



ENVIRONMENTAL MANAGEMENT STRATEGY

August 2026

PORT KEMBLA COAL TERMINAL
HSEC
Environmental Management Strategy



Management Plan
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Version	Date	Reviewer	Comments
10	6 th September 2017	Luke Pascot	Review following 2017 Triennial Independent Audit recommendations.
11	28 th December 2018	Luke Pascot	Annual review
12	21 st August 2019	Luke Pascot	Review following submission of AEMR, updates to roles were made
16	9 th September 2020	Luke Pascot	Review following 2020 Triennial Independent Audit recommendations. Tidied up version number, headers and footers based on findings.
17	12 th February 2021	Luke Pascot	Review and update following DPIE RFI and PKCT site separation for AIE site
18	1 st April 2021	Luke Pascot	Update of EMS following DPIE review
19	10 th September 2022	Michael Curley	Annual review – no changes made.
20	21 st August 2023	Luke Pascot	Annual review – no material changes made. Updates to document I.D's where required.
21	14 th August 2024	Luke Pascot	Annual review – no material changes made. Updates to document I.D's where required.
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24	19 th August 2026	Luke Pascot	Review following AEMR submission. Minor updates only.

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1. INTRODUCTION

1.1 Purpose

The purpose of this document is to outline the Environmental Management Strategy (EMS) for Port Kembla Coal Terminal (PKCT)'s site operations. This document has been prepared in accordance with the Department of Planning, Industry and Environment (DPIE)'s Project Approval 08_0009.

1.2 Background

Port Kembla Coal Terminal (PKCT) provides a coal product receipt, storage and shipping loading service to its customers. PKCT is located on the north side of the inner harbour and operates premises leased from the Port Authority of NSW.

PKCT have been successfully managing environmental impacts from its onsite activities since commencement of operations and has been gradually improving to mitigate impacts over time through measures such as:

- Improved water spraying of coal stockpiles to reduce dust escape
- Improvements to the surface water capture and treatment process
- Use of recycled water to reduce potable water use
- Improved dust monitoring to identify dust generation causes
- Improved weather monitoring equipment to warn of high wind events to reduce effect on dust escape.

1.3 Scope

This strategy applies to PKCT's site operations described in the DPIE Project Approval. The strategy and associated management processes are integral to and form part of PKCT's business management system.

1.4 Objectives

The objectives of this Environment Management Strategy are the following:

- Provide the strategic context to PKCT's environment management process
- Outline the statutory and other requirements applicable to PKCT's environmental management
- Describe PKCT's environmental management system, including means by which environmental aspects are managed, how system effectiveness is reviewed and how improvement actions are identified
- Describe the communication and reporting processes in place for community and regulators
- Describe the process for managing stakeholders' complaints.
- Describe PKCT's event management processes, including responding to emergencies, incident investigation, notification and management

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- Outline the environmental monitoring required, including those covering Project Approval 08_0009
- Define the business context, policies, standards and key responsibilities applicable in operation of PKCT's business.

2. RESPONSIBILITIES

The roles and responsibilities relevant to environmental management at PKCT are defined in Table 1.

Table 1: Environmental Management Roles and Responsibilities

Policy / Standard	Description
PKCT employees, contractors and site personnel	<p>All PKCT employees, contractors and other site personnel are responsible to comply with this management plan.</p> <p>PKCT employees, contractors and other site personnel must take appropriate action detailed in this management plan in accordance with PKCT's legal and environmental obligations.</p>
Environmental Specialist	Is responsible to the Superintendent Process, Reliability & HSEC for the coordination and implementation of the management plan to PKCT site operations. Is responsible to the General Manager for site monitoring and operation of environmental control systems.
Superintendent Process, Reliability & HSEC	Is responsible to the General Manager for site monitoring and operation of environmental control systems.
Operations Manager	Is responsible for managing and supporting the shift and daywork teams to effectively and safely operate the business in line with customer, community and regulator expectations..
Maintenance Superintendent	Is responsible to the General Manager for work execution ensuring environmental control equipment is maintained, reliable and effective.
Asset Manager	Is responsible for asset management and planning, ensuring environmental control equipment is fit for purpose, reliable and effective.
General Manager	Is accountable for PKCT's legal and environmental compliance.

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3. STRATEGIC CONTEXT

This section describes the strategic context applicable to PKCT's environment management as it applies to the operation of PKCT's business in servicing its customers. In providing its service, PKCT adds value within the industry, economically and to the community in general. So that PKCT can provide a sustainable business, consideration needs to be given to customer service requirements together with other stakeholder interests and needs.

PKCT's location within the port precinct and the community in general, its proximity to Wollongong CBD and the potential for impacts on environment and amenity associated with PKCT's operation is noted. Community expectations are high and are expected to increase with changes to community demographics associated with residential developments occurring in proximity to PKCT's northern boundary. Standards and regulatory requirements are also likely to increase. Strategically, the importance for PKCT to provide effective environmental management, continually improve and deliver the required performance standard is recognised.

3.1 Requirement for PKCT

PKCT is an integral part of Illawarra's and NSW's mining infrastructure. The operation of PKCT results in the company directly employing in the order of 85 people. The location of PKCT in Wollongong has an employment and economic flow-on effect for the region. It is estimated that a further 34 contractors are employed on a full-time equivalent basis at PKCT, as well as the multiplier effects into the region.

The aims of the Illawarra Regional Strategy 2006-31 show that the NSW State Government understands the importance of the port of Port Kembla to the economic viability of the Illawarra. The strategy advises that export opportunities presented by the Port and protection of existing and proposed transport corridors to support freight transport can strengthen the region's economy.

The importance of coal export to the NSW economy and state employment shows there is a long-term requirement for this industry to continue and part of achieving this is by having an organised and permanent method to move this coal from land transport modes to ship. PKCT provides this need for the NSW Southern and Western coalfields.

3.2 Business Content

PKCT's business is outlined in Business Management Plan (PR.BM.48). It describes PKCT's business, the context, principles and systems by which it is managed and operated. This Environment Management Strategy forms part of this system.

3.2.1 Business Description

- PKCT is a bulk handling facility that handles the receipt, stockpiling, loading and unloading (ships) of coal, coke and other dry bulk materials for shipment.

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- PKCT is an important part of Australia's coal export trade. Servicing the Southern and Western coal fields of NSW, PKCT operates to provide an efficient service that will ensure the long-term viability of the district's coal mining industry.
- PKCT seeks to ensure the long-term support of the local coal producers by supplementing its operations with the receipt, stockpiling and loading of other bulk materials where viable.

The PKCT site layout is shown in Figure 1.

3.2.2 Vision

PKCT's vision is to be a valued link in the global coal supply chain.

3.2.3 Mission

PKCT's mission is to provide a safe, reliable & cost-effective bulk material handling service.

3.2.4 Values

Safety: We take responsibility for safety and wellbeing, speaking up about risks and building a strong safety culture.

Respect: We value people, listen and speak honestly and act with integrity.

Accountability: We create a sustainable future by working together and delivering on our commitments.

Teamwork: We work together by listening, valuing differences and strengthening relationships with people, customers and contractors.

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Figure 1: PKCT Site Layout



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3.3 AIE Site Interactions with PKCT

AIE is working to develop Australia's first liquefied natural gas (LNG) import terminal at PKCT's Berth 101. PKCT has reached a commercial agreement with NSW Ports and AIE to surrender the southern area of its lease for AIE to construct and operate the LNG import terminal. The date of surrender is 31/03/2021. The revised site boundary for PKCT, as shown in Figure 1, has resulted in a change in PKCT's site operations, infrastructure and environmental management strategies.

The changes include:

- Reduced lease area due to the surrender of the Bulk Products Area, Berth 101 and Seawall Road
- The removal of five (5) collection ponds / sumps and two (2) wet weather discharge points from the PKCT Contaminated Water Collection Treatment System (CWCT), which include:
 - Pump 1 – Southern Pond (wet weather discharge point)
 - Pump 8 – T3 Pond (wet weather discharge point)
 - Pump 9 – Conveyor C7 Sump
 - Pump 16 – Berth 101 North Sump
 - Pump 17 – Berth 101 South Sump
- The addition of two (2) collection ponds / sumps and two (2) wet weather discharge points to the CWCT System, which include:
 - Pump 24 – TS8 Sump (wet weather discharge point)
 - Pump 25 – South Eastern Pond (wet weather discharge point)
- Amendment to the Air Quality Monitoring network which includes the relocation of the southernmost continuous dust monitor (nominated as C1)
- Traffic management and site access arrangements from the southern end of the revised PKCT site boundary.

PKCT and AIE will work collaboratively during the operation of the AIE site to ensure environmental obligations are met, site operations for PKCT and AIE can be run effectively and safely and any issues raised are dealt with in a timely manner.

3.4 Policies and Standards

PKCT is managed by GM3 (Illawarra Coal) and has a management system in place which operates in accordance with its Sustainability Policy (PO.003), Environment Policy (PO.002) and Quality Policy (PO.004). These policies are summarised in Table 2.

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Table 2 PKCT Policies and Standards

Policy / Standard	Description
Sustainability Policy	<p>The sustainability policy outlines the objectives PKCT undertake to ensure site operations are undertaken in a sustainable manner which considers the following key concepts:</p> <ul style="list-style-type: none"> • The health and safety values of PKCT staff, contractors and site personnel • Set and achieve sustainable development targets with respect to energy and water efficiency targets which promotes the efficient use of resources and include reducing and preventing pollution throughout the lifecycle of PKCT products • Develop partnerships that foster the sustainable development of our local communities, enhance economic benefits from our operations. • Ongoing consultation with customers, employees, indigenous land owners and the local community.
Environmental Policy	<p>The environmental policy outlines PKCT commitment to improved environmental performance and ensuring site operations are undertaken in an environmentally responsible manner which includes:</p> <ul style="list-style-type: none"> • Understanding and controlling impacts of site operations on the environment and community • Maintain the highest possible standards of environmental management and monitoring • Compliance with regulatory requirements, conditions of approval and licence conditions • Ongoing consultation with customers, employees, indigenous land owners and the local community.
Quality Policy	<p>PKCT Business Management System provides a framework for managing quality and establishing, achieving and reviewing quality objectives in compliance with the requirements of AS/NZS ISO 9001:2015 and ISO 14001:2015. PKCT staff, contractors and site personnel will fulfil the requirements detailed in the AS/NZS ISO 9001:2015 and ISO 14001:2015 and continually seek opportunities to improve system effectiveness</p>

PKCT has an environment management system in place which is certified to ISO 14001:2015. The system includes documented policies and procedures, environmental aspects assessed and registered with processes for their control and continual improvement. The system is subject to audit and review including biannual surveillance visits by PKCT's external certifier (Lloyd's Register Quality Assurance Limited).

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3.5 Surrounding Land Uses

As PKCT is part of the port of Port Kembla, land use surrounding the premises is predominately industrial. A Sydney Water sewage treatment plant and Wollongong Golf Course are located directly to the north of PKCT and the Tasman Sea is located directly to the east.

Port related activities are located to the south and west of PKCT. Inner harbour port users include the Grain Terminal, BlueScope Steel, AAT (car terminal and general cargo).

There are a variety of land uses within 1 kilometre (km) of the PKCT premises in a northerly direction. This area incorporates the closest residential properties and public reserves to PKCT. Specific land uses in this area include:

- Australian Industrial Energy (AIE) – Liquefied natural gas (LNG) import terminal at PKCT's Berth 101 (refer to Section 3.3)
- JJ Kelly Park – public open space including rugby and football fields
- Wollongong Golf Club – mixture of public and privately-owned land
- Sydney Water Sewage Treatment plant
- Private open space – no public access
- Springhill Road - arterial road carrying on average 14,500 vehicles per day
- Tate Street – industrial and commercial buildings
- Wollongong Cemetery
- Swan Street – residential, commercial and industrial buildings
- Keira Street - residential, commercial and industrial buildings.

3.6 Customers and Stakeholders

There is a variety of customer and stakeholder groups with interests in PKCT's operations. Such groups include the following:

- Community groups
- Shareholders and associated mine operations
- Coal and Bulk Products shippers
- Other port users
- Contractors and service providers
- Regulators and government
- Shipping, pilotage, port services
- Port Authority
- Other ports and coal terminals.

In operating PKCT business and determining the service to be provided, consideration needs to be given to customer and stakeholder needs and requirements. In developing strategic plans, it is noted that needs and requirements may vary from group to group, change and at times, conflict.

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Potential for conflict may take a number of forms e.g. increased operations increase the risk of adverse impacts; increased water usage to reduce dust may result in increased water usage.

PKCT has a Community Engagement Plan (MP.HS.385) in place which covers proactive and reactive engagement, i.e. complaints and enquiries engagement processes.

3.7 Environmental Management

Having obtained Department of Planning and Environment Major Project Approval 08_0009 in June 2009, PKCT's environmental management system has been revised to accommodate the new approval conditions. The DPIE approval, together with EPL 1625 issued by the EPA, are now the primary statutory instruments under which PKCT operates.

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4. STATUTORY REQUIREMENTS

4.1 Major Project 08_009

The purpose of this EMS is to provide an overarching environment management strategy that sets out PKCT's environmental management, monitoring and reporting framework. In accordance with Condition 1 in Schedule 4 of Major Project Approval 08_0009, this EMS provides the required information as shown in Table 3 to Table 7 below.

Table 3: EMS Response to Condition 1, Schedule 4 – Environmental Management

Condition and Schedule	Condition Description	EMS Section
Condition 1, Schedule 4	The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy must:	N/A
	(a) be submitted to the Director-General within 12 months of this project approval or otherwise agreed by the Director-General;	7.2
	(b) provide for the strategic context for the environmental management of the project;	4
	(c) identify the statutory requirements that apply to the project;	4
	(d) describe the procedures that would be implemented to:	9
	• keep the local community and relevant agencies informed about the operation and environmental performance of the project;	9.2
	• receive, handle, respond to, and record complaints;	9.3
	• resolve any disputes that may arise during the course of the project;	5.6
	• respond to any non-compliance;	5.3
	• manage cumulative impacts; and	6.1
	• respond to emergencies;	
	(e) include an environmental monitoring program for the project that includes all the monitoring requirements of this approval;	7
	(f) describe how the various incident and approval reporting requirements of the project would be integrated into a single reporting system; and	7.2
	(g) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.	3

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Table 4: EMS Response to Conditions 2 and 3, Schedule 4 – Incident Reporting

Condition and Schedule	Condition Description	EMS Section
Condition 2, Schedule 4	Within 24 hours of detecting the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident.	6.3, 6.4
Condition 3, Schedule 4	<p>Within 21 days of notifying the Department and other relevant agencies of such an incident, the Proponent shall provide the Department and these agencies with a written report that:</p> <ul style="list-style-type: none"> (a) describes the date, time, and nature of the incident; (b) identifies the cause (or likely cause) of the incident; (c) describes what action has been taken to date; and (d) describes the proposed measures to address the incident. 	6.4

Table 5: EMS Response to Condition 4, Schedule 4 – Annual Reporting

Condition and Schedule	Condition Description	EMS Section
Condition 4, Schedule 4	<p>Within 12 months of this approval, and annually thereafter, the Proponent shall submit an AEMR to the Director-General and all relevant agencies. This report must:</p> <ul style="list-style-type: none"> (a) identify the standards and performance measures that apply to project; (b) describe the works carried out in the last 12 months; (c) describe the works planned to be carried out in the next 12 months; (d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (e) include a summary of the monitoring results for the project during the past year; (f) include an analysis of these monitoring results against the relevant: <ul style="list-style-type: none"> • impact assessment criteria/limits; • monitoring results from previous years; and • predictions in the EA or other documents listed in condition 2 of schedule 2; (g) identify and discuss all exceedances of approval and licence conditions and other applicable standards and performance measures; (h) identify any trends in the monitoring results over the life of the project; (i) identify any non-compliance during the previous year; and (j) describe what actions were, or are being, taken to ensure compliance. 	7.2, 8.0

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Table 6: EMS Response to Condition 4, Schedule 5, 6, 7 – Independent Environmental Audit

Condition and Schedule	Condition Description	EMS Section
Condition 5, Schedule 4	<p>By 31 March 2011, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL (including any strategy, plan or program required under these approvals); and (d) review the adequacy of strategies, plans and/or programs required under these approvals; and, if appropriate, (e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals. <p><i>Note: This audit team should be led by a suitably qualified auditor, and include experts in the field of noise, air quality and traffic management.</i></p>	7.3
Condition 6, Schedule 4	<p>Within 6 weeks of completing this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General with a response to any recommendations contained in the audit report.</p>	7.3
Condition 7, Schedule 4	<p>Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director General.</p>	7.3

Table 7: EMS Response to Condition 4, Schedule 8, 9 – Access to Information

Condition and Schedule	Condition Description	EMS Section
Condition 8, Schedule 4	<p>Within 3 months of the approval of any strategy/plan/program required under this approval (or any subsequent revision of these strategies/plans/programs), or the completion of the audits or AEMR, required under this approval, the Proponent shall:</p> <ul style="list-style-type: none"> (a) provide a copy of the relevant document/s to the relevant agencies; (b) place a copy of the document/s on its website; and (c) remove superseded copies of strategies/plans/programs from its website. 	7.2, 9.1, 9.2
Condition 9, Schedule 4	<p>During the project, the Proponent shall:</p> <ul style="list-style-type: none"> (a) make a summary of monitoring results required under this approval publicly available on its website; and (b) update these results on a regular basis (at least every 6 months). 	7.2, 9.1, 9.2

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4.2 Environmental Protection Licence (EPL) 1625

PKCT's EPL 1625 includes all the Environment Protection Authority (EPA) environmental requirements. Particular focus is given to the following aspects:

- Harbour discharges, including monitoring requirements
- Dust deposition, including monitoring requirements
- Noise criteria, including monitoring requirements
- Complaints
- Pollution Reduction Plans.

4.3 Acts and Regulations

The following Federal Acts are applicable to the PKCT premises and onsite activities:

- Environment Protection & Biodiversity Conservation Act 1999.

The following Acts and Regulations are applicable to the PKCT premises and onsite activities:

- Biodiversity Conservation Act 2016
- Coastal Protection Act 1979
- Coastal Regulation 2004.
- Environmental Planning & Assessment Act 1979
- Environmental Planning & Assessment Regulation 2000
- Environmental Protection and Biodiversity Conservation Act 1999
- Environmentally Hazardous Chemicals Act 1985
- Environmentally Hazardous Chemicals Regulation 1999
- National Greenhouse and Energy Reporting Act 2007 (Commonwealth regulation)
- National Greenhouse and Energy Reporting Regulations 2008 (Commonwealth regulation)
- Protection of the Environment Operations (Amendment) Act 2011
- Protection of the Environment Operations Act 1997 & associated regulation.
- Protection of the Environmental Administration Act 1991
- Threatened Species Conservation Act 1995
- Waste Avoidance and Resource Recovery Act 2001
- Workplace Health & Safety Act 2011
- Workplace Health & Safety Regulation 2011

Section 7.2 also outlines PKCT's processes for identifying and evaluating compliance of applicable legal and other requirements and the means for accessing legislation and Australian and other standards.

4.4 Local Environmental Controls

PKCT's premises are within the port of Port Kembla property which has been listed by the DPIE Director-General as a State Significant Site. Due to this, the port area including the PKCT premises, is

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excluded from the Wollongong Local Environmental Plan 2009. Local planning controls such as zoning and land use/development permissibility are specified by the NSW State Environmental Planning Policy (SEPP) (Major Development) 2005.

The Major Development SEPP zones the PKCT premises 'SP1 - Special Activities' which is summarised in Table 8.

Table 8: Zone SP1 - Special Activities Description

Zone SP1 Special Activities

(1) The objectives of Zone SP1- Special Activities are as follows:

- (a) to provide for special land uses that are not provided for in other zones,
- (b) to provide for sites with special natural characteristics that are not provided for in other zones,
- (c) to facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land,
- (d) to maximise the use of waterfront areas to accommodate port facilities and industrial, maritime industrial and bulk storage premises that benefit from being located close to port facilities,
- (e) to enable the efficient movement and operation of commercial shipping, and to provide for the efficient handling and distribution of freight from port areas through the provision of transport infrastructure,
- (f) to facilitate development that by its nature or scale requires separation from residential areas and other sensitive land uses,
- (g) to encourage employment opportunities.

(2) Development for any of the following purposes is permitted without development consent on land within Zone SP1 Special Activities:

community facilities; environmental facilities; environmental protection works.

(3) Development for any of the following purposes is permitted only with development consent on land within Zone SP1 Special Activities:

boat launching ramps; depots; food and drink premises; freight transport facilities; heavy industries; navigation and emergency response facilities; port facilities; roads; transport depots; warehouse or distribution centres.

(4) Except as otherwise provided by this Part, development is prohibited on land within Zone SP1 Special Activities unless it is permitted by subclause (2) or (3).

Whilst the Major Development SEPP controls the zoning and permissible developments, Wollongong City Council remains as the approval authority unless the proposed works have a capital investment value of \$30 million or greater. In this instance, the DPIE is the Director-General under Part 3A of the

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Environmental Planning & Assessment Act (EPAA) 1979 as so specified by the Major Development State Environmental Planning Policy (SEPP).

Additionally, certain developments at the PKCT premises may be permissible under the Infrastructure SEPP (ISEPP) 2007. In this instance the Port Kembla Port Authority will be the approval authority under Part 5 of the EP&A Act 1979. The Three Ports SEPP 2013 provides a consistent planning regime for the development and delivery of infrastructure on land in Port Kembla. The Three Ports SEPP identifies certain development within the PKCT Lease Area as exempt development or complying development. The three ports SEPP will be utilised by PKCT to determine if site developments within their site boundary are exempt under the Three Ports SEPP or ISEPP or require approval under Part 5 of the EP&A Act 1979.

5. MANAGEMENT STRATEGY

5.1 Operational Activities and Potential Environmental Issues

PKCT's site operations and associated activities are generally described as follows:

- Product receipt (truck and train receipt and unloading)
- Stockpiling (conveyor transfer of products to stockyard and stockpiling)
- Reclaiming and ship loading (conveyor, reclaimer, ship loading operations)
- Transportation and shipping (ship movements, tugs, pilotage)
- Mobile plant operations (front end loaders, truck loading, unloading)
- Equipment maintenance and upgrade (conveyors, plant, services)
- Infrastructure maintenance and upgrade (buildings, roads, site works).

Potential environmental impacts include vehicular traffic, air emissions, water discharges, electricity and water use, noise and waste generation. Most significant aspect concerning the community is particulate emissions. Since PKCT has obtained DPIE Project Approval 08_0009, aspects such as truck movements, noise and truck driver behaviour have a heightened community focus.

5.2 Environmental Management System

PKCT's environmental management system is integrated into PKCT's overall Business Management System and operates in compliance with the following:

- AS/NZS ISO 9001:2015 Quality Management Systems
- AS/NZS ISO 14001:2015 Environmental Management Systems
- The Environment Management Strategy outlined herein.

The environment management system is documented in Environment Management (PR.024) controlled and supported by management plans and procedures with processes covering:

- Environmental aspects and impacts
- Planning and objectives

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- Legal and other requirements
- Training and competency
- Emergency management
- Event management and investigation
- Customer and stakeholder management
- Monitoring, auditing and management review.

Further to Section 7 herein, compliance with legal and other requirements is evaluated periodically by responsible PKCT personnel using the Tickit Legal Compliance Evaluation system. PKCT personnel have access to legislation in full and plain English through a web-based service which includes communication of updates and changes to environmental and Work Health and Safety (WHS) legislation.

PKCT has a number of audit processes to check compliance, assess effectiveness and identify improvement actions. These processes include the following: -

- Site level Critical Task Observations i.e. “mini” audits
- Internal Audit Program (including AS/NZS ISO 14001)
- AS/NZS ISO 14001 external surveillance audit – occurring 6-monthly covering different aspects of PKCT’s EMS.
- DPIE Approvals Implementation: triennial external audit.

Critical Task Observations are supported by check sheets focusing on different Health, Safety and Environmental Community (HSEC) aspects.

Results of audits and associated corrective actions are tracked by senior management through Business Management System review meetings.

5.3 Environmental Aspects and Impacts

An Environmental Aspects and Impacts Register is in place listing the various aspects identified as being applicable to PKCT’s operations. Environmental Aspects are listed against the associated regulation and include a risk rating and information on associated environmental controls.

Environmental aspects are supported by management plans and procedures as appropriate. In accordance with DPIE Project Approval 08_0009, management plans include the following:

- Fire Management Plan (MP.019)
- Water Management Plan (MP.022)
- Waste Management Plan (MP.020)
- Drivers Code of Conduct Implementation Plan (MP.008)
- Air Quality Management Plan (MP.017)
- Noise Management Plan (MP.018)
- Greenhouse Gas and Energy Management Plan (MP.021)

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- Landscape Management Plan (MP.026)
- Green and Golden Bell Frogs Management Plan (MP.015).

Where applicable, consideration shall be given to cumulative impacts where there may be more than one source contributing. This is particularly relevant to aspects such as air quality, noise and traffic. Consideration of cumulative impacts and their management shall be included in respective management plans.

5.4 Environmental Management and Mitigation

Environmental management of PKCT's operation is through the operation of PKCT's EMS (refer Section 5.2). This includes the operation of associated environmental plant, equipment and facilities.

PKCT's environmental control equipment includes the following:

- Coal Berth Road Receival has road sprays
- Coal Berth Rail Receival is enclosed within a building. Rail bins have sprays which can be activated if required to minimise dust
- In-loading conveyors are fully enclosed within tunnels and transfer stations
- Coal Berth Stockyard conveyors and yard machines have wind guards
- All transfer points are enclosed except for TS6 which has an enclosed chute
- There are two truck washers at the Coal Berth Road Receival and at southern end of the PKCT lease area
- Ship loader chutes are designed to discharge within ship's hatches, reducing the impact of prevailing winds
- Variable height stackers minimise drop height and are used to load coal into stockpiles in the Coal Berth Stockyard
- Coal Berth – Conveyor sprays located at various locations on receival and ship loading flow paths
- Water collection and treatment system
- Recycled water system
- Fire detection and suppression facilities
- Waste collection facilities
- Computer control system enabled for monitoring of equipment status and fault detection
- Air quality monitoring equipment.

5.5 Management Strategy and Effectiveness

The effectiveness of PKCT's environmental management and associated environmental performance is assessed in various ways, and corrective and improvement actions are determined at a strategic or operational level, including:

- Top/down – strategic review/ external environment assessment

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- Bottom/up – environmental issues identified at an operational level requiring attention and providing an opportunity for improvement

In evaluating effectiveness, inputs are obtained from various sources including:

- Evaluation of compliance to requirements (Section 5.2 and Section 7)
- Environmental performance monitoring (Section 7)
- Audits, inspections, site observations (Section 5.2)
- Customer and stakeholder inputs (Section 9)
- Community inputs (Section 9)
- Networking and benchmarking (Section 9).

Improvement strategies are developed through PKCT's Business Planning process and Capital Works program. Annual Business Plans are developed, implemented and tracked. Annual Business Plans sit within a Strategic Business Plan which has a 5-year horizon. External expertise is used where appropriate to identify improvement opportunities. Networking is also undertaken with other coal terminals and within the industry to:

- Ensure PKCT has up to date knowledge of best methodologies when developing improvement strategies
- Benchmark environmental with other bulk terminals to check its environmental performance

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6. EVENT MANAGEMENT

6.1 Emergencies

An Emergency is defined as an event that requires immediate, rapid external medical or other assistance and/or rapid deployment of internal PKCT resources. Such an event may involve actual or potential personal injury, plant and/or environmental damage.

PKCT has an emergency procedure in place, coordinated through the PKCT's Main Control Room, which provide a rapid response in case of an emergency. Key steps are as follows:

1. Activation of an emergency siren.
2. Contact with external emergency services to arrange deployment.
3. Mobilisation of first aid and support personnel to the accident scene.
4. Mobilisation of site personnel to rendezvous with emergency services and convey to accident scene.

Emergency procedure is supported by an Emergency Management Plan which may be activated where the emergency is significant and material harm has occurred. Consideration has been given to typical emergency scenarios in the preparation of plans and procedures. Training and emergency drills are carried out periodically.

In accordance with the Protection for the Environment Operations (Amendment Act) 2011, PKCT has a Pollution Incident Response Management Plan (MP.013) in place which integrates with PKCT's Emergency Management Plan (MP.001).

6.2 Events and Hazards

Events and hazards observed on site are reportable. Site personnel are encouraged to readily take action to mitigate harm and prevent harm from occurring. Procedure Incident Reporting and Investigation Procedure (PR.011) outlines PKCT's process. Investigations seek to identify the root cause and key contributing factors so that effective corrective actions can be developed. All events and hazards are entered into PKCT's event management system, and actions tracked to completion.

6.3 Non-Compliance

The Health, Safety, Environment and Risk (HSER) Lead or equivalent person shall be notified under the following circumstances:

- If a situation arises, whether due to forecast extreme weather conditions, equipment failure, plant malfunction or other events, that PKCT is at risk of causing a pollution incident.
- Any licence breach (actual or suspected).
- If a pollution complaint or observation is received from a member of the community, statutory authority or stakeholder.
- An accident/mishap occurs resulting in an uncontrolled discharge in air and waterways.

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The team Supervisor, together with other relevant PKCT personnel, shall investigate notifiable incidents. The HSER Lead or their equivalent shall arrange for a report of any licence breach, including corrective measures taken, for the Operations Manager, the General Manager and the relevant regulatory authority e.g. EPA, DPIE. For potential licence breaches, the HSER Lead or their equivalent shall assess the circumstances and liaise/report as appropriate. Events and actions shall be recorded and tracked in PKCT's event management system.

Attention is drawn to the notification requirements under the Protection of the Environment Operations (Amendment) Act 2011 and the Major Project Approval 08_0009. Refer to Section 6.4 for further details.

6.4 Notifications

DPIE Major Project Approval 08_0009 and EPA EPL 1625 set out notification requirements as follows:

- DPIE: Incident reporting for the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall notify the Department and other relevant agencies of the incident in accordance with Conditions 2 and 3 of Major Project Approval 08_0009. Refer to Table 4 for reporting timelines (within 24 hours for initial notification and 21 days for a written report of the incident).
- EPA: Notification of environmental harm in accordance with Conditions R2 and R3 of EPL 1625.

Notification requirements are also included in PKCT's Incident Reporting and Investigation Procedure (PR.011) and PKCT's Pollution Incident Response Management Plan (MP.013).

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7. ENVIRONMENTAL MONITORING PROGRAM

7.1 Monitoring Framework

Environmental monitoring required to meet PKCT's environmental regulatory obligations are listed in Table 9. Additional monitoring may be undertaken to assess environmental aspects. More details are contained in the reference documents.

Table 9: Additional Monitoring

Aspect	Description	Reference document
1. Dust deposition	Dust deposition gauges - monthly sample/test	Air Quality Management Plan
2. Continuous dust	Continuous dust monitors	Air Quality Management Plan
3. Water discharges	Licensed discharge point overflows - daily grab sample Routine pond monthly samples	Water Management Plan
4. Water usage	Usage; recycled water, portable	Water Management Plan Recycled Water Quality Management Plan
5. Recycled water	Water quality	Recycled Water Quality Management Plan
6. Electricity	Usage	Greenhouse Gas and Energy Efficiency Management Plan
7. Greenhouse gas	Usage; fuels, acetylene; also, electricity as above	Greenhouse Gas and Energy Efficiency Management Plan
8. Waste	Quantity and types generated	Waste Management Plan
9. Noise	Event based surveys - day/evening/night	Noise Management Plan
10. Activity	Road, rail, throughput	Drivers Code of Conduct Implementation Plan
11. Rainfall	Daily	Environment Monitoring procedure
12. Pollutants	Inputs into the National Pollution Inventory	Environment Management Strategy
13. GGBF	Green & Golden Bell frogs (GGBF)- record sightings; periodic surveys	GGBF Management Plan
14. Complaints	Community and stakeholder complaints	Customer and Stakeholder Management procedure
15. Incidents	Report, record, investigate incidents, notify where required	Event Management system Event Management procedure

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16. Pond Sediment Levels

Maintain ponds to ensure that sediment does not reduce capacity by more than 20% of design capacity

EPL 1625, Condition O4.2

7.2 Reporting System

Table 10 provides details of the reporting requirements pertaining to PKCT's environmental monitoring framework listed in Table 9.

Table 10: Reporting Requirements

Regulator	Statutory Instrument/Regulation	Report	Due Annually	Aspects Included (Refer Table 9)
DPI	Approval 08_0009	Annual Environment Management Report (AEMR)	31 st July	1-15
EPA	EPL 1625	Annual Return/Summary Report	31 st May	1,3,4,9,11,14,15
EPA	EPL 1625	Monthly EPL monitoring data published to PKCT's website.	14 days from receipt by PKCT	1,2,9
EPA	EPL 1625	Ambient Air Monitoring Report	31 st May with Annual Return/Summary Report	1,2
EPA	EPL 1625	Wet weather overflow reporting	31 st May with Annual Return/Summary Report	3,11
EPA	National Environment Protection (National Pollutant Inventory) Measure (NPI NEPM)	National Pollution Inventory	30 th September	1, 12
Dept. of Climate Change	National Greenhouse and Energy Reporting Act 2007	PKCT below threshold; monitor, keep records		6,7
EPA	Threatened Species Conservation Act	Hold records on site, report sightings		13

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Reports shall be provided in the format required by the regulator. The format adopted will provide for ready assessment against the approval conditions or requirements which pertain. The format for the AEMR will follow the Project Approval 08_0009 documents as follows:

- Administrative Conditions
- Specific Environmental Conditions
- Environment Management, Monitoring, Auditing and Reporting
- Statement of Commitments.

In accordance with the AEMR condition in Project Approval 08_0009, the necessary monitoring results and environmental impact assessments will be summarised into the Annual Environmental Monitoring Report (AEMR) based on the specialist work prepared under the direction of the respective Environment Management Plans.

7.3 Auditing

PKCT has a number of audit processes to check compliance, assess effectiveness and identify improvement actions. These processes include the following:

- Site level Task Observations i.e. “mini” audit;
- Internal Audit Program (including ISO 14001);
- ISO 14001:2015 external surveillance audits via biannual surveillance visits by PKCT’s external certifier (Lloyd’s Register Quality Assurance Limited);
- Independent Environmental Audit (triennial external audit) to meet the compliance requirements of DPIE Major Project Approval 08_0009, specifically Conditions 5, 6 and 7 of Schedule 4. Refer to Table 6 for details and deadlines for the facilitation of this audit (Condition 5), audit report submission (Condition 6) and implementation of any corrective/improvement actions arising from the audit (Condition 7).

8. REVIEW AND IMPROVEMENT

This EMS shall be reviewed at least annually as part of AEMR preparations. This review will consider:

- The adequacy of the EMS to meet the PKCT environmental management requirements
- Any deficiencies identified during the previous year
- Any complaints that indicate the EMS may need alteration
- Any non-compliance with PKCT environmental criteria during the previous year
- Any improvements made during the last review
- Results of monitoring programs
- Input from stakeholders
- Achievement of environmental criteria.

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Any alterations made to this EMS will be communicated to relevant PKCT staff and stakeholders.

9. STAKEHOLDER MANAGEMENT

9.1 Networking and Stakeholder Relations

Further to Section 3.6, PKCT shall proactively manage stakeholder relations to be conversant with needs and expectations. This will assist in day-to-day operations, but also strategic planning. Key focus areas are as follows:

- Maintain a Community Engagement Plan MP.HS.385, which includes the following:
 - PKCT Community Consultative Committee;
 - Participate in environmental groups, where appropriate;
 - Undertake community surveys;
 - Provide information through website and through newsletters;
 - Maintain community hotline;
- Participate in Port user forums.
- Maintain effective communications with regulators and meet requirements.
- Maintain customer networks and communications.

9.2 Access to Information

PKCT has an obligation to provide information to the relevant agencies and to the public under DPIE Major Project Approval 08_0009. Refer to Table 7 for details for the provision and management of information to address Conditions 8 and 9 of Schedule 4 of the Approval. Further, refer to Table 10 for details of PKCT's reporting requirements and processes, inclusive of the reporting of monthly EPL monitoring data that is published to PKCT's website.

9.3 Complaints and Enquiries

PKCT has a 24 hour, 7 day free call community hotline number (1800 111448) and email link i.e. communitylinks@pkct.com.au which is advertised on the PKCT website (refer www.pkct.com.au). This provides a mechanism by which complaints and general enquiries regarding the environment or community issues associated with operational activities can be managed.

PKCT has a Community and Stakeholder Management Procedure (PR.055) in place which ensures complaints are recorded, registered and investigated. Where appropriate, corrective actions are developed and implemented.

9.4 Dispute Resolution

PKCT shall endeavour to resolve issues that are raised or which may occur through constructive communications and seek to address matters based on the facts at hand. Wherever possible, data will be collected to clarify, resolve matters and provide information to the parties concerned.

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Consent Condition 14 (Section 2 – Administrative Conditions) of DPIE Project Approval 08_0009 is noted by PKCT. PKCT will endeavour to resolve matters of disagreement with council, government agency or other Department wherever possible so that the involvement of the Director-General is not required.

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10. REFERENCES

NSW EPA, *Environmental Protection Licence (EPL) 1625*, New South Wales Environment Protection Authority.

PKCT *Greenhouse Gas and Energy Management Plan MP.021*. Port Kembla Coal Terminal.

PKCT *Air Quality Management Plan MP.017*. Port Kembla Coal Terminal.

PKCT *Stakeholder Management Procedure (PR.055)*, Port Kembla Coal Terminal

PKCT *Drivers Code of Conduct Implementation Plan MP.008*. Port Kembla Coal Terminal.

PKCT *Environment Policy Statement PO.002*. Port Kembla Coal Terminal.

PKCT *Fire Management Plan MP.019*. Port Kembla Coal Terminal.

PKCT *Green and Golden Bell Frogs Management Plan MP.015*. Port Kembla Coal Terminal.

PKCT *Landscape Management Plan MP.026*. Port Kembla Coal Terminal.

PKCT *Noise Management Plan MP.018*. Port Kembla Coal Terminal.

PKCT *Pollution Incident Response Management Plan MP.013*. Port Kembla Coal Terminal

PKCT *Quality Policy PO.004*. Port Kembla Coal Terminal.

PKCT *Sustainable Development Policy PO.003*. Port Kembla Coal Terminal

PKCT *Waste Management Plan MP.020*. Port Kembla Coal Terminal.

PKCT *Water Management Plan MP.022*. Port Kembla Coal Terminal.