented and the effectiveness of the bird deterrents and other control measures described in section 5.1 is the number of times problem birds need to be actively managed by SICTL through the use of mitigation measures specified in this sub plan such as:

- Flock dispersion;
- Nest removal;
- Installation of predator mannequins;
- Use of trained predators;

Summarily these will be expressed as the number of bird hazard management events. 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
Aviation Operational Impacts	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

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 Sydney Airport complaints attributed to the operation of the SICTL Terminal.

6.1 Opportunities for Improvement

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



6.1.1 Management of Complaints or Common Issues involving Neighbouring Stevedores

The SICTL HSEQ Officer or the Environmental and Safety Compliance Engineer will investigate the complaint or the bird hazard 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:

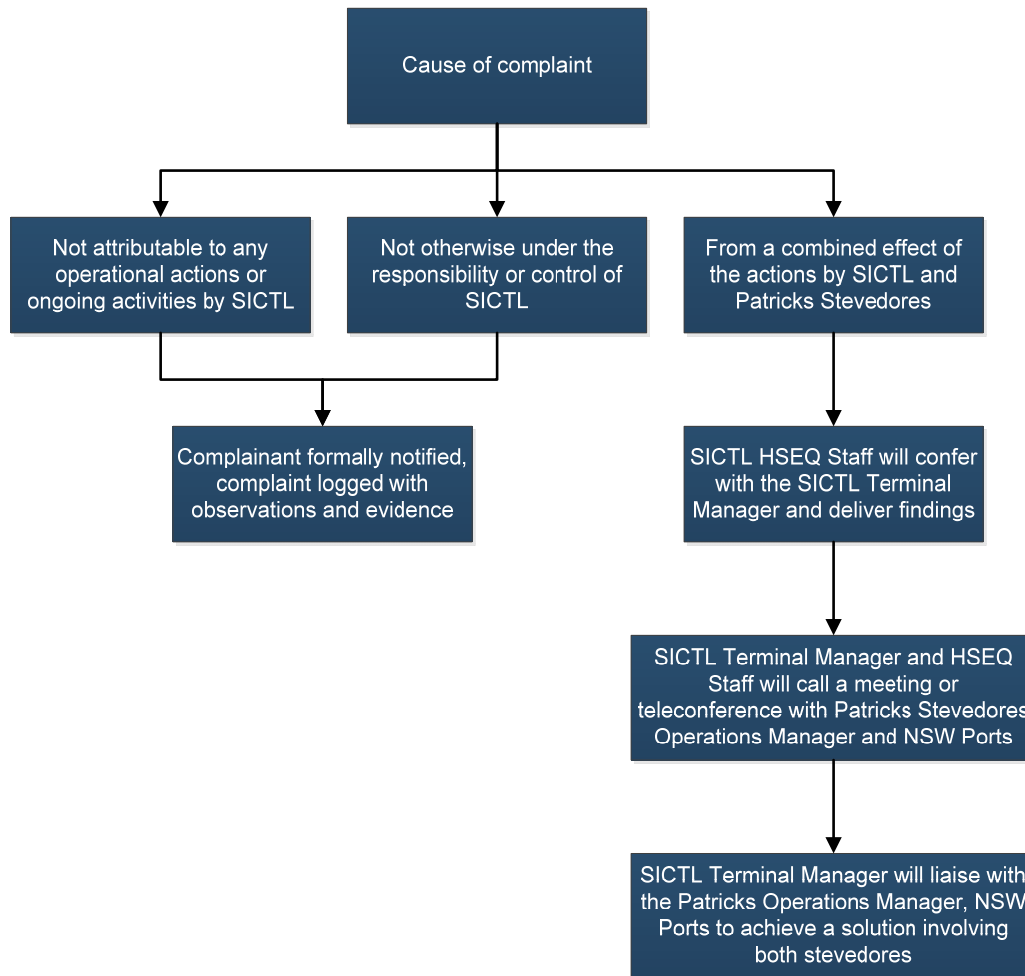


Figure 4 The process of managing complaints involving organisations other than or in addition to SICTL.

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

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

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

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

6.2.1 Reporting Obligations

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

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



7 Responsibility, Accountability and Authority

7.1 SICTL as tenant

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

7.1.1 HSEQ Officer

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

- general surveillance of the terminal to eliminate bird attractants such as litter, overflow of rubbish collection areas, nests etc;
- advise on suitable control measures (listed in this Sub-Plan) required to minimise the attraction of bird species that pose a risk to aircraft movements
- co-ordinate dispersal or harassment (or any other method of bird removal) with Sydney Airport, and
- interface with the Sydney Airport Airfield Operations Co-ordinator to manage any bird hazards originating from the SICTL terminal which affect Sydney Airport as they arise.

The SICTL Environmental Representative can also undertake these functions.

7.1.2 Environmental and Safety Compliance Engineer

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

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

7.1.3 National HSEQ Manager (Environmental Representative)

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

7.1.4 Terminal Manager

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



7.1.5 Work Crews and Plant Operators

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

7.2 Sydney Airport Corporation Limited

As the managing body for Sydney Airport and SICTL's liaison with Air Services Australia and the Civil Aviation Safety Authority, Sydney Airport will notify SICTL of any relevant bird hazard related complaints raised by pilots. SICTL will interface with Sydney Airport and work to resolve these complaints promptly.



8 Identification of Stakeholders

8.1.1 Internal Stakeholders

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

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

8.1.2 External Stakeholders

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

- The local community;
- The Operational Community Consultative Committee;
- Randwick City Council;
- Botany Bay City Council;
- NSW Ports;
- Sydney Ports Corporation;
- NSW Roads and Maritime Services;
- NSW Department of Planning and Infrastructure;
- NSW Office of Environment and Heritage/ EPA;
- Sydney Airport Corporation Limited;
- Air Services Australia;
- Civil Aviation Safety Authority (CASA), and
- Commonwealth Department of Infrastructure and Transport.



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. Under this sub-plan, the primary external stakeholder is the Sydney Airport Corporation Limited who will also interface with Air Services Australia and the Civil Aviation Safety Authority.

SICTL will interface with Sydney Airport at an operational level with the aim of minimising bird hazards originating from the SICTL terminal. The SICTL HSEQ Officer will be the primary point of contact with Sydney Airport Airfield Operations Co-ordinator. All airport and aviation-related consultation will go through Sydney Airport including where involvement by CASA or Air Services Australia is required. The frequency of interface will be as needed.

Complaints from stakeholders will be handled in accordance with sections 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

8.2.3 Key Personnel Contact Details – Sydney Airport Corporation Limited

Name	Position	Contact number
Operations Officer	Airfield Operations Co-ordinator	0419 278 208 (24 Hours) 9667 9824 (24 Hours)



9 Referenced Documents

- Manual of Standards Part 139 – Aerodromes. Version 1.6: June 2011, Civil Aviation Safety Authority
- Recommended Practices No. 1 – Standards for Aerodrome Bird/ Wildlife Control. Issue 1 October 2006, International Bird Strike Committee
- 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.