



CS ENERGY PROCEDURE FOR
**ENVIRONMENTAL COMMUNICATION & TRAINING
PROCESS
CS-EMSP-3**

Responsible Officer: Portfolio Environment Manager

Approved: GM Portfolio Services

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1. Purpose

This procedure aims to ensure that the objectives of the EMS are communicated to staff and the general public. It also defines the requirements of an operation to institute consultation with staff and the public where appropriate.

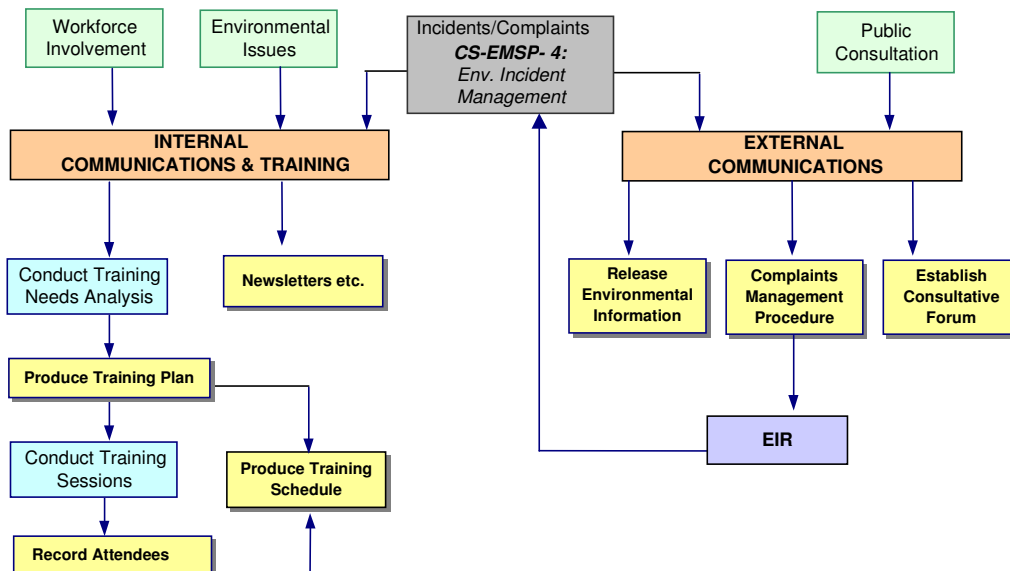


Figure EMSP-3: Environmental Communication & Training Process Flow Diagram.

2. Scope

This procedure applies to internal and external communication of environmental issues or incidents across CS Energy operations and to internal training processes.

3. Actions

3.1 External Communication

In managing external communications with regard to an operation's environmental impacts, management will establish an external environmental communication strategy dealing with the following matters:

Consider establishing a community consultation forum

The criteria to be considered when deciding on whether an operation needs to set up such a forum are:

- Number of external complaints (incidents) received (refer to CS-EMSP-4: Environmental Incident Management Procedure);
- Verification of need to take action on a complaint;
- Proposed changes to site operations;
- Communication policy of the operation; and
- Community needs/expectations.

If it is decided that a forum is to be established, then the following should be documented:

- Objectives of the forum;
- Terms of reference;
- General procedure for conducting meetings; and
- Meeting minutes.

In the case of sites where joint-ventures are involved, the joint-venture parties need to agree on the management of community relations.

Release Environmental Information

CS Energy does not externally communicate information in relation to all identified significant environmental issues. It does, however, release specific information to the public predominantly in the Annual Report and to a lesser extent through the Corporate website, National Pollutant Inventory website, newsletters, factsheets and media releases. Types of information released to the public include:

- a) Annual Report
 - Performance against key objectives and targets for current reporting period
 - Likely targets for the next reporting period
 - Number of environmental incidents
 - Greenhouse gas intensities
 - Fly ash generation
 - Water consumption and efficiencies
 - Renewable energy investments
- b) Corporate Website
 - Public access to Annual Report and Environmental Policy.
- c) National Pollutant Inventory
 - Water, air and land emissions by reporting year.
- d) Energy Matters quarterly newsletter, site factsheets and media releases
 - Topical environmental issues as approved by Corporate and Site Managers.

Make available and publicise CS Energy's Environment Policy

CS Energy's Environment Policy, developed as a part of EMS Procedure (CS-EMSP-2 Developing Environmental Planning) is communicated to the public via the CS Energy Internet web site.

Maintain a community (external) complaint procedure

This procedure addresses the following:

- Registration and documentation of community complaints;
- Provision of feedback to the complainant;
- Mechanism for signoff when actions completed;

- Registration of complaints of an environmental nature as per the EMS Procedure CS-EMSP-4 Environmental Incident Management.

Communication with joint-venture partners

Any CS Energy sites with joint-venture arrangements in place will maintain regular communication processes addressing at least the following:

- Environmental approval obligations and amendments;
- Status of any Environmental Management Programs in place;
- Update on status of any Plant Handover issues;
- Items from monthly reports;
- Management and close-out of incidents reported since last meeting;
- Management and close-out of community complaints reported since last meeting;
- Outcomes from audits and status of actions recommended;
- Plant issues affecting environmental performance;
- Environmental approval non-compliances;
- Review of plant and environmental monitoring performance; and
- Review of any Contract Environmental Management Plan.

3.2 Appointment of CS Energy Spokesperson

Contact with the media is planned and arranged by the Corporate Communications Manager. The Chief Executive, General Managers or Site Managers have the authority to speak to the media when nominated as part of the communication strategy for a particular issue. Other staff are authorised from time to time to speak to the media on specific issues in their area of expertise. Approval for such contact is on an issue-specific basis. Staff likely to be called to speak to the media are to undergo media training. Refer also to Corporate Communications Procedure CS-COMMS-2 "Handling Media Enquiries".

In the event of an incident or emergency situation, an officer is nominated as authorised media spokesperson in accordance with CS Energy Procedure CS-IM-2 "Crisis Management Plan".

For site matters, contact with the Department of Environment and Resource Management (DERM) is authorised by the Site Manager and coordinated through the site Environmental Coordinator.

Portfolio Environmental Managers are authorised to contact the DERM in consultation with their General Manager.

In the case of joint-ventures, agreement is reached between the joint-venture parties as to how external communications are organised. For issues related to joint-venture power plant, this is usually through the joint-venture management company.

3.3 Internal Training

In managing internal training with regard to an operation's environmental impacts, management will:

Conduct a training needs analysis & develop a suitable training plan & schedule for staff

The needs analysis must consider the following information during development:

- Awareness of the EMS implemented on site;
- The needs of managers and staff to facilitate their understanding of environmental impacts relevant to their operations or processes;
- Staff responsibilities, and how they are to manage impacts associated with their job tasks;
- Incidents that have occurred in the past as a result of poor understanding;
- Current targets or goals that require specific training; and
- Priority issues from the EIR.

Training needs analysis and schedules will be prepared through the following processes:

- For new starters, as a component of the new starter package to identify training needs and delivery;
- For graduates, as part of the graduate development program; and
- For other staff, through identification of training needs during individual staff six-monthly or annual performance reviews.

It is a requirement that new staff and contractors undertake appropriate environmental inductions prior to or soon after commencing work.

These **induction** modules are to ensure that staff and contractors are made aware of:

- CS Energy's Environment Policy;
- General awareness of the EMS implemented on site;
- General site conditions/rules;
- Specific site information e.g. recycling, drainage systems;
- Responsibilities – General Environmental Duty (Section 319 of the Environmental Protection Act); and
- Introduction to incident reporting.

3.4 Internal Communication

In managing internal communication with regard to an operation's environmental impacts, management will:

Consider other process(es) for informing staff of their environmental obligations

Apart from the training programs, staff whose work may create a significant impact upon the environment must receive information and advice.

Environmental awareness may be maintained and communicated where appropriate through the use of: newsletters; e-mail releases; media releases; work group meetings, notice boards, and tool box meetings.

Environmental Coordinators Meeting

At an appropriate interval (target six-monthly), the Site Environmental Coordinators and the Portfolio Environmental Managers will meet to initiate a collaborative forum. The structure and function of which will:

- Include representation from site and corporate environmental management.
- Include reviewing incidents and complaints;
- Provide an avenue for communication to the workforce; and
- Act as a means for promoting environmental awareness and discussing job related environmental impacts.

The agenda for this forum is to be similar to that specified in CS-EMSP-7 for Environmental Management System Review. Key outcomes/issues identified during the Environmental Coordinators' meeting will be taken into consideration when reviewing policy, goals and targets within the Environmental Management System Review (see s. 3.5 of CS-EMSP-7).

4. Responsibilities

4.1 General Managers

- Develop external environmental communications plan establishing communication lines with the public on environmental issues and the release of environmental information to the public.

4.2 Portfolio Environmental Managers

- Conduct a training needs analysis for site environment staff.
- Development of Corporate environmental reports.
- Initiating review of this procedure and ensuring outputs are updated.
- Make available and publicise CS Energy's Environment Policy

4.3 Site Environmental Coordinator

- Establish a community (external) complaints procedure.
- Develop suitable training plan and schedule.

4.4 Employees and Contractors

- Be active in communicating incidents, environmental issues and supplying feedback on the general environmental management philosophy of CS Energy operations.

5. Review

The following item is described in CS-EMSP-7 Environmental Audit, Review and Performance Evaluation.

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

6. Auditable Outputs

The following items are outputs of this procedure:

- Training needs analysis and schedules;
- Training records;
- Minutes of Community Consultation Meetings/Forums (if conducted);
- External communications;
- External Complaints Management procedure; and
- Environmental Coordinators meeting minutes.

7. Definitions

Definitions to the following are found in the EMS Manual Glossary: environmental issue, EIR (Environmental Issues Register), goals, targets, environmental incidents

8. Reference Documentation

CS Energy / General	QA Doc No.	Location
EMS Procedure - Developing Environmental Planning	EMSP-2.doc	K:\Corprocs1\Environment
EMS Procedure - Environmental Incident Management	EMSP-4.doc	K:\Corprocs1\Environment
EMS Procedure - Environmental Audit, Review & Performance Evaluation	EMSP-7.doc	K:\Corprocs1\Environment
Environment Policy	Environment Policy Jan10.pdf	K:\Corprocs1\CorporatePolicies
Environmental Legal Compliance Manual		Intranet – Environmental Management
Environmental Protection Legislation	N/A	http://www.legislation.qld.gov.au/OQPChome.htm
Crisis Management	CS-IM-2	K:\Corprocs1\PlantManagement\IncidentManagement
Handling Media Enquiries	CS-COMMS-2	K:\Corprocs1\Governance\Media&Communications

9. Attachments

None

10. Document History

Issue Date	Nature of Changes
27.1.1999	Original Issue
17.5.2000	Updated responsibilities, removed public environmental review
3.7.2000	New section 3.2 Media and EPA contact
28.8.2000	Added Diagram
17.11.2000	Altered diagram, added review and auditable outputs, restructured to clarify training as separate but related to communication.
24.11.2000	Expanded Section 3.4 Minor editorial changes
16.02.2001	Update document history
31.10.2001	Mica Creek reference documentation updated, legislation references added
17.12.2001	Section 3.1 Community Consultation modified
18.11.2002	Section 3.1 modified re release of environmental information and joint ventures, Section 3.2 modified re joint ventures, Section 3.2 re appointment of media spokesperson during incidents or emergency situations, minor changes to titles and responsibilities, minor editing.
25/11/2003	Minor editing
04/06/2005	New "joint venture communication" paragraph in Section 3.1; minor editing; document owner; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.
19/04/2006	Update to ISO 14001:2004; clarification of training needs analysis and schedules in Section 3.8; update organisational titles; include contractors in Section 4.4; minor editing.
13/07/2009	EPA replaced with DERM; release of environmental information to public in s.3.1 elaborated; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.