



CS ENERGY PROCEDURE FOR
DEVELOPING ENVIRONMENTAL PLANNING
CS-EMSP-2

Responsible Officer: Portfolio Environment Manager

Approved: GM Portfolio Services

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1. Purpose

The purpose of this document is to provide a process to:

- Formulate Environmental Policy, Goals and Targets; and
- Prepare Environmental Issue Management Plans.

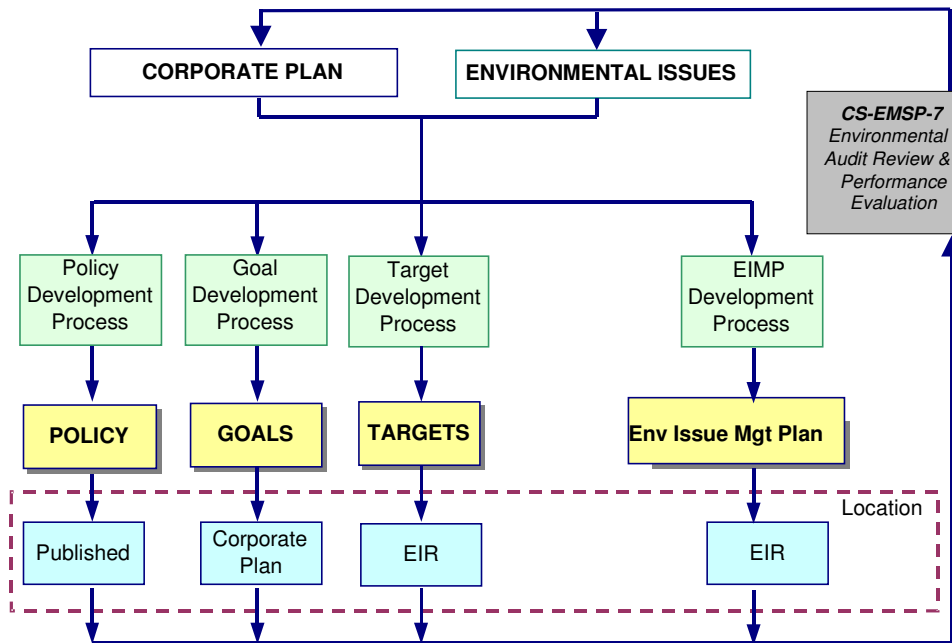


Figure EMSP-2: Environmental Planning Flow Diagram.

2. Scope

This procedure applies to the management of environmental issues. Outputs from this procedure are implemented through the Environment Policy, Corporate Plan and Environmental Issue Management Plans.

3. Actions

The specific details/examples of these instructions have been separated according to the item being developed / amended.

3.1 Formulating Environmental Policy

Development process:

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

3.2 Formulating Environmental Goals

Development process:

The development of corporate goals is in accordance with strategic planning for development of the Corporate Plan. The Corporate Plan and Key Objectives are published as a "Corporate Scorecard". Divisional business plans and individual site business plans are also developed for internal use.

The Chief Executive and General Managers carry out a strategic assessment and analysis of business drivers including environmental drivers, incorporating the views of invited parties.

The list of environmental issues produced by the Environmental Issue Identification Procedure (CS-EMSP-1) at each site is considered during the development process for site-specific goals and targets.

In the case of plant owned by joint ventures, goals may also be set for CS Energy as the operation and maintenance contractor.

Description of contents:

General strategic goals which must contain the following information:

- Statement on broad environmental issue being addressed; and
- Where possible, state some quantitative indicator.

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

3.3 Formulating Environmental Targets

Development process:

The development of targets may occur via three methods:

- From Environment Policy and Goals that have to be achieved. These are reviewed annually as part of the Business Planning cycle which involves the development of both Corporate and site business plans.
- From the Owner's Environmental Management Plan and any owner-specified goals when performing an operation and maintenance contract role.
- From high-risk issues where the Site Managers, Divisional Environmental Managers and site Environmental Advisers agree there is a need.

The process results in corporate targets identified in the Corporate Plan and also site specific targets which are identified in the site business plans.

Description of contents:

- Measurable and specifically aimed statement that is sufficiently detailed and follows the SMART rule:
Specific
Measurable
Attainable
Relevant
Trackable
- It contains a statement which has sufficient detail so that it can have actions attributed to it by the relevant strategy group/ process manager.
- Is sufficiently detailed so that actions can be set (targets must not be actions, i.e. work order level).
- Contains specific quantitative measures. They can be semi-qualitative e.g. "reduction from 1997 levels" or quantitative e.g. "% NOx reductions".
- Where possible linked to Environmental Goals.

3.4 Environmental Issue Management Plans

Development process:

Issue management plans are developed using the priority issues identified from the Environmental Issues Identification Process. This may result in specific environmental targets for each workgroup of a site.

Minimum content:

Environmental Issue Management Plans (EIMPs) is a general term that collectively describes:

- Risk Management Plans in ROMS which have been developed in response to high and significant environmental issues (see Section 3.7 of CS-EMSP-1).
- Management actions designated for low and moderate risk environmental issues within the EIR.
- Issue-specific procedures that address certain environmental approval requirements and/or voluntary agreements.

These plans may be initiated as a result of any of the following events:

- A priority issue identified in the EIR.
- As a result of a CS Energy investigation of an incident or complaint or requirement of the Department of Environment and Resource Management (DERM) following an incident or complaint or submission of a program notice (see CS-EMSP-5: Environmental Legal Compliance).
- Environmental approval requirements such as Stormwater Management Plan, Waste Management Plan.
- Voluntary industry agreements, such as the Greenhouse Challenge Plus Agreement.

The minimum contents of a plan are:

- Listing of the **priority** environmental issue being managed and its effects.
- Environmental Risk Rating.
- Operational controls in place.
- List of **actions** being undertaken for the issue, noting:
 - Action description (use EIR for management)
 - Expected completion date
 - Work order number or SAP notification
 - Responsible person/plant group

EIMPs undergo management review and are accepted and agreed through this process. Higher-level EIMPs (high and significant risk) for major issues would normally be managed as Risk Management Plans which are signed off by the responsible General Manager. All information is recorded within the EIR.

4. Responsibilities

4.1 CS Energy Board

- Review and authorise CS Energy Environment Policy.

4.2 Chief Executive

- Recommend Policy to Board.

4.3 General Managers

- Development of policy, goals and targets
- Initiate Policy review
- Allocating resources for implementation of action/management plans
- Approval of Issue Management Plans converted to Risk Management Plans

4.4 Risk Facilitators

- Preparation of Risk Management Plans

4.5 Portfolio Environmental Managers

- Facilitate development of policy, goals and targets consistent with the Environmental and Business Management System Processes.
- Initiating review of this procedure and ensuring outputs are updated.

4.6 Site Environmental Coordinator

- Ensure that a site register of environmental issues is maintained and updated in accordance with review requirements.
- Provide technical advice relating to environmental issues.
- Formulate and/or oversee the formulation of Environmental Issue Management Plans (EIMPs).
- Provide support in the dissemination of environmental policy and goals.
- Development of site goals and targets.

5. Review

Reviews listed below are described in the EMS Procedure CS-EMSP-7.

- The EMS Audit Program encompasses checking of this document (See CS-EMSP-7 Environmental Audit, Review and Performance Evaluation)
- The policy and goals are reviewed as part of the Strategic Planning Process to formulate the corporate plan.
- The environmental action plans, issues management plans and environmental targets are reviewed as part of the Environmental Issues Review (See CS-EMSP-7 Environmental Audit, Review and Performance Evaluation).

6. Auditable Outputs

These items are outputs of this procedure and are to be assessed by auditors.

- Environment Policy
- Environmental Goals
- Environmental Targets
- Environmental Issue Management Plans

7. Definitions

Definitions to the following are found in the EMS Manual Glossary: environmental issue, EIR (Environmental Issues Register), goals, targets, Environmental Issue Management Plan, significance and priority.

8. Reference Documentation

CS Energy / General	QA Doc No.	Location
EMS Procedure – Environmental Legal Compliance	EMSP-5.doc	K:\Corprocs1\Environment
EMS Procedure – Environmental Audit, Review & Performance Evaluation	EMSP-7.doc	K:\Corprocs1\Environment
Corporate Plan	Corporate Plan	General Managers
Risk Management Policy	Risk Mgt Policy.pdf	K:\Corprocs1\CorporatePolicies
Risk Management Procedure	Risk Mgt Proc.doc	K:\Corprocs1\Governance
Environment Policy	Environment Policy.pdf	K:\Corprocs1\CorporatePolicies
Environmental Issues Register (EIR)	N/A	SQL Server

9. Attachments

None

10. Document History

Issue Date	Nature of Changes
27.1.1999	Original Issue
17.5.2000	Updated responsibilities

3.7.2000	Modified Section 3.2
28.8.2000	Diagram added
16.11.2000	Review and Auditable Output sections added
24.11.2000	Clarification of Sections 3.1, 3.3 and 3.4
16.02.2001	Updated document history
17.12.2001	Modified Sections 4.2 and 4.3
18.11.2002	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.
25/11/2003	Deleted 3.5 and other references to Environmental Action Plans. Minor editing.
04/06/2005	Minor editing; document owner; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.
19/04/2006	Minor clarification to Section 3.2; update organisational titles; minor editing.
6/07/2009	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.