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# Environmental Management Procedure

**WNH Q16 - Revision 2.0**

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Effective from 8 December 2020



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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 Renewables (WNR) and to demonstrate and describe how WNR 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 WNR business, any worksite managed by WNR, and any personnel engaged or invited by WNR to conduct activities on behalf of WNR.

## 2.0 Introduction

WNR's Health, Safety and Environmental (HSE) Management system provides specific documentation to ensure environmental (and Health and Safety risks) are managed to an acceptable level (as determined by WNR). The management system is also intended to seek and implement opportunities where they exist and when they arise. The system documentation also describes the governance, processes and accountabilities that are applied in order to manage environmental risks and opportunities at WNR in alignment with the requirements of AS/NZS ISO14001.

This document 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 WNR apply to meet the intent of the standard and the WNR Environmental Policy.

## 3.0 Not used

Intentionally left blank

## 4.0 Context Of The Organisation

### 4.1 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 and effect 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 WNR's operations do affect and can have a significant effect on the organisation.

### 4.2 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 WNR Board
- WNR employees
- Direct contractors/sub-contractors
- Hydro Tasmania
- Shenhua Clean Energy Holdings
- The Tasmania Environment Protection Authority
- The Commonwealth Department of Agriculture, Water and Environment
- The Tasmanian Department of Primary Industries, Waster
- Birds Australia – Tasmanian division
- Property Licensees
- 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 WNR to implement sound environmental management practices and also be completely compliant with operational environmental conditions. Some of the interested parties expect that the WNR 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.

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

## 4.3 Determining the scope of the environmental management system

The WNR 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 WNR, 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 WNR 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 the termination point at the Smithton sub-station (owned and operated by TasNetworks) and the transmission line between Musselroe Wind and 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

## 4.4 Environmental management system

WNR's Health, Safety and Environmental (HSE) Management system provides specific documentation to ensure environmental (and Health and Safety risks) are managed to an acceptable level (as determined by WNR). The management system is also intended to seek and implement opportunities where they exist and when they arise. The system documentation also describes the governance, processes and accountabilities that are applied in order to manage environmental risks and opportunities at WNR in alignment with the requirements of AS/NZS ISO14001.

**Special Note:** Since 2018, WNR have been establishing their own HSE Management System, tailored to the context and operational requirements of the WNR business. WNR previously relied on the Hydro Tasmania (HT) HSE Management System. WNR has significantly reduced the complexity and extent of the Management System and in doing so are likely to have created areas of deficiency. WNR acknowledges that this and where required will continue to use the HT HSE Management System to support our operations. Over time WNR will fill such deficiencies with WNR documentation.

HT HSE Management system can be found at [HSE \(hydro.com.au\)](https://www.hydro.com.au). Access is password protected. The WNR HSE team can assist with access if required.

## 5.0 Leadership

### 5.1 Leadership and commitment

As the WNR 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 of the management system.

### 5.2 Environmental Policy

The Environmental Policy establishes specific commitments relevant the activities undertaken WNR. The Environmental Policy is communicated to all staff and contractors working for/ or on behalf of WNR, 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.

## 5.3 Organisation roles, responsibilities and authorities

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

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

All HSE Management System documents contain information of roles and responsibilities.

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## 6.0 Planning

### 6.1 Actions to address and opportunities

#### 6.1.1 General

The management system followed and implemented by WNR addresses the internal and external issues and expectations of stakeholders relevant to the organisation. It also assists WNR 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 WNR's aspects, compliance obligations and other issues. These risks and opportunities are documented as described in section 5.1.2.

#### 6.1.2 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 WNR, 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 WNR. A life cycle perspective is considered where at all possible.

WNR determines and documents corporate level environmental risks and opportunities following the risk management approach outlined in WNH Q14 Risk Management Procedure. The strategic risk register is reviewed annually and the review process includes forecast or known changes to WNR'S operations, abnormal conditions and reasonably foreseeable emergency situations.

Significant risks are identified by WNR and the organisation commits to implementing actions in a timely fashion. Significant risks are considered by WNR 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 WNR 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.

WNR'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.

#### 6.1.3 Compliance obligations

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

WNR also has underlying obligations to comply with general State and Commonwealth laws. Specific requirements, from an environmental perspective, have not been distilled into a single register. Compliance is broadly achieved through compliance with the 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 WNR review these for changes to legislation and regulations. Relevant information from these updates is provided to the WNR GM and if required the broader business.

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

Annual reports are produced for each operating asset and these document legal compliance.

#### 6.1.4 Planning action

WNR 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.

## 6.2 Environmental objectives and planning to achieve them

### 6.2.1 Environmental objectives

WNR 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 through regular reviews of HSE performance and reference to the WNR 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 WNR 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).

### 6.2.2 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.

## 7.0 Support

### 7.1 Resources

WNR has determined and provided resources to manage its environmental management system including risks and opportunities, compliance obligations and provision of operation support to WNR operation. The current resource allocation is 2 FTE, but this is continuously tracked and if required increased.

### 7.2 Competence

Competence is considered at various levels within the organisation from the recruitment phase through to the job planning phase including contractor engagement. WNR 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. Competency is also tested and checked through the implementation of the annual audit and emergency preparedness schedules.

### 7.3 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.

### 7.4 Communication

#### 7.4.1 General

WNR communicates environmental matters relevant to their operations extensively, both internally and externally. WNR 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. WNR also have established processes for external communications.

#### 7.4.2 Internal

Internal communications are carried out through various mechanisms:

- Induction processes
- regular WNR 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

### 7.4.3 External

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

WNR do this through the external website [www.woolnorthwind.com.au](http://www.woolnorthwind.com.au). The HSE Management System is available via the WNR website. WNR produces an annual environmental report for all wind farm operations which is publicly 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 WNR website.

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

## 7.5 Documented information

### 7.5.1 General

Through the established HSE Management System, WNR have a suite of documents available to manage and reduce the environmental risks and impacts of its operations. This documentation is available via the WNR website – [www.woolnorthwind.com.au](http://www.woolnorthwind.com.au).

### 7.5.2 Creating and updating

WNR documents are managed (created and updated) through the application of a document control process which includes change management and communication. The WNR document management process is evolving but is relatively well established. Relevant documents are held in the Controlled Documents folders of the WNR SharePoint site.

### 7.5.3 Control of documented information

Central management of the system is conducted by WNR. The management system documents are stored electronically in WNR's document management system. The repository has restricted permissions with only certain individuals provided edit rights. General access to the system is provided through the WNR website. Various processes are in place to manage version control. Documents are communicated to relevant staff and staff are encourage to take documents from the central locations (such as internet) where the latest copies of documents are maintained.

As indicated WNR has a document management system (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.

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## 8.0 Operation

### 8.1 Operational planning and control

WNR has numerous operational documents that assist it to manage its environmental risks and legal requirements, opportunities, commitments and controls. These documents are made available either via the WNR website or 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.

### 8.2 Emergency preparedness and response

WNR environmental emergency preparedness is conducted in accordance with system procedure WNH Q29. An Emergency Response Plan is available at each WNR operational wind farm sites and it is regularly updated (at least every three years). A preparedness schedule is held in the WNR 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 WNR operations.

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## 9.0 Performance evaluation

### 9.1 Monitoring, measuring, analysis and evaluation

#### 9.1.1 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 WNR may need to establish specific methods or criteria for aspects or issues to be monitored, measured, analysed or evaluated.

WNR 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.

#### 9.1.2 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 WNRs 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 WNR HSE Management Database.

### 9.2 Internal audit

#### 9.2.1 General

WNR 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.

#### 9.2.2 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 WNR 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.

## 9.3 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.

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# 10.0 Improvement

## 10.1 General

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

## 10.2 Nonconformity and corrective action

Various documents supports WNR's approach to managing actions (non-conformance, corrective or preventative actions) legal and other requirements. Non-conformances can be identified either in an audit, management review, incident, site inspection 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 WNR 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.

## 10.3 Continual improvement

Continual improvement is a cornerstone of the management system. 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.

# 11.0 Definitions

None

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# 12.0 Accountabilities

## General

Officers of WNR 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 WNR business and tasks it undertakes and lastly communicating hazards to the workers of WNR.

All workers of WNR 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 WNR 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.

## 13.0 References

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