



**GLE-PL-0006**

**Glebe Island Terminal**

**Environmental Management Plan (EMP)**

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## Alterations and Amendments

<b>Table 0-1: Alterations and Amendments</b>		
<b>Date</b>	<b>Initial</b>	<b>Alteration / Amendment</b>
02/12/2019	PJ	New Revision. Updated to refresh document structure to ISO14001:2015 framework and to meet requirements for Development Consent DA9967
19/02/20	GW	Updated to reflect Port Authority of NSW review feedback

## DA9967 Part B - B1 and B2 Schedule Mapping

<b>Condition</b>	<b>Location of Requirement</b>
B1	Prepare and implement an OEMP – OEMP is this document
B1 a	Roles, responsibilities and accountabilities – Section 2.3 and 4.3.1
B1 b (i)	Informing community and relevant agencies of performance – Section 4.3.3
B1 b (ii)	Manage Complaints – Section 4.3.3
B1 b (iii)	Resolve disputes – Section 4.3.3
B1 b (iv)	Respond to noncompliance – Section 4.3.3
B1 b (v)	Respond to emergencies – Section 4.3.3 and 5.8
B1 c	Noise and Vibration – Section 5.1
B1 d	Air Quality – Section 5.2
B1 e	Traffic Management – Section 5.3
B2 a	Not commence until OEMP is approved by Planning Secretary – Site to operate to current approved limits of 500,000 tonnes until OEMP approved
B2 b	Operate in accordance with the approved OEMP – ongoing compliance requirement

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# 1 Introduction

As part of its commitment to continual improvement in safety, health and environmental management, Cement Australia has developed and implemented an integrated Safety, Health, Environmental and Quality Management System (SHEQMS) at the Glebe Island Terminal ("The Terminal") based on the requirements of:

- ISO 14001:2015 Environmental Management Systems;
- AS/NZS 4801:2001 Occupational Health and Safety Management Systems; and
- ISO9001:2016 Quality Management Systems

Certification is managed via an agreed surveillance program with SAI Global.

The integrated SHEQMS provides the framework to enable Cement Australia to manage and demonstrate compliance with all relevant safety, health and environmental (SHE) compliance obligations; and incorporates the Cement Australia Environmental Management System.

This Environmental Management Plan (EMP) provides specific information for the Terminal operations to support the Cement Australia SHEQMS Manual (CAS-FW-002). This plan also meets the requirements of Clause B1 of Glebe Island's Development Consent (DA 9967) which requires the development and implementation of an Operational Environmental Management Plan.

This EMP is reviewed as minimum annually, or following a significant change to an operation, system or process.

## 1.1 Purpose

The purpose of this EMP is to describe the environmental management practices employed by the Terminal and to ensure the site complies with all environment-related legal and other requirements. The EMP seeks to ensure effective processes are in place for the:

- Identification of, and compliance with, all issued conditions, licences and other relevant legal and other requirements;
- Identification and assessment of all environmental aspects and impacts;
- Implementation of controls to prevent environmental harm;
- Development of objectives and targets to promote continual improvement in environmental management and sustainability, and
- Critical evaluation and review of environmental and sustainability performance and the environment management system.

## 1.2 Context of the Organisation

### 1.2.1 Organisation and its context

The site is located in the Glebe Island port facility in Sydney, as shown in Figure 1. The Glebe Island facility is part of the Bays Precinct, and is located approximately 2.3km west of the Sydney CBD. The subject site is the westernmost 16 silos of the Glebe Island Silos (shown in Figure 1). The site is approximately 3,740m<sup>2</sup> in area and irregular in shape, and is comprised of different site lots. The registered owner is the Port Authority of New South Wales, and the site is currently leased and operated by Cement Australia.

The site features 16 of the total set of 30 silos which make up the complete Glebe Island Silos set (the remaining 14 silos are operated by Sugar Australia). In the lead up to the 2000 Olympic Games, the south-eastern and south-western sides of the silos were painted to mimic Grecian columns and a structure was attached to the top of the silos to take advertising. A photo of the silos has been provided in Figure 2.

The entire Glebe Island Silos are a heritage item of State significance, listed under the Port Authority of New South Wales' Heritage Register (Inventory Number: 4560016), as per section 170 of the NSW Heritage Act 1977. The silos are also a heritage item under Schedule 4, Part 3 (Item 1) of the Sydney Regional Environmental Plan No 26 – City West (SREP 26).

This Cement Australia terminal facility relies on wharf infrastructure alongside White Bay to unload cementitious material via conveyor into the Glebe Island Silos. Cementitious material is then dispatched by tanker truck from the silos to concrete batching plants and other customers around Sydney. The facility operates with three weighbridges. Each weighbridge has a capacity to dispatch four trucks per hour. As such, the maximum hourly dispatch of cementitious material is 12 tankers per hour.

To the north of site is a section of White Bay, with the suburb of Balmain beyond. To the east of site is the state heritage listed Glebe Island Bridge, with the suburb of Pyrmont beyond. To the south-west is the ANZAC Bridge, with Rozelle, Johnston's, and Blackwattle Bays to the south, and the suburb of Glebe further south. To the west of site is the state heritage listed White Bay Power Station, with the suburb of Rozelle beyond.

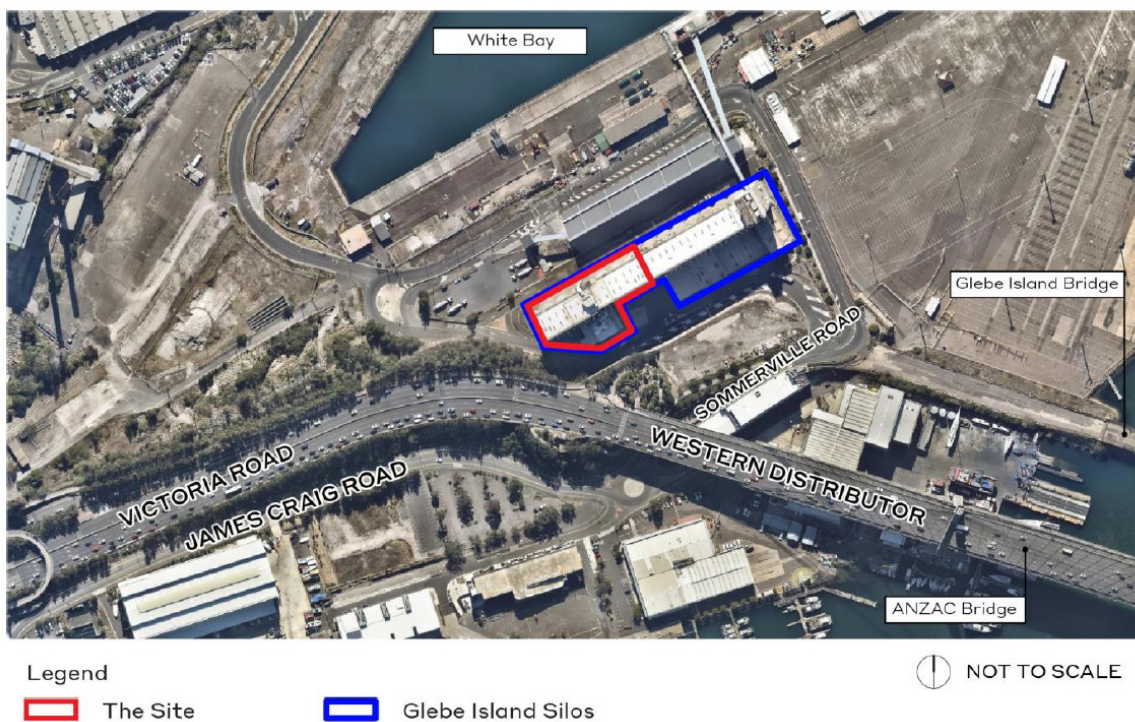


Figure 1- Site Plan

Source: Ethos Urban Statement of Environmental Effects Glebe Island Silos



Figure 2- Glebe Island Silos, looking north-west

Source: *Ethos Urban Statement of Environmental Effects Glebe Island Silos*

Cement Australia's Glebe Island Terminal operates 24 hours a day, 7 days a week.

### 1.3 Scope

This EMP is limited in scope to the operational activities carried out by the Terminal occupying the following lots:

- Lot 1 DP 1009965 being Part Lot 2 DP 879549
- Part Lot 10 DP 1170710
- Lot 12 of DP1170710

It does not cover maritime operations, ship refuelling, ship maintenance or the transport and distribution of cement products beyond site boundaries.

## 2 System Overview

The Cement Australia SHEQMS documentation structure is described in CAS-FW-002 Safety, Health, Environment and Quality Management System (SHEQMS) Manual, and is followed by the Terminal operations.

All Cement Australia sites are expected to maintain a high level of environmental performance in line with the Cement Australia's SHEQ Policy (CAS-PO-001).

The SHEQMS provides the framework to enable Cement Australia to manage and demonstrate compliance with all relevant SHE compliance obligations.

This EMP provides specific information for Terminal operations to support the SHEQMS Manual.

### 2.1 Document Overview

This document details how the Terminal operations maintain and manage the site-specific elements of the SHEQMS and its environmental and sustainability performance.

The structure of this EMP follows the framework of the ISO14001:2015 Environmental Management System standard, with the key sections being:

- Context of the Organisation
- Leadership
- Planning
- Support
- Operation
- Performance Evaluation
- Continual Improvement

### 2.2 Relationship to other Documents

This EMP is part of a suite of SHEQMS documents that describes the processes and techniques that are used to manage the environmental performance and risks associated with Glebe Island Terminal based activities.

The documents listed in Section 3 support the Cement Australia SHEQMS and this EMP.

### 2.3 Responsibilities

It is the responsibility of all Terminal employees, contractors and visitors to the site to comply with the requirements of this EMP.

All personnel are encouraged to suggest improvements, corrections and alterations to this EMP.

The Terminal Team Leader of Cement Australia Glebe Island is the accountable person for the implementation of this plan.

The Glebe Island Safety and Sustainability (S/S) Specialist, in conjunction with Team Leader, is responsible for facilitating updates to this EMP.

Further details of specific responsibilities are presented in Section 4.3.

### 3 Applicable Documents

<b>Table 3-1: Cement Australia Documents</b>	
<b>Reference</b>	<b>Document Name</b>
CAS-PO-001	SHEQ Policy
CAS-FW-002	SHEQMS Manual
CAS-FW-008	Managers Safety Health and Environment Due Diligence
CAS-FW-17.2	Crisis and Business Continuity Management
CAS-PR-1.1	Leadership and Accountabilities
CAS-PR-1.2	SHEQ Management System Review
CAS-PR-3.1	Competency and Behaviours
CAS-PR-3.2	SHE Site Inductions
CAS-PR-4.1	Communication and Engagement
CAS-PR-4.2	SHEQ Observations
CAS-PR-5.1	Risk Management
CAS-PR-5.2	Management of Change
CAS-PR-5.5	Hazardous Substances and Dangerous Goods
CAS-PR-7.1	Legal and Other Requirements
CAS-PR-10.1	Environmental and Sustainability Management System Requirements
CAS-PR-10.2	Air Quality
CAS-PR-10.3	Water Conservation and Management
CAS-PR-10.4	Land Management
CAS-PR-10.4.1	Land Contamination Management
CAS-PR-10.5	Waste Management
CAS-PR-10.6	Environmental Noise, Vibration and Blast Overpressure
CAS-PR-11.1	Contract Management for Onsite Works
CAS-PR-11.3	Principal Contractors
CAS-PR-12.1	Community Engagement and Licence to Operate
CAS-PR-13.1	Project Management SHEQ Requirements
CAS-PR-15.1	Incident Management – Notification, Recording, Investigation and Analysis
CAS-PR-15.2	Community Complaints
CAS-PR-16.1	Compliance and Reporting
CAS-PR-17.1	Emergency Management
CAS-PR-18.1	Site Security

**Table 3-2: Non Cement Australia Documents**

Reference	Document Name
NSW EPA	Environment Protection Licence (EPL) 4310
Department of Planning, Industry and Environment	Development Consent DA 9967
Ethos Urban	Statement of Environmental Effects - Glebe Island Silos (25 Feb 2019)
ISO 14001:2015	Environmental management systems – Requirements with guidance for use
AS/NZ 4801	Occupational Health and Safety Management Systems – Specification with guidance for use

**Table 3-3: Definitions**

Term	Definition
Environmental Aspect (ISO14001:2015)	An element of an organisation's activities, products, or services that can interact with the environment.
Cementitious Material	Traditional Portland cement and other cementitious materials, such as fly ash, ground granulated blast furnace slag (GGBS) and/or limestone fines.
Life Cycle (ISO14001:2015)	Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal. The life cycle stages include acquisition of raw materials, design, production, transportation/delivery, use, end-of-life treatment and final disposal.
Material Environmental Harm	Harm that: a) Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or b) Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.)
Outsource (ISO14001:2015)	Make an arrangement where an external organisation performs part of an organisation's function or process. Note, the external organisation is outside the scope of the management system, although the outsourced function or process is within the scope.

**Table 3-3: Definitions**

<b>Term</b>	<b>Definition</b>
Worker	Workers include: <ul style="list-style-type: none"><li>• an employee; or</li><li>• a contractor or subcontractor; or</li><li>• an employee of a contractor or subcontractor; or</li><li>• an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or</li><li>• an outworker; or</li><li>• an apprentice or trainee; or</li><li>• a student gaining work experience; or</li><li>• a volunteer; or</li><li>• a person conducting a business or undertaking (PCBU) if the person is an individual who carries out work in that business or undertaking.</li></ul>

## **4 Management System Requirements**

### **4.1 Leadership**

#### **4.1.1 Leadership and Commitment**

The National Terminals Manager is responsible for the effective implementation of this EMP and the establishment of environment and sustainability objectives and targets that facilitates continual improvement of environmental and sustainability management within Cement Australia activities at the Terminal.

In addition, members of the Terminals leadership team play an active role in the weekly SHE Friday Forum conference calls, chaired by members of Cement Australia Executive. This forum is used across the business to share relevant learnings from incident and industry alerts, as well as providing the business units the opportunity to share proactive actions taken to improve SHE performance.

The Safety and Sustainability Specialist participates in the fortnightly Safety and Sustainability team conference call. The purpose of this engagement is a two-way conversation for the sharing ideas, team focus areas, areas of concern, project updates etc.

At a site level, a weekly meeting is scheduled between the National Terminals Manager and the Terminal Team Leaders (as a group) that includes safety and environmental matters on the agenda. This meeting is conducted via phone or video conferencing. The site also maintains a quarterly housekeeping inspection with particular attention paid to environmental and sustainability proactive measures.

In addition, as part of the SHEQMS management review process, the effectiveness of the EMP is reviewed and communicated to the Terminals Leadership Team, ensuring the accountability for improving environmental and sustainability performance across the organisation.

#### **4.1.2 Policy**

Terminal operations are undertaken in accordance with CAS-PO-001 SHEQ Policy. Commitment to this policy is demonstrated via communication and promotion of the policy to relevant stakeholders and the implementation and the effectiveness of this EMP.

The SHEQ Policy is communicated internally via the induction process and will be made available to interested parties upon request. Copies are maintained on noticeboards within Terminal work areas and on the Cement Australia website.

#### **4.1.3 Organisational Roles, Responsibilities and Authorities**

All Cement Australia employees, subcontractors/suppliers, and visitors to the Terminal have a responsibility for identifying improvement opportunities, working to achieve environment and sustainability performance improvements, and for limiting and reducing the impacts on the environment associated with the Terminal activities.

Section 4.3 of this EMP provides a general description of the resources, roles, responsibility, and authority for environmental and sustainability management within Cement Australia.

Other site documents may also define site roles and responsibilities.

## **4.2 Planning**

### **4.2.1 General**

Management of environmental aspects, impacts and opportunities are undertaken in accordance with CAS-PR-10.1 Environment and Sustainability Management System Requirements.

In addition, hazard identification and risk management shall be applied prior to the introduction of new activities, work areas, tasks, management systems, procedures, substances or equipment, including company organised and supported activities/events involving participation of Cement Australia employees, and during any change/trial period at Glebe Island.

### **4.2.2 Environmental Aspects**

Environmental aspects and any associated risks and opportunities (those that can be controlled or influenced by our activities) are identified for Terminal based activities, products and services within the defined scope of the SHEQMS and this EMP. These are recorded in the site's Risk Register (GLE-REG-004 Risk Register) as "Environmental Aspects and Impacts".

Identification of environmental aspects shall take into account where the Terminal has outsourced processes still within Cement Australia work scope to an external organisation. It also takes into account planned or new developments or new/modified activities, products and services.

Identification of environmental aspects also requires consideration of the entire life cycle of the product or service where Cement Australia can control or influence. Dependent on the work scope applicable to this EMP, life cycle considerations may include the identification of environmental impacts or opportunities applicable to the acquisition of raw materials, production, transportation and/or delivery, use of products, and the recycling or disposal processes utilised, and the operational controls required to address any associated significant environmental aspects from these stages.

The environmental aspects register will identify for each environmental aspect if the activity is outsourced, if there are known risks with managing an environmental aspect and impact, any relevant life cycle considerations and the level of control that Cement Australia can exercise over the risk or opportunity. Significant aspects are those that have an assessed raw risk rating of Medium 13 or above.

The Environmental Aspects register is a live document that is reviewed annually and maintained whenever new aspects are identified.

### **4.2.3 Task Based Risk Assessment**

In addition to the high level risk assessment, all tasks carried out on site which are not governed by a set of specific written instructions require a Job Planning Tool be used to plan the work and assess potential risks (including environmental risks). All risk identified must have controls implemented prior to commencing work.

All tasks that are subject to a written work instruction (i.e. routine tasks) must also first be assessed for risk (including environmental risks) and have controls documented. These controls must be implemented prior to commencing work.

### **4.2.4 Management of Change**

Terminal operations will ensure that any changes to operations will meet all environmental compliance obligations and shall effectively control environmental aspects, risks and opportunities and any potential for environmental incident that may result from activity, product, service or system changes.

Management of change shall be conducted in accordance with CAS-PR-5.2 Management of Change. The management of change process is looking to identify potential environmental or sustainability risks and/or opportunities that may be introduced in the event of, but not limited to, the following triggers:

- Temporary or permanent changes to Cement Australia occupied facilities, raw materials, process chemicals, process parameters, equipment design, technology, design/layout of workplaces, tools, processes and materials;

- Contractual changes e.g. new contracts, contract renewal, contract closure, customer, supplier, contractor;
- Significant organisational changes e.g. personnel or staffing changes, including suppliers and contractors;
- Installation of new equipment;
- Demolition, remodelling or addition of existing buildings;
- Installation and/or occupation of a new building;
- Replacement of existing equipment not like for like;
- Digging, trenching, excavation and/or removal of soils.

Terminal operations will ensure that any new significant environmental aspect or sustainability risk and/or opportunity identified via the management of change process is incorporated into the environmental aspects register, is communicated to all relevant stakeholders and subject to appropriate operational control, internal audit and review.

#### **4.2.5 Compliance Obligations**

Terminal operations manage relevant environmental compliance obligations in accordance with CAS-PR-7.1 Legal and Other Requirements, using Enviro Essentials, an externally administered legislation alert and records database for Safety and Environment law and via a documented Cement Australia Compliance Obligations Register.

On a monthly basis, the Cement Australia Safety and Sustainability Function review changes to the relevant legal obligations via the EnviroEssentials subscription service and identifies any potential impacts to Cement Australia operations. Where relevant changes are identified, the applicable Cement Australia operations are notified of the updated legal obligation via email communications.

Where a legislative change impact is identified in relation to Terminal activities, the Safety and Sustainability Specialist shall ensure appropriate actions are implemented to address the change.

Environmental legislation in New South Wales (NSW) is typically administered and enforced by the NSW Environment Protection Authority (EPA).

The following information in this section identifies other relevant compliance obligations with respect to environmental and sustainability management for this Terminal.

##### **4.2.5.1 Site Leases**

Cement Australia holds a lease with the Sydney Ports Corporation for the property located on Sommerville Road Sydney (Property Reference Lot 1 of DP 1009965). This lease is currently due to expire 31 December 2020. The above Lot is now referred to as Lot 12 of DP 1170710.

Cement Australia also holds a lease over Part Lot 10 of DP 1170710 used as a staging area for Cement Australia tankers and prime movers.

Copies of these leases are available within Cement Australia's Controlled Documents Database. These leases may contain references to environmental management to which Cement Australia is required to comply.

#### **4.2.5.2 Environment Protection Licence (EPL)**

This Terminal operates under an Environmental Protection Licence EPL No. 4310 administered by the NSW EPA. A copy of the EPL can be located on the NSW EPA website (see link) and a hard copy should be made easily accessible to site employees e.g. posted on site noticeboards.

<https://apps.epa.nsw.gov.au/prpoeoapp/>

The EPL authorises the carrying out of scheduled activities associated with cement/lime handling (with an annual handling capacity threshold of between 500,000 tonne and 2,000,000 tonne) and shipping in bulk (with an annual capacity to load and unload of greater than 500,000 tonne).

The EPL sets conditions to protect environmental values such as water, (stormwater, groundwater, marine), air, (including odour, noise and dust), land and waste management.

The reporting period for the EPL covers dates from the 1 July to 30 June of the relevant year.

The annual compliance return to the NSW EPA is due for submission no later than 30 August every year (i.e. within 60 days of the end of the reporting period). This is a declaration of Cement Australia's compliance with its EPL and is required to be signed by two Company Directors. The annual return must be supplied to the EPA via eConnect EPA (online portal) or by registered post within the due date.

Following receipt and approval of the annual return, the EPA will issue a licence return invoice to be paid by the due date. There are penalties for late lodgement or failure to lodge an annual return.

Details of each condition of the EPL No. 4310 are maintained within the site-specific obligations section of Cement Australia's subscription of EnviroEssentials.

#### **4.2.5.3 Development Consent**

The Terminal facility operates under Development Consent D.A.350/91, which was granted by Leichhardt Municipal Council on 16 October 1991 and subsequently modified by the Minister for Planning and Sydney Harbour Foreshore Authority in 2002 and 2003.

The above consent permitted a maximum throughput of 500,000 tonnes per annum of cementitious materials.

In 2019, Cement Australia submitted a Development Application that sought approval for a permitted maximum throughput of 600,000 tonnes per annum (an increase per annum of 100,000 tonnes), and for this throughput to apply for two years only (at which point, the throughput will revert to the current 500,000 tonnes per annum cap). The proposal did not require any physical works or changes to infrastructure or operational arrangements on site, noting that the current operation, including the dispatch of trucks, is carried out on a 24 hours per day 7 days per week basis.

As a result, the Terminal operations are now subject to conditions of Development Consent DA 9967, approving the site for a temporary increase of annual cementitious material throughput capacity to 600,000 tonnes per annum for an 18 month period, from the date of approval of this EMP from NSW Department of Planning and the Environment.

Relevant conditions of this consent are discussed in other sections of this EMP.

#### **4.2.5.4 ISO14001:2015 Environmental Management Systems**

The environmental management system in place at Glebe Island is based on the requirements of the Cement Australia Corporate Environment Management System that is certified to the International Standard for Environment Management Systems, ISO 14001:2015.

#### **4.2.6 Objectives and Planning**

Each year, Terminal operations as a business unit establish and maintain environmental and sustainability objectives and targets in accordance with CAS-PR-10.1.

## 4.3 Support

### 4.3.1 Resources

While all Cement Australia workers hold environmental management responsibilities, the following section details the roles within Terminal operations with specific environmental responsibilities relating to activities conducted under the scope of this EMP.

<b>Table 4-1: Resources and Responsibilities</b>	
<b>Role</b>	<b>Environmental Responsibilities</b>
Principal Sustainability Specialist	<ul style="list-style-type: none"> <li>Establishing appropriate SHE policies, plans, processes and systems to manage SHE risks in the company;</li> <li>Providing assistance to relevant operational and functional managers in determining SHE requirements;</li> <li>Planning for, development and communication of annual internal SHE function and site/project internal self-auditing programs;</li> <li>Evaluating, recommending and delivering suitable SHE training for all staff;</li> <li>Advising site Safety and Sustainability Specialists and Managers/personnel with respect to SHE management of all aspects of their business;</li> <li>Developing, delivering and evaluating suitable SHE management training for operations and business units;</li> <li>Assisting with the identification of risks, through participation in risk assessments;</li> <li>Emphasis of the importance of SHE management during site visits updates and reviews;</li> <li>Keeping abreast of changes to legislation and communicating such changes to line management; and</li> <li>Monitor SHE compliance obligations and those areas where operations are not in compliance.</li> </ul>
National Terminals and S&OP Manager	<ul style="list-style-type: none"> <li>Ensure the relevant employees are appropriately trained in environmental matters</li> <li>Oversee the implementation of all Group environment procedures</li> <li>Set objectives and targets for improving site environmental performance</li> <li>Approve and facilitate the implementation of environmental controls, projects and other required works</li> <li>Notification of the relevant authorities following an environmental incident (e.g. pollution incident)</li> </ul>
Terminal Team Leader / Terminal Operator	<ul style="list-style-type: none"> <li>Record and keep data relating to water and energy consumption</li> <li>Initiate and manage pollution incident responses as the Pollution Incident Response Coordinator</li> <li>Operate equipment in the manner in which it was designed and as per relevant work instructions and manuals;</li> <li>Report any environmental incidents to the National Terminals Manager and Safety and Sustainability Specialist;</li> <li>Respond to and clean up any spillages immediately, taking care to prevent spillages reaching the stormwater system;</li> <li>Maintain housekeeping standards throughout the Plant;</li> <li>Attend environmental awareness training.</li> </ul>

**Table 4-1: Resources and Responsibilities**

Role	Environmental Responsibilities
<p>Safety and Sustainability Specialist</p>	<ul style="list-style-type: none"> <li>• Actively promoting environment management and sustainability across the Terminal operations;</li> <li>• Advising site personnel on all aspects of environment and sustainability management, including updates to legislation;</li> <li>• Monitoring the site/project compliance with the Cement Australia SHEQMS and advising the National Terminals Manager of any non-compliance.</li> <li>• Keeping the National Terminals Manager informed of all environment and sustainability matters;</li> <li>• Reviewing all incident reports, advising on and confirming that appropriate corrective actions are implemented;</li> <li>• Identification and coordination of environmental monitoring activities;</li> <li>• Collection, collation, monitoring and reporting of environmental data as required (e.g. resource use, waste disposal);</li> <li>• Assisting site employees in the identification of hazardous situations and appropriate site controls;</li> <li>• Working with the employees to identify and assess all environmental aspects and risks/impacts and keeping registers up to date.</li> <li>• Facilitate the completion of internal and external environmental reporting requirements;</li> <li>• Active participation in scheduled safety and sustainability function meetings;</li> <li>• Participate in organised internal related audits of other Cement Australia operations;</li> <li>• Developing and promoting a positive reporting culture;</li> <li>• Understand and managing the environmental compliance obligations for the operations;</li> <li>• Provide assistance to other key stakeholders in identifying the environmental risks and/or opportunities when procuring goods and/or services;</li> <li>• Managing environmental documents and records as required;</li> <li>• Ensuring the appropriate level of environmental performance of contractors when carrying out activities with environmental risk; and</li> <li>• Reviewing and contributing to the ongoing management of the environmental management system including updates to the Environmental Management Plan and supporting documents.</li> <li>• Keep environmental records in a logical and systematic manner.</li> </ul>

### **4.3.2 Competency, Training and Awareness**

All employees, visitors and contractors who work/visit the Terminal are required to complete a site induction. This induction covers:

- Significant environmental issues and sensitive environmental areas of the site;
- Legal requirements including due diligence and duty of care;
- Environmental responsibilities;
- Identifying and reporting environment and community incidents; and
- Emergency response and pollution incident response and reporting for environment events.

Environmental awareness training for Terminal employees and any embedded contractors occurs every 2 years and covers as a minimum:

- Cement Australia SHEQ Policy and SHEQMS overview;
- Responsibilities for managing environmental impacts;
- Defining environmental aspects and opportunities for their control;
- Types of environmental events and how to report them; and
- Obligations of Cement Australia under legislation.

### **4.3.3 Communication, Participation, Consultation and Reporting**

This section provides a description of the communication, participation and consultation requirements and processes for the Terminal.

#### **4.3.3.1 Internal Communication**

Mechanisms for the communication of environment management related information to internal stakeholders include:

- At a site level, a weekly meeting is scheduled between the National Terminal Manager and the Terminal Team Leaders that focusses on safety and sustainability. Via phone or video conference;
- Periodic business reviews with the Cement Australia executive;
- Safety or environmental learning's from incidents, events or other opportunities experienced on site or within the Cement Australia group are shared with Terminal personnel via email or the weekly meeting;
- Sharing of learnings from presentations given at the weekly SHE forum with employees as relevant.

#### **4.3.3.2 External Communication**

The National Terminals Manager is responsible for coordinating all communication with Government authorities including relevant environmental authorities.

The National Terminals Manager is responsible for coordinating all communication with the community and local community groups. Community engagement will be on an as-needs basis.

#### **4.3.3.3 Complaint Handling**

All community complaints relating to the environment are treated as environmental incidents.

As per Environment Protection Licence No. 4310, the Glebe Terminal will operate a telephone complaints line during operating hours and will notify the public of its availability and purpose.

The following details pertaining to a community complaint shall be recorded in the Cement Australia incident management database (Donesafe):

- Date and time of complaint;
- Method by which the complaint was made;
- Personal details of the complainant or a note to the effect that details were not provided;
- Nature of the complaint;
- Action taken by the Terminal in relation to the complaint, including follow-up contact with the complainant; and
- If no action taken then the reasons why no action was taken.

These records must be provided to an EPA officer if so requested and reported in the Annual Return (EPA).

The Donesafe record must be kept for four years and made available to an authorised EPA officer upon request

All community complaints will be investigated using the processes outlined in CAS-PR-15.1 including raising of corrective actions.

#### **4.3.3.4 Incident Notification, Reporting and Response**

Incident management is managed in accordance with CAS-PR-15.1 Incident Management, Notification, Recording, Investigation and Analysis. This procedure details the requirements for notification, classification, recording, investigating and analysis (including identification of corrective actions) of events (incidents) that can affect Cement Australia operations.

The Cement Australia Incident Management System (Donesafe) is used to record all event information that relate to three primary event categories – incidents, near hits and hazards. These event types are then further classified based on predefined criteria.

All Terminal employees and on-site contractor personnel are responsible, through verbal or written means, for bringing suspected (actual and potential) non-conformances or opportunities for improvement of environmental performance to the attention of any supervisor.

Identified actions that require follow-up are entered into the Donesafe where they are periodically reviewed and are subject to management oversight.

Visibility and oversight of open actions are to be reviewed and reported on by the Glebe Terminal Team Leader.

The status of corrective actions is reviewed on a regular basis at site meetings. Where necessary, overdue corrective actions are reviewed in these meetings. Updates are made to the EMP documentation to reflect process improvements intended to prevent future non-conformance.

#### **Notification of Pollution Incident or Environmental Harm**

Where any incident that, because of action taken by Terminal personnel or contractors, or activities associated with the Terminal, leads to actual or potential material environmental harm (see Definitions in Section 3.3), the Terminal Team Leader shall immediately inform the National Terminals Manager.

The NSW environmental legislation contains very stringent requirements for reporting environment incidents and if there is any doubt as to whether an event constitutes material environment harm the Group Safety and Sustainability Manager should be consulted.

When reporting an incident internally, all relevant details of the pollution incident should be able to be provided including; but not limited to the following:

- The nature and scale of the pollution incident;
- Date and time of the incident;
- Initial assessment of the cause for the incident;
- Immediate actions taken to respond to the incident;
- Corrective actions planned to prevent recurrence.

The National Terminals Manager shall inform the General Manager – Supply Chain and Logistics and the Group Safety and Sustainability Manager as soon as practicable of any incidents deemed material or significant, to determine the level of external reporting that may be required.

If deemed by management that external reporting to the authorities is required, the National Terminals Manager or their delegate shall inform the following agencies immediately in the order outlined in the following table.

<b>Table 4-2: Contact details for authorities in the event of a pollution incident</b>	
<b>Authority</b>	<b>Contact Details</b>
<b>EPA Environment Line</b>	131555
<b>NSW Health</b>	1300 066 055
<b>Safe Work Authority</b>	13 10 50
<b>Inner West Council</b>	02 93925000
<b>Fire and Rescue NSW (if not contacted already)</b>	000 if an emergency
<b>Department of Planning and Environment</b>	1300 305 695
<b>Port Authority of New South Wales</b>	02 9296 4999

### **Reporting Incidents and Exceedances to the Authorities**

The Terminal is required to report (including written reports and investigations) certain incidents, complaints and non-compliances to relevant authorities. Table 4-3 below provides a summary of these requirements.

#### **4.3.3.5 Dispute Resolution**

In the event that a dispute with Terminal operations arise from the community or other stakeholder, it will be managed in accordance with CAS-PR-15.1 Incident Management, Notification, Recording, Investigation and Analysis.

All disputes will be responded to, and where relevant, options for resolution provided, within seven (7) business days.

Where a stakeholder is not satisfied with the information or resolution put forward by Cement Australia, the matter may be escalated within the company or may involve, by mutual agreement, an external third party.

Similar to complaints and incident events, disputes received by the Terminal will be logged and tracked at all stages of the process to ensure accurate records are maintained for the purpose of monitoring, reporting and reviewing Terminal performance.

**Table 4-3: Regulatory Reporting Requirements**

Report Required	Due by	Report provided to	Method of communication	Information to be reported	Responsible
<b>Incident that causes, or threatens to cause material environmental harm</b>	<i>Immediately</i> (incidents only)	NSW EPA Inner West Council NSW Health WorkCover Authority Fire and Rescue NSW Port Authority of New South Wales	Telephone	<ul style="list-style-type: none"> <li>• Time and duration of the emergency event</li> <li>• The type, volume and concentration of every pollutant discharged because of the event (spills).</li> <li>• All actions taken in relation to the emergency event and any associated communications.</li> <li>• The names and contact details of all people involved including staff and any witnesses.</li> <li>• The details of any measure/s taken or proposed to be taken to prevent or mitigate against the recurrence of such an event</li> </ul>	National Terminals Manager
	Within 7 days	NSW EPA	Telephone followed by written notification (email)	<ul style="list-style-type: none"> <li>• Written details of the notification previously provided by telephone.</li> </ul>	
	<i>Immediately</i> (incidents only)	Department of Planning and Environment	Email	<ul style="list-style-type: none"> <li>• <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a></li> <li>• Development application number, location and nature of the incident.</li> </ul>	
	Within 7 days		Email	<ul style="list-style-type: none"> <li>• <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a></li> <li>• As per Appendix 1 of Development Consent 9967</li> </ul>	
	Within 30 days		Email	<ul style="list-style-type: none"> <li>• <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a></li> <li>• As per Appendix 1 of Development Consent 9967</li> </ul>	
<b>Non-Compliance to Development Consent</b>	Within 7 days	Department of Planning and Environment	Email	<ul style="list-style-type: none"> <li>• <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a></li> <li>• Development application number, consent condition that the non-compliance relates to, why site doesn't comply, reasons for the non-compliance and actions have or will be undertaken to address.</li> </ul> <p><b>NOTE</b> – a non-compliance that has already been notified as an incident does not need to be reported as a non-compliance.</p>	

#### **4.3.4 Documented Information**

Documents and records will be controlled in accordance with the Cement Australia procedures Document Control Procedure CACS-PR-1003 and Document Retention Procedure CACS-PR-1002.

These procedures stipulate processes for the drafting, approval, distribution and control of all documents and records related to the environmental management system.

Obsolete documents are destroyed or are identified as being out-of-date to prevent their unintended use. Documents that must be retained after revision to meet a records retention requirement are marked as obsolete upon revision. Documents that need not be retained are destroyed upon revision.

Documents relevant to the SHEQMS at both the corporate level and site level are maintained within Cement Australia's Controlled Documents Database (CDD).

## **5 Operation**

Cement Australia manages its environmental operational control requirements in accordance with those procedures identified in Section 3.1.

Operational control procedures are developed with a priority on control options with a higher reliability in the prevention of environmental incident, consistent with the hierarchy of controls, and implemented to manage environment or sustainability risks identified in relation to Cement Australia activities.

Site personnel on an ongoing basis verify their effectiveness through evaluation of the operational controls.

Applicable processes that are outsourced by Cement Australia to suppliers and/or contractors external to Cement Australia shall be managed in accordance with CAS-PR-11.1 Contract Management for Onsite Works.

Where contractors are performing activities at the Terminal, or on behalf of Cement Australia where those activities may affect the Terminal's environmental performance, these shall be captured on the site environmental aspects register to ensure the appropriate risk control measures are in place and monitored.

Site specific work process and instructions are developed where it has been identified that the control of all aspects of the risk have not been identified within the Cement Australia operational control procedures, or where the work involves discreet activities for which environmental management is inherently complex (e.g. significant risk, legal or contractual requirement).

### **5.1 Environmental Noise and Vibration**

Although Glebe Island has been used as an industrial port for more than a century, the surrounding areas of Balmain, Rozelle and Glebe have become increasingly residential and commercial in recent years, increasing the areas' sensitivity to noise emissions. In light of this, Terminal personnel will continue to ensure machinery is well maintained and operated correctly, participate in regular community engagement sessions and operate a 24-hour telephone complaints line.

The main sources of noise at the Terminal are ship-unloading activities, the operation of trucks and other vehicles, and the operation of ancillary plant and equipment.

While the risk of nuisance noise levels arising from site operations is low, it is still important that the site continue to review and assess its activities, plant and equipment that emit the most noise on the site and have in place the appropriate noise controls.

Controls implemented and maintained by the site to mitigate excessive noise levels include:

- Positive collaboration with the shipping contactor CSL on shipping noise management;
- Sound power levels considered when purchasing new equipment.
- Where necessary, noise controls and/or shielding of equipment is installed.
- Within six months of commissioning new equipment, noise contour mapping is undertaken and noise issues addressed systematically.
- Noisy equipment is housed inside buildings where possible.
- Vehicles will not be left turned on or idling at the site for longer than minimum amount of time required completing site activities.
- Regular and effective plant/equipment maintenance will be completed.
- Noise monitoring by external contractors completed every 24 months to demonstrate compliance.

Based on equipment used, there are no significant sources of vibration on site.

## 5.2 Air Quality

This section describes how the Terminal manages and controls air emission related aspects associated with its operations.

With minimal volatile substances stored on site and all operational activities powered by electricity, potential sources of atmospheric emissions on site are limited to dust originating from the handling of cementitious materials.

As a number of residential communities exist less than a kilometre from the site, it is of high priority that all emissions to air generated by site activities are appropriately collected and treated. This is achieved using dust collectors at all point source locations and the regular inspection and maintenance of site plant and equipment, including pollution control equipment such as dust collectors.

### 5.2.1 Air Quality Limits

Atmospheric emissions limits have not been set for Cement Australia Glebe Terminal, however, the site is legally required to maintain all machinery and equipment in a condition that minimises or prevents the emission of dust from the premises.

Cement and lime handling is a Scheduled Activity under Schedule 1 of the NSW Protection of the Environment Operations Act. Air quality limits are prescribed in the Protection of the Environment Operations (Clean Air) Regulation 2010 in Schedule 3 for Cement and Lime Handling.

The regulations stipulates all plant equipment must meet Group 5 air emission limits. The group 5 limits applicable to the Terminal's operation are summarised below.

<b>Table 5-1: Air Quality Limits</b>			
<b>Reference</b>	<b>Activity</b>	<b>Pollutant</b>	<b>Group 5 Limit</b>
Schedule 3 POEO (Clean Air) Regulation 2010 Cement and Lime Handling	Any crushing, grinding, separating or materials handling activity	Total Solid Particulates (TSPs)	100 mg/m <sup>3</sup>

## 5.2.2 Air Emission Controls

The Glebe Terminal has identified and assessed all actual and potential aspects and impacts associated with air quality and has implemented appropriate mitigating controls including:

- Dust collectors strategically placed at all air emissions points located on the silo, ship unloader, and truck loading facility. Dust collectors and bag filters are inspected, serviced at a minimum of annually, with additional maintenance such as bag replacement carried out on an 'as needed' basis.
- Roller doors fitted to the truck loading facility (where product spills are most likely to occur) which can be lowered to prevent dust from being transported beyond site boundaries whilst spilled product is cleared away.
- Regular maintenance of the site's plant and equipment to ensure that they are operating in an efficient manner to prevent fugitive dust emissions.

## 5.3 Traffic Management

The peak number of cement tankers dispatched from this Terminal is limited by the physical infrastructure on site – the three weighbridges on site are able to each load four trucks an hour when operating at peak capacity, meaning the site has an overall peak dispatch capacity of 12 trucks an hour.

The facility currently operates at this maximum peak capacity periodically throughout the year. Analysis of the weighbridge data indicates that during calendar year 2018 the peak dispatch rate of 12 tankers per hour was achieved on 58 occasions.

Of this, all except four of such occasions were during normal daytime hours of 7am and 7pm. Further, these periods of peak tanker dispatch still only occurred for 54 occasions out of the available 4,140 1-hour periods available during normally operating hours (not including up to 20 days per year associated with public holidays). Meaning that the facility is operating at its maximum throughput capacity only 1.3% of the time during normal daytime hours.

Operational traffic and vehicle/pedestrian interactions on site are managed through implementation of the site traffic management plan (GLE-PL-003).

## 5.4 Water Quality and Conservation Management

This section describes how the Terminal manages and controls water related aspects associated with its operations.

The main sources of pollutants that could potentially enter the stormwater system at the Terminal are:

- Spilled cementitious product;
- Hydrocarbons from a chemical, fuel or oil spill or leak;
- Gross pollutants e.g. rubbish, debris

Controls to be implemented to manage the risk of water pollution include:

- Ensuring minimal dangerous goods and fuel are stored on site and those that are, are stored and handled in a covered bunded area to ensure that no fuels or chemicals are exposed to the weather or can enter the stormwater system;
- All areas where vehicles operate are sealed or hard stand to prevent vehicle generated dust and erosion;
- Good housekeeping practices are carried out on site with regular site clean ups and routine housekeeping inspections;
- Spill kits are provided for all areas where chemicals are handled as well as near the truck parking and loading/unloading zones in case of a ruptured fuel tank;

- Product loading from silos occurs via enclosed and sealed hoses which have a failsafe shut valve in case of a malfunction;
- Emergency spill response procedures are in place for oil and chemical spills;
- Spill kits are on hand at key locations where oil and chemical spills could occur;
- Maintenance procedures are in place for maintenance of the stormwater system in addition to maintenance of all plant and equipment including that which could give rise to dust or product spillages;
- Trays beneath ship unloading hoses and caps on end of hoses.
- Inspection processes are in place for regular inspection and cleaning of the stormwater system.

Water consumption at the Terminal is limited to municipal use, grounds maintenance and incidental cleaning of truck windscreens etc. as required. Water meters are installed at the site.

All wastewater is discharged into the local sewerage system.

Any water used for truck hosing activities is collected in sumps located on either side of the weighbridge area that then drains into a concrete pit. The pits are inspected by external contractors and any sediment collected is removed as a programmed maintenance activity at six monthly intervals.

## 5.5 Heritage

The Glebe Island Terminal includes 16 historically significant and state heritage listed grain silos, which are currently used by the site for the bulk storage of cementitious products.

Cement Australia ensure that the structures are preserved and maintained by ensuring approval is obtained from the Heritage Council of NSW for all works carried out on or around the heritage listed items, unless the activity is listed in the Schedule of Standard Exemptions under the Heritage Act (1977).

As the site is covered by hardstand, unexpected discoveries of heritage artefacts are unlikely. However, in the event that an artefact of suspected heritage significance is uncovered, personnel will:

- Record the location of discovery whilst avoiding any unnecessary disturbance.
- Seek the advice of the central Safety and Sustainability function, the NSW EPA and any relevant local experts.

## 5.6 Waste Management

Cement Australia's Glebe Terminal is required to ensure that the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity is carried out in a competent manner as a condition of its license to operate.

Site activities and their associated actual and potential waste impacts are shown in the table below.

<b>Table 5-2: Site Activities and Potential for Waste Impacts</b>	
<b>Activities</b>	<b>Potential wastes and their impacts if incorrectly managed</b>
Cement handling activities (including storage and handling of cementitious materials)	Process wastes (spillages and dust) if not managed adequately could enter stormwater system and be discharged to the environment or cause fugitive dust
Maintenance activities	Incorrect disposal of oils and greases used in maintenance. Generation of packaging waste from spare parts. Missed opportunity for recycling scrap metal, oils and lubricants and packaging materials.
Office and Driver Amenity activities	Paper and general waste generation Missed opportunity for waste segregation and recycling
Pollution control devices	Bag filters – dust emissions if not correctly maintained (dust should be recycled back into system) Filter bags Drains and culverts – accumulation of dust and debris – if not collected and appropriately disposed of will be mobilised in stormwater system and released to environment.
Landscape maintenance	Accumulation of rubbish from on and offsite activities. Visual impact and could be released to environment causing harm to flora and fauna

### 5.6.1 Hazardous Waste

In NSW, the transport and disposal of hazardous waste listed in its Schedule 1 of the Protection of the Environment Operations (Waste) Regulation 2014 must be tracked when it is transported into, within or out of NSW.

Schedule 1 identifies a list of more than 60 different types of wastes that are required to be tracked and include waste types applicable to Terminal operations. These include such materials as clinical and related wastes, containers and drums contaminated with residues of substances listed in Schedule 1, waste mineral oils unfit for original intended use, waste oil/water/hydrocarbon mixtures.

The Terminal is responsible for ensuring any hazardous waste it produces and disposes of is properly tracked and for characterising the waste to determine its waste code and description as this is required for the waste tracking documentation.

Where required, hazardous wastes are collected and stored awaiting disposal from site in secure containers and removed, by external contractors approved for hazardous waste collection and disposal.

A Waste Data Form (or equivalent) must be created and accompany the waste load during transport. This form contains information about the waste and records details about the transport and disposal of a load of waste.

A copy of the form, if being generated on the Terminal's behalf by the waste contractor, should be checked by a Terminal representative as reflecting correctly the waste being removed from site contains correct contact details and has been signed by an appropriate company representative.

Copies of these completed forms will be maintained within site waste management records for a minimum of five (5) years.

## 5.7 Hazardous Substances and Dangerous Goods

Cement Australia Glebe Terminal is legally required to ensure that the 'processing, handling and movement of materials and substances used to carry out the activity are carried out in a competent manner' as per clause O1.1 (a) of licence 4310. In order to comply with this condition, Terminal personnel are given appropriate training relevant to their role and are required to follow the relevant Safety Data Sheets (SDSs) and AS 1940:2017 The Storage and Handling of Flammable and Combustible Liquids where applicable.

Separate to the storage of cementitious materials in the storage silos, the Terminal stores and handles minor quantities of hazardous substances and dangerous goods, mainly in the form of oils and lubricants for use in site maintenance activities. Refer to the site Hazardous Chemical Register for further details.

Storage and handling of hazardous substances and dangerous goods is done in accordance with CAS-PR-5.5 Hazardous Substances and Dangerous Goods.

The potential risk for a chemical spill is managed through the implementation of a number of controls, including bunding of chemical stores, readily available spill kits and emergency berms, clear labelling and signage and onsite driving restrictions to reduce the likelihood of collisions with storage containers.

## 5.8 Emergency Response

The Terminal manages its emergency response in accordance with GLE-SHEP-0002 Emergency Response Plan (and Pollution Incident Response Management Plan). This plan describes the emergency procedures to be implemented in the event of an incident that would require the total or part evacuation of the Terminal facility.

The Terminal provides coverage of applicable emergency preparedness and response procedures within SHE site inductions of new employees, visitors, workers and/or Contractors as required.

### 5.8.1 Pollution Incident Response Plan

The terminal maintains its Pollution Incident Response Management Plan as part of its Emergency Response Plan (GLE-SHEP-0002)

In all cases where a pollution incident has occurred, the following immediate actions shall be taken:

- Ensure own personal safety first
- Raise the alarm (inform supervisor / National Terminals Manager)
- Cease the activity causing the pollution (shut down equipment etc.)
- Contain the spill / pollutant
- Ensure notification procedures are followed
- Secure the scene (barricade off to prevent access)
- Conduct task-based risk assessment (Job Planning Tool) to plan clean-up activities
- Commence clean up
- Make a note of key timings (alarm raise, notifications made, activity ceased, clean up commenced etc.), extent of pollution (including whether it left the site boundary) and any witnesses.

## 6 Performance Evaluation

### 6.1 Monitoring, Measurement, Analysis and Evaluation

There are no specific environmental monitoring requirements stipulated in the site Environmental Protection Licence however the site shall implement systems and processes that include the completion of regular, scheduled and documented environmental site inspections to ensure that effective housekeeping practices are in place and maintained for:

- Sweeping of paved areas for dust control;
- Site roadways and drains are kept clean and free from solids and debris;
- Bins are provided and used to promote correct waste segregation and recycling;
- Containers of hazardous chemicals and/or wastes are stored within adequate secondary containment for spill control;
- Emergency spill equipment is maintained in close proximity to chemical storage areas;
- Identification and repair of leaking equipment e.g. water taps, hoses, etc.;
- Prompt spill clean-up and control, reporting and investigation of any environmental events.

In addition, systems and processes are in place to:

- Validate the completion of timely and regular programmed plant and equipment inspection and maintenance, in particular that associated with the pollution control equipment such as dust collectors, to ensure proper and effective operation of this equipment;
- Review the effectiveness of operational risk controls and practices;
- Monitor Terminal performance against its agreed environmental and sustainability objectives and targets;
- Ensure applicable legislative changes are managed and communicated;
- Monitor the close out of audit, incident, hazard and other management review actions;
- Ensure applicable training has been completed;
- Review and analyse environmental incidents for trends and identify actions to prevent recurrence;
- Noise monitoring by external contractors completed every 24 months;
- For each ship discharge, an assessment of noise level is informally completed by Terminal personnel as an assessment against previous discharges to identify any anomalies.

### 6.2 Evaluation of Compliance

In addition to the compliance verification audit identified in Section 6.3, the Terminal maintains a register of its relevant safety, health and environment compliance obligations and undertakes periodic verification of the activities associated with these compliance obligations.

Non-compliances may be raised because of near-hit incidents (an incident that occurs but does not result in harm to people, property or the environment), breaches and/or exceedances of EPA licence or Major Project Approval conditions, or identified during an audit or inspection.

As with incidents, non-compliances will be:

- Reported, classified and recorded in the Cement Australia incident management database or in the Audit Management Tool (electronic database) for non-compliances identified through an audit or inspection.
- Appropriate corrective and preventative actions shall be implemented and verified for effectiveness.
- Non-compliance data and statistics will also be presented periodically to the management team and all the way up to the Board of Port Kembla Milling and Cement Australia for their review
- Non-compliance related data should be analysed for trends to prioritise resource allocation and identify opportunities for improvement of the Management System and performance.

### 6.3 Internal Audit

At the beginning of each year, the central Safety and Sustainability (S/S) function develops and communicates an audit schedule detailing all planned verification audits and any audits required for the SHEQ management system. This may include internal audits conducted at the Glebe Island Terminal site by the central S/S function.

Additionally, the Terminal Safety and Sustainability Specialist, with assistance from the central S/S function develops a number of internal monitoring and measurement activities, which are designed to focus on any key or topical areas of concern, recent environmental incidents, processes that require revision due to their environmental impact or aspects that have not been audited in recent years.

The table below identifies the details and responsibilities for the minimum internal audit activities to be undertaken for the Terminal.

<b>Table 6-1: Audits</b>			
<b>Audit Type</b>	<b>Who</b>	<b>When</b>	<b>What</b>
Internal monitoring and measurement activities	Site S/S Specialist and site personnel	Minimum one per quarter	For environment, these usually check compliance to relevant Group Procedures or the effectiveness of controls for specific environment aspects and impacts.
Compliance verification	Principal Sustainability Specialist	Annually	Desktop and/or including site inspection. Criteria may include the assessment of compliance to site licence conditions and any other relevant compliance obligation.
SHEQMS Audit	Principal Sustainability Specialist or delegate	As scheduled	Terminal operations will be subject to internal management systems audits on a rotational basis to assess the effectiveness of the implementation of the SHEQMS.
Pollution Incident Response Management Plan (PIRMP)	Site S/S Specialist and site personnel	Annually	Testing of emergency contacts and emergency response plan, including pollution incident scenario/drill/exercise.
Site Inspection Checklist	Site personnel	Monthly	Effectiveness of housekeeping practices for environmental management.

All findings from the above audit activities will be documented, reported and maintained as per CAS-PR-16.1.

## **6.4 Management Review**

The central S/S function undertakes an annual SHEQMS Management Review in accordance with CAS-PR-1.2 SHEQ Management System Review. This SHEQMS Management Review may include relevant information provided by other Cement Australia operations, including the Terminal operations.

SHEQMS Management Review meetings include a review of the SHEQMS/EMP, including the policy, objectives, and targets, review of SHE performance data and identification of issues and corrective actions to be taken.

This EMP and the site Environmental Aspects Register will be reviewed annually by the Terminals team, led by the site S/S Specialist. These documents will also be reviewed following any significant change to the size and/or nature of site activities or structures. All previous copies of these documents shall be stored in the site's electronic records.

A record of changes and amendments to this plan will be maintained in the "Alterations and Amendments" table at the front of this EMP.

## **6.5 Improvement**

It is important to take all of the learnings obtained from the performance evaluation activities outlined in Section 6 to identify those actions that are to be taken to continue to improve the performance of the Cement Australia SHEQMS and the environment and sustainability performance of Terminal operations.