CS ENERGY PROCEDURE

DEVELOPING ENVIRONMENTAL PLANNING
CS-ENV-02

Responsible Officer: Environmental Specialist
Responsible Manager: Head of Health, Safety and Environment
Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
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Modified Section 3.2.				03/07/2000
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Modified Sections 4.2 and 4.3.				17/12/2001
Section 3.2 modified re strategic planning process, Sections 3.2 and 3.3 modified to cover goals and targets from owners to operator-maintainer, Section 3.4 modified re approval of plans, minor changes to titles and responsibilities, minor editing.				18/11/2002
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EPA replaced with DERM; term, 'EIMPs' broadened in s. 3.4; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.				6/07/2009
Document transferred to new CS Energy template, minor editing.	J Lafferty	R Hartigan	R Hartigan	17/11/2011
Updated to reflect current business processes and address internal EMS audit recommendations.	S Harabasz	R Hartigan	T Wiltshire	22/01/2016
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Reviewed and updated with current position titles and clearer language associated with the hierarchy of environmental planning documents. Process flow chart updated	J Ritchie	R Harvey	B Prain	20/12/2023
Minor wording edits, changed Section 8 - Reference of Corporate Environmental Quarterly Report to Monthly Enterprise Performance Report.	J Choong	R Harvey	B Prain	18/02/2025

CONTENTS

1 PURPOSE

The purpose of this procedure is to document the process associated with environmental planning activities, specifically:

- Formulating environmental policy, goals and targets
- Preparing Environmental Issue Management Plans (EIMPs)

Environmental planning can include cultural heritage considerations (both Indigenous and non-Indigenous cultural heritage values).

The overall process applied to environmental planning activities is summarised in Figure 1.
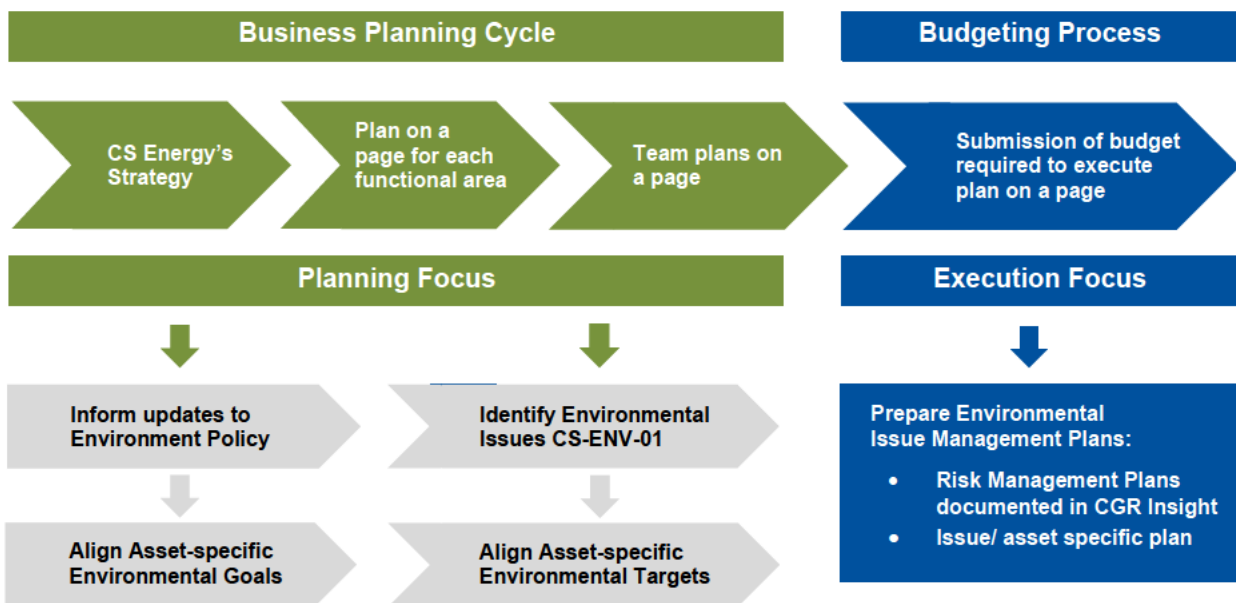

Figure 1: Environmental Planning Flow Diagram

2 SCOPE

This procedure applies to environmental planning activities and the process to be applied to them, so that the policy, goal and targets developed are directly linked to the management of environmental issues. Refer to Procedure - CS-ENV-01 - Environmental Issue Identification for details on identifying, describing and documenting Environmental Issues.

This procedure also outlines the process for preparing EIMPs where they are required for a specific environmental issue or activity at an asset.

3 ACTIONS

The actions described below have been separated according to the environmental planning activity underway and the output being developed or amended.

3.1 Formulating Environmental Policy

The environmental team together with the site and corporate General Managers review the Environment Policy at regular intervals for changes and recommend the revised policy through the Chief Executive for approval by the Board. It is the responsibility of the Executive General Manager – Plant Operations to review the Environment Policy as required as part of the corporate management review process. As part of this review, the policy's effectiveness and relevance is assessed.

3.2 Formulating Environmental Objectives (Goals) and Targets (KPIs)

3.2.1 Development process for objectives (goals)

The business planning cycle drives the identification of corporate goals. The Chief Executive and General Managers carry out a strategic assessment and analysis of business requirements including environmental drivers (e.g. technological changes, significant risks, legal requirements, and the views of interested parties).

Divisional business plans and individual asset business plans are also developed for internal use.

To identify environmental goals, the corporate, divisional and asset business goals are assessed and aligned with the following:

- Environmental issues identified through application of the Procedure - CS-ENV-01 - Environmental Issues Identification.

- High-risk issues where the site General Managers, Head of Health, Safety and Environment and site Environment and Stakeholder Business Partners agree there is a need for a specific goal.

- Any asset owner's Environmental Management Plan (EMP) and/or any asset owner-specified goals to be considered by CS Energy when performing an operation and maintenance contract role.

The following documents are then reviewed to determine if changes are required to align them with the identified environmental goals:

- Environment Policy – Reviewed every 2 years as part of CS Energy's EMS and registered document review process.

- Environment Strategy – A standard review is conducted within a 5-year period in-line with ISO 14001:2015 certification and/or CS Energy's strategic goals and applicable strategies / plans.

- Asset-specific environmental goals – These are reviewed annually as part of the business planning cycle.

In general, the environmental goals should contain the following information:

- Statement on the broad environmental issue being addressed.

- Where possible, state some quantitative indicator.

Information must be available for external (public disclosure) when requested.

3.2.2 Development process for targets (KPIs)

Targets (KPIs) must be measurable and specific and follow the SMART rule:

- **S**pecific

- **M**easurable

- **A**ttainable

- **R**elevant

- **T**rackable

The strategic planning completed as part of the business planning cycle drives the identification of measurable corporate targets that are monitored each month in the Enterprise Scorecard.

The environmental goals documented in the Environment Strategy as well as for specific assets are linked to measurable KPIs that are monitored each month in the Environment Scorecard.

In the case of assets owned by joint ventures, targets may also be set for CS Energy as the Operation and Maintenance contractor.

3.3 Formulating EIMPs

EIMP is a general term that collectively describes:

- Environmental Risk Management Plans which have been developed in response to significant and high-risk environmental issues. Procedure - CS-ENV-01 - Environmental Issue Identification details the process for identifying significant environmental issues and the method for documenting the associated risk actions in the Enterprise Risk Management System (CGR Insight).

- Issue-specific or asset-specific management plans that address certain environmental approval requirements and/or voluntary agreements. A plan of this type may be initiated as a result of any of the following events:

- Action plans generated as a result of a CS Energy investigation into an incident or complaint.

- Documents prepared in response to a requirement of the Queensland Environmental Regulator following an incident, complaint or submission of a Notice or Direction under the Environmental Protection Act (refer to Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation: Section 3.5.1).

- Documents prepared to meet environmental approval requirements such as Stormwater Management Plans, Waste Management Plans.

- Voluntary industry agreements.

The minimum contents of an EIMP are:

- Listing of the environmental issue being managed and its effects.
- Environmental risk rating.
- Operational controls in place.
- List of actions being undertaken for the issue, noting:
  o Action description.
  o Expected completion date.
  o Work order number or SAP notification if relevant.
  o Responsible person/plant group.

EIMPs undergo management review and are accepted and agreed through this process.

4 RESPONSIBILITIES

4.1 CS Energy Board

- Review and authorise CS Energy Environment Policy and Strategy.

4.2 Chief Executive

- Recommend Policy and Strategy to Board.

4.3 General Managers

- Develop asset-specific policy, goals, targets and KPIs.
- Initiate asset-specific policy review.

- Allocate resources for implementation of action/management plans.
- Allocate resources for achieving goals, targets, KPIs.
- Approve EIMPs developed for assets.

4.4 Risk and Compliance Facilitators and Technical Risk Owners

- Develop and review Environmental Risk Management Plans within the Enterprise Risk Management System (CGR Insight).

4.5 Head of Health, Safety and Environment

- Facilitate development of policy, goals, targets and KPIs consistent with the CS Energy Environmental Strategy and planning processes.
- Allocate resources for achieving goals, targets and KPIs.
- Initiate review of this procedure and ensure outputs are updated.

4.6 Environment and Stakeholder Business Partner and Principal Environmental Specialist

- Provide technical advice relating to environmental issues.
- Formulate and/or oversee the formulation of EIMPs.
- Provide support in the dissemination of environmental policy and goals.
- Develop issue-specific or asset-specific goals, targets and KPIs.

5 REVIEW

The EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed correctly.

Adherence to this procedure is supported by the business planning cycle which initiates review of environmental goals, targets and KPIs and in turn, is supported by the process for developing any required EIMPs.

These review actions align with Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation.

6 AUDITABLE OUTPUTS

The following items are outputs of this procedure and are to be assessed by auditors:

- Outputs from the business planning cycle
- Enterprise Scorecard
- Environment Policy
- Environment Strategy
- Environmental goals and targets (KPIs)
- Environment Scorecard
- EIMPs

7 DEFINITIONS

Term	Definition
EIMP	Environmental Issue Management Plan
EMP	Environmental Management Plan
EMS	Environmental Management System

8 REFERENCES

Reference No	Reference Title	Author
B/D/15/22460	Procedure - CS-ENV-01 - EMS - Environmental Issue Identification	CS Energy
B/D/11/31093	Procedure - CS-ENV-05 - EMS - Environmental Legal Compliance	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation	CS Energy
TM/17/54	CSE - External Reporting - Monthly Performance Reports (MPR) (location of monthly enterprise scorecards)	CS Energy

9 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of controlled documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

Government Owned Corporations must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.