

Level: CS ENERGY
 Procedure No: CS-ENV-04
 TRIM Ref No: B/D/11/31092
 Reviewed: 02/25
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CS ENERGY PROCEDURE

ENVIRONMENTAL INCIDENT MANAGEMENT CS-ENV-04

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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Added diagram.				28/08/2000
Added Review and Auditable outputs.				17/11/2000
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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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Key Changes	Prepared By	Checked By	Approved By	Date
Updated the Incident and Complaints process.	J Skillington	S Harabasz	B Monckton	26/02/2018
Updated to reflect current business processes and address internal EMS audit recommendations and findings.	S Harabasz	S Verano	B Monckton	15/02/2019
Updated to reflect that environmental complaints are treated as incidents and included a reference to the duty to notify.	S Harabasz	T van den Berg	B Monckton	27/08/2021
Updated to reflect the integration of Consultation Management to complaints.	L Crawford	S Verano	B Monckton	29/03/2022
Reviewed and updated with current position titles and more explicit language associated with the hierarchy of environmental planning documents. Clarified the requirements for an environmental incident versus an environmental emergency/crisis. Updated to include changes at the organisational structural level and to update Community Complaints section 3.3.3 in accordance with actions from Findings ID #0952 and Action ID#4429. Updated to include alignment with Procedure - CS-IM-01 - Learning from Incidents. Updated process flow chart and definitions section. Updated the term 'contractor' to 'contingent worker'	S Verano J Ritchie D Lawrence	R Harvey	B Prain	18/02/2025

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1 PURPOSE

The purpose of this document is to outline the requirements for effectively managing all environmental incidents on CS Energy Operational asset sites to ensure appropriate reporting and legal protection, and to provide guidance for internal / external notification and investigation of environmental incidents.

Environmental incidents also include any incidents associated with cultural heritage matters.

The process for managing incidents at CS Energy is documented in the Procedure – CS-IM-01 - Learning from Incidents.

This procedure aligns with Procedure – CS-IM-01 - Learning from Incidents, however, provide additional information when dealing with an environmental incident.

The overall process for Environmental Incident Management is summarised in Figure 1.

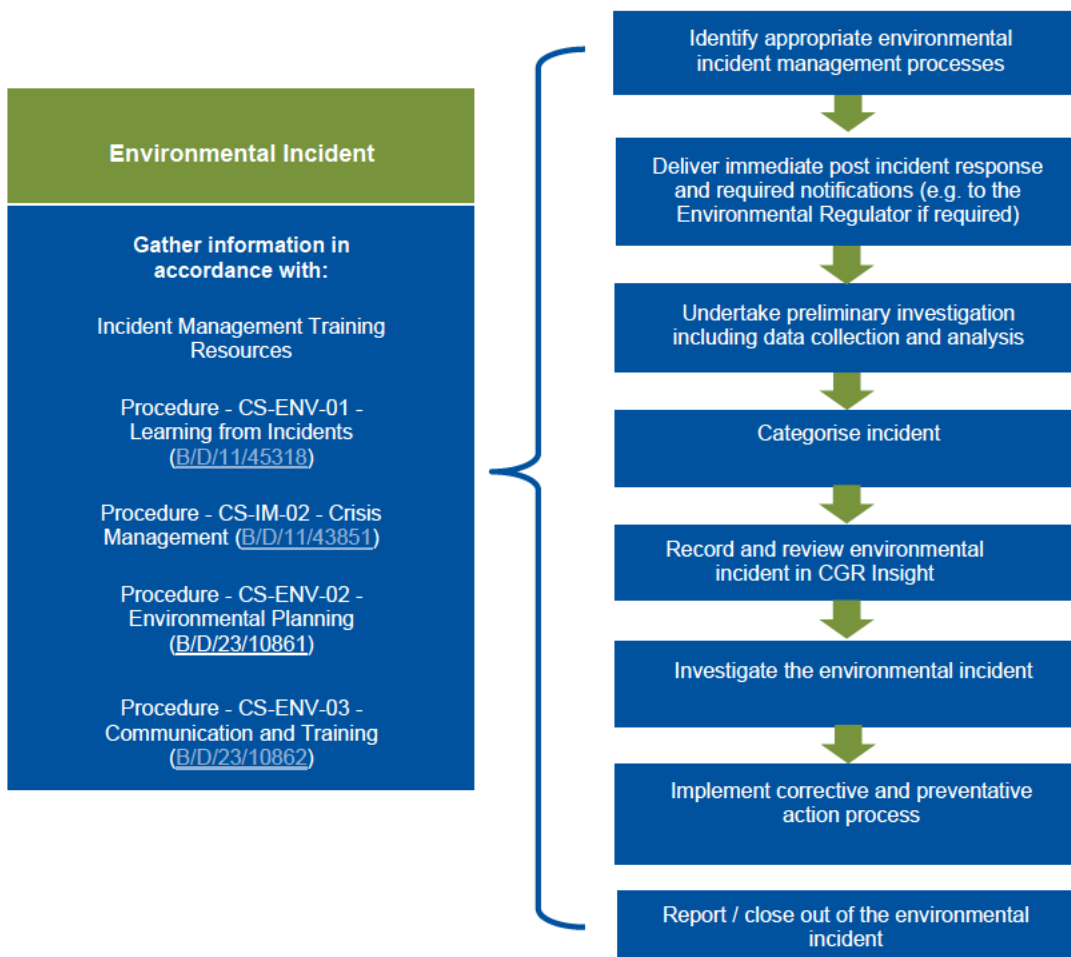


Figure 1: Environmental Incident Management Flow Diagram

2 INCIDENT TYPES

CS Energy's Environmental Management System (EMS) applies a range of measures to ensure that reasonably practicable measures are taken to prevent or minimise environmental harm as a result of

operations. There are a range of site-based management and monitoring plans established to support this. These are identified in:

- CS-ENV-11 - EMS Manual – Corporate office
- CAL-ENV-01 - EMS Manual – Callide Power Station
- KA-ENV-M-01 - EMS Manual – Kogan Creek Power Station

Environmental incidents form one of CS Energy's five key incident types i.e. Health and Safety, Environment, Operations, Security, ICT, and Process Safety.

Refer to Attachment 1 – Incident Category Matrix for further information. The Incident Category Matrix is sourced from the Procedure – CS-IM-01 - Learning from Incidents.

Environmental incidents also include any incidents associated with cultural heritage matters.

As presented in Attachment 1, environmental incidents are categorised as follows:

- Category 1: Low - Small contaminant release localised on-site area affected. Non-conformance with land disturbance procedure, on-site previously disturbed area. Routine short-term clean-up/remediation.
- Category 2: Moderate - moderate contaminant release or unauthorised land disturbance, localised on-site. Non-compliance with a cultural heritage agreement or applicable legislation that does not impact on-site areas of cultural heritage. Routine short-term clean-up/remediation. Low level compliance failure that does not result in Regulator enforcement actions e.g. failure to correctly complete a waste tracking certificate.
- Category 3: Significant - Large contaminant release or unauthorised unlawful land disturbance, localised on or off-site. Non-compliance with cultural heritage agreement or applicable legislation that potentially impacts on-site areas of cultural heritage. Short-term clean-up/remediation. Likely enforcement action from Regulator.
- Category 4: High - Large to very large contaminant release or unlawful land disturbance, localised off-site (in breach of environmental licence). Long-term or complex long-term clean-up/remediation, potentially irreversible. Major fine and/or prosecution imposed or likely to be imposed. Loss of community trust or active opposition to business activities. Loss (unauthorised) of areas of cultural heritage and archaeological significance.

3 SCOPE

This procedure applies explicitly to the management of environmental incidents occurring on any of CS Energy assets or extending offsite. It is applicable to all CS Energy employees and contingent workers, visitors to CS Energy workplaces, including complaints from people external to the business.

4 RESPONSIBILITIES

Roles and accountabilities of each step in the incident management process are outlined in Attachment 2 – Incident Management Process Flow. The Incident Management Process Flow is sourced from the Procedure – CS-IM-01 - Learning from Incidents

Additional information regarding the responsibilities specific to environmental incidents is provided below.

4.1 General Managers

- Approve and allocate resources for environmental incident management, investigation and close-out.

4.2 Line Managers

- Manage activities under their control to comply with policies, procedures and environmental approval limits.

4.3 Head of Health, Safety and Environment

- Update procedures in accordance with changes in policy.
- Implement requirements of this procedure.
- Provide technical advice / liaise with environmental regulators.

4.4 Environment and Stakeholder Business Partner and Principal Environmental Specialist

- Ensure all environmental incidents are entered into the Enterprise Risk Management System (CGR Insight).
- Provide technical advice / liaise with environmental regulators.
- Review site environmental incident management procedures as required, including after incidents.

4.5 Asset Operators

- Operate assets within environmental approval limits.

4.6 Employees and Contingent Workers

- Follow site procedures including environmental procedures.
- Ensure all activities are conducted to prevent environmental harm.
- Control and report environmental incidents.

5 ACTIONS

All environmental incidents must be identified, managed, reported, investigated, and reviewed. Appropriate corrective actions are to be identified and completed, with operational-related procedures revised as appropriate to prevent recurrence.

CS Energy's environmental incident management process comprises the following:

5.1 Identify appropriate environmental incident management processes

Environmental incident management processes should be appropriate to:

- The site and CS Energy asset.
- The environmental licence conditions applicable to the asset.
- Scale of the environmental incident (i.e. Category 1 to 4).

- Resources available.
- Geographical location and sensitivity of the receiving environment.
- The environmental incident categorisation / type.

5.2 Deliver immediate post incident response and required notifications

To ensure that environmental incidents are responded to promptly, any harmful impact(s) mitigated, and an investigation can be subsequently conducted, the response from the Environment and Stakeholder Business Partner and other site personnel shall be immediate and effective and ensure preservation of the scene / area.

Immediately following an environmental incident at CS Energy, site personnel and/or the responsible supervisor shall:

- Take any action necessary to prevent further harm e.g. isolating plant, turning ignition sources off, minimising chemical spills, etc.
- Initiate emergency response, if required, in accordance with the CS Energy Emergency Response Plan CS-IM-03. Refer to Section 7 below for more information on environmental emergencies.
- Initiate the crisis management plan, if required, in accordance with the CS Energy Crisis Management Plan CS-IM-02. Refer to Section 7 below for more information on crisis management. Secure the incident scene.

5.2.1 Complete the required notifications

The EP Act 1994 (Section 319) imposes a General Environmental Duty on all employees, namely that 'a person must not carry out any activity that has the potential to cause, environmental harm unless the person takes all reasonably practicable measures to prevent or minimise the harm.'

If an incident does occur that may have caused or threatens material or serious environmental harm, there is a duty to notify the Queensland Environmental Regulator, and landowner or occupier.

. Internal notifications: these are to be completed in accordance with the information in Table 1.

External notifications: Some Environmental Incidents or activities causing or threatening environmental harm are reportable to the Queensland Environmental Regulator. This may be either as a condition of the site environmental approvals or in accordance with Section 320 of the Environmental Protection Act 1994 (EP Act). External notification requirements are included in Table 2 and is required if the incident meets the following thresholds:

- **Notifiable Incident:** Environmental incidents that cause or threaten environmental harm and/or are reportable to the Environmental regulatory authority. This may be a breach of the site license condition(s) or related approvals or in accordance with Section 320 of the Environmental Protection Act (see serious or material environmental harm definitions) and set a duty to notify under the appropriate guidelines, licenses and legislation.
- **Significant Environmental Incident:** An incident that has a significant impact on the environment or results in enforcement action by a regulator (i.e. Environmental Enforcement Order, Penalty Infringement Notices, administrative notices and orders made under the legislation, proceedings for court orders, prosecution and suspension or cancellation of permit, licence or authority).

Contact CSE Legal Advisor when reporting to the Regulator for incidents with actual or potential Categories 3 and 4 environmental or community related incidents.

Incident Type	Communication Activity	Format	Timeframe	Template	Report to	Internal Stakeholders to be Consulted	Responsible Person
All incidents	Initial notification	Verbal	As soon as practicable	N/A	Up through line management chain to the Site Manager	Health & Safety/ Environment/ Process Safety Team, Executive Leadership Team	Supervisor/ Investigation leader
	Incident record	Insight entry	Before end of shift	S0024	Line Manager	Functional Site Business Partner (H&S, OPS, ENV, PSE)	Supervisor/ Investigation leader
Medical Treatment or Category 3 & 4 incidents	Incident summary notification (initial)	Email	48 hours	S1819 (1) (Red banner)	All CS Energy personnel	Site Manager, Legal (if incident is under LPP)	Site Business Partners, Head of department
Category 3 & 4 Incidents	Investigation report	Report saved in TR M/ Insight	21 days – report drafted for review 30 days – to finalise incident	S1937 RCA S2189 (1)	From Investigation Lead to nominated ELT member	Site Leadership Team, Executive Leadership Team, Legal (if incident is under LPP)	Site Manager
	Incident investigation outcomes (final notification)	Email	30 days	S1819 (3) (Green banner)	All CS Energy personnel	Legal (if incident is under LPP)	Site Business Partners, Head of department

Table 1: Internal notification requirements (sourced from Procedure – CS-IM-01 - Learning from Incidents)

Incident Type	Communication Type	Communication Format	Time Frame	Template	External Stakeholders	Internal Stakeholders	Responsible Person
Notifiable Environmental Incident and Significant Environmental Incident (SEI)	Notification	Verbal	As soon as practicable (within EA specified timeframe)	Not applicable*	– Environment Administering Authority – Queensland Government	Site Manager, EGM OPS	Head of Health Safety and Environment (HoHSE)
		Written (energyandextractive@des.qld.gov.au; pollutionhotline@des.qld.gov.au)	48 Hours (within EA specified timeframe)	Not Applicable*	– Environment Administering Authority – Queensland Government	Site Manager, EGM OPS	Head of Health, Safety and Environment (HoHSE)
	Report (if required)	Written (energyandextractive@des.qld.gov.au; pollutionhotline@des.qld.gov.au)	14Days (within EA specified timeframe)	Not Applicable	– Environment Administering Authority – Queensland Government	Site Manager EGM OPS	

Table 2: External notification requirements (sourced from Procedure – CS-IM-01 - Learning from Incidents)

*Email templates for Kogan Creek Power Station and Kogan Creek Mine are available for emergency or incident reports at T:\OUTLOOK_TEMPLATES\OFT_ENV_Email_Templates

5.3 Undertake preliminary investigation including data collection and analysis

The Environment and Stakeholder Business Partner and supervisor (or delegates) shall attend the scene and arrange for the preliminary gathering of all relevant information.

The information to be collected will be determined by the nature of the environmental incident. The type of data to be collected must allow appropriate classification of the incident, and the subsequent investigation type required and associated corrective actions.

The information collected during this preliminary investigation should also consider any data required by the regulator.

The information to be collected or requested in response to an environmental incident will be determined by the following:

- The requirements of the site's Environmental Authorities (licences).

- If there were witnesses to the incident.
- If the incident is associated with a complaint (refer to section 6).
- If the incident is notifiable to the regulator.

The type of data to be collected may include:

- Photographs already taken by others.
- Additional photos.
- Initial action taken to prevent impact, contain material or respond to complaint.
- Samples of water, soil etc if the nature of the environmental incident involves a release of chemicals, waste materials or other potentially contaminating substances.
- Documents or other artefacts in conjunction with that work e.g. Permit to Work (PTW), Job Safety Environmental Assessment (JSEA), plant drawings, training, etc.
- Measurements or other physical information at the incident scene.
- A re-enactment of the event (if suitable).
- Information from witnesses using the following templates:
 - S2241 Record of Interview form ([B/D/16/28439](#)).
 - S2034 Witness Statement form (B/D/12/43915).

For further information on the interview process please refer to Section 5.9 of the Learning from Incidents Procedure CS-IM-01

5.4 Categorise incident

The Environment and Stakeholder Business Partner and supervisor (or delegates), in consultation with the relevant Site Functional Coordinator, shall confirm the incident category based on the **actual outcome** and **maximum reasonable potential consequence**¹ in accordance with Incident Category Matrix – Attachment 1. The Head of Health, Safety and Environment, EGM Operations and EGM Asset Management may be consulted (and the incident re-categorised) as required to determine incident categorisation. Both **actual outcome** and **maximum reasonable consequence** is to be included in the incident report.

5.5 Record and review environmental incident in CGR Insight

Once an incident has been controlled and initial information from witness recorded, the Environment and Stakeholder Business Partner (or delegate) is responsible for:

- Creating an entry in the Enterprise Risk Management System (CGR Insight) including all known details of the incident as detailed in Procedure - CS-IM-01- Learning from Incidents ([B/D/11/45318](#)). The level of investigation required will be determined (refer Section 5.8 of the Learning from Incidents Procedure CS-IM-01). CS Energy has three core incident investigation methodologies:
- 5 Why - A simple process to highlight probable causes of an incident. This method is suitable for Low level events i.e. Category 1 actual and potential.

¹ The maximum reasonable consequence (Potential) is the largest realistic or credible consequence from an event, considering the quality of controls in place for that event (if any) and credible failure (energy release) of these at the time of the event.

- Incident Cause Analysis Method (ICAM) - Primary investigation method to be used for significant Health and Safety, Environmental and Security incidents. This is the preferred method where the incident involves people interacting with plant or process.
- Root Cause Analysis (RCA) - Primary investigation method to be used for significant Operations incidents. This is the preferred method to identify plant and equipment failure root causes.
- Allocating an Investigation Leader to conduct an investigation to determine the root cause of the incident and determine actions to prevent recurrence of the incident.
- Allocating all identified actions and due dates to the applicable responsible persons.
- Any specific statutory authority notification details.

5.6 Investigate the environmental incident

The investigation into the environmental incident will be completed by the investigation lead and shall determine the causation of the environmental incident.

Investigation timeframes set out in the Learning from Incidents Procedure CS-IM-01 apply.

The investigations shall be at a depth commensurate with the actual and potential consequences of the incident. External technical services may be required during the investigation into an environmental incident (e.g., hydrogeological study)

For all incident categories, investigation leaders are responsible for recording the outcome of the investigation in the investigation section in Insight. For category 3 and 4 incidents if applicable (e.g. when an incident report needs to be accessed and updated by multiple users or incident investigated under Legal Professional Privilege (LPP)) the investigation leader is responsible for recording incident investigation reports and/or associated documents in the following TRIM BCS location:

- Use - ENVIRONMENTAL MANAGEMENT >> INCIDENT MANAGEMENT - for environmental related incidents

Where legal advice is required, or legal proceedings are anticipated in connection with an incident, consideration should be given to the structure and scope of investigations and reports - to maintain appropriate segmentation of Privileged and non-privileged material. This could include the preparation of separate factual reports, and analysis and recommendation reports.

If an incident is to be investigated under Privilege, incident information should not be added to Insight without In House Legal guidance or approval.

Any relevant TRIM links are to be included in Insight.

5.7 Implement corrective and preventive action process

Long-term management of an incident or the root cause of an environmental incident is to be managed in accordance with the Procedure - CS-ENV-02 - Developing Environmental Planning. Under this procedure long-term management is to be attributed to Environmental Issue Management Plans (EIMPs) or Risk Management Plans.

5.8 Report / close out of the environmental incident

An incident can be closed in Insight by the investigation lead or Site Functional Coordinator when the following has occurred:

- Significant incident challenge completed (if required);
- Feedback and comments have been included in the incident investigation report;
- Investigation finalised;
- Investigation details included in Insight; and
- Actions are raised in Insight from investigation recommendations.

Risk ratings, risk controls and procedures relating to incident management will be reviewed after an incident where procedures are found to be deficient, and any deficiency corrected.

Only the Functional Site Coordinators and the person responsible for each action and can move the incident to 'completed' within the Enterprise Risk Management System (CGR Insight). The time, date and identity of any person completing an action is recorded in the Enterprise Risk Management System (CGR Insight) and is considered to be an electronic signature.

6 COMMUNITY COMPLAINTS

Community enquiries or complaints are generally received by reception or administration staff. If the complaint is environmental, the reception or administrative staff will forward the call to the Environment and Stakeholder Business Partner, if possible, otherwise record the person's contact details and nature of the complaint. This contact information must be forwarded to the Environment and Stakeholder Business Partner as soon as possible.

With the exception of complaints related to PFAS issues at the Callide Power Station, the complaint is recorded as an incident in CGR Insight – Incident module and managed as per the Procedure - CS-IM-01- Learning from Incidents. If the complaint is related to PFAS issues at the Callide Power Station, the complaint is documented in Consultation Manager.

Regardless of the nature of the complaint, the following information is required for all complaints:

- Time, date, and nature of the complaint.
- Type of communication (telephone, letter, personal etc.).
- Name, contact address and contact telephone number of complainant (NB: if the complainant does not wish to be identified then 'Not identified' is to be recorded).

For each complaint (except for PFAS issues at Callide), the Environment and Stakeholder Business Partner (or delegate) is required to complete the following:

- Contact the person making the complaint and record details of the complaint in the Environmental Complaints / Requests for Information Form (S2258, TRIM: B/D/18/3388) if applicable.
- Enter the complaint as an environmental incident into the Enterprise Risk Management System (CGR Insight).
- Determine if the complaint reaches the threshold of a Category 3 or 4 incident. If so, a TRIM folder for each complaint under EXTERNAL RELATIONS - PUBLIC FEEDBACK in the applicable CSE site folder must be established. The Incident ID number generated by CGR

Insight must be included in the title of the folder. All applicable email / documents and investigation reports must be saved to the TRIM folder

- Record the incident and saving records of conversation with the stakeholder into Consultation Manager, which is CS Energy's stakeholder database management system.
- Record the applicable TRIM folder in the Enterprise Risk Management System (CGR Insight) and allocating the person responsible for investigating the complaint (Investigation Leader).

For each complaint related to PFAS issues at Callide, the Environment and Stakeholder Business Partner (or delegate) is required to complete the following:

- Contact the person making the complaint and record details of the complaint in the Environmental Complaints / Requests for Information Form (S2258, TRIM: B/D/18/3388) if applicable.
- Record the incident and saving records of conversation with the stakeholder into Consultation Manager, which is CS Energy's stakeholder database management system.

The Investigation Leader is responsible for conducting an investigation and preparing a report including details and conclusions of the investigation undertaken and the agreed actions as a result of the complaint. The Investigation Leader must record each action together with the person responsible and due date for the action to be undertaken.

7 ENVIRONMENTAL EMERGENCY OR CRISIS

Not all environmental incidents will reach the threshold of an emergency or a crisis.

In accordance with the CS Energy Emergency Response Plan CS-IM-03, the following circumstances are considered an environmental emergency:

- An event which may potentially result in serious environmental effects leading to a moderate loss of operation and requires a coordinated response beyond normal operational processes.
- An event which may potentially result in very serious environmental impacts affecting operations and requiring a joint site (operational) and corporate (strategic) response.

If an environmental incident reaches these thresholds, the requirements of the CS Energy Emergency Response Plan CS-IM-03 apply.

In accordance with the CS Energy Crisis Management Plan CS-IM-02, a crisis is defined as any incident that has escalated to the point that it has potential to cause major loss or damage to the organisation. This requires a distinct strategic, operational and tactical response that must take priority over normal business activity.

If an environmental incident reaches these thresholds, the requirements of the CS Energy Crisis Management Plan CS-IM-02 apply.

8 INCIDENT MANAGEMENT TRAINING RESOURCES

It is a requirement that staff are able to:

- Identify what is an environmental incident – refer to Procedure - CS-ENV-11 - Environmental Management System (EMS) Manual ([B/D/22/9917](#)), Section 5.1.5.
- Take appropriate immediate action to control an incident.

- Report, communicate and notify as per Procedure - CS-IM-01- Learning from Incidents ([B/D/11/45318](#)) which covers health, safety, environmental, process safety and operational incidents.
- Understand the activation of the Emergency Response Plan - CS-IM-03 - Emergency Response Plan.
- Understand the crisis escalation process as indicated in Procedure - CS-IM-02 - Crisis Management.

9 REVIEW

The following items are described in Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation:

- The EMS Audit Program encompasses the checking of this document.
- Incidents are reported and managed through the Enterprise Risk Management System (CGR Insight).
- Incidents are collated and reported.

10 AUDITABLE OUTPUTS

The following items are outputs of this procedure:

- Enterprise Risk Management System (CGR Insight) – List of Environmental Incidents and status.
- Incident action verification – completion of incident actions.
- Consultation Manager - Community complaints records vs incidents records.
- Internal and external incident notification process and records.
- TRIM records – evidence related to the incident and actions (communications, reports, data, etc.).

11 DEFINITIONS

Term	Definition
Activation	The act of declaring that an organisation's business continuity arrangements need to be put into effect to continue delivery of key products or services.
Business Continuity Plan (BCP)	CS Energy's documented methodology for addressing business interruption incidents and disasters, impacting on business-critical resources and systems.
Business Continuity Team (BCT)	The BCT comprises groups of CS Energy staff responsible for managing interruptions to business-critical resources and systems in accordance with the provisions of the BCP.
Corrective Action	Action taken, or proposed, to stop, control or remedy the environmental incident.
Crisis	A crisis is defined as any incident that has escalated to the point that it has potential to cause major loss or damage to the organisation. This requires a distinct strategic, operational and tactical response that must take priority over normal business activity.
Crisis Management	The overall coordination of an organisation's response to a crisis, in an effective, timely manner, with the goal of avoiding or minimising damage to the organisation's profitability, reputation, or ability to operate.
Crisis Management Plan (CMP)	A response document outlining key information including: who has authority and responsibility for key decision and actions in a crisis, internal and external crisis communication, activation mechanisms, details of levels of response across the organisation, and key templates to be used during a crisis.
Crisis Management Team (CMT)	A trained group of people with defined roles and responsibilities for implementing the organisation's Crisis Management Plan.
Environmental Incident	Any event resulting from the activities of CS Energy, CS Energy contingent workers and third parties that has the potential to, or has caused environmental impact, or a complaint relating to an environmental issue. This may include environmental incidents where CS Energy does not comply with legislation (i.e. approvals, licences, permits, or approval conditions) or corporate processes (i.e. Failure to follow EMS or Environmental Assessment and Approval procedures).
EIMPs	Environmental Issue Management Plans also known as Risk Management Plans
Action Officer	All CS Energy staff with access to CGR Insight can be assigned an action. The action officer must complete the assigned action and provide evidence for completion of the action to the satisfaction of the Lead Investigator. The action officer must liaise with the Lead Investigator directly where they are unable to complete the action by the due date.
Close Out	The process of reviewing the corrective and preventative actions of environmental incidents for completion and approval.
Closed Out	An Obligation Action / Event associated with an Environmental Incident is considered to be closed out when all of the relevant corrective and preventative actions have been completed to the satisfaction of the Lead Investigator and the event has been managed / approved.
Emergency	A sudden, unexpected incident requiring immediate action due to its potential threat to health and safety, the environment, or property.
Emergency Response Plan (ERP)	CSE's documented methodology (or tactical response) to an emergency.
Emergency Response Team (ERT)	The Emergency Response Team comprises competent, trained CSE personnel responsible for assessing and managing an emergency incident or chain of emergency incidents.

Term	Definition
Environment	<p>The term "environment" is defined broadly to encompass various elements. Specifically, it includes:</p> <ol style="list-style-type: none"> 1. Ecosystems and their constituent parts: This covers natural systems and the living organisms within them. 2. Natural and physical resources: Such as air, water, soil, minerals, and energy sources. 3. Qualities and characteristics of locations, places, and areas: This includes the aesthetic, cultural, and social aspects of the environment. 4. Heritage values: Both natural and cultural heritage values are considered part of the environment. 5. Human-made structures and areas: These are included to the extent that they influence or are influenced by the natural environment
Environmental Impact	<p>Any adverse change (direct or indirect) to the environment resulting from the activities of CS Energy, CS Energy contingent workers or third parties.</p>
ICAM	<p>Incident Cause Analysis Method. Primary investigation method to be used for significant Health and Safety, Environmental and Security incidents. This is the preferred method where the incident involves people interacting with plant or process.</p>
Incident	<ol style="list-style-type: none"> a) An event which may potentially result in low level safety, environmental or social impacts, or involve minor legal issues; or which causes a minor loss of operation and can generally be managed under normal operational processes. To accommodate the escalation of an incident, which requires an emergency or crisis response, incidents are categorised on a scale of I-IV. b) An unplanned event which causes injury, damage to plant or the environment, loss of production, theft, fraud, breach of the Code of Conduct or public interest.
JSEA	<p>Job safety environment analysis. Used to identify, assess, and control hazards associated with specific tasks</p>
Environmental Incident Category	<p>The classification of the incident based on the severity and consequence of the actual impact. There are 4 categories of incidents – low, moderate, significant and high.</p>
Incident Investigation	<p>A systematic process of gathering and analysing information about an incident for the purpose of identifying causes and making recommendations to prevent recurrence.</p>
Legal Professional Privilege (LPP)	<p>Legal Professional Privilege is a privilege attainable by a party if the party can establish that the dominant purpose for obtaining the advice or undertaking the investigation was in preparation for legal proceedings, whether existing or contemplated.</p>
Material Environmental Harm (section 16 of the EP Act)	<ol style="list-style-type: none"> 1. Material environmental harm is environmental harm— <ol style="list-style-type: none"> a) that is not trivial or negligible in nature, extent or context; or b) that causes actual or potential loss or damage to property of an amount of, or amounts totalling, more than the threshold amount but less than the maximum amount; or c) that results in costs of more than the threshold amount but less than the maximum amount being incurred in taking appropriate action to - <ol style="list-style-type: none"> i. prevent or minimise the harm; and ii. rehabilitate or restore the environment to its condition before the harm. 2. The chief executive must ensure a threshold amount calculated under subsection (3), definition threshold amount, paragraph (b) is published on the department's website during the financial year to which it relates.

Term	Definition
	3. In this section- maximum amount means the threshold amount for serious environmental harm. Threshold amount means— a) for the financial year ending 30 June 2023 - \$10,000; or b) for a later financial year - the threshold amount for the financial year immediately preceding the later financial year (the previous financial year) increased by the consumer price index for the previous financial year.
Non-conformance	Activity or event that does not meet legal and/or corporate requirements.
Notifiable Environmental Incident	Environmental incidents that cause or threaten environmental harm and/or are reportable to the Environmental regulatory authority. This may be a breach of the site license condition(s) or related approvals or in accordance with Section 320 of the EP Act (see serious or material environmental harm definitions) and set a duty to notify under the appropriate guidelines, licenses, and legislation.
Preventative action	Action taken, or proposed, to prevent the occurrence of a similar environmental incident.
PTW	Permit to Work. It is a formalized safety protocol used to manage hazardous work activities. It ensures that all necessary precautions are taken before starting high-risk tasks.
RCA	Root Cause Analysis - Primary investigation method to be used for significant Operations incidents. This is the preferred method to identify plant and equipment failure root causes.
Serious environmental harm	1. Serious environmental harm is environmental harm— a) that is irreversible, of a high impact or widespread; or b) caused to— (i) an area of high conservation value; or (ii) an area of special significance, such as the Great Barrier Reef World Heritage Area; or c) that causes actual or potential loss or damage to property of an amount of, or amounts totalling, more than the threshold amount; or d) that results in costs of more than the threshold amount being incurred in taking appropriate action to— (i) prevent or minimise the harm; and (ii) rehabilitate or restore the environment to its condition before the harm. 2. The chief executive must ensure a threshold amount calculated under subsection (3), definition threshold amount, paragraph (b) is published on the department's website during the financial year to which it relates. 3. In this section threshold amount means— a) for the financial year ending 30 June 2023—\$100,000; or b) for a later financial year—the threshold amount for the financial year immediately preceding the later financial year (the previous financial year) increased by the consumer price index for the previous financial year
Significant Environmental Incident (SEI)	An incident that has a significant impact on the environment or results in enforcement action by a regulator (i.e. Penalty Infringement Notices, administrative notices and orders made under the legislation, proceedings for court orders, prosecution and suspension or cancellation of permit, licence or authority).
Site Functional Coordinators	The Site Functional Coordinators are identified persons who are responsible for each incident type on that site e.g. H&S – Site Health and Safety Business. The responsibilities of this role include: <ul style="list-style-type: none"> • Reviewing the detail assigned to the incident. • Confirming the incident category as per the category definition. • Appoint an Investigation Leader to follow up the incident and conduct and investigation.

Term	Definition
	<ul style="list-style-type: none"> Issue of Red Banners (Cat 3 and Cat 4), Green Banners (as required). Close out incidents.
SFAIRP	Legislated requirement when considering actions to manage risk to “So Far As Is Reasonably Practicable”
Third Party	Any person or organisation not contracted, employed or directed by CS Energy.
Third Party Environmental Incident	Any event, which has caused environmental impact, resulting from activities done by a person, organisation or government body (that is not CS Energy) and not at the request of CS Energy (with or without CS Energy knowledge or consent).

12 REFERENCES

Reference No	Reference Title	Author
B/D/11/45318	Procedure - CS-IM-01 - Learning from Incidents	CS Energy
B/D/11/31098	CS-ENV-11 - Environmental Management System (EMS) Manual – Corporate	CS Energy
C/D/16/3315	Procedure – CAL-ENV-01 – Environmental Management System Manual – Callide Power Station	CS Energy
K/D/10/1945	Procedure - KA-ENV-M-01 – Environmental Management System Manual – Kogan Creek Power Station	CS Energy
K/D/15/7343	Procedure – KA-OHS-07 – Kogan Creek Incident Response Management Plan	CS Energy
C/D/14/18233	Procedure – CAL-IM-03 – Callide Power Station Incident Response Management Plan	CS Energy
B/D/23/10312	Compliance Plan - BESS - H&S - Emergency Management - Chinchilla Battery	CS Energy
B/D/12/14048	Compliance Plan - CS-IM-03 - Emergency Response Plan	CS Energy
B/D/16/28439	S2241 Record of Interview form	CS Energy
B/D/12/43915	S2034 Witness Statement form	CS Energy
B/D/18/3388	Environmental Complaints / Requests for Information Form	CS Energy
N/A	Environmental Protection Legislation	Aust Govt
N/A	Environmental Protection Legislation	Qld Govt
B/D/16/2453	Environmental Legal Compliance Manual (ELCM) Volume 1	CS Energy
B/D/16/2454	Environmental Legal Compliance Manual (ELCM) Volume 2	CS Energy
B/D/11/31089	Procedure - CS-ENV-01 - Environmental Issue Identification	CS Energy
B/D/11/31090	Procedure - CS-ENV-02 - Developing Environmental Planning	CS Energy
B/D/11/31091	Procedure - CS-ENV-03 - Environmental Communication and Training Process	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation	CS Energy
B/D/11/43851	Procedure - CS-IM-02 - Crisis Management	CS Energy

13 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.



14 ATTACHMENTS

14.1 Attachment 1 – Incident Category Matrix (Source: Procedure - CS-IM-01 - Learning From Incidents)

Category	Health and Safety ²	Environment	Operations	Process Safety	Security	ICT
Non work related	Non work related injury or illness.	N/A	N/A	N/A	N/A	N/A
C1 Low	First aid injury (FAI) - (actual or potential). No Treatment Given	Small contaminant release localised on-site area affected. Non-conformance with land disturbance procedure, on-site previously disturbed area. Routine short-term clean-up/remediation.	Unit trip or LOA or Equipment damage Event assessed as MINOR using CSE Risk Matrix – Operations B/D/13/17881. Permit to work any minor administration errors e.g. leaving lock on at end of shift.	TIER 3.5 Error or gap in Process Safety Management System Event Early warnings that critical systems are not in control. These largely include Risk Control System failures that do not lead to a higher tier event: Tier 3.5 - Error or gap in Process Safety Management System requirements, examples include: Management of Change application error or failure Override or bypass of Safety Critical Equipment without approval and / or adequate controls in place. Prohibited items taken into a hazardous area Failure related to Operational Procedures (e.g. Plant, shift handover, routine checks, etc) Failure to meet competence requirements for working on Safety Critical Equipment	Minor security incident (theft of company property) Trespass resulting in low or very minor damage to property (graffiti) Building doors found not locked Maintenance issue with gate, fence, security cameras etc Unidentified vehicle parked or travelling adjacent to the site after hours	Loss of ICT critical system/service for 1-4 hours
C2 Moderate	Medical Treatment Injury (MTI) - (actual or potential). Positive AOD result.	Moderate contaminant release or unauthorised land disturbance, localised on-site. Non-compliance with a cultural heritage agreement or applicable legislation that does not impact on-site areas of cultural heritage. Routine short-term clean-up/remediation. Low level compliance failure that does not result in Regulator enforcement actions e.g. failure to correctly complete a waste tracking certificate.	Unit trip or LOA or Equipment damage Event assessed as LOW using CSE Risk Matrix – Operations B/D/13/17881. Permit to work - any non-conformance e.g. incorrect isolations or no lock on to a permit assessed as a Potential to cause CAT 2 HS injury.	TIER 3.1-3.4 Minor Process Safety Event Asset failure resulting in actual event consequences as per any CAT 2 threshold OR Asset loss of energy control with potential event consequence as per any CAT 2 threshold OR Challenges to risk control systems that progressed along the path to harm but are stopped short. Typical examples are failed protection activations, exceeding operating limits and functional failure of safety critical equipment: Tier 3.1 - Safe operating limit excursions; Tier 3.2 - Safety Critical Equipment or Process Safety Protecting device fault or function compromised; Tier 3.3 - Non-spurious activation of a Process Safety Protecting device; Tier 3.4 - Loss of primary containment (LOPC) less than the threshold quantities for a Tier 2 incident in Attachment 6 Learning from Incidents Procedure – Material Release Threshold Quantities for Different Materials.	Fraud or theft or suspected fraud or theft where the value, money, equipment, materials or property involved does not exceed \$10,000 Trespass resulting in minor property damage or vandalism. non-violent demonstration/protest outside but near company property Activities observed offsite that identifies the potential for a security breach	Unauthorised access to CS Energy IT systems Loss of ICT critical system/service for 4-8 hours Malware successfully installed/running/deployed on a single computer

² The maximum reasonable consequence (Potential) is to be considered when categorising incidents. It is the largest realistic or credible consequence from an event. The quality of controls in place (if any) are to be considered as well as the credible failure (energy release) of these at the time of the event.



Category	Health and Safety ²	Environment	Operations	Process Safety	Security	ICT
C3 Significant	Lost Time Injury (LTI) - (actual or potential) Serious injury or illness, defined by WHSQ, where the reasonable maximum consequence is not a fatality (actual or potential).	Large contaminant release or unauthorised unlawful land disturbance, localised on or off-site. Non-compliance with cultural heritage agreement or applicable legislation that potentially impacts on-site areas of cultural heritage. Short-term clean-up/remediation. Likely enforcement action from Regulator.	Unit trip or LOA or Equipment damage Event assessed as MEDIUM using CSE Risk Matrix – Operations B/D/13/17881. Permit to work - any non-conformance e.g. incorrect isolations or no lock on to a permit assessed as a Potential to cause CAT 3 HS injury.	TIER 2 Significant Process Safety Event Asset failure resulting in actual event consequences as per any CAT 3 threshold OR Asset loss of energy control with potential event consequence as per any CAT 3 threshold OR Loss of Primary Containment (LOPC) release of hazardous material greater than Tier 2 threshold quantities, refer Attachment 6.	Trespass with clear criminal intent e.g. theft Violent/non-violent demonstration/protest outside or near company property Breach of site security systems which allows unauthorized entry onto site or into computer systems resulting in escalated damage A bomb threat or threat of violence by any means. Fraud or theft or suspected fraud where the value, money, equipment, materials or property involved exceeds \$10,000	Malware successfully installed/running/deployed on multiple computers Successful hack or unauthorized access CS Energy's secure ICT network on site that results in MAJOR risk to personnel, plant, systems. Loss of ICT critical system/service for 8-24 hours.
C4 High	Fatality or multiple fatalities - (actual or potential). Serious injury or illness, defined by WHSQ, where the reasonable maximum consequence is a fatality - (actual or potential).	Large to very large contaminant release or unlawful land disturbance, localised off-site (in breach of environmental licence) Long-term or complex long-term clean-up/remediation, potentially irreversible. Major fine and/or prosecution imposed or likely to be imposed. Loss of community trust or active opposition to business activities. Loss (unauthorised) of areas of cultural heritage and archaeological significance.	Unit trip or LOA or Equipment damage Event assessed as MAJOR or greater using CSE Risk Matrix – Operations B/D/13/17881. Permit to work - any non-conformance e.g. incorrect isolations or no lock on to a permit assessed as a Potential to cause CAT 4 HS injury.	TIER 1 Major Process Safety Event: Asset failure resulting in actual event consequences as per any CAT 4 threshold OR Asset loss of energy control with potential event consequence as per any CAT 4 threshold OR Loss of Primary Containment (LOPC) release of hazardous material greater than Tier 1 threshold quantities, refer Attachment 6.	An actual attack on facilities or assault on staff. Violent demonstration on company property.	Unauthorised Access that cannot be contained or results in damage to data not recoverable within 24 hours. Loss of ICT critical system/service greater than 24 hours. Unauthorised Access that results in a loss of sensitive information that cannot be contained; such as a leak of confidential CS Energy data the internet.



14.2 Attachment 2 – Incident Management Process Flow (Source: Procedure - CS-IM-01 - Learning From Incidents)

