



# **Environmental Management System Manual**

## DOCUMENT CONTROL

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## AUDIT

This Manual shall be reviewed or revised:

- where a Risk Assessment or Audit identifies a need to review
- legislative changes impacting this Manual
- following a significant incident involving this Manual
- at least every three years.

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# 1 INTRODUCTION

## 1.1 Purpose

This Environmental Management System Manual Manual describes the system used by Southern Ports to manage the environment for the Ports of Albany, Bunbury and Esperance.

Southern Ports is committed to “*minimising impacts from Port operations on the environment and community*” in accordance with the objectives of the Southern Ports [Environmental Policy](#).

This Environmental Management System Manual Manual describes environmental management for Southern Ports consistent with the requirements of [ISO 14001:2015 Environmental management systems – Requirements with guidance for use](#) and [ISO 31000:2009 Risk Management – Principles and guidelines](#).

## 1.2 Scope

| In Scope                                                                                                                                                                                                                                            | Out of Scope                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All activities relating to environmental management under the direct operational control of Southern Ports inside its Port land and marine boundaries, including Stevedoring operations at the Port of Esperance. In-house stevedores at Esperance. | Activities conducted by leaseholders and State and Federal Regulatory personnel on Port land which are under the full control of the lessee or actions of the public (non-shipping) inside the marine boundaries.<br>Activities conducted by lines boats, towage companies and stevedores licensed to operate at the Port of Albany and Port of Bunbury. |

## 1.3 Background

Expectations for sustainable development, transparency and accountability have evolved with increasingly stringent legislation, growing pressures on the environment from pollution, inefficient use of resources, improper waste management, climate change, degradation of ecosystems and loss of biodiversity.

This has led Southern Ports to adopt a systematic approach to environmental management by implementing environmental management systems with the aim of contributing to the environmental pillar of sustainability.

## 2 REFERENCES

### 2.1 Legislation, Standards and Codes of Practice

Key Legislation, Standards and Codes of Practice for Environmental Management are shown in Table 1 below. Full detail on Legislation, Standards and Codes of Practice relevant to environmental management for Southern Ports are maintained in EnviroEssentials.

Table 1: Legislation, Standards and Codes of Practice

| Reference                                                       | Title                                                                                              |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Department of Agriculture, Water and the Environment            | <a href="#">Australian Ballast Water Management Requirements 2020</a>                              |
| Commonwealth                                                    | <a href="#">Biosecurity Act 2015</a>                                                               |
| Commonwealth                                                    | <a href="#">Biosecurity (Human Health) Regulations 2016</a>                                        |
| WA                                                              | <a href="#">Contaminated Sites Act 2003</a>                                                        |
| ISO 14001:2015                                                  | <a href="#">Environmental management systems – Requirements with guidance for use</a>              |
| WA                                                              | <a href="#">Environmental Protection (Noise) Regulations 1987</a>                                  |
| Commonwealth                                                    | <a href="#">Environmental Protection (Sea Dumping) Act 1981</a>                                    |
| WA                                                              | <a href="#">Environmental Protection (Unauthorised Discharges) Regulations 2004</a>                |
| WA                                                              | <a href="#">Environmental Protection Act 1986</a>                                                  |
| Commonwealth                                                    | <a href="#">Environmental Protection and Biodiversity Conservation Act 1999</a>                    |
| WA                                                              | <a href="#">Environmental Protection Regulations 1987</a>                                          |
| Commonwealth                                                    | <a href="#">Export Control Act 2020</a>                                                            |
| WA                                                              | <a href="#">Fish Resources Management Act 1994</a>                                                 |
| WA                                                              | <a href="#">Government Trading Enterprises Act 2023</a>                                            |
| WA                                                              | <a href="#">Government Trading Enterprises Regulations 2023</a>                                    |
| International Maritime Organisation                             | <a href="#">International Convention for the Prevention of Pollution from Ships (MARPOL 73/78)</a> |
| WA                                                              | <a href="#">Main Roads Act 1930</a>                                                                |
| WA Department of Transport                                      | <a href="#">Maritime Environmental Emergencies State Hazard Plan</a>                               |
| Department of Climate Change, Energy, the Environment and Water | <a href="#">National Assessment Guidelines for Dredging 2009</a>                                   |
| Department of Climate Change, Energy, the Environment and Water | <a href="#">National Environment Protection (Ambient Air Quality) Measure 2021</a>                 |
| Commonwealth                                                    | <a href="#">National Greenhouse and Energy Reporting Act 2007</a>                                  |
| WA                                                              | <a href="#">Port Authorities Act 1999</a>                                                          |
| WA                                                              | <a href="#">Port Authorities Regulations 2001</a>                                                  |
| WA                                                              | <a href="#">Ports Legislation Amendment Act 2019</a>                                               |
| WA                                                              | <a href="#">Rights in Water and Irrigation Act 1914</a>                                            |
| ISO 31000:2018                                                  | <a href="#">Risk Management – Principles and guidelines</a>                                        |
| WA                                                              | <a href="#">Shipping and Pilotage Act 1967</a>                                                     |
| WA                                                              | <a href="#">Waterways Conservation Act 1976</a>                                                    |
| WA                                                              | <a href="#">Waterways Conservation Regulations 1981</a>                                            |

## 2.2 Southern Ports Documents

Southern Ports documents supporting this Manual are shown in Table 2 below.

Table 2: Southern Ports Documents

| Reference | Title                                                                          |
|-----------|--------------------------------------------------------------------------------|
| D20/7     | <a href="#">Controlled Document Manual</a>                                     |
| D18/24683 | <a href="#">Crisis and Emergency Management Plan</a>                           |
| D18/8795  | <a href="#">Environmental Policy</a>                                           |
| D18/19779 | <a href="#">Invasive Marine Species Management Plan</a>                        |
| D18/16130 | <a href="#">Long Term Monitoring and Management Plans for Dredging</a>         |
| D24/3525  | <a href="#">Marine Environmental Management Plan</a>                           |
| D20/13612 | <a href="#">Oil Spill Contingency Plan</a>                                     |
| D19/6263  | <a href="#">Reconciliation Action Plan</a>                                     |
| D24/216   | <a href="#">Record Keeping Plan</a>                                            |
| D18/11692 | <a href="#">Risk Management Framework</a>                                      |
| D18/16542 | <a href="#">Sampling Analysis Plan for the Routine Contaminants Monitoring</a> |
| D18/5582  | <a href="#">Training, Conferences and Seminars Procedure</a>                   |
| D23/1954  | <a href="#">Sustainability Plan</a>                                            |

## 3 DEFINITIONS

Definitions for terms used in this Manual are shown in Table 3 below.

Table 3: Definitions

| Term                                | Definition                                                                                                                                                                                                                                                                     |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environmental Aspect                | An element that can interact with the environment.                                                                                                                                                                                                                             |
| Environmental Impact                | Any change to the environment resulting from an organisation's environmental aspects.                                                                                                                                                                                          |
| Environmental Management Plan       | The system (and document describing the system) for controlling environmental outcomes.                                                                                                                                                                                        |
| Environmental Management Program    | Specific scheduled actions for achieving the organisation's environmental objectives and targets.                                                                                                                                                                              |
| Environmental Management System     | Part of an organisation's management system used to develop and implement its Environmental Policy and manage its environmental aspects.                                                                                                                                       |
| Environmental Objective             | Overall environmental goal, consistent with the Environmental Policy, that an organisation sets itself to achieve.                                                                                                                                                             |
| Environmental Performance           | Measurable results of an organisation's management of its environmental aspects.                                                                                                                                                                                               |
| Environmental Performance Indicator | Specific expression that provides information about an organisation's environmental performance.                                                                                                                                                                               |
| Environmental Policy                | The Southern Ports Environmental Policy describes intentions and direction for environmental performance as formally expressed by the Executive Leadership Team. It provides a framework for action and for the setting of environmental objectives and environmental targets. |
| Environmental Target                | Detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.                                                                        |
| May, Should                         | Recommended, but discretionary.                                                                                                                                                                                                                                                |
| Must, Shall, Will                   | Mandatory.                                                                                                                                                                                                                                                                     |

## 4 CONTEXT OF THE ORGANISATION

### 4.1 Understanding the Organisation and its Context

Southern Ports Authority (trading as Southern Ports) is a Western Australian State Government Trading Enterprise that operates in accordance with the Port Authorities Act 1999. Southern Ports is the custodian of the three 'gateway' Ports of Albany, Bunbury and Esperance, connecting Western Australia to the world.



Figure 1: Port Locations

Under the Port Authorities Act 1999, all Crown land in the Ports of Albany, Bunbury and Esperance, including the seabed and shores, is vested in Southern Ports. For more information about individual Port facilities, see the Southern Ports website at [www.southernports.com.au](http://www.southernports.com.au).

The purpose of Southern Ports is to provide import and export facilities at Bunbury, Albany and Esperance Ports located in south-western Australia. External and internal issues that have the potential to constrain this purpose include:

- Capacity of assets to handle throughput.
- Sensitivity of the surrounding community.
- Sensitivity of the environment.
- Regulatory requirements.

#### 4.1.1 Environmental Licenses

Southern Ports holds Environmental Licences issued by the Department of Water and Environment Regulation under Part V of the WA Environmental Protection Act 1986 and Schedule 1, Environmental Protection Regulations 1987.

All activities undertaken within the licenced Prescribed Premises area must comply with relevant conditions in the Environmental Licences as amended from time to time.

### 4.1.2 Key Port Assets

Growth of the throughput capacity at each Port is limited by its current infrastructure with little latent capacity to allow future growth.

Existing infrastructure includes well-constructed roads and rail connecting all three Ports to the major agricultural and mineral production areas, but assets critical to all three Ports include:

- Berths
- Berth pockets, turning basins and shipping channels
- Ship loaders (rail mounted or mobile) for bulk products
- Shore-based dual-purpose gantry crane or mobile harbour cranes
- Bulk storage sheds and conveyors
- Sealed laydown areas.
- Railcar unloaders
- Road Hoppers.
- Maintenance workshops.
- Vehicle and machinery washdown bays and oily water separator.
- Port administration offices and service buildings.

## 4.2 Needs and Expectations of Interested Parties

Southern Ports have stakeholders with differing needs and areas of interest. These stakeholders can be both internal (Table 4) or external (Table 5) and require different levels of management and approach for engagement.

Table 4: Internal Stakeholders

| Interested Party                  | Needs and Expectations                      | Key Issues                                                                                                                                                                                             |
|-----------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board                             | Legal and other obligations compliance      |                                                                                                                                                                                                        |
| Executive Leadership Team         | Community Engagement, Reputation and Brand  | Resourcing                                                                                                                                                                                             |
| Workers and contractors           | Shared culture, attitudes and job security. | Employee meetings, consultation and feedback.                                                                                                                                                          |
| Port Users                        | Competitive pricing, reliability and value. | Client/customer reviews and relationship management/customer feedback.<br>Compliance verified during regular Port User meeting – the Port provides an operational environment that is safe and secure. |
| Suppliers                         | Beneficial supplier-client relationships.   | Supplier reviews and relationship management                                                                                                                                                           |
| Unions and worker representatives | Representation and cooperation.             | Consultation and feedback on employment and safety issues                                                                                                                                              |

Table 5: External Stakeholders

| Interested Party   | Needs and expectations                                                                                                                                       | Key issues                                                                                       |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Minister for Ports | Government Trading Enterprise Business Achievement against plan, portfolio management, community support, and compliance with the Port Authorities Act 1999. | Contamination prevention and management of contaminated land management, Frugality, "Buy Local". |

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Table 5: External Stakeholders

| Interested Party                                                             | Needs and expectations                                                                                                                                                                                                                                                                                             | Key issues                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Local Authorities and Government                                             | Consultation and information.                                                                                                                                                                                                                                                                                      | Engagement with planning and development issues.                                                                                                                                                                                                                                                                                                                                     |
| Certification Body                                                           | Compliance against <a href="#">ISO 14001:2015</a>                                                                                                                                                                                                                                                                  | Internal and external audits.                                                                                                                                                                                                                                                                                                                                                        |
| Australian Maritime Safety Authority and International Maritime Organisation | Provision of Port Waste Reception facilities.                                                                                                                                                                                                                                                                      | Oil Spill Contingency Plan<br>Emergency Response Procedures<br>Port Waste Reception Facilities<br>Management of Marine Pollution from Ships                                                                                                                                                                                                                                          |
| Clean Energy Regulators - National Greenhouse and Energy Reporting           | Green House and Energy reporting established by the National Greenhouse and Energy Reporting Act 2007 is a single national framework for reporting and disseminating company information about greenhouse gas emissions, energy production, energy consumption and other information specified in the legislation. | Estimate energy usage annually and register with National Greenhouse and Energy Reporting if the usage exceeds the reporting threshold.                                                                                                                                                                                                                                              |
| Department of Agriculture, Fisheries and Forestry                            | Management of Biosecurity and First Point of Entry protocols.<br>Biosecurity Act 2015<br>Export Control Act 2020                                                                                                                                                                                                   | Provide receptacles to accept biosecurity waste and report Invasive Marine Species intrusions.<br>Undertake Invasive Marine Species surveys in the marine environment<br>Provide locations for the positioning of bee attractant boxes and bee surveillance hives.<br>Implement State-wide Array Surveillance Program.<br>Biodiversity assessment.<br>South Coast Aquaculture Zones. |
| Department of Biodiversity, Conservation and Attractions                     | To provide assistance where necessary to the relevant regulatory agencies to facilitate the safe and effective rescue and/or removal of any land or marine wildlife within the Port boundaries.<br>Marine and Land Management for flora and fauna.<br>Regional open space and nature reserves.                     | Report any unusual occurrence to the regulator.                                                                                                                                                                                                                                                                                                                                      |
| Department of Climate Change, Energy, the Environment and Water              | Compliance with the National Assessment Guidelines for Dredging 2009 and dredging permits for individual ports.                                                                                                                                                                                                    | Annual dredging volume return is submitted to the regulator.<br>Conditions set on permits are managed via Long Term Monitoring and Management Plans for Dredging.                                                                                                                                                                                                                    |
| Department of Health and Aged Care                                           | Compliance with the Biosecurity (Human Health) Regulations 2016                                                                                                                                                                                                                                                    | Quarantine                                                                                                                                                                                                                                                                                                                                                                           |
| Department of Primary Industry and Regional Development                      | Compliance with the Fish Resources Management Act 1994.<br>Compliance with Agriculture legislation.                                                                                                                                                                                                                | Regional alignment to policy projects.                                                                                                                                                                                                                                                                                                                                               |

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Table 5: External Stakeholders

| Interested Party                               | Needs and expectations                                                                                                                                                                                                                                                                                 | Key issues                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Department of Water and Environment Regulation | Compliance with the site environmental license and the Environmental Protection Act 1986.<br>Compliance with the Contaminated Sites Act 2003.<br>Compliance against the issue of the licence under the Rights in Water and Irrigation Act 1914.<br>Compliance with the Waterways Conservation Act 1976 | Detailed in individual Environmental Management Plans.<br>Regulator inspection and audit.<br>Emissions monitoring.<br>Contaminated Sites Management Framework for Port precincts.<br>Annual reporting of the bore water usage at berths.<br>Annual compliance report to the Regulator.<br>Annual payment of license fee. |
| Neighbours and communities                     | Social responsibility and engagement.                                                                                                                                                                                                                                                                  | Consultation and engagement exercises to identify environmental concerns via quarterly Port Community Consultation Committee meetings.                                                                                                                                                                                   |
| Other Regulators                               | Compliance with the requirements of the Port Authorities Act 1999 Part 5, Division 1, s.51(1)(b).<br>Profitability and growth.<br>Main Roads Act 1930                                                                                                                                                  | Consultation and engagement exercises to identify concerns.<br>Annual reporting to the Minister.<br>Noise Management of logistics activities.                                                                                                                                                                            |

Outcomes from the implementation of this strategy are considered in the development of strategic objectives for Southern Ports.

### 4.3 Scope of the Environmental Management System

#### 4.3.1 Sensitivity of the surrounding community

The relationship between the Ports and their respective communities remains pivotal to Southern Ports being able to effectively operate at each location. Each Port is committed to working with the community closely to establish feedback on significant decisions through the Port Community Consultative Committee and other forms of communication such as community surveys.

#### 4.3.2 Sensitivity of the environment

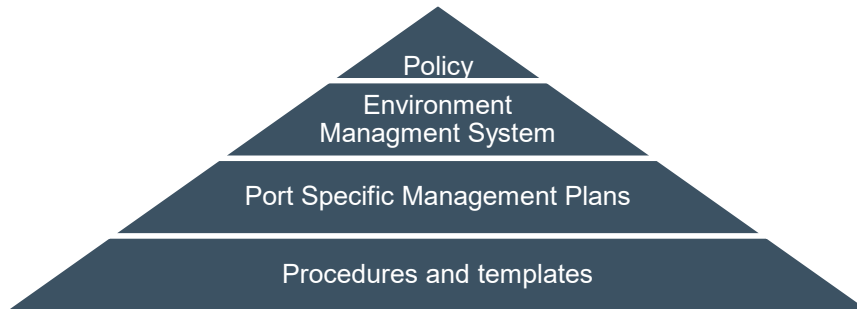
Port activities may impact on the environment by physical disturbance, emissions of contaminants from land or marine activities, or translocation of pest species from the movement of vessels or imported cargo.

Management of sensitive aspects of the environment is undertaken through implementation of site specific management plans and risk treatments.

## 4.4 Environmental Management System

Southern Ports has a guiding management system document that is aligned to 14001, the site specific Port Environmental Management Plans feed from this without duplication to identify how they implement the business objectives at each Port.

Figure 2: Environment Management System



## 5 LEADERSHIP

### 5.1 Leadership and Commitment

The Southern Ports Leadership team demonstrate their commitment through:

- Promoting continual improvement of environmental performance.
- Leadership team hold protection of the environment as a core value.
- Jointly setting and reviewing meaningful environmental targets with Southern Ports staff to ensure continual improvement.
- Ensuring that decisions regarding port planning, development, operational and maintenance activity include long term environmental viability to minimise the impacts from Port operations.
- Recognising that the ports responsibility for their activities extends beyond the port boundaries to the adjacent communities and environment, through regular stakeholder engagement, involvement in community events and commitment to support research and development in environmental management.
- Providing resources, training and support to meet environmental objectives.
- Participation in risk workshops to understand and identify specific, measurable, achievable, time bound and agreed actions that effectively address risk mitigation.
- Participation in management review of the Environmental Management Plans.
- Participation in the annual surveillance audit for third party accreditation.
- Communicating stakeholder feedback to the environmental teams to ensure transparent and informed improvement plans.
- Participation in workplace inspections and observations to identify and remediate environmental hazards.
- Reporting all environmental risks and incidents and implementing appropriate remedial actions.

### 5.2 Environmental Policy

The Southern Ports Environmental Policy is reviewed annually for its effectiveness and relevance by the *Chief Executive Officer* and delegated staff members and approved by the Board *Chair* and *Chief Executive Officer*.

### 5.3 Roles and Responsibilities

The Southern Ports have Environment teams at each port.

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The *Environment Manager* at each port reports on environmental management performance to their *Regional Manager* who reports directly to the *Chief Operating Officer*. Roles and responsibilities for environmental management are shown in Table 6 below.

Table 6: Roles and Responsibilities

| Role                             | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board Directors                  | Board Directors determine and endorse Environmental Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Chief Executive Officer          | The <i>Chief Executive Officer</i> ensures environmental stewardship, leads the culture of the organisation and delegates responsibility for various risk mitigation initiatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Chief Operating Officer          | The <i>Chief Operating Officer</i> has overall accountability for environmental compliance and performance across Southern Ports.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Regional Managers                | <i>Regional Managers</i> has overall responsibility for environmental compliance and performance at their Port.<br>Monitor ongoing trade to ensure compliance with environmental legal and other obligations from a commercial perspective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Environmental Managers           | <i>Environmental Managers</i> have overall responsibility for coordination of environmental management at their Port, including development and implementation of this Manual, technical advice, reporting and monitoring.<br>Monitor ongoing trade to ensure compliance with environmental legal and other obligations from a commercial perspective.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Marine Teams                     | Marine Teams at each Port ensure the safe and efficient movement of vessels and that associated activities are undertaken with minimal impact on Port marine environments.<br>Monitor ongoing trade to ensure compliance with environmental legal and other obligations from a commercial perspective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Operations and Maintenance       | Ensure all operational and maintenance activities and procedures have effective environmental protection controls implemented, inclusive of housekeeping.<br>Ensure inspection and maintenance of pollution control equipment.<br>Monitor ongoing trade to ensure compliance with environmental legal and other obligations from a commercial perspective.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Development and Commercial teams | Development and Commercial teams implement a development proposal process that involves relevant stakeholders, to ensure environmental requirements are identified, adequately controlled and embedded in commercial agreements, trade development, proposals, leases and licences.<br>Regular performance review of trade activities, that address any changes or noncompliance which need to be modified in agreements.<br>Ensure that development proposals are assessed for viability of achieving and complying with relevant legal and other obligations including Southern Ports requirements.<br>Facilitate performance reviews and audits of leases and licences to ensure compliance with environmental legal and other obligations from a commercial perspective. |
| Workers and Port users           | All Southern Ports Workers (including contractors and consultants – but not visitors) and Port Users are to abide by environmental legislative requirements and this Manual.<br>All Southern Ports workers and Port users have a general duty under the WA Environmental Protection Act 1986 to: <ul style="list-style-type: none"> <li>• Not cause or allow serious environmental harm or material environmental harm.</li> <li>• Intentionally or otherwise, cause pollution or an unreasonable emission from any premises.</li> </ul>                                                                                                                                                                                                                                     |

Table 6: Roles and Responsibilities

| Role                  | Responsibilities                                                                                                                                                                                                                                                                |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | <ul style="list-style-type: none"> <li>Identification and reporting of all environmental hazards and incidents.</li> </ul>                                                                                                                                                      |
| Lessees and Licensees | <p>Lessees and Licensees must adhere to the conditions in their commercial agreements with Southern Ports to ensure the environmental impacts from their activities are managed.</p> <p>Lessees and Licensees must also abide by environmental legal and other obligations.</p> |

## 6 PLANNING

### 6.1 Actions to address Environmental Risks and Opportunities

#### 6.1.1 General

The Southern Ports Environmental Management System planning is informed by ISO 14001:2015 as follows:

- The internal and external environmental issues that may have a direct influence on the effectiveness of Southern Ports achieving the intended outcomes of its Environmental Management System.
- The needs and expectations of internal and external stakeholders.
- The current scope of Southern Ports services and activities.
- The Southern Ports Sustainability Plan.
- The risks and opportunities related to its legal and other requirements, environmental aspects and other issues and requirements that need to be addressed.

#### 6.1.2 Environmental Aspects

The Environmental section of the Risk Management Framework sets out a process for identifying actual and potential environmental impact and aspects including risks treatments that will enable Southern Ports to manage their activities pro-actively.

The framework for risk and opportunity management described in these documents is consistent with the requirements of ISO 14001:2015.

The Port maintains a Risk Register in an electronic risk management tool which identifies key environmental aspects, impacts and risk treatments associated with its activities and services.

The purpose of the Risk Register is to identify and maintain key corporate risks and to ensure that appropriate management strategies are in place.

In addition to the Risk Register, risk workshops are held for activities, such as new trades, which may not be captured in the current Risk Register.

The following aspects of the environment which Southern Ports manage, are detailed in the Port specific environmental management plans:

- Ambient air quality (including odour)
- Biosecurity
- Biodiversity and Habitats
- Energy, Water and Waste
- Land, Surface and Groundwater Quality
- Marine, Estuarine and Freshwater Environment Quality
- Noise.

### 6.1.3 Compliance Obligations

Each Port locally manages compliance obligations using Environment Essentials and Riskware, available from the [My Port App Hub](#).

Environment Essentials is a comprehensive directory of legal other obligations.

Riskware identifies relevant Port aspects and impacts that are addressed through site specific audits and inspections to verify compliance status.

### 6.1.4 Planning Action

Southern Ports implements an annual strategic planning process to set strategic business direction in the long, medium, and short-term, including targets and budgeting to meet environmental objectives.

Southern Ports commissioned staff and stakeholder surveys to better understand how environment performance is perceived and determine critical aspects that need to be assessed and managed.

From these surveys, workshop sessions and stakeholder consultation, site specific Environmental Management Plans for each port are reviewed and updated as required.

Surveys:

- Community Engagement Surveys (November 2022, annual survey).
- Employee Engagement Surveys (2022, biennial survey).
- Materiality Survey for each Port to inform master plan and sustainability (2021) Survey actions are integrated into the master plans and sustainability strategy.

## 6.2 Environmental Objectives and Planning to Achieve Them

In accordance with its Environmental Policy, Southern Ports has established several high-level environmental management objectives to help the organisation meet the intended outcomes for each environmental management 'theme'.

### 6.2.1 Environmental Objectives

Each management objective has been developed with consideration of:

- Southern Ports Environmental Policy
- Southern Ports Sustainability Plan
- Master Plans for each Port
- Legal and other requirements
- Significant environmental risks
- Priority environmental management areas
- Strategic objectives
- Environmental issues (identified through weekly review of incidents, hazards, inspections and monitoring outcomes)
- Outcomes of annual reviews of significant environmental risks with the relevant Risk Owners
- Views of interested parties, both internal and external.

### 6.2.2 Environmental Themes

This Manual has been structured to ensure comprehensive management of the significant environmental themes associated with Southern Ports.

An environmental objective has been set for each environmental theme.

### 6.2.3 Planning Actions to Achieve Environmental Objectives

Key driving strategies, programs and plans implemented to achieve environmental management objectives are shown below:

- Minimising the potential impacts on our air, lands, water at and around our port environments, such as via.
  - Development approvals, and risk mitigation.
  - Controls Identified through risk management.
  - Emissions management (dust, noise, water quality).
  - Minimise impacts on the community from site sourced air emissions and ensure emissions are within legislative guidelines.
  - Environmental monitoring programs at each Port including PM10 Air Quality Monitoring and Reporting Program, including water use and water quality monitoring.
  - Support Water Resources Management across all sites, including water reuse and recycling.
  - Support Waste Management and recycling programs at each site
  - Plan to assess and implement as appropriate biodiversity and biosecurity monitoring programs for each site.
  - Biosecurity marine pest surveillance program undertaken at our ports
  - Alignment to and action towards certification for ISO14001 of an Environmental Management System across all sites.
- Regenerating landscapes and enhancing the value of our natural assets.
  - Deliver Marine Environmental Quality Plans that improve the baseline knowledge of each of the ports' marine and estuarine environments and harbours.
  - Support activities for port land regeneration, which include community access and nuisance mitigation.
  - Management of port buffers and bushland to create natural and community assets.
  - Support ocean awareness initiatives and clean up days across all sites.
  - Collaborate with key stakeholders to participate in harbour, river and foreshore protection and monitoring programs neighbouring our ports.

## 7 SUPPORT

### 7.1 Resources

Southern Ports determines organisational resources on an annual basis taking into consideration staffing resources to ensure sufficient expertise is available for the successful implementation of the Southern Ports Environmental Management System.

Other resources including monitoring equipment, specialist environmental consultants and so on, are assessed and planned for during the annual budgeting process.

### 7.2 Competence

Training and competency records for all Southern Ports staff are kept by the *General Manager Sustainability* and the *Human Resources Manager* in accordance with the Training, Conferences and Seminars Procedure.

A mandatory minimum training requirement for all people working at each Port involves the completion of online Port inductions. These Port inductions communicates environmental obligations and expectations to ensure Port services and activities are delivered in a manner that respects Southern Ports environment cultural assets.

## 7.3 Awareness

Environment Awareness information is included in the induction which all employees and port users complete. This is followed by Biosecurity Awareness and Preparedness training. Other Environmental awareness is conducted through environmental alerts, team meetings and risk register reviews.

These awareness information tools communicate Southern Ports roles in environment across its Ports, including levels of operational control, legal and other requirements, significant environmental aspects and environmental objectives, and expectations around hazard and incident reporting.

Additional training needs are identified when circumstances dictate the need for new or further training and awareness.

The Southern Ports Training, Conferences and Seminars Procedure outlines how staff can apply for training approval, for access to external training and development programs to maintain or increase skills in environmental management or environmental technical skills.

## 7.4 Communication

### 7.4.1 General

Southern Ports welcome direct general feedback on environment management of its regional Ports. This is possible by contacting the Port Administration office directly or through the [Southern Ports](#) website.

### 7.4.2 Internal Communication

Environment Teams at each Port lead internal communication on environment activities through:

- Executive and Board reporting;
- [MyPort](#) intranet;
- environment awareness programs (including staff inductions); and
- monthly Health, Safety, Environment and Security Reports.

Issues relating to environmental compliance are included on the agenda of Port Activity Meetings and toolbox meetings with Operational and Maintenance personnel.

Environmental compliance is also discussed as needed during daily pre-start meetings.

### 7.4.3 External Communication

Southern Ports hosts and attends a range of external forums to allow information exchange with external stakeholders and the community on a wide range of operational issues, including environment management.

Southern Ports hold biannual Port User Meetings that include representatives from Port lease holders, transport companies, emergency services, shipping agents, stevedores, towage companies, Border Force, and the Department of Agriculture and Water Resources for biosecurity. *Regional Managers* speak at these meetings and provide updates on environmental issues.

The main forum information exchange with the community is through the quarterly Port Community Consultation Committee, attendance at major community events, and provision of sponsorship opportunities. These forums share information and provide mechanisms for feedback with the local community and environmental management issues are included on the agenda.

Southern Ports also communicates key information on its environmental performance to Port stakeholders via Annual Reports (available from the [Southern Ports](#) website), Environment alerts, Facebook page and this Manual.

Records of external contacts from community and interested parties are maintained by *Environment Managers* to record communications about Port operations, particularly environmental risks and impacts such as noise and dust.

## 8 OPERATION

### 8.1 Operational Planning and Control

Southern Ports maintains processes to effectively manage risks and minimise impacts of services and activities to environmental assets for each Port. These are consistent with the Southern Ports Environmental Policy and Risk Management Framework.

Normal operational activities and their associated risks and impacts are recorded in the Riskware Database.

Health, Safety and Environment Management Plans and Safe Work Method Statements are available for all regular activities and set the operating criteria and controls to ensure environmental management requirements are met.

Risk Assessments are conducted for new operations and proposals that have the potential for increased risk and require a specific Job Hazard Analysis to be compiled to assess the environmental risks and impacts and determine appropriate controls.

All new proponents who wish to establish operations within the Port are required to contact the Southern Ports Commercial Team and provide information regarding the nature of the proposed development, product characteristics, storage and loading methods and details of environmental impact issues such as air quality, water quality, noise, odour and visual impact via a Southern Ports New Trade Proposal Form.

The application is assessed by the Commercial Team in consultation with the relevant Departmental Managers before a decision is made to allow a new proponent to establish at the Port.

Management system documentation is updated (including the Riskware Database) when processes and activities undergo planned changes.

Changes are communicated in accordance with the requirements of the Southern Ports Controlled Document Manual. Uncontrolled changes (or incidents) are managed in accordance with Southern Ports Incident Management Framework.

### 8.2 Emergency Preparedness and Response

The Southern Ports Emergency Planning Committee meets periodically to review and improve emergency management processes across Southern Ports.

A Crisis and Emergency Management Plan has been developed for Southern Ports in addition to Emergency Response Procedures for each port. The overarching Plan and underlying Procedures apply to all Port operations, covering all emergencies involving each Port and surrounding areas for which Southern Ports has legal, ethical or community responsibilities.

The Crisis and Emergency Management Plan is deliberately concise to assist the Incident Management Team in stressful situations, and is the initial document consulted whenever a significant issue is encountered that falls outside the parameters of “business as usual” at Southern Ports.

Southern Ports conduct periodic emergency exercises at each Port to prepare for dealing with emergency events that may affect the Port and its environment.

### 8.2.1 Oil Spill Contingency Plan

Marine oil pollution is a significant potential environmental risk and a targeted Oil Spill Contingency Plan has been established to provide rapid access to essential information for nominated who may be required to report or respond to spills.

The Southern Ports Oil Spill Contingency Plan has been prepared to align with the Western Australia Maritime Environmental Emergencies State Hazard Plan and covers:

- the scope of effective oil spill response
- operational plans
- structures and agreements for inter-agency cooperation
- framework for Port authorities and industry to develop Oil Spill Contingency Plans.

## 9 PERFORMANCE EVALUATION

### 9.1 Monitoring, Measurement, Analysis and Evaluation

#### 9.1.1 General

In accordance with Environmental Management System requirements, Southern Ports monitor, measure and report on various facets of overall environmental performance. With the intent to continually progress the system, recognition of deficiencies are noted and opportunities taken to improve environmental management.

Environmental complaints and incidents are recorded and tracked through the software program INX – InControl.

Southern Ports have established a comprehensive program of environmental monitoring for the marine, terrestrial, riverine and estuarine areas of each of its Ports.

Monitoring records are retained in the Record Management System. Monitoring programs have been implemented either due to:

- **Legal Requirements:** where Southern Ports are bound to undertake monitoring and audits under statutory approvals issued to the organisation under environment legislation.
- **Best Practice:** where the aspects and impacts of delivering Southern Ports services and activities have been analysed through the *Risk Register* and in response an environmental monitoring program has been established.

Current environmental monitoring programs include:

- **Air Quality:** PM10 and TSP dust monitoring and reporting in compliance with the National Environment Protection (Ambient Air Quality) Measure 2021.
- **Feral Animal Control:** Routine rat control and ad hoc rabbit control to ensure that feral animal abundance remains stable or is lowered.
- **Marine Pests:** Bi-annual implementation of State-Wide Array Surveillance Program marine biosecurity surveillance in conjunction with the Department of Primary Industries and Regional Development.
- **Marine Water and Sediment:** Periodic water and sediment monitoring of harbours and as required prior to and during dredging and development projects.
- **Surface and shallow groundwater:** Periodic water quality sampling of shallow groundwater well to identify potential contamination. Annual water and sediment monitoring of wastewater capture systems, riverine and estuarine water bodies.
- **National Greenhouse and Energy Reporting Scheme:** National Greenhouse and Energy Reporting to Commonwealth Government on fuel (diesel & petroleum) and

electricity usage which are calculated as carbon dioxide emissions. Targets are in line with Commonwealth requirements.

- **Noise Quality:** Regular noise monitoring to ensure community is not impacted by nuisance and environmental noise. Targets are in compliance with the Environmental Protection (Noise) Regulations 1997.
- **Sentinel Beehive Program:** Sentinel beehives established at ports as part of a state-wide biosecurity program to detect new bee pests and diseases.
- **Weed Management:** Ongoing weed management by specialist contractors to ensure that weed populations remain stable or are lowered.

Southern Ports communicate to external stakeholders and the community on the key outcomes of its environmental monitoring programs and initiatives through reporting, Port User Meetings and Port Community Consultative Committee.

### 9.1.2 Evaluation of Compliance

The INX – InControl program enables the identification, assessment and remediation via risk assessment and action generation.

All substantiated environment-related complaints and incidents are reported monthly internally and published in the annual report.

Where appropriate, results of environmental monitoring and performance are communicated to stakeholders and the general community.

Communication occurs either via the Southern Ports website, direct email or Environment Alerts and publications.

However, the main methodology for external communication is through the Port Community Consultative Committee. The Port Community Consultative Committee meets a minimum four times per year and allows the exchange of information and feedback between Southern Ports and Port Community Consultative Committee members.

Southern Ports aims to continually improve the suitability and effectiveness of its Environmental Management System.

### 9.1.3 Internal Audit Program

*Regional Managers* are responsible for overseeing and leading the implementation of Internal Audit Programs at each Port with the assistance of their *Harbour Masters* and the *Group Manager Health, Safety, Environment & Security*.

Internal Audit Programs are reviewed by the Executive Leadership Team and approved by the Board. Internal audits are conducted in accordance with the Health Safety and Environment Internal Audit Safe Work Instruction.

## 9.2 Management Review

The Southern Ports Environmental Policy is reviewed and approved by the Board every two years to ensure continuing suitability and effectiveness.

This Environmental Management System Manual is reviewed annually and updated every two years or as deemed appropriate by Southern Ports.

Monthly updates on environment matters, including any non-compliance matters are reported monthly to the Executive Leadership Team via Health, Safety, Environment and Security Reports.

The Southern Ports Executive Committee also receives 6-monthly updates on environmental incidents. Performance is monitored against strategy, master plans reviewed in regular Key Reporting Areas and Key Performance Indicators reporting to the business, executive leadership team and board.

Any relevant observations, conclusions and recommendations for necessary changes to the Southern Ports Environmental Management System Manual or Environmental Policy will be identified and incorporated in the updated version of this Manual.

## 10 IMPROVEMENT

### 10.1 General

The Southern Ports Change Management Procedure identifies the process by which Southern Ports documents non-conformity and preventative and corrective actions. By following this process, Southern Ports can achieve continual improvement and prevent recurrence of non-conformity.

Actions taken by Southern Ports to correct the non-conformance are communicated to the Regulator by email or by letter. Copies are held in the Environmental Management System.

### 10.2 Non-conformity and Corrective Actions

Inspections and audits of Southern Port operations and administrative processes identify non-conformances that are corrected by line management. Non-conformances are recorded in an 'Action Register' and communicated via internal email and the records of corrective and preventative actions taken held on the Environmental Management System.

Non-compliances identified by regulatory agencies are communicated to Ports in either hard copy or electronic form. Non-conformances identified by the Department of Water and the Environment can be communicated either by a hard copy Environmental Field Notice, email or by letter.

Southern Ports maintains a register of all non-conformity records. All preventative and corrective measures are actioned in accordance with the Change Management Procedure.

### 10.3 Continual Improvement

Southern Ports Environment teams through internal audit and inspection processes, identify opportunities to improve the suitability, adequacy and effectiveness of the Environment Management System. In addition, environmental monitoring reports are reviewed to identify opportunities for improvement.

External consultancies are engaged to peer review the environmental monitoring systems to assess data quality, data capture percentages and cost effectiveness and make recommendations for improvement if deemed necessary. External consultancies also recommend changes to the sampling methodologies and sampling frequencies to ensure that the monitoring program provides the necessary environmental due diligence outcomes and legal compliance based on environmental impact risk potential.

Changes to legislation are continuously assessed to verify compliance and identified opportunity for continual improvement.

New trade is risk assessed to ensure the Environment Management System is sufficiently structured to take into account any new environmental impacts identified. In addition, the licence amendment process through Department of Water and Environmental Regulation also employs a risk assessment process to set appropriate conditions for new products to ensure environmental impacts are mitigated.

Ongoing review of the Environment Management System is essential to ensure its associated management plans remain relevant and any opportunity for improvement is identified. Southern Ports strive to continually improve the suitability, adequacy and effectiveness of its Environment Management System to enhance environmental performance through the implementation of this Manual, and associated documentation.

## Environmental Management System Manual

The review of this Manual and ongoing auditing pursuant to the Southern Ports Internal Audit Program ensures Southern Ports can meet its commitment to continual improvement, in line with the Southern Ports Environmental Policy.

### 10.4 Information

#### 10.4.1 General

Southern Ports has a business-wide Controlled Document Manual that sets out the expected standard for controlled documents.

#### 10.4.2 Creating and Updating

Environmental management documentation is created and updated in line with the Southern Ports Controlled Document Manual.

#### 10.4.3 Control of Documented Information

Environment Management System documents and associated records are kept in the Record Management System in accordance with the Southern Ports Record Keeping Plan