



SOUTHERN PORTS

ALBANY BUNBURY ESPERANCE

**ENVIRONMENTAL MANAGEMENT
SYSTEM (EMS) MANUAL - BUNBURY**

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1. INTRODUCTION

This manual provides information for understanding the structure of the EMS of the Southern Ports – Bunbury (SP - PoB). It identifies organisational structure, planning activities, roles and responsibilities within the organisation, development of staff and processes, and the procedures for continual improvement.

The Southern Ports (SP) was established on 1 October 2014 following the merger of the Albany Port Authority, Bunbury Port Authority and Esperance Ports Sea and Land. The legislation enabling the merger of the ports, “*The Ports Legislation Amendment Act 2013*”, was given Royal Assent on 21 May 2014.

In late 2017, Southern Ports Authority adopted the registered business/ trading name of Southern Ports (SP) with Southern Ports Authority remaining as the legal entity name in the Port Legislation Amendment Act 2014 – subdivision 2.

The Ports of Albany (PoA), Bunbury (PoB) and Esperance (PoE) continue to operate under local management, with supervision and governance under SP. SP is responsible to and reports to the Minister for Regional Development; Agriculture and Food; Ports; Minister assisting the Minister for State Development, Jobs and Trade (the Minister). SP is committed to contribute to the economic growth and development of the State of WA by facilitating trade in a commercial, efficient and sustainable manner.

2. STRUCTURE OF THE MANUAL

This manual is structured as follows:

- It uses the 10 control headings as set out in the ISO14001:2015 standard.
- Under each heading, the ISO14001 requirements are shown in italics.
- Brief description of how the organisation complies with the requirements of the ISO1400:2015 standard is outlined immediately below it.
- This is followed by a reference to any corresponding supporting documents.

3. LIST OF ABBREVIATIONS USED IN THIS DOCUMENT

Table 1 - List of Abbreviations

ARC	Audit and Risk Committee
BAU	Business as Usual
CCO	Chief Commercial Officer
CEO	Chief Executive Officer
COO	Chief Operating Officer
GM PORT	General Manager Port
DAWR	Department of Agriculture and Water Resources - Federal
DWER	Department of Water and Environment Regulation (WA)
DIMRS	Department of Mines, Industry Regulation and Safety
DoT	Department of Transport
DPIRD	Department of Primary Industries and Regional Development

EMS	Environmental Management System
HSE	Health, Safety and Environment
IMS	Introduced Marine Species
IMT	Incident Management Team
ISO	International Organization for Standardisation
JSA	Job Safety Analysis
KPI	Key performance indicators
MOSCP	Marine Oil Spill Contingency Plan
MSIC	Marine Security Identification Card
NORM	Naturally Occurring Radioactive Materials
OEPA	Office of the Environmental Protection Authority
OHS	Occupational Health and Safety
PDF	Portable Document Format
PoA	Port of Albany
PoB	Port of Bunbury
PoE	Port of Esperance
PCCC	Port Community Consultation Committee
RM	Regional Manager
RMF	Risk Management Framework
RMS	Records Management System
RTAP	Risk Treatment Action Plans
S & SC	Safety & Sustainability Committee
SPA	Southern Ports Authority
SP	Southern Ports
SP - PoB	Southern Ports – Port of Bunbury
SWI	Safe Working Instruction
WA	Western Australia

4. CONTEXT OF THE ORGANIZATION

4.1. Understanding the organization and its context

Requirement:

The organization shall determine:

- a) *the interested parties that are relevant to the environmental management system;*
- b) *The relevant needs and expectations (i.e. requirements) of these interested parties;*
- c) *Which of these needs and expectations become its' compliance obligations.*

Demonstrating Compliance:

Understanding the external context – this is facilitated by considering issues arising from legal, technological, competitive market, cultural, social, and economic environments, whether international, national, regional or local.

Understanding the internal context – this is facilitated by considering issues related to values, culture knowledge and performance of the organization.

To comply with both requirements:

- Risk Management Framework across SP was implemented.
- SP commissioned staff and stakeholder surveys, the results of which reinforced our mission to facilitate safe, efficient and innovative trade for the benefit of our three regions, port users and our shareholder, the state government.
- The survey helped SP to better understand and determine the important issues that can affect, either positively or negatively, the way the organization manages its health, safety and environmental responsibilities.
- The stakeholder survey helped to develop the Southern Ports' Vision, Mission, and Values.
 - **Our Vision**
Strong Regional Ports, Strong Regions
 - **Our Mission**
To Strengthen our regional communities through smart and sustainable development of our ports,
 - **Our Values**

Accountability	Empowering people to perform well, demonstrating initiative and acting responsibly.
Safety	Demonstrating an uncompromising commitment to safety at all times.
Integrity	Holding high standards of conduct and decision making to ensure confidence and trust.
Teamwork	Working as one team to achieve common goal.
Future Focus	Building sustainable future aligned with our vision, while respecting our history.
- The management of the stakeholder and community survey was contracted out to Kantar Public (formerly TNS). The survey involves:
 - 200 quantitative telephone interviews with stakeholders
 - 25 in-depth qualitative interviews with key stakeholders

- 300 quantitative telephone interviews with the community
- Analysis of the research findings.
 - The initial survey took place in June 2016 and repeated every year.
 - The summary of the survey findings is documented in the Annual Report

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Bunbury Port – Inner Harbour Structure Plan 2009.
- Environmental Management System Manual.
- Competitor analysis – Finance Dept.
- Economic reports from business sectors or consultant’s reports - Finance Dept.
- Annual analysis of data from the stakeholder survey - CEO
- Business plans and strategy reviews - Finance Dept.
- Risk Management Framework - Risk and opportunity assessments
- HS and E Policies.
- Code of conduct Statement
- Minutes of Environmental Management review meetings (that show decisions and actions relating organizational context.
- Annual Report.

4.2. Understanding the needs and expectations of interested parties

Requirement:

The organization shall determine:

- a) *the interested parties that are relevant to the environmental management system;*
- b) *The relevant needs and expectations (i.e. requirements) of these interested parties;*
- c) *Which of these needs and expectations become its compliance obligations.*

Demonstrating Compliance:

- Internal stakeholders:

Internal interested parties:	Needs and expectations:	How key issues are captured:
Employees 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 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 2 - Internal Stakeholders

- External stakeholders could include:

External interested parties:	Needs and expectations:	How key issues are captured:
Regulators - Department of Water and Environment Regulation (DWER) – (previously known as Dept of Environment and Regulation and The Dept of Water).	<ul style="list-style-type: none"> Compliance with the site Environmental Licence and the Environment Protection Act Compliance against the issue of the licence under the 'Rights in Water and Irrigation Act 1914'. 	<ul style="list-style-type: none"> annual submission of AACR to the regulator Annual Payment of Licence fee Regulator inspection and audit Emissions monitoring Annual reporting of the bore water usage at berths 5 and 8
Regulators - Other	<ul style="list-style-type: none"> Compliance against Requirements of the Port Authorities Act 1999 Profitability and growth 	<ul style="list-style-type: none"> Consultation and engagement exercises to identify concerns Annual reporting to the Minister
Regulators - Department of Mines and Industry Regulation Safety. (DIMRS) - previously known as DMP	Compliance to the Requirements of Mines and Safety inspection Act 1994, Occupational Safety and Health Act 1984	<ul style="list-style-type: none"> Regulator inspection and audit Consultation and engagement exercises to identify concerns.
Regulators - Department of Agriculture and Water Resources (DAWR) - Previously known as The Australian Quarantine and Inspection Service (AQIS) Following a period operating under the name Department of Agriculture, Fisheries and Forestry (DAFF) Biosecurity	Management of Biosecurity and first point of entry protocols	<ul style="list-style-type: none"> Provide receptacles to accept biosecurity waste and report foreign species (IMS) intrusions. Provide locations for the positioning of bee attractant boxes and bee surveillance hives. Undertake IMS surveys in the marine environment.
Regulators - The Department of the Environment and Energy	Compliance with the 10 year dredging permit	<ul style="list-style-type: none"> Annual dredging volume return is submitted to the regulator. Conditions set on the permit are managed via LTMMP.

External interested parties:	Needs and expectations:	How key issues are captured:
Regulators - Department of Biodiversity, Conservation and Attractions (DBCA).	To provide assistance where necessary to the relevant Regulatory Agency or Agencies to facilitate the safe and effective rescue and or removal of any land or marine wildlife within the Port boundaries.	Report any unusual occurrence to the regulator.
Regulators - Australian Maritime Safety Authority (AMSA) and IMO	Provision of Port waste reception facilities	Oil spill management plan and Emergency Management Plan are in place.
Regulators - Clean Energy Regulator - NGER	Green House and Energy reporting established by the National Greenhouse and Energy Reporting Act 2007 (NGER Act), is a single national framework for reporting and disseminating company information about greenhouse gas emissions, energy production, energy consumption and other information specified under NGER legislation.	Estimate energy usage annually and register with NGER if the usage exceeds the reporting threshold.
Neighbours and communities	Social responsibility and engagement	Consultation and engagement exercises to identify environmental concerns via quarterly Port Community Consultation Committee (PCCC) meetings.
Local Authorities and Government	Consultation and information	Engagement with planning and development issues.
Bureau Veritas	Compliance against the ISO14001 - 2014	Internal and External audits

Table 3 - External Stakeholders

Supporting documents to demonstrate Compliance – the following documented information is available to demonstrate compliance: -

- Survey report – available from the CEO;
- Port User meeting minutes;
- Monitoring Reports;
- External regulators communications and documentation;
- PCCC meeting minutes.

4.3. Determining the scope of the environmental management system

Requirement:

The organization shall determine the boundaries and applicability of the environmental management system to establish its scope.

When determining this scope, the organization shall consider:

- a) The external and internal issues referred to in 4.1;*
- b) The compliance obligations referred to in 4.2;*
- c) Its organizational units, functions and physical boundaries;*
- d) Its activities, products and services;*
- e) Its authority and ability to exercise control and influence.*

Once the scope is defined, all activities, products and services of the organization within that scope need to be included in the environmental management system.

The scope shall be maintained as documented information and be available to interested parties.

Demonstrating Compliance:

Scope of the EMS:

The EMS applies to all SP - PoB operations and administration functions (see map shown below - area shaded in purple) under the direct day to day control of the SP - PoB, excluding those activities conducted by lease holders on leased sites within the port, their contractors, the licenced towage company, the lines boats and the licensed stevedores (see red dotted line on the map).

In addition, the EMS includes all marine areas within the SP - PoB limits including the shipping channel and the spoil ground for the purposes of periodic maintenance dredging, dredge material disposal and periodic sediment, water chemistry and invasive marine species monitoring and potential emergency situations, including those that can have an environmental impact.



Figure 1- Scope of the EMS – excludes lease holder site (red dotted line)

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:

- EMS scope statement clearly defines the boundaries of the EMS
- Evidence of communication of this scope to interested parties:-
 - DWER was informed of the ISO14001 certification
 - As required by the dredging permit
 - Copy of the EMS is available on the SP -Bun website and MyPort

4.4. Environmental Management System

Requirement:

To achieve the intended outcomes, including enhancing its environmental performance, the organization shall establish, implement, maintain and continually improve an environmental management system, including the processes needed and their interactions, in accordance with the requirements of this International Standard.

The organization shall consider the knowledge gained in 4.1 and 4.2 when establishing and maintaining the environmental management system.

Demonstrating Compliance:

Overview of the SP - PoB EMS

The SP - PoB EMS has been established, documented and supported with the specific objective of ensuring that all port related activities under the direct day to day control of SP - PoB achieve the environmental commitments set out in the Environmental Policy and meet ISO 14001:2015 requirements.

The EMS is designed to enable SP - PoB to address both environmental and compliance imperatives by creating a system of processes, plans and procedures that guide its performance against its environmental objectives and targets.

The ISO 14001:2015 standard emphasises continual improvement in the performance of the system and through this, improvements in SP - PoB's environmental performance are expected to be demonstrated.

SP - PoB believes that sound environmental management is a key component of its overall management responsibility from both a corporate, legal, sustainability and community responsibility perspective.

The cornerstones of the EMS are:

- Development of an Environmental Policy;
- Development and implementation of Environmental Objectives and Targets;
- Identification of environmental risks and their management
- Ongoing monitoring and reviewing of environmental performance; and
- Continuous improvement of the EMS to further enhance SP - PoB's environmental performance.

The SP Board sets environmental policy and strategic direction and the EMS is implemented, managed and monitored by SP - PoB's senior management team as part of the commitment to minimise operational environmental impacts.

The Environmental Policy, EMS manual, Risk Register, plans, other registers and procedures are the key EMS documents. They are found within the SP - PoB's Synergy Records Management System (RMS), on the SP - PoB's website and on the MYPORT Intranet.

This EMS manual describes how SP - PoB will implement its environmental management system and monitor its environmental performance. The format of the Plan will be consistent with the AS/NZS ISO 14001:2015 environmental system requirements and describe the systems and processes actioned by the SP - PoB to meet the requirements of this International Standard.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- No particular evidence is needed for this requirement - it will be fulfilled by other requirements included in this document.

5. LEADERSHIP

5.1. Leadership and Commitment

Requirement: *Top management shall demonstrate leadership and commitment with respect to the environmental management system by:*

- taking accountability for the effectiveness of the environmental management system;*
- ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization;*

- c) *ensuring the integration of the environmental management system requirements into the organization's business processes;*
- d) *ensuring that the resources needed for the environmental management system are available;*
- e) *communicating the importance of effective environmental management and of conforming to the environmental management system requirements;*
- f) *ensuring that the environmental management system achieves its intended outcomes;*
- g) *directing and supporting persons to contribute to the effectiveness of the environmental management system;*
- h) *promoting continual improvement;*
- i) *Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.*

NOTE: Reference to "business" in this International Standard can be interpreted broadly to mean those activities that are core to the purposes of the organization's existence.

Demonstrating Compliance:

Leadership and commitment within this organization are demonstrated by the following:-

- ***Taking accountability for the effectiveness of the environmental management system: -***

A General Manager Sustainability (GM – Sustainability) was appointed in 2020. This position is a member of the SP Executive Leadership Team (ELT) and has functional accountability for the Environment function across all SP sites. However, the day to day operational environment function is reported to the Regional Manager - Port of Bunbury

- ***Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization;***

The environmental policy is reviewed annually and approved by the SP Board Chairman and the SP-CEO.

SP - PoB sets its objectives and targets such that they support the environmental commitments and strategies as set out in the Environmental Policy. Objectives and targets are also set with reference to the high and extreme rated environmental risks identified within the operational and strategic Risk Registers (RiskWare).

- ***Ensuring that the resources needed for the environmental management system are available;***

Functional Accountability Matrix was issued in May 2020 which defines the accountability of the executive leadership team within Southern Ports.

Position descriptions have been developed for all SP - PoB staff which set out responsibilities and authorities to facilitate effective environmental management. Individual position descriptions for SP employees are available from the HR department.

Maintenance and repair of Port Infrastructure is managed by the Maintenance and Operations Superintendent via the Operations & Maintenance Asset Management Procedure.

- ***communicating the importance of effective environmental management and of conforming to the environmental management system requirements;***

EMS Management review meeting occurs once a year unless significant change in the EMS occurs. The Regional Manager, Maintenance and Operations Superintendent, Environment Manager, Environmental Officer are present.

Issues relating to the EMS are included on the agenda for the:

- Monthly HSE and General Staff meeting
- Monthly Operations/Maintenance ‘Tool Box’ meetings
- Quarterly Port User meeting
- Quarterly PCCC meeting

The minutes of the meetings mentioned above and the monthly report to the Health and Safety Environmental committee (HSEC) are recorded in the SP Record Management System – Synergy.

In addition, the HSEC reports to the full Board meeting regarding environmental matters.

- ***ensuring that the environmental management system achieves its intended outcomes;***

Sufficient budget allocations are made each financial year for environmental activities and adequate in-house monitoring equipment is available. External specialist environmental consultancies are engaged as required for environmental monitoring, survey and analysis work plus the provision of ad-hoc advice.

- ***promoting continual improvement;***

Continual Improvements are identified by:

- Annual Minor Works and/or Capex for consideration
- Observations and Hazards raised in the INX System
- ‘Stop and think’ book
- Internal site audits and inspections
- Annual management review
- Risk assessments (RiskWare)
- Incident reports and investigations.
- Emergency drills and Desktop exercises

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Annual budget for minor works program and CAPEX
- Records in the INX data base
- Management review meeting minutes
- Risk registers/RiskWare
- HSE audit and inspection reports
- Incident reporting and investigations
- Meeting Minutes
- Reports to Regulatory Agencies.
- Environmental monitoring reports (dust, noise, water quality, sediment quality and biota sampling)

5.2. Environmental Policy

Requirement:

Top management shall establish, implement and maintain an environmental policy that, within the defined scope of its environmental management system:

- a) *is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services;*
- b) *provides a framework for setting environmental objectives;*
- c) *includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization;*

NOTE: Other specific commitment(s) to protect the environment can include sustainable resource use, climate change mitigation and adaptation, and protection of biodiversity and ecosystems.

- d) *includes a commitment to fulfil its compliance obligations;*
- e) *Includes a commitment to continual improvement of the environmental management system to enhance environmental performance.*

The environmental policy shall:

- be maintained as documented information;*
- be communicated within the organization;*
- be available to interested parties*

Demonstrating Compliance:

Electronic copy of the Environmental Policy is available within the SP-PoB's Synergy Records Management System (RMS), on the SP website and on the MYPORT intranet.

Hard copies of the policy are available at the following locations:

- Administration Office at Casuarina Drive
- HSE demountable Offices
- Operations and Maintenance Manager's office
- Workshop

The environmental policy is reviewed annually for its effectiveness and relevance by the CEO and delegated staff members and approved by the Board Chairman and the SP-CEO.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Environmental Policy
- Document Control procedure
- HSEC and Board Meeting Minutes

5.3. Organizational roles, responsibilities and authorities

Requirement:

Top management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within the organization.

Top management shall assign the responsibility and authority for:

- a) *ensuring that the environmental management system conforms to the requirements of this International Standard;*
- b) *Reporting on the performance of the environmental management system, including environmental performance, to top management.*

Demonstrating Compliance:

SP - PoB has provided adequate staff resources to implement and control the EMS through the employment of personnel with specific competencies and experience in environmental science and port operations, both marine and land based.

SP - PoB employs an Environment Manager and an Environment Officer. The Environment Manager reports directly to the Regional Manager – Port of Bunbury (RM-PoB) who reports directly to the Chief Operating Officer (COO).

The SP - PoB Maintenance and Operations Superintendent and the PoB Harbour Master have specific authorities and responsibilities for ensuring that the port is controlled to ensure loading activities and shipping do not cause adverse environmental impacts.

The RM is the officer with specific responsibilities for emergency management, the most significant part of which is the prevention of and control of oil or chemical spills into the marine environment or onto land.

The RM - PoB also assumes Registered Mine Manager responsibilities under the Mines Safety and Inspection Act.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- Individual position descriptions for SP - PoB employees are available from the HR Department
- Organisation Chart – available from MyPort
- Accountabilty Matrix – available from MyPort

6. PLANNING

6.1. Actions to address risks and opportunities

6.1.1. Requirement: General

The organization shall establish, implement and maintain the process(es) needed to meet the requirements in 6.1.1 to 6.1.4.

When planning for the environmental management system, the organization shall consider:

- a) the issues referred to in 4.1;*
- b) the requirements referred to in 4.2;*
- c) the scope of its environmental management system;*

and determine the risks and opportunities, related to its environmental aspects (see 6.1.2), compliance obligations (see 6.1.3) and other issues and requirements, identified in 4.1 and 4.2, that need to be addressed to:

- *give assurance that the environmental management system can achieve its intended outcomes;*
- *prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organization;*
- *achieve continual improvement.*

Within the scope of the environmental management system, the organization shall determine potential emergency situations, including those that can have an environmental impact.

The organization shall maintain documented information of its:

- *risks and opportunities that need to be addressed;*

- process(es) needed in 6.1.1 to 6.1.4, to the extent necessary to have confidence they are carried out as planned.

Demonstrating Compliance:

The Risk Management Framework sets out a process for identifying actual and potential environmental risks that result in impacts that are non-compliant with legal and SP's requirements.

There is a specific risk assessment context. To set the specific risk context, the activity that is the focus of the risk assessment is defined, and the level at which the activity occurs is determined. These are as follows:

Business Risk – Are those risks associated with the long term planning of SP's future direction. Business risk assessments are normally conducted at the CEO/Board & ELT levels. SP risk information will be maintained within the 'RiskWare' database.

Operational Risk – Arise from the day to day business functions that occur within SP. These are normally conducted at local Management levels of SP, and are assessed by the parties familiar with the particular function or service with which the risks are associated. This would typically include key staff; the identified risks are managed and maintained using the excel register/RiskWare database

Project Risk – Arise from specific projects or discrete undertakings. They tend to be one off venture which contain starting and finishing dates. Project risks exist at every stage and they need to be identified and managed to ensure the successful completion of the project. These are normally conducted at ELT and Management levels of SP and are assessed by the parties familiar with the particular project with which the risks are associated. This would typically include key staff;

Risks are monitored and reviewed on a regular basis to maintain the relevance and usefulness of information.

This Table selects the criteria for the management of risk and the decision base

Risk Level	Risk	Criteria for Risk Management		Decision Base
1-5	Low	Monitor	With adequate controls	N/A
6-9	Medium	Management Control Required	With adequate controls	COO
10-14	High	Urgent Management Attention	Only acceptable with excellent controls	CEO
15-25	Extreme	Unacceptable	Only acceptable with excellent controls	S & SC / Full Board

Table 4 - Risk acceptance and decision base table

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Risk Management Policy - available on the MYPORT intranet
- Risk Management framework - available on the MYPORT intranet
- Risk Registers
- RTAP's
- RiskWare

6.1.2. Requirement: Environmental aspects

Within the defined scope of the environmental management system, the organization shall determine the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering a life cycle perspective.

When determining environmental aspects, the organization shall take into account:

- a) change, including planned or new developments, and new or modified activities, products and services;*
- b) abnormal conditions and reasonably foreseeable emergency situations.*

The organization shall determine those aspects that have or can have a significant environmental impact, i.e. significant environmental aspects, by using established criteria.

The organization shall communicate its significant environmental aspects among the various levels and functions of the organization, as appropriate.

The organization shall maintain documented information of its:

- environmental aspects and associated environmental impacts*
- criteria used to determine its significant environmental aspects;*
- significant environmental aspects.*

NOTE: Significant environmental aspects can result in risks and opportunities associated with either adverse environmental impacts (threats) or beneficial environmental impacts (opportunities).





Demonstrating Compliance:

As required by clause 6.1.2 of the standard, SP–Bun has examined its activities and services to determine which of them have an impact on the environment. The identification of the Environmental aspects (risks) and impacts are identified and recorded by SP - PoB within the Environmental Section of the Risk Register. The Risk Register is a live document and updated on a regular basis and/or as soon as new risks are identified. Periodic Operational Exposure Summary Meeting takes place where existing risks are reviewed, and new identified risk are added.

Safe Working Instruction (SWI) are written to manage day to day operational activities. Non-routine tasks (abnormal conditions) may require a specific Job Safety Analysis (JSA) to be compiled that addresses environmental aspects (risk) and impacts and what controls are needed.

To identify possible environmental impacts of all new trade opportunities, proponents who wish to establish operations and new products are required to complete a New Trade Inquiry Form. This form provides information regarding the nature of the proposed development, product characteristic, storage and loading methods and details of environmental impact issues such as air quality, water quality, noise, odour and visual impact.

Life cycle approach is applied only to the loading of product from 'Shed to Ship'. The identified environmental impact associated with this activity and management in place to mitigate the risks is shown below:-

INPUT	ACTIVITY	MANAGEMENT IN PLACE	OUTPUT
Labour Natural resources Materials	Approval for new and existing Proponent	Application, consideration and Approval Process – control and manage by commercial team via Southern Ports New Trade Proposals.	Emission to air, Land and Water
			
Labour Natural resources Materials	Issue of contract/renewal of contract	contractual agreement – control and manage by commercial team	Emission to air, Land and Water
			
Labour Natural resources Materials	Using existing infrastructure or improving/building new infrastructure	<ul style="list-style-type: none"> • if required – Process is in place for managing DWER licence amendment • Tender Process • Risk assessment 	<ul style="list-style-type: none"> • Emission to air, Land and Water • Compliance against licence condition • Opportunity for improvement
			
Labour Natural resources Materials	loading/unloading of Product	<ul style="list-style-type: none"> • Port Users Management plan and procedures • air monitoring to assess air emission • marine and freshwater monitoring • Land/Ground water monitoring 	Emission to air, Land and Water
			
Labour Natural resources Materials	Maintenance and repair of the infrastructure	<ul style="list-style-type: none"> • contractor management – permits, JSA and MSIC cards • tender process for supplier selection – control and manage by commercial team • Tender process for services – control and manage by commercial team 	Emission to air, Land and Water

INPUT	ACTIVITY	MANAGEMENT IN PLACE	OUTPUT
Labour Natural resources Materials	Provision of electricity	NGERS reporting – synergy invoice and monthly meter readings	Emission to air, Land and Water
Labour Natural resources Materials	Provision of water	Water entitlement – DWER – licence condition	Emission to air, Land and Water
Labour Natural resources Materials	Waste collection	testing, storage and transport – lab reports, waste consignment notes	Emission to air, Land and Water
Labour Natural resources Materials	Regulatory requirements	DWER, DMIRS and DAWR requirements – Licence conditions	Emission to air, Land and Water
Labour Natural resources Materials	End of leased agreement	contractual agreement – available from the Commercial team	Emission to air, Land and Water
Labour Natural resources Materials	Rehabilitation of land and infrastructure	PSI and DSI	Waste disposal - approved Landfill site

Table 5 - Life Cycle Approach of Loading Bulk Products from shed to Chute

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Risk Management Framework
- Risk Register/RiskWare
- Southern Ports New Trade Proposal
- Contractual agreement between SP and Port users
- EP Act Part V licence amendment applications.
- Reports to Regulators
- Annual returns as required by the DWER licence condition
- Laboratory data
- Waste disposal consignment notes
- Tender process
- Monitoring and sampling data
- Work permits
- JSAs
- NGERS calculations
- New Trade Enquiry Form
- SWI

6.1.3. Requirement: Compliance obligations

The organization shall:

- a) determine and have access to the compliance obligations related to its environmental aspects;*
- b) determine how these compliance obligations apply to the organization;*
- c) take these compliance obligations into account when establishing, implementing, maintaining and continually improving its environmental management system.*

The organization shall maintain documented information of its compliance obligations.

NOTE:- Compliance obligations can result in risks and opportunities to the organization.

Demonstrating Compliance:

SP - PoB has access to applicable legal and other compliance requirements relating to its EMS through subscription to the on-line service Environment Essentials (www.enviroessentials.com.au).

This service provides monthly advisories on changes to environmental legislation and is e-mailed to the Environment Manager and Environment Officer. All SP - PoB staff have access to this on-line service via the External Publications section of the MYPORT Intranet.

HSE staff have internet access to the websites of the Department of Water and Environment Regulation (www.dwer.wa.gov.au) and the Department of the Environment and Energy (www.environment.gov.au) and visit these periodically to check for notification of legislation changes.

SP - PoB is also a member of Ports Australia (www.portsaustralia.com.au) and receives regular e-mail communications from this organisation with regard to proposed changes to

environmental legislation as it directly affects ports and requests for input during comment periods for proposed legislative change.

SP - PoB has also established a Legal Obligations Register which is maintained by the Environment Officer. Changes to legislative and compliance requirements are noted in the register. Where significant changes to the legislation are noted and applicable to SP - PoB, these are communicated within the monthly HSES Report that is part of the monthly Board meeting agenda. Pertinent changes are also discussed at the SP - PoB weekly Trade and Infrastructure meeting. Changes are also discussed at the monthly HSE and General Staff meeting.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Legal Obligations Register
- Subscription to the on-line service Environment Essentials (www.enviroessentials.com.au)
- Monthly HSES Reports - <S:\HSES Business Integration\Quarterly HSES Reports Includes Graphs>

6.1.4. Requirement: Planning action

The organization shall plan:

a) *to take actions to address its:*

- 1) *significant environmental aspects;*
- 2) *compliance obligations;*
- 3) *risks and opportunities identified in 6.1.1;*

b) *how to:*

- 1) *integrate and implement the actions into its environmental management system processes (see 6.2, Clause 7, Clause 8 and 9.1), or other business processes;*
- 2) *evaluate the effectiveness of these actions (see 9.1).*

When planning these actions, the organization shall consider its technological options and its financial, operational and business requirements.

Demonstrating Compliance:

Environmental aspects (risks) and impacts are identified using the Risk Management Framework –see section 6.1.2 above for more details. The identified aspects are recorded by SP - PoB within the Environmental Section of the Risk Register. The identified risks are managed using the Risk Register. This register is a live document and updated as soon as new risks are identified.

Changes to legislative and compliance requirements are managed as stated in section 6.1.3 above.

The risk management process employed by SP provides a structured and systematic approach to identifying, analysing, evaluating and treating risks and combined with ongoing communication and monitoring, forms a dynamic and iterative risk management process. Risks are monitored and reviewed on a regular basis to maintain the relevance and usefulness of information.

The diagram below represents the key stages within the risk management process:

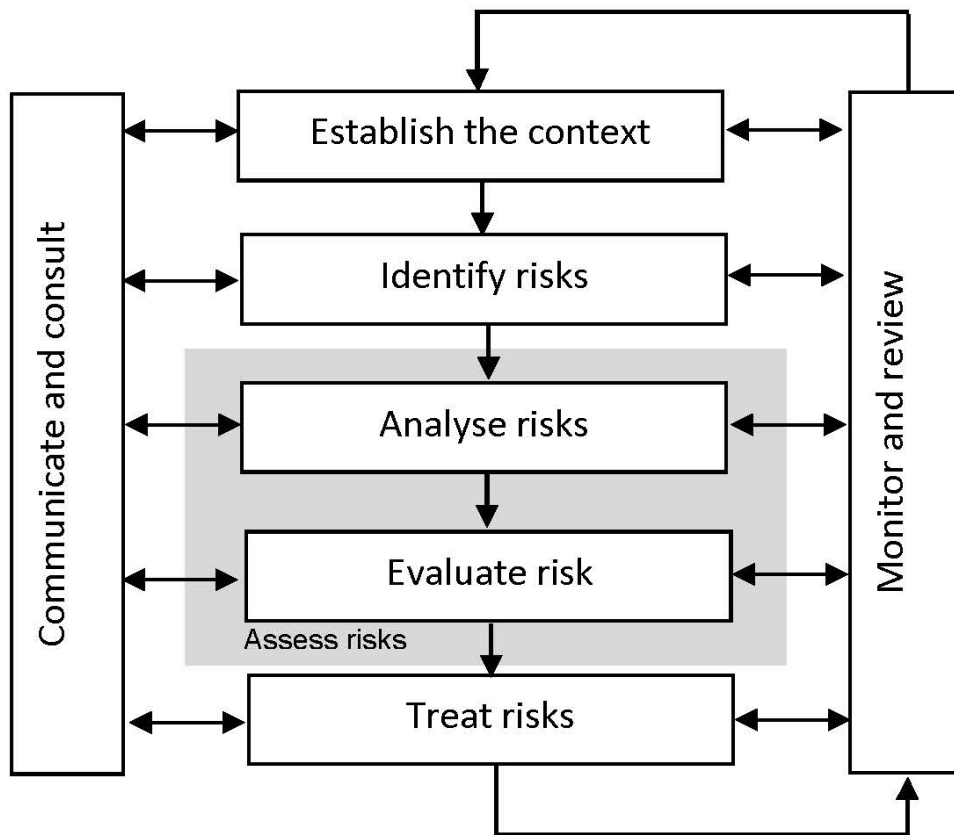


Figure 2 - Risk Management Process

Opportunity for improvement - This stage asks “What else can be done to manage this risk and improve the system?” Continual Improvements are identified by:

- the use of the ‘Observation’ book
- ‘Stop and think’ book
- Observations and hazards raised in the INX system
- Internal site audits and inspections
- Annual management review
- Risk assessments/RiskWare database
- Incident reports and investigations.
- Emergency drills and Desktop exercises

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- Risk Management Framework
- Risk register/RiskWare database
- Risk Treatment Action Plans

- Monthly Operational Exposure Summary Meetings (previously called Risk Meeting)
- Compliance register
- Records in the INX database
- Incident reporting
- Inspection reports
- Internal audit reports
- Meeting minutes

6.2. Environmental objectives and planning to achieve them

6.2.1. Requirement: Environmental objectives

The organization shall establish environmental objectives at relevant functions and levels, taking into account the organization's significant environmental aspects and associated compliance obligations, and considering its risks and opportunities.

The environmental objectives shall be:

- a) consistent with the environmental policy;*
- b) measurable (if practicable);*
- c) monitored;*
- d) communicated;*
- e) Updated as appropriate.*

The organization shall maintain documented information on the environmental objectives.

Demonstrating Compliance:

SP - PoB sets its objectives and targets such that they support the environmental commitments and strategies as set out in the Environmental Policy. Objectives and targets are also set with reference to the high and extreme rated environmental risks identified within the Risk Register.

SP - PoB has developed an Objectives and Targets tracking spread-sheet which is updated by the Environment Manager or the Environment Officer.

The spreadsheet also sets out key performance indicators (KPI's) for each objective and target and monitors performance against the KPI's every six months.

Objectives and targets are set for:

- Air Quality
- Preston River – water and sediment quality
- Marine Water and sediment quality
- Noise
- Land and groundwater contamination
- Groundwater abstraction
- Biosecurity

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- Objectives and Targets tracking register

6.2.2. Requirement: Planning actions to achieve environmental objectives

When planning how to achieve its environmental objectives, the organization shall determine:

- a) *what will be done;*
- b) *what resources will be required;*
- c) *who will be responsible;*
- d) *when it will be completed;*
- e) *how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental objectives (see 9.1.1).*

The organization shall consider how actions to achieve its environmental objectives can be integrated into the organization's business processes.

Demonstrating Compliance:

Environmental Management Plans (EMPs) have been written to outline the processes for the various monitoring programs to achieve the objectives and targets as follows:

- Air Quality Management Plan
- Biosecurity incident response
- Invasive Marine Species (IMS) Management Plan
- Long Term Dredge Materials Management Plan
- Noise Management Plan
- Waste Management Plan
- Risk Management Framework

The environmental management program has been developed to ensure legal compliance with but not limited to the requirements of the Ports Legislation Amendment Act 2014, the Environmental Protection Act 1986, the Environmental Protection (Sea Dumping) Act 1981 and subsequent amendments and the conditions set out in the SP - PoB's Berth 8/5 part V Environmental Licence and its 10 Year Sea Dumping Permit.

In addition, the program is also designed to achieve the objectives and targets described in the Environmental Objectives and Targets. The progress of the environmental management program is tracked on the *Objectives and Targets* tracking spread sheet maintained by the Environmental Officer.

Senior Management and other staff are informed of progress of the environmental management program at the weekly Trade and Infrastructure meeting. Changes are also discussed at the monthly HSE and General Staff meeting.

In addition, monthly reports prepared by the COO go to the Board's Health, Safety and Environment Committee (HSEC) which in turn provide feedback to the full Board.

Responses from the Board on the environmental management program are communicated to the relevant Bunbury senior managers by the COO or RM -PoB.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- Environmental Management Plans – see MYPORT intranet
- Weekly Trade and Infrastructure meeting minutes
- Monthly HSES reports
- Monthly COO reports

- Monthly RM reports
- Monthly HSE and General Staff Meeting minutes

7. SUPPORT

7.1. Resources

Requirement:

The organization shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system.

Demonstrating Compliance:

Position descriptions have been developed for all SP - PoB staff which set out responsibilities and authorities to facilitate effective environmental management.

The SP - PoB has provided adequate staff resources to implement and control the EMS through the employment of personnel with specific competencies and experience in environmental science and port operations, both marine and land-based.

The SP - PoB employs an Environment Manager and an Environment Officer. The Environment Manager reports directly to the RM - PoB who reports directly to the COO. The COO is a member of the SP Executive Leadership Team (ELT).

The PoB Maintenance and Operations Superintendent and the Harbour Master have specific authorities and responsibilities for ensuring that the port is controlled to ensure that loading activities and shipping do not cause adverse environmental impacts.

The RM - PoB is the officer with specific responsibilities for emergency management and response, the most significant part of which is the prevention of and control of oil or chemical spills into the marine environment or onto land. The Regional Manager also assumes the Registered Mine Manager responsibilities under the Mines Safety and Inspection Act.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Individual Job descriptions – available from the HR Manager
- Organisation Chart – available in MYPORT
- Accountability Matrix – available in MyPort
- Maintenance plan via MEX system
- Emergency Management Plan
- Oil spill Management Plan
- Air Quality Management Plan
- Invasive Marine Species (IMS) Management Plan
- Long Term Dredge Materials Management Plan
- Noise Management Plan
- Waste Management Plan
- Risk Management Framework
- Odour Management Plan

7.2. Competence

Requirement:

The organization shall:

- a) *determine the necessary competence of person(s) doing work under its control that affects its environmental performance and its ability to fulfil its compliance obligations;*
- b) *ensure that these persons are competent on the basis of appropriate education, training or experience;*
- c) *determine training needs associated with its environmental aspects and its environmental management system;*
- d) *where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken.*

NOTE: Applicable actions can include, for example, the provision of training to, the mentoring of, or the re-assignment of currently employed persons; or the hiring or contracting of competent persons.

The organization shall retain appropriate documented information as evidence of competence.

Demonstrating Compliance:

The GM Sustainability through the HR Manager maintains SP – Bun training records and competency that relate to the EMS.

Sufficient budget allocations are made each financial year for environmental activities and adequate in-house monitoring equipment is available. External specialist environmental consultancies are engaged as required for environmental monitoring, survey and analysis work plus the provision of ad-hoc advice.

Training needs are identified when circumstances dictate the need for new or further training and awareness. Training, Conference & Seminars Procedure outlines how a 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.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Training, Conference & Seminars Procedure – available in MYPOR
- Training records – maintained by HR department
- Training certificates
- Position descriptions

7.3. Awareness

Requirement:

The organization shall ensure that persons doing work under the organization's control are aware of:

- a) *the environmental policy;*
- b) *the significant environmental aspects and related actual or potential environmental impacts associated with their work;*
- c) *their contribution to the effectiveness of the environmental management system, including the benefits of enhanced environmental performance;*
- d) *the implications of not conforming with the environmental management system requirements, including not fulfilling the organization's compliance obligations.*

Demonstrating Compliance:

The Environmental Policy is available on the MYPORT intranet and the SP website. Hardcopies are displayed in the main admin office and the HSE/operations demountable and Workshop.

Environmental aspects (risks) and impacts are recorded in the Risk Register/RiskWare. The Risk register is currently periodically reviewed/validated by the COO in the first instance.

Further review of high and extreme ranked risks (significant environmental aspects) is regularly undertaken by the COO, CEO and at S & SC (Board sub-committee) meetings (and full Board meetings if necessary).

SP - PoB personnel are encouraged to report near misses and opportunity for improvements (Observations). These findings are captured in INX database. The reviews of the completed report are carried out by the H&SS Advisor in consultation with the RM -PoB and/or HSE personnel. They identify the corrective and / or preventative actions required to prevent a recurrence of the event and develop an agreed time frame for the corrective actions to be implemented.

Issues relating to the EMS and environmental compliance in general are included on the agenda for the monthly HSE and General Staff meeting, the weekly Trade and Infrastructure Meeting and the quarterly Port User meetings. Environmental issues are also included in the Management Report for the monthly Board meeting.

Environmental management issues are also included in the bimonthly Port Community Consultation Committee agenda.

A section of the SP - PoB on-line induction video is devoted to environmental and biosecurity awareness and other requirements for working within the port. The induction video can be viewed at the SP - Bun website (www.southerportsauthority.com.au).

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- HSE and General Staff meeting minutes
- Monthly HSES Reports for the Board
- Port users Meeting minutes
- INX Data base system

7.4. Communication

7.4.1. Requirement: General

The organization shall establish, implement and maintain the process(es) needed for internal and external communications relevant to the environmental management system, including:

- a) on what it will communicate;*
- b) when to communicate;*
- c) with whom to communicate;*
- d) how to communicate.*

When establishing its communication process(es), the organization shall:

- *take into account its compliance obligations;*
- *ensure that environmental information communicated is consistent with information generated within the environmental management system, and is reliable.*

The organization shall respond to relevant communications on its environmental management system.

The organization shall retain documented information as evidence of its communications, as appropriate.

Demonstrating Compliance:

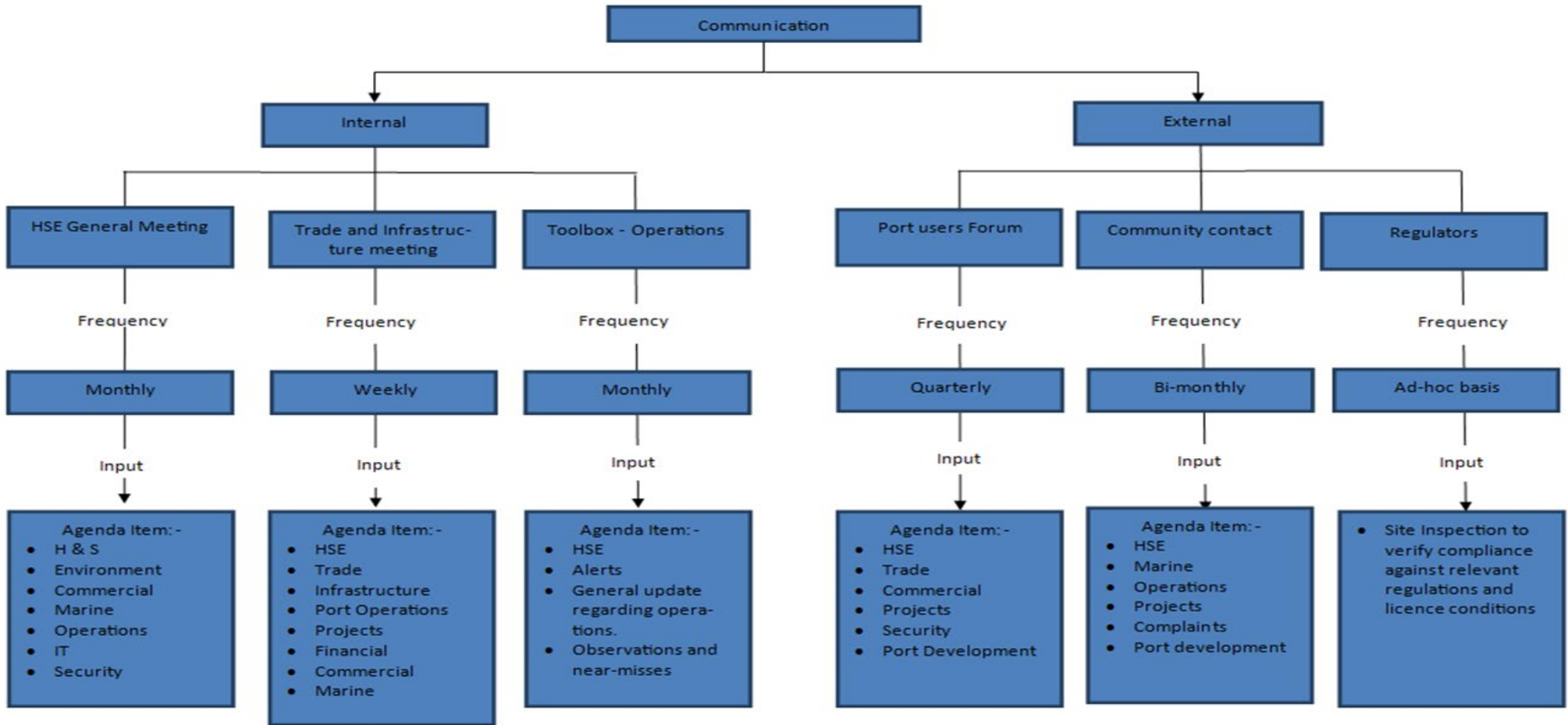


Figure 3 - Communication

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Outlook calendar
- meeting minutes
- MyPort
- Port Talk
- Annual Report
- Reports to Regulators

7.4.2. Requirement: Internal Communication

The organization shall:

- a) internally communicate information relevant to the environmental management system among the various levels and functions of the organization, including changes to the environmental management system, as appropriate;*
- b) ensure its communication process(es) enable(s) persons doing work under the organization's control to contribute to continual improvement.*

Demonstrating Compliance:

Issues relating to the EMS and environmental compliance in general are included on the agenda for the monthly HSE and General Staff meeting, the weekly Trade and Infrastructure Meeting and the quarterly Port User meeting. Environmental issues are also included in the Management Report for the monthly Board meeting and the monthly report to the HSES.

Toolbox meetings for Operational/ Maintenance personnel occurs once a month as well as the daily pre-start meeting. Environmental compliance is an agenda item during this meeting.

Management review also occurs once a year where the environmental management system is discussed in detail.

MYPORT, Port talk and Annual report are also available as communication media for all internal and external stakeholders.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Meeting minutes
- Reports to Regulatory agencies
- Outlook calendar
- MYPORT
- Port Talk
- Annual report

7.4.3. Requirement External communication

The organization shall externally communicate information relevant to the environmental management system, as established by the organization's communication process(es) and as required by its compliance obligations

Demonstrating Compliance:

External interested parties communicate through either hard copy, electronic (email or phone) or in-person at SP - PoB's Administration Office.

Quarterly Port User meetings at which environmental issues are an agenda item, include representatives from SP - PoB, lease holders, transport companies, emergency services, shipping agents, stevedores, towage companies, Boarder Force, and the federal Department of Agriculture and Water Resources for biosecurity.

The Environment Manager is the key SP -Bun contact for external regulatory agencies such as the Department of Environment and Water Resources (DWER), the Department of Agriculture and Water Resources (DAWR) and the Department of the Environment and Energy (DoEE)

Records of external contacts are maintained within the Synergy Records Management System to record community or other interested party communications regarding port operations, in particular, environmental aspects (risk) and impacts such as noise or dust.

The Environment Manager or delegate is the officer responsible for maintaining the contacts records and responding to external interested parties.

Environmental management issues are also included in the bimonthly Port Community Consultation Committee agenda.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Meeting minutes
- Outlook calendar
- Synergy records

7.5. Document Information

7.5.1. Requirement: General

The organization's environmental management system shall include:

- a) documented information required by this International Standard;*
- b) documented information determined by the organization as being necessary for the effectiveness of the environmental management system.*

NOTE: The extent of documented information for an environmental management system can differ from one organization to another due to:

- the size of organization and its type of activities, processes, products and services;*
- the need to demonstrate fulfilment of its compliance obligations;*
- the complexity of processes and their interactions;*
- the competence of persons doing work under the organization's control.*

Demonstrating Compliance:

SP - PoB has established a record management system to electronically store all documents related to Port operations.

The Document Controller ensures that electronic copies of approved EMS documents are authorised and registered into the RMS with unique record number identifier. Approved documents are available through the Document Hub on the MYPORT Intranet site

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- SP-Bun Record Keeping Plan 2020
- Controlled Document Guideline

Policy and procedures MYPORT

7.5.2. Requirement: Creating and Updating

When creating and updating documented information, the organization shall ensure appropriate:

- a) identification and description (e.g. a title, date, author, or reference number);
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) review and approval for suitability and adequacy.

Demonstrating Compliance:

All EMS documentation is readily identifiable and dated and authorised. Retention, revision, suspension and archive of EMS documents are managed in accordance with the Controlled Document Guideline.

Retention of vital records in electronic record management system are managed in accordance with the State Records Act requirements and the SP - PoB Record Keeping Plan.

SP - PoB applies a document hierarchy system, a document lower in the hierarchy must relate to, and be consistent with, documents higher in the hierarchy.

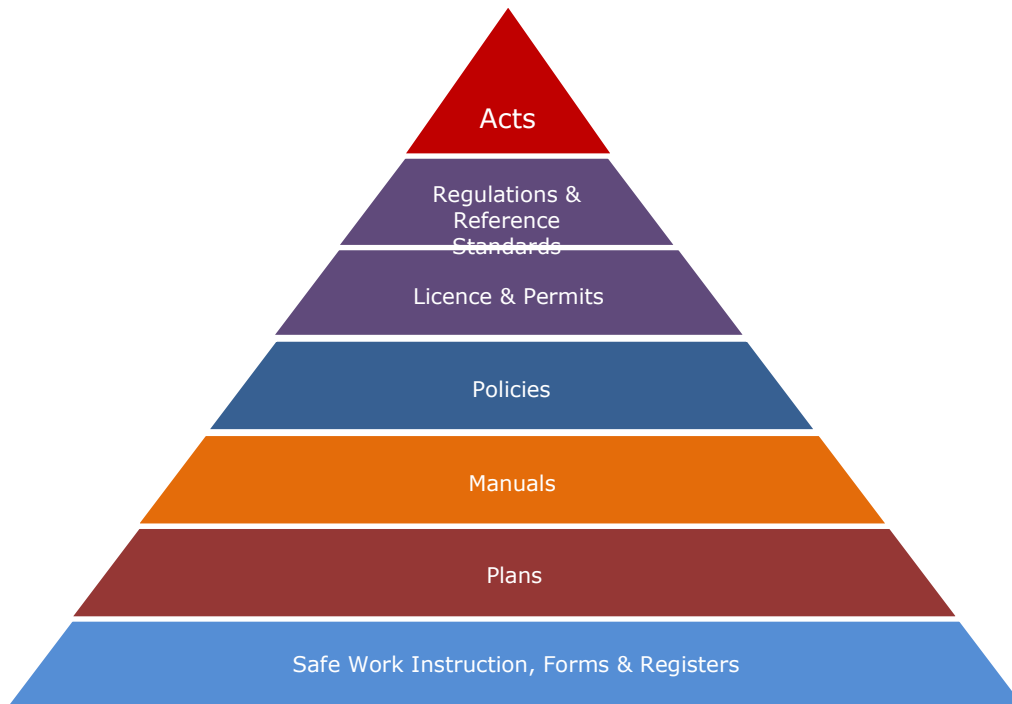


Figure 4 - Document Hierarchy System

Details for each document type are described in Table below.

Type	Description
Act	An act means Australian common law, federal laws enacted by the Parliament of Australia, and laws enacted by the Parliaments of the Australian states and territories. The Ports Legislation Amendment Act 2014 has obvious and specific relevance to SP - Bun operations. The Act specifies the requirements for; Annual Strategic Development Plan (SDP), Evidence of consideration of environmental management in strategic development of the port, the Authority's organisational structure, roles and responsibilities.
Regulations and Referenced Standards	Regulations and Referenced Standards means subsidiary regulations made under the Ports Legislation Amendment Act 2014 (the Act) governing specific internal affairs of the SP.
Licence and Permits	Licence and permits means a formal statement of the conditions which must apply to the conduct of key aspects of the port operations. These are usually issued by government regulators such as DIMRS, DDER, EPA, Department of Transport (DoT) and the DotE.
Policies	A policy is a broad statement of commitment and expectations which creates the accepted principles and rules governing the day to day activities and is aligned to the strategic objectives of Southern Ports. Policy is used as a basis for making decisions, e.g. Human Resources Policy, Risk Management Policy. A policy is implemented through Standards, Systems, Procedures and Manuals
Manuals	A manual is a detailed overview of SP– PoB's Environmental Management System. It is a written account of existing and intended future courses of action (scheme) aimed at achieving compliance against relevant standards, i.e. ISO 14001:2015 standard.
Plans	A plan is a subsidiary document to Manual
Procedures	A Safe Work Instruction (SWI) is a written document or instruction detailing all steps and activities of a process or procedure.
Guidelines	Guideline means non-mandatory approaches to the implementation of licence/permit conditions, policies or procedures. Guidelines provide flexible "good practice" recommendations and advice to assist those responsible for implementing by-laws, rules, policies, or procedures and may include codes of conduct guiding behaviour.

Table 6 - Description of Document Types

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Synergy records
- SP MYPORT intranet

Controlled Document Guideline

7.5.3. Requirement: Control of Document Information

Documented information required by the environmental management system and by this International Standard shall be controlled to ensure:

- a) *it is available and suitable for use, where and when it is needed;*
- b) *it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).*

For the control of documented information, the organization shall address the following activities as applicable:

- *distribution, access, retrieval and use;*
- *storage and preservation, including preservation of legibility;*
- *control of changes (e.g. version control);*
- *retention and disposition.*

Documented information of external origin determined by the organization to be necessary for the planning and operation of the environmental management system shall be identified, as appropriate, and controlled.

NOTE: Access can imply a decision regarding the permission to view the documented information only, or the permission and authority to view and change the documented information.

Demonstrating Compliance:

SP - PoB staff has access to the EMS documents either in electronic form through the RMS and MYPORT Intranet. Hard copy documents can be printed if required. Printed copies of EMS documents are identified with "UNCONTROLLED WHEN PRINTED" in the document footer.

All EMS documentation is readily identifiable and dated and authorised. Retention, revision, suspension and archive of EMS documents are managed in accordance with

Controlled Document Guideline.

To ensure obsolete documents are not inadvertently used, the following requirements apply:

- Versions of documents on the MYPORT Intranet are the latest version of the documents and the Intranet is used to verify the currency of documents.
- All hard copies of documents, emailed versions of documents and electronic copies retained outside of the processes defined in this procedure are uncontrolled.
- Departmental Managers are responsible for ensuring that superseded or obsolete versions of documents are removed from all points of use.
- Superseded documents are removed from the MYPORT Internet and replaced with the Current Copy. An email is sent to all staff alerting them of the new revision requesting staff members to destroy any copies they may have either in hard copy or electronically.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- SP- PoB Record Keeping Plan 2012 (Synergy Ref. File No. SMT1/11).
- Documents on the MYPORT intranet
- Electronic documents in Record Management System
- Controlled Document Guideline

8. OPERATIONS

8.1. Operational planning and control

Requirement:

The organization shall establish, implement, control and maintain the processes needed to meet environmental management system requirements, and to implement the actions identified in 6.1 and 6.2, by:

- *establishing operating criteria for the process (es);*
- *implementing control of the process (es), in accordance with the operating criteria.*

NOTE: Controls can include engineering controls and procedures. Controls can be implemented following a hierarchy (e.g. elimination, substitution, administrative) and can be used individually or in combination.

The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

The organization shall ensure that outsourced processes are controlled or influenced. The type and extent of control or influence to be applied to the process(es) shall be defined within the environmental management system.

Consistent with a life cycle perspective, the organization shall:

- a) *establish controls, as appropriate, to ensure that its environmental requirement(s) is (are) addressed in the design and development process for the product or service, considering each life cycle stage;*
- b) *determine its environmental requirement(s) for the procurement of products and services, as appropriate;*
- c) *communicate its relevant environmental requirement(s) to external providers, including contractors;*
- d) *consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.*

The organization shall maintain documented information to the extent necessary to have confidence that the processes have been carried out as planned.

Demonstrating Compliance:

SP - PoB has established a Risk Register in compliance with the Risk Management Framework that identifies normal operational activities and their associated environmental aspects (risk) and impacts. Risk assessments are also conducted for new operations and for export proposals that have the potential for increased risk. Risk assessments are either conducted in-house or by the regulatory agency DWER in relation to environmental licence amendments for new export proposals that are deemed to be prescribed activities under the Environmental Protection Act.

SP - PoB requires all new proponents who wish to establish operations within the Port to contact the SP commercial team and provide information regarding the nature of the proposed development, product characteristic, storage and loading methods and details of environmental impact issues such as air quality, water quality, noise, odour and visual impact.

This information is provided in the 'Southern Ports New Trade Proposal' Form. The commercial team assesses the application in consultation with the relevant Departmental Managers before a decision is made to allow a new proponent to establish at the Port.

HSE Management Plans and Safe Working Instructions (SWI) are written to manage day to day operational activities. Non-routine tasks may require a specific Job Safety Analysis (JSA) to be compiled that addresses environmental aspects (risk) and impacts and what controls are needed.

'Stop & Think' form was also implemented recently for new tasks or during the task when there is a change in work or environment conditions.

The 'Stop & Think' booklet will prompt an employee to identify risks to themselves, their workmates, equipment and the environment.

The 'Stop & Think' process involves the five following steps:

- Think through the task
- Spot the hazard
- Assess the risks
- Make the changes
- Do the task safely

Works undertaken at the Port by contractors are controlled through a Contractor Authorisation to Work process.

Change management process at SP-Bun is defined below:-

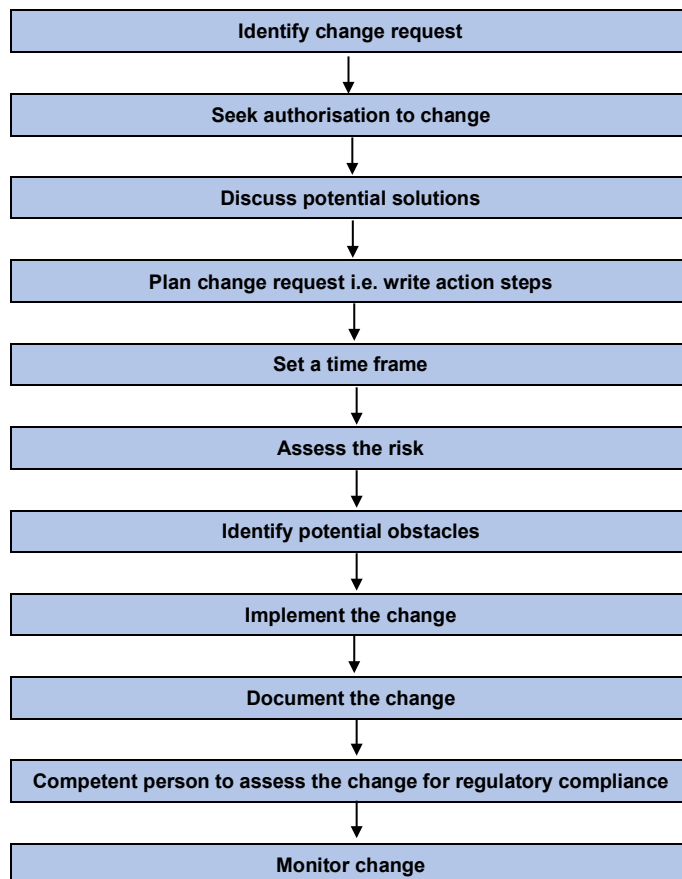


Figure 5 - Change Process Flow

Project tender conditions require the tenderer, during tender preparation, to take particular account of the requirements of Clause 14 of the 'General Conditions of Contract' which includes reference to all relevant environmental laws.

Inspections of loading equipment is undertaken prior to and during loading activities to ensure that plant and equipment controlling potential emissions to the environment such as dust control equipment is in working condition.

Maintenance of operational infrastructure is scheduled through the MEX Maintenance Software system and work is overseen by the Operations and Maintenance Manager or delegate.

At SP - PoB, the Life Cycle approach is applied only to the loading of product from 'Shed to Ship'. The process is summarised in **Table 5** of this document.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- SWI available from the RMS and SP Intranet
- Risk assessments
- Lease Holder lease agreement
- Port Access Licence
- New Trade Inquiry Form
- Project Management Plans (HSE Management Plans and Procedures)
- Operations & Maintenance Asset Management Procedure (including MEX system)
- Project tender process

8.2. Emergency preparedness and response

Requirement:

The organization shall establish, implement and maintain the process(es) needed to prepare for and respond to potential emergency situations identified in 6.1.1.

The organization shall:

- prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations;*
- respond to actual emergency situations;*
- take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;*
- periodically test the planned response actions, where practicable;*
- periodically review and revise the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests;*
- provide relevant information and training related to emergency preparedness and response, as*
- Appropriate, to relevant interested parties, including persons working under its control.*

The organization shall maintain documented information to the extent necessary to have confidence that the process (es) is (are) carried out as planned.

Demonstrating Compliance:

An Emergency Management Plan has been developed for SP-PoB. This Emergency Management Plan applies to the entire SP - PoB operations covering all emergencies involving the SP - PoB and surrounding areas for which it has legal, ethical or community responsibilities. The plan is deliberately concise so that it actually assists the Incident Management Team (IMT) in a stressful situation. Business priorities in any emergency situation are firstly people, followed by environment and property including information.

The Emergency Management Plan serves as the initial document to be consulted whenever a significant issue is encountered which falls outside the parameters of Business as Usual (BAU) at the PoB. These parameters are described in Section 1.6 of the Emergency Management Plan. This document forms part of and can be used in conjunction with a series of documents as detailed in **Figure 6**.

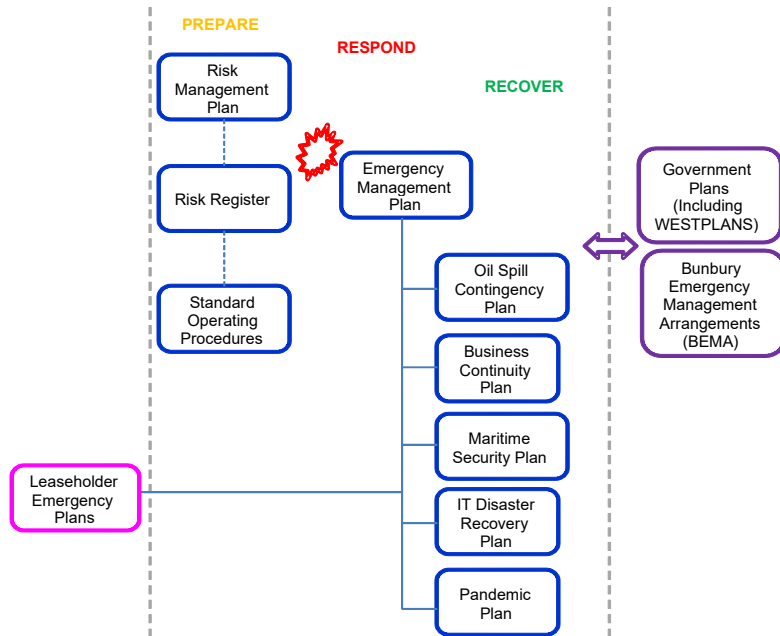


Figure 6 - SP - PoB Emergency Preparedness and Response Framework

In addition, the Marine Oil and Chemical Spill Contingency Plan Action Plan (Synergy File Ref. No. SMT1/11) has been established to provide rapid access to essential information for personnel who are nominated for response roles or who may be required to report or respond to spills.

The Action Plan contains key procedures from SP - PoB Marine Oil Spill Contingency Plan (MOSCP). The Marine Manager/Harbour Master is the officer responsible for the implementation and review of both of these plans.

Emergency exercises are conducted periodically to test SP - PoB's preparedness for dealing with emergency events that may affect the Port and its environment.

In addition, a SP Emergency Planning Committee has been established and meets periodically to review and improved emergency management processes across all of SP.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- SP - PoB Emergency Management Plan
- Marine oil and Chemical Spill Contingency Plan
- Business Continuity Plan
- Maritime Security Plan – available from the Bun Security Officer
- IT Disaster Recovery Plan
- Pandemic Plan
- Emergency Exercise reports – available from GM-HSES
- Emergency Planning Committee meeting minutes

9. PERFORMANCE EVALUATION

9.1. Monitoring, measurement, analysis and evaluation

9.1.1. Requirement: General

The organization shall monitor, measure, analyse and evaluate its environmental performance. The organization shall determine: what needs to be monitored and measured; the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results; the criteria against which the organization will evaluate its environmental performance, and appropriate indicators; when the monitoring and measuring shall be performed; when the results from monitoring and measurement shall be analysed and evaluated.

The organization shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.

The organization shall evaluate its environmental performance and the effectiveness of the environmental management system.

The organization shall communicate relevant environmental performance information both internally and externally, as identified in its communication process (es) and as required by its compliance obligations.

The organization shall retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.

Demonstrating Compliance:

SP - PoB has established a comprehensive program of environmental monitoring for the marine, terrestrial, riverine and estuarine areas of the port. Monitoring records are retained in the RMS.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Synergy records – consultants' technical sampling and analysis reports.
- Synergy records – weekly verified particulate (dust) data reports.
- Synergy Records – Reports to regulatory agencies.
- Calibration Certificates

9.1.2. Requirement: Evaluation Compliance

The organization shall establish, implement and maintain the process (es) needed to evaluate fulfilment of its compliance obligations. The organization shall:

- a) determine the frequency that compliance will be evaluated;*
- b) evaluate compliance and take action if needed;*
- c) Maintain knowledge and understanding of its compliance status.*

The organization shall retain documented information as evidence of the compliance evaluation result(s).

Demonstrating Compliance:

SP - PoB has established a Legal Obligations Register and monitors EMS compliance against the obligations set out in the Register. The Environment Manager or delegate is responsible for ensuring that compliance is evaluated and reviewed.

Compliance is also monitored when reports from external consultants are submitted in relation to SP-PoB's environmental monitoring program as described in the Monitoring and Measurement element of this EMS Plan.

In addition, compliance is monitored during the SP - PoB's mandatory Internal and External audit program.

State regulatory agencies such as the DWER and Department of Mines, Industry Regulation and Safety (DIMRS) undertake either ad hoc or planned audits of SP operations for compliance against regulations or licences. Federal regulatory agencies such as the Department of the Environment and Energy (DotEE) and the Department of Agriculture and Water Resources (DAWR) also conduct audits.

Compliance with respect to the conditions in licences issued by Western Australian regulatory agencies such as DWER is monitored and reported annually to the agency through Annual Audit Compliance Reports (AACR). Compliance with respect to permits issued by Federal regulatory Agencies such as the DotEE for sea dumping of dredged materials is monitored by the Harbour Master and reported through the Environment Manager or delegate as required by the Sea Dumping Permit conditions.

The Risk Management Framework sets out a process for identifying actual and potential environmental risks that result in impacts that are non-compliant with legal and SP's requirements.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Synergy Records

9.2. Internal audit

9.2.1. Requirement: General

The organization shall conduct internal audits at planned intervals to provide information on whether the environmental management system:

a) conforms to:

- 1) the organization's own requirements for its environmental management system;*
- 2) the requirements of this International Standard;*

b) is effectively implemented and maintained.

Demonstrating Compliance:

Internal environmental audits are carried out to determine that the EMS has been properly implemented and maintained and that it conforms to the requirements of the standard.

Every element in the Environmental management systems is audited on a regular basis. Activities are audited more frequently if there are significant changes taking place or considered high risk (i.e. if there is a history of problems/incidents in that area).

Audit reports are written and recommendations for corrective or preventive action are made and agreed when necessary which are recorded and tracked via an 'Activity Register'.

Audit findings and action taken are reported to the annual environmental management review meeting.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance:-

- SWI Internal Audit
- Audit reports
- Activity register

9.2.2. Internal Audit Programme

The organization shall establish, implement and maintain (an) internal audit programme(s), including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits.

When establishing the internal audit programme, the organization shall take into consideration the environmental importance of the processes concerned, changes affecting the organization and the results of previous audits.

The organization shall:

- a) *define the audit criteria and scope for each audit;*
- b) *select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;*
- c) *ensure that the results of the audits are reported to relevant management.*

The organization shall retain documented information as evidence of the implementation of the audit programme and the audit results.

Demonstrating Compliance:

An internal audit schedule has been developed and the audits are conducted by the HSE Department. The Environment Manager is responsible for ensuring the audit schedule is met.

Only competent personnel may perform internal auditing activities. These competent personnel are classified as "Internal Auditors" and have received as a minimum the following training:

- 2 day accredited training on internal auditing techniques relating to the Standards.

Audits will be carried out to a defined scope and shall be as follows:

- Planned as per the internal audit schedule
- Unplanned: arising as a result of:
 - Customer/community complaints.
 - An incident that has environmental or health and safety impacts.
 - Following the implementation of actions outlined in the 'Activity Register'
 - Following the identification of additional or amended procedures for products and services.

Auditors will not rely solely upon verbal confirmation but will seek documentary and actual visual evidence to support conclusions.

Auditors may make any appropriate recommendations and discuss them with the responsible person in the department.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Audit reports
- Audit Schedule
- Activity Register
- Training records (Internal Auditor)

9.3. Management review

Requirement:

Top management shall review the organization's environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

The management review shall include consideration of:

- a) *the status of actions from previous management reviews;*
- b) *changes in:*
 - 1) *external and internal issues that are relevant to the environmental management system;*
 - 2) *the needs and expectations of interested parties, including compliance obligations;*
 - 3) *its significant environmental aspects;*
 - 4) *risks and opportunities;*
- c) *the extent to which environmental objectives have been achieved;*
- d) *information on the organization's environmental performance, including trends in:*
 - 1) *nonconformities and corrective actions;*
 - 2) *monitoring and measurement results;*
 - 3) *fulfilment of its compliance obligations;*
 - 4) *audit results;*
- e) *adequacy of resources;*
- f) *relevant communication(s) from interested parties, including complaints;*
- g) *opportunities for continual improvement*

The outputs of the management review shall include:

- *conclusions on the continuing suitability, adequacy and effectiveness of the environmental management system;*
- *decisions related to continual improvement opportunities;*
- *decisions related to any need for changes to the environmental management system, including resources;*
- *actions, if needed, when environmental objectives have not been achieved;*
- *opportunities to improve integration of the environmental management system with other business processes, if needed;*
- *any implications for the strategic direction of the organization.*

The organization shall retain documented information as evidence of the results of management reviews.

Demonstrating Compliance:

As required by Clause 9.3 of the Standard the RM – PoB, Maintenance and Operations Superintendent and other Senior Managers meet every 12 to 15 months unless a significant change or changes in the EMS occurs to review the EMS to ensure its continuing suitability for the needs and objectives of the organisation and its adequacy and effectiveness. The meeting also sets and progresses environmental objectives and targets.

The agenda includes the following items:

- the status of actions from previous management reviews;

- changes in:
 - external and internal issues that are relevant to the environmental management system;
 - the needs and expectations of interested parties, including compliance obligations;
 - its significant environmental aspects;
 - risks and opportunities;
- the extent to which environmental objectives have been achieved;
- information on the organization's environmental performance, including trends in:
 - nonconformities and corrective actions;
 - monitoring and measurement results;
 - fulfilment of its compliance obligations;
 - audit results;
- adequacy of resources;
- relevant communication(s) from interested parties, including complaints;
- opportunities for continual improvement

the meeting minutes is distributed to relevant personnel and notes of action points are added to the action register and followed-up to completion.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Activity Register
- Management Review Meeting Minutes

10. IMPROVEMENT

10.1. Requirement: General

Requirement:

The organization shall determine opportunities for improvement (see 9.1, 9.2 and 9.3) and implement necessary actions to achieve the intended outcomes of its environmental management system.

Demonstrating Compliance:

Opportunities for Improvement at SP–Bun is driven by a number of processes including:

- Risk assessments – using the Risk Management Framework
- Internal and external audits
- Internal and external inspections
- Incident reports and investigations
- Observations/Hazard reports
- Community and customer complaints/feedback
- Customer satisfaction
- Market research and analysis
- Inputs from employees, suppliers and other interested parties
- Records of product or process non-conformances

- Data from process and product characteristics and their trends
- Emergency drills and desktop exercises

For example, 'opportunities for improvement' at Berth 8 conveyor system are considered in the 'Shed to Chute' assessment carried out by GHD.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Risk Management Framework – section 5 and 5.3.4
- Risk Treatment Action Plans
- Audit/Inspection reports
- Incident investigation Reports
- Survey reports
- Community and customer complaints/feedback records
- Customer satisfaction surveys
- Market research and analysis reports
- Inputs from employees, suppliers and other interested parties
- Records of product or process non-conformances
- Data from process and product characteristics and their trends

10.2. Requirement: Non-conformity and corrective action

Demonstrating Compliance:

When nonconformity occurs, the organization shall:

- a) react to the nonconformity and, as applicable:*
 - 1) take action to control and correct it;*
 - 2) deal with the consequences, including mitigating adverse environmental impacts;*
- b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:*
 - 1) reviewing the nonconformity;*
 - 2) determining the causes of the nonconformity;*
 - 3) determining if similar nonconformities exist, or could potentially occur;*
- c) implement any action needed;'*
- d) review the effectiveness of any corrective action taken;*
- e) make changes to the environmental management system, if necessary.*

Corrective actions shall be appropriate to the significance of the effects of the nonconformities encountered, including the environmental impact(s).

The organization shall retain documented information as evidence of:

- *the nature of the nonconformities and any subsequent actions taken;*
- *the results of any corrective action.*

Demonstrating Compliance

In addition, inspections and audits of Port operations and administrative processes identify non-conformances that are corrected by line management. The non-conformance is recorded in the 'Action Register' and usually communicated via internal email and the records of corrective and preventative actions taken held on the RMS.

Non-compliances identified by regulatory agencies are communicated to the SP - PoB in either hard copy or electronic form. In the case of the DMIRS, environmental non-conformances are recorded in the Mines Record Book (and the DMIRS on-line SRS) which is held by SP - PoB's Registered Mine Manager.

Non-conformances identified by the DWER can be communicated either by a hard copy Environmental Field Notice (EFN), email or by letter.

Actions taken by SP - PoB to correct the non-conformance are communicated to the Regulator by email or by letter. Copies are held in the SP-PoB's RMS.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Records held in the RMS
- Records held in the on-line DMIRS SRS
- EMS Management Review meeting minutes
- Incident Investigation Reports

10.3. Requirement: Continual Improvement

Requirement:

The organization shall continually improve the suitability, adequacy and effectiveness of the environmental management system to enhance environmental performance.

Demonstrating Compliance:

The SP–Bun Environment Team through its internal audit and inspection process identifies opportunities to improve the suitability, adequacy and effectiveness of the EMS. 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 % 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 EMS is sufficiently structured to take into account any new environmental impacts identified. In addition, the licence amendment process through DWER also employs a risk assessment process to set appropriate conditions for new products to ensure environmental impacts are mitigated.

Ongoing review of the EMS is essential to ensure its associated management plans remain relevant and any opportunity for improvement is identified.

Supporting documents to demonstrate Compliance – the following documented information are available to demonstrate compliance: -

- Review of risk register

- Review of TAPS
- Risk assessments provided by DWER and licence condition compliance reports
- Monitoring reports (dust, noise)

APPENDIX A – ENVIRONMENTAL POLICY

The current Version of the Southern Ports Environmental Policy is available on the Southern Ports Website and on MyPort - [Environmental Policy.pdf](#)