



Environmental Management Procedure

WNH Q16 - Revision 1.0

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1.0 This Document

1.1 Purpose

The purpose of this procedure is to outline the environmental management expectations of Woolnorth Wind Farms (WNH) and to demonstrate and describe how WNH meet the requirements of the AS/NZS ISO 14001:2016 Environmental management systems – Requirements with guidance for use.

1.2 Scope

This procedure applies to all aspects of the WNH business, any worksite managed by WNH, and any personnel engaged or invited by WNH to conduct activities on behalf of WNH.



2.0 Introduction

The environmental management system utilised by WNH is the Hydro Tasmania (HT) Health, Safety and Environmental (HSE) Management system. The HT HSE management system is currently supplemented with WNH specific documentation to ensure environmental risks are managed to an acceptable level (as determined by WNH). The management system is also intended to seek and implement opportunities where they exist and when they arise.

WNH are currently preparing a standalone management system and in the future there will be no reliance on HT HSE documentation.

This system describes the governance, processes and accountabilities that are applied in order to manage environmental risks and opportunities at WNH in alignment with the requirements of AS/NZS ISO14001.

This manual sets out the overall approach to conformance with AS/NZS ISO 14001 and where appropriate provides a description of the policies, procedures and processes that WNH apply to meet the intent of the standard and the WNH Environmental Policy.



3.0 Context Of The Organisation

3.1 Understanding the organisation and its context

The company risk registers (including aspects and Impacts register) summarises and sets out the internal and external issues that are relevant to its purpose and affect its ability to achieve the intended outcomes of the management system.

The issues set out and the conditions included in the environmental permits and approvals for WNH's operations do affect and can have a significant effect on the organisation.

3.2 Understanding the needs and expectations of interested parties

There are a limited number of interested parties. Relevant interested parties are listed as stakeholders in the aspects and impacts register. Stakeholders relevant to the HSE Management System include:

- The WNH Board
- WNH employees
- Direct contractors/sub-contractors
- Hydro Tasmania
- Shenhua Clean Energy Holdings
- The Tasmania Environment Protection Authority
- The Commonwealth Department of Environment
- Birds Australia – Tasmanian division
- Van Diemen's Land Company
- Southern Rural Enterprises
- Tasmanian Land Conservancy
- Natural Resource Management North
- mtwCA
- Woolnorth Tours
- Tasmanian National Park and Wildlife Service
- Adjoining landowners
- Local councils

In relation to the HSE Management system, the above interested parties are likely to expect WNH to implement sound environmental management practices and also be completely compliant with operational environmental conditions. Some of the interested parties expect that the WNH operational will develop and act on opportunities that arise to reduce operational impacts. Many of the interested stakeholders have a need and expectation for us to be good custodians of the land we operate on and manage.

WNH take the view that the compliance obligations are clear and are documented via our permits and approvals. Other need and expectations are considered discretionary.



3.3 Determining the scope of the environmental management system

The WNH Environmental Management System (EMS) is applicable to the operation, maintenance, administration and management of the all operational wind farm generation facilities, associated infrastructure (such as transmission lines, roads, buildings and visitor centres) and the immediate environment including the land on which we own, lease and License. With respect to Licensees (other parties with a legally binding right to undertake certain activities) that operate on land owned or leased by WNH, the scope of the EMS extends to the extent the company can assert influence over the management approaches and practices of the Licensee.

The EMS shall therefore be practically implemented at Bluff Point Wind Farm (located at 1665 Woolnorth Road Woolnorth TAS 7330), Studland Bay Wind Farm (located at 1227 Woolnorth Road Woolnorth TAS 7330) and Musselroe Wind Farm (2098 Cape Portland Rd Cape Portland TAS 7264) and principally administered from the Launceston Head office (Level 1 59 Cameron Street Launceston TAS 7250). The EMS is also applicable and shall be implemented for all operation and maintenance activities associated with the transmission line infrastructure owned by WNH to connect the above mentioned wind farms to the transmission network. Specifically the latter means the transmission line between Bluff Point and Studland Bay Wind Farms and it's the termination point at the Smithton sub-station (owned and operated by TasNetworks) and the transmission line between Musselroe Wind and it's the termination point at the Derby sub-station (owned and operated by TasNetworks).

The scope of the EMS includes documented information covering:

- The identification, management and influence of environmental issues both external and internal identified through the identification and management of environmental aspects, impacts and opportunities.
- How these external and internal issues can impact business activities, stakeholders, communities and in particular areas of heightened environmental concern/sensitivity.
- Identifying, understanding and responding to the needs and expectations of interested parties/stakeholders.
- Fulfilment of identified compliance obligations including identified interested parties/stakeholder needs and environmental legal and other requirements.

Continual environmental performance improvement through monitoring, review and implementation of controls

3.4 Environmental Management System

The environmental management system utilised is the HT HSE Management system. This system describes the governance, processes and accountabilities that are applied in order to manage environmental risks and opportunities at WNH. It is aligned with the requirements AS/NZS ISO14001:2016. Where required, issues specific to the WNH operation are managed through WNH formulated procedures (i.e. these do not appear in the HT HSE system).



4.0 Leadership

4.1 Leadership and commitment

As the WNH business is relatively small and the nature of the environmental risks are low (as per Aspects and Impacts) there is limited need for Top Management to take an extensively active role in Environmental Management. The HSE Manager reports directly to the General Manager and the HSE Manager liaises directly with the other management and their staff.

Leadership and commitment to environmental management is demonstrated by:

- being accountable for the ensuring the application of the management system
- preparing, authorising and supporting the policies of the business
- ensuring the management system processes and requirements are included in operations and business processes
- supporting and referring matters to the specific HSE resources of the business and ensuring work teams have sufficient resources to implement the necessary parts and/or requirements of the management system
- supporting the methods used to communicate the importance of the management system and to conforming with its requirements
- ensuring the management system is meeting its needs through active participation on review processes
- as required being directly involved in the management system and supporting improvement measures

The HSE Manager is assigned the responsibility and authority for ensuring the management system meets the requirement of ISO14001 and reporting on performance the management system.

4.2 Environmental Policy

The Environmental Policy establishes specific commitments relevant the activities undertaken WNH. The Environmental Policy is communicated to all staff and contractors working for/ or on behalf of WNH, and it is displayed on the company website. The Environmental Policy is reviewed no less than three yearly or within a shorter timeframe where a need to review is identified.

Changes that require review and updates to the Environmental policy include:

- Appointment on new General Manager or other significant leadership change;
- Significant changes in functional structure of the organisation;
- Reduced or expanded business operations; and
- Change to ISO14001 standards where the policy requirements are amended.



4.3 Organisation roles, responsibilities and authorities

The General Manager (GM) of WNH has overall responsibility regarding environmental management and compliance. WNH staff assist the GM to ensure compliance with general law and specific permit and approval requirements.

Core to the environmental management of the WNH operation is a dedicated HSE team to ensure that all activities are undertaken in accordance with the company's legal and system requirements.

All HT HSE Management System documents contain information of roles and responsibilities and these apply to the WNH organisational structure in a commensurate manner (e.g. HT CEO and WNH GM share same level of responsibility regarding environmental management). Other documents also contain information regarding roles and responsibilities.



5.0 Planning

5.1 Actions to address and opportunities

5.1.1 General

The management system followed and implemented by WNH addresses the internal and external issues and expectations of stakeholders relevant to the organisation. It also assists WNH address compliance obligations. The management system is consistent with, and meets the requirements of the documented scope of the system.

The system assists in the determination of risks and opportunities that are related to WNH's aspects, compliance obligations and other issues. These risks and opportunities are documented as described in section 6.1.2.

5.1.2 Environmental aspects

Environmental risks and opportunities are described through the determination of 'aspects' and 'impacts'. An environmental aspect defined as an element of an activity, product or service, undertaken by WNH, that can interact with the environment and an impact being any change to the environment, whether adverse or beneficial, wholly or partially resulting from activities, products, or services of WNH. A life cycle perspective is considered where at all possible.

WNH determines and documents corporate level environmental risks and opportunities following the risk management approach outlined in HSEP0301 – Hazard Identification and Risk Management. The strategic risk register is reviewed annual and the review process includes forecast or known changes to WNH'S operations, abnormal conditions and reasonably foreseeable emergency situations.

Significant risks are identified by WNH following the HSEP0301 and the organisation commits to implementing actions in a timely fashion. Significant risks are considered by WNH as those risks where a moderate or above exposure remains after reasonably practicable controls have been implemented. Additional control measures may be implemented for these. Depending on the level of risk exposure WNH may implement a control measure immediately or through its annual program of setting objectives and targets. Other risks and opportunities, which are not regarded as significant, but are not considered acceptable will be controlled in the same manner.

WNH's environmental objectives and targets are documented in the annual HSE Management Plan and through various other documents and through various levels of the organisation.

5.1.3 Compliance obligations

In relation to environmental management, WNH maintains a compliance database which lists permit/ approval requirements and commitments applicable to the operation of their assets.

WNH also has underlying obligations to comply with general State and Commonwealth laws. Specifics requirements, from an environmental perspective, have not been distilled into a single register. Compliance is broadly achieved through compliance with the HT HSE Management System, State and Commonwealth Permits and Approvals and site environmental management plans.

Legal and Policy Updates are received from Hydro Tasmania and each month WNH review these for changes to legislation and regulations. Relevant information from these updates is provided to the WNH GM and if required the broader business.



Legal environmental requirements are taken into account during WNH's operational and maintenance planning processes, and investigations into legal compliance are undertaken as required (e.g. requirements of certain laws or Australian Standards).

Several annual reports are produced which document legal compliance.

5.1.4 Planning action

WNH addresses risks and opportunities at various levels in the organisations. These are documented in various documents including the annual HSE Management Plan but also in site based environmental management plans (internal and regulatory approved Management Plans). These documents address environmental aspects, impacts and compliance obligations.

Where necessary the actions outlined in these document are transferred into operational documents, controls inserted into the management system or managed through business processes.

5.2 Environmental objectives and planning to achieve them

5.2.1 Environmental objectives

WNH establishes, maintains and tracks its performance against, environmental objectives and targets. The environmental objectives and targets are defined in the annual HSE Plan. These are developed in a manner consistent with the processes documented under the HT HSE management system element 4 (planning and objectives) and also reviews of HSE performance and reference to the WNH risk and compliance registers.

In addition objectives, targets and programs feature strongly in site based environmental management plans (internal and Regulatory approved plans). These plans deal with many of the core risks and issues relevant to the WNH operation.

Monitoring and Reporting against objectives targets and programs is completed in many ways including monthly internal reports, standalone reports and publically available Annual Environmental Reports (and Public Environmental Reports every three years) for each of the three wind farm sites owned and operated by WNH.

5.2.2 Planning actions to achieve environmental objectives

The various mechanisms outlined above are the conduits for action. These mechanisms document what will be done, what resources are required, who is responsible, when it will be completed and an evaluation process or a commitment to assess the results of a specific or group of actions.



6.0 Support

6.1 Resources

WNH has determined and provided resources to manage its environmental management system including risks and opportunities, compliance obligations and provision of operation support to WNH operation. The current resource allocation is 2 FTE.

6.2 Competence

Competence is considered at various levels within the organisation from the recruitment phase through to the job planning phase including contractor engagement. WNH identifies training and competence requirements of its staff. Various records are maintained to document what training has been conducted and when. A training plan is used to document what HSE orientated training an individual should ideally receive.

6.3 Awareness

Environmental awareness is principally managed through the induction process. Other mechanisms used to increase awareness of the environmental issues relevant to the business include noticeboards, toolbox meetings, asset signage, emergency preparedness and topic specific training.

6.4 Communication

6.4.1 General

WNH communicates environmental matters relevant to their operations extensively, both internally and externally, and at some level to all persons or other organisations engaged to conduct work or deliver a service for or on behalf of WNH. WNH also have established processes for communicating the contents of the HSE management system, other information relevant to the environmental management system, compliance obligations and requirements and operational documents and records. WNH also have established processes for external communications.

6.4.2 Internal

Internal communications are carried out through various mechanisms:

- Induction processes
- regular WNH meetings (formal and informal);
- site notice boards
- internal memos
- quarterly site HSE meetings
- Toolbox meetings
- Site Management Pages
- System change advice
- Incident notification advice
- Monthly HSE reports



6.4.3 External

WNH communicates relevant information externally including information relevant to the HSE Management System but also information relevant to its compliance obligations.

WNH do this through the external website www.woolnorthwind.com.au. WNH produces an annual environmental report for all wind farm operations which is publically available via the website. Every three years a Public Environment Report is also produced and includes an expanded amount of information regarding environmental management, performance and compliance. This document is provided to various stakeholders and to the general public on request. The document are available on the WNH website.

A website, a free call 1800 number and general email address have been established. The latter are listed on the WNH website.

6.5 Documented information

6.5.1 General

Through the HT HSE Management System (and other WNH specific documents), WNH have a suite of documents available to manage and reduce the environmental risks and impacts of its operations. This documentation is followed by WNH and where required WNH have added additional documentation to ensure the needs of WNH are met.

6.5.2 Creating and updating

Creating and updating of HT system documents is done by HT. Some other WNH specific documents are managed (created and updated) through the application of a document control process which includes change management and communication. The WNH document management process is evolving but is relatively well established. Relevant documents are held in the Controlled Documents folders of the WNH SharePoint site.

Documents are created and updated following specific procedures contained in the management system.

6.5.3 Control of documented information

As outlined, WNH follow HT's HSE Management System. The management system documents are stored electronically and made accessible via the internet or through dedicated points of contacts within HT. The system contains processes and methods to manage version control and editing permissions. Documents are communicated to relevant staff and staff are encourage to take documents from the central locations (such as internet or intranet) where the latest copies of documents are maintained.

WNH, as a part of the management review confirms and verifies that central management of the system is completed by Hydro Tasmania.

WNH has a document management system (also SharePoint) and this is used to hold all HSE documents and records. System records and documents retained include legal compliance, correspondence, incidents records audit records and objectives and targets for example.



7.0 Operation

7.1 Operational planning and control

WNH has numerous operational documents that assist it to manage its environmental risks and legal requirements, opportunities, commitments and controls. These documents are generally contained on the corporate and site intranet pages. They include permits, procedures, forms, management plans and protocols.

Operational documents that establish controls to manage environmental impacts are completed for specific tasks and jobs such as JHAs, Work instructions and Safe Work Method statements. Although these are often safety orientated documents they may also contain information to management environmental risks.

Where specific environmental requirement are required these are communicated to contractors or supplies through the contractor management process. Contractor management (and where relevant procurement of goods and equipment) is conducted in accordance with a HT HSE system procedure.

7.2 Emergency preparedness and response

WNH environmental emergency preparedness is conducted in accordance with the requirements outlined in HT HSE management system, Element 12. An Emergency Response Plan is available at each WNH operational wind farm sites and it is regularly updated (at least every three years). A preparedness schedule is held in the WNH HSE Management Database and emergency sessions are run accordingly. The emergency preparedness schedule aims to address and test the emergency scenarios that are most likely to eventuate during or apart of WNH operations.



8.0 Performance evaluation

8.1 Monitoring, measuring, analysis and evaluation

8.1.1 General

Monitoring and measuring in relation to activities that can have an environmental impact is required as part of specific operational documents and environmental management plans. These documents, in most cases, outline what is monitored/measured, the methods for monitoring, measuring, when it is done and how the analysis and evaluation will be performed. On a case by case basis WNH may need to establish specific methods or criteria for aspects or issues to be monitored, measured, analysed or evaluated.

WNH monitors a range of issues and these are reported annually (or 3 yearly) through publically available reports as already described. Monitoring includes avian, weed, vegetation growth, fuel usage, site waste, SF6 volumes, energy consumption and energy production.

8.1.2 Evaluation of compliance

Regulatory compliance is managed through various databases both at corporate and site level. Key databases holding all permit and management plan commitments are maintained for each site and reviewed at least annually. Regulatory compliance is reported annually for each site.

The internal audit plan includes aspects relevant to compliance to routinely assess WNHs compliance with environmentally relevant compliance obligations.

Regulatory authorities also conduct independent audits to verify compliance.

Records of compliance evaluations and audits are maintained in the WNH HSE Management Database.

8.2 Internal audit

8.2.1 General

WNH schedules regular internal audits to evaluate its compliance against legal requirements. In addition to compliance with legal requirements the internal audit program conducts internal audits to assess the implementation and effectiveness of the HSE management system against the documented requirements of the system as well as the requirements of AS/NZS ISO14001:2016.

8.2.2 Internal audit program

The internal audit plan is developed based on risks identified in the strategic risk register and previous audit plans. The annual schedule of internal audits is documented in the HSE Management Database. Internal audits are conducted by suitably qualified and experienced personnel and with a view to maintain objectivity and impartiality of the audit process. Audit reports are documented and the findings, including any non-conformances, identified are communicated to the auditees. Audit outcomes are logged in the WNH HSE Management Database. The implementation of corrective actions or opportunities for improvement are monitored regularly by management. Audit actions are not be closed without evidence of the action being completed.

Audits are conducted in accordance with relevant system procedures.



8.3 Management Review

A management review is undertaken every 3 years (as of November 2016) in accordance with the AS/NZS ISO 14001:2016. This review is documented.

Monthly reviews of system performance and HSE issues is conducted monthly. This review is not documented.



9.0 Improvement

9.1 General

As outlined in Section 9 and in other places in this document, WNH have numerous processes to identify and seek improvements in HSE Management. Additionally processes exist for the implementation of the necessary actions identified.

9.2 Nonconformity and corrective action

WNH follows the HT process/response to system non-conformances and non-compliances with legal and other requirements, and differentiates non-conformances that have the direct potential for environmental harm. Non-conformances can be identified either in an audit, management review or through a staff member within the field or office.

Reporting of non-conformances and opportunities for improvement are undertaken and records held in the WNH HSE Management Database as already outlined. Action may be taken immediately to rectify a non-conformance and/or a control determined and implemented to prevent recurrence of the same or a similar non-conformance.

9.3 Continual improvement

Continual improvement is a cornerstone of the management system. Improvement to system document is managed by HT. The processes of applying and implementing the system requirements and ensuring continual improvement is functionally achieved through the various mechanisms described in Section 9 of this document.

Continual improvement is also fundamental to managing and adjusting compliance obligations to ensure that these obligations remain in-step with site risks and opportunities. This process is managed through regular and planned reviews of relevant compliance orientated documents.



10.0 Definitions

None



11.0 Accountabilities

General

Officers of WNH shall ensure that AFARP, hazards are identified and where they cannot be eliminated, will be controlled. This shall include documenting hazards, processes to identify hazards relevant to WNH business and tasks it undertakes and lastly communicating hazards to the workers of WNH.

All workers of WNH shall ensure that:

- they understand the requirements of this procedure
- ensure their activities are in compliance with this procedure
- can access this procedure
- support the implementation of this Procedure by providing feedback to peers and supervisors where improvements to task compliance or risk management can be made.

The HSE Manager for WNH is to ensure AFARP that this meets National and State legislative requirements and Standards and that this document is maintained as a part of the businesses HSE management system.



12.0 References

AS/NZS ISO 14001:2016 Environmental management systems – Requirements with guidance for use