

Level: CS ENERGY
 Procedure No: CS-ENV-05
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CS ENERGY PROCEDURE

ENVIRONMENTAL LEGAL COMPLIANCE CS-ENV-05

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
Original Issue				27/01/1999
Update responsibilities.				17/05/2000
Expand Section 3.1 other requirements.				03/07/2000
Added diagram.				28/08/2000
Added Review and Auditable Outputs.				17/11/2000
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Reference documentation updated.				31/10/2001
Replacement of "Environmental Legislation Register" with "Environmental Legal Compliance Manual", reference to Legal Hotline, removal of reference to EMRO, minor editing.				18/11/2002
Minor editing.				25/11/2003
Document owner; minor editing; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.				06/06/2005
Clarification and amendment of processes detailed in Sections 3.1, 3.2 and 3.3; inclusion of Early Warning Updates in Section 6; update organisational titles; minor editing.				19/04/2006
EPA replaced with DERM; references to site-specific documentation removed; 'Legal Officer' changed to 'Corporate Legal Counsel'; responsibilities for Corporate Legal Counsel added to s. 4; 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	17/11/2011
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Updated to reflect current business processes and address internal EMS audit recommendations and findings.	S Harabasz	S Verano	B Monckton	15/02/2019
Document reviewed no changes made.	S Harabasz	T van den Berg	B Monckton	27/08/2021
Reviewed and updated with current position titles. Text restructured and other editorial edits. Included reference to Due Diligence meetings. Updated process flow chart.	J Ritchie	R Harvey	B Prain	20/12/2023
Document Review. Included additional information regarding cultural heritage requirements. Added to Definitions table. No other changes.	K Tippett	R Harvey	B Prain	18/02/2025



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1 PURPOSE

The purpose of this procedure is to document the process to ensure CS Energy employees have access to up-to-date legal information pertaining to CS Energy’s operations. The Environmental and Cultural Heritage Legal Compliance Manual (ECHLCM) is compiled and maintained by an external legal advisor and is made available to CS Energy staff through the CS Energy Intranet.

The overall process for ensuring CS Energy is provided with up-to-date legal information is summarised in Figure 1.

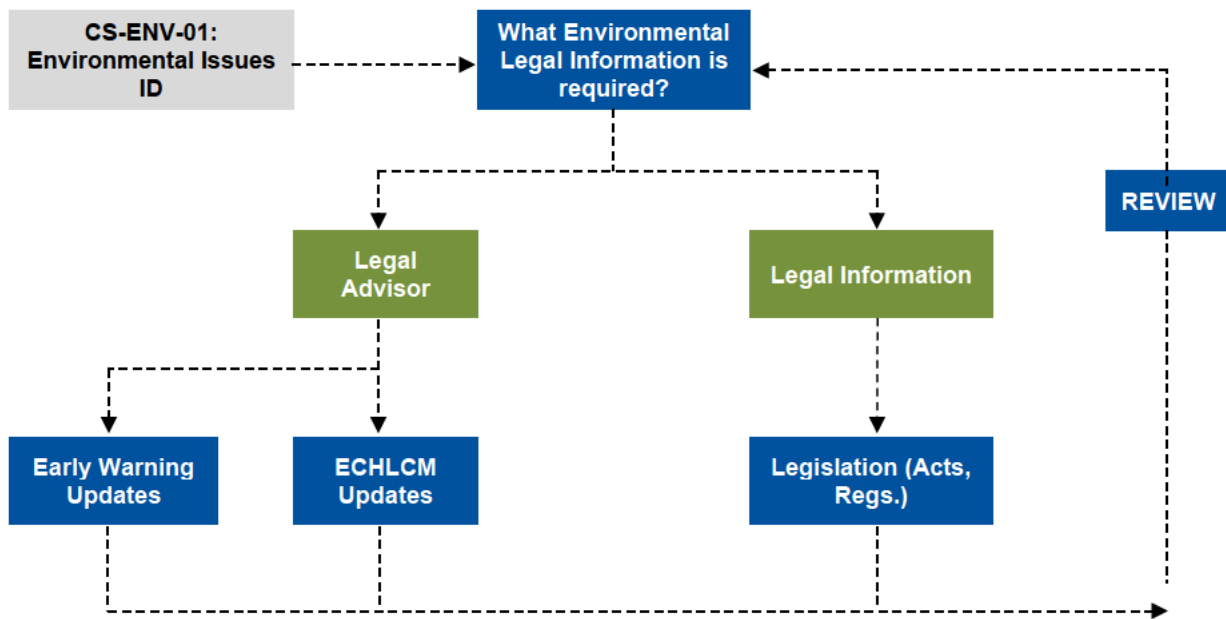


Figure 1: Environmental Legal Information Flow Diagram

2 SCOPE

This procedure applies only to the process for maintaining the ECHLCM and the distribution of updated legal information associated with managing environmental issues associated with CS Energy activities.

3 ACTIONS

The sections below describe the specific actions to be completed to ensure relevant legal and other information is identified, maintained and distributed on a regular basis to ensure CS Energy’s environmental and cultural heritage obligations are appropriately managed.

3.1 Identification of Legal Requirements

Environmental and cultural heritage legal requirements relevant to CS Energy’s operations are informed by understanding the nature of the activities undertaken by the organisation. This information is used by the external legal advisor engaged by CS Energy to identify relevant content for the ECHLCM.

The ECHLCM is available on the Intranet and outlines all Commonwealth and State legislation and other requirements relevant to CS Energy. The ECHLCM comprises two volumes, as described below:

- Volume 1 contains information on applicable statutory and non-statutory requirements for all operational assets. This volume contains detailed descriptions of all relevant State and Commonwealth environmental legislation, guidelines, policies, standards, strategies, codes of

practice, agreements and plans, as well as relevant local laws and planning scheme requirements of relevant regional councils.

- Volume 2 summarises legal requirements by environmental aspect (e.g. air, noise etc.) for all operational assets. This volume contains the legal and other requirements and definitions relevant to CS Energy's licences and permits for operational assets.

The ECHLCM is used to identify the legal requirements relevant to operational assets.

The external legal advisor also issues Early Warning Updates or other publications relating to legal changes that occur from time to time.

3.2 Identification of Other Requirements

Other environmental and cultural heritage requirements associated with operating assets can be identified by referring to the following range of information sources:

- Industry Codes of Practice.
- Australian Standards.
- Guidelines issued by the Queensland Environmental Regulator.
- Sampling and analysis manuals published by the Queensland Environmental Regulator.
- Cultural heritage agreements and plans.
- Documents issued via subscriptions to appropriate journals or newsletters (refer to Procedure - CS-ENV-03 - Environmental Communication and Training Process).

Combined Health, Safety and Environment Due Diligence meetings are held routinely to review information from these sources and identify any risks to legal compliance and any actions required to align with new information.

3.3 Access to Legal Information

Legislation, environmental and cultural heritage approval information is available through the Internet or the CS Energy Intranet. Some information may be restricted due to privacy (e.g., some elements of cultural heritage management plans and agreements are restricted).

All staff are to have access to the following information:

- Commonwealth legislation, accessible on-line at <https://www.legislation.gov.au>.
- Queensland Environmental Protection legislation, accessible on-line at <https://www.legislation.qld.gov.au>. This website is managed by the Office of the Queensland Parliamentary Council.
- Information on the Queensland Environmental Regulator's website in relation to regulatory requirements, licensing and permitting. Staff can subscribe to regular updates issued via email from the regulator.
- The latest versions of Environmental Authorities (EA) (licences) or Development Approvals (DA) via the CS Energy Intranet.
- The CS Energy ECHLCM via the CS Energy Intranet.
- Cultural Heritage laws – Queensland, accessible on-line at <https://www.qld.gov.au/firstnations/environment-land-use-native-title/cultural-heritage/queensland-legislation>.
- Early Warning Updates issued by the external legal advisor and saved in TRIM: [F/23/2990](#).

- Australian Standards available via the CS Energy Intranet ([ISO 14001:2015 | Techstreet Enterprise](#))

3.4 Obtaining Legal Advice

Any staff member must request legal advice, through the CS Energy Corporate Legal Counsel, where significant environmental or cultural heritage legal compliance matters are identified as relevant, before any of the following events:

- Commencement of a new project which has been identified as having an impact on the environment or cultural heritage matters.
- During internal reviews of procedures which influence the control of any environmental or cultural heritage issue.
- Any enquiries raised by other staff members concerning environmental or cultural heritage issues.

To assist in deciding whether any of the above may have a legal consequence, first refer to the ECHLCM.

The Corporate Legal Counsel, utilising the services of an external Legal Advisor as required, can also be used to identify any relevant legal issues.

3.5 Distribution and Use of Legal Information

Staff are to refer to the ECHLCM and Early Warning Updates before advising or distributing legal information relating to environmental issues. Corporate environmental staff coordinate provision of legal support and also forward legal update information via email to site Environment and Stakeholder Business Partners.

The legal and other requirements relevant to operational assets are to be used to identify environmental and cultural heritage obligations as per the Enterprise Risk and Compliance Management Framework (CS-RISK-01).

3.6 Maintenance of Legal Information

Legal information described by this procedure is to be maintained as required by significant legal changes or initiatives to improve the usefulness of the ECHLCM.

4 RESPONSIBILITIES

4.1 Head of Health, Safety and Environment

- Convene regular Health, Safety and Environment Due Diligence meetings.

4.2 Principal Environmental Specialist

- Manage updates to the ECHLCM via Corporate Legal Counsel.
- Supply additional reference material to Environment and Stakeholder Business Partners.

4.3 Corporate Legal Counsel

- Notify Head of Health, Safety and Environment of any significant changes in environmental legislation with potential to influence operations.
- Offer legal advice upon request for specific legal environmental issues.

5 REVIEW

The EMS Audit Program encompasses the checking of this document to ensure it is appropriate and being followed correctly. The review of incoming Early Warning Updates from the external Legal Advisor initiates the identification of any impacts to the management of environmental and cultural heritage obligations and risks for operating assets. Updates to the ECHLCM when significant changes to environmental and cultural heritage legislation occur also initiates changes to operations to ensure compliance with legal obligations. These review actions align with Procedure - CS-ENV-07 - Environmental Audit, Review and Performance Evaluation.

6 AUDITABLE OUTPUTS

- Early Warning Updates and other publications relating to legal changes.
- Environmental and Cultural Heritage Legal Compliance Manual.

7 DEFINITIONS

Term	Definition
ECHLCM	Environmental and Cultural Heritage Legal Compliance Manual
EA	Environmental Authorities
DA	Development Approvals
EMS	Environmental Management System

8 REFERENCES

Reference No	Reference Title	Author
B/D/16/2453	Environmental and Cultural Heritage Legal Compliance Manual (ECHLCM) Volume 1	External legal advisor
B/D/16/2454	Environmental and Cultural Heritage Legal Compliance Manual (ECHLCM) Volume 2	External legal advisor
B/D/11/31091	Procedure - CS-ENV-03 - Environmental Communication and Training Process	CS Energy
B/D/12/63934	Standard - CS-RISK-01 - Risk and Compliance Management Framework	CS Energy
B/D/11/31095	Procedure - CS-ENV-07 - Environmental Audit Review and Performance Evaluation	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.